

# APPENDIX P2.M

## Comment Response Tables for Draft EAR/IS

- P2.M.1 – Comment Response Tables from First Nations Review
- P2.M.2 – Comment Response Tables from Government Review Team Review
- P2.M.3 – Comment Response Tables from Public and Other Stakeholders – Review



# APPENDIX P2.M.1

## Comment Response Tables for Draft EAR/IS

- Comment Response Tables from First Nations Review



# Weenusk First Nation





## WEENUSK FIRST NATION

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January 6, 2026

**Michael Fox**

Regional Consultation Lead  
Webequie Supply Road Project Team  
699 Mountain Road  
Fort William First Nation  
Ontario, Canada, P7J 1C1  
Email: [wsrcments@supplyroad.ca](mailto:wsrcments@supplyroad.ca)

RE: Webequie Supply Road Draft Environmental Assessment Report / Impact Statement Responses on Proponent Comment Response Table

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Dear Mr. Fox,

As elected Chief of Weenusk First Nation (“WFN”), I write to you on behalf of the Nation. As part of WFN’s consultation with the Webequie Supply Road (WSR or the “Project”) Draft Environmental Assessment Report/Impact Statement (EAR/IS) process my responsibility as Chief is to protect my Nation’s Section 35 rights. We, as a Nation, are signatories to Treaty No. 9 and hold rights throughout this treaty area.

As requested in your letter, WFN has reviewed WSR responses to our initial comments on the WSR EA/IS.<sup>12</sup> Please find below an overview of select comments for consideration as well as a detailed table identifying WFN’s satisfaction level and follow-up comments. As requested, satisfaction levels are indicated as:

- A. Satisfied with response;
- B. Partially satisfied pending final EAR/IS; or
- C. Not satisfied.

Out of the five comments on the Draft EAR/IS three are partially satisfactory pending final EAR/IS, and two responses are unsatisfactory.

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<sup>1</sup> December 9, 2025, letter *Response to Weenusk First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement* via email.

<sup>2</sup> October 1, 2025, letter *Feedback on the Webequie Supply Road Draft Environmental Assessment / Impact Statement* via email.



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### **Partially Satisfied Pending Final EAR/IS**

In WFN's initial comments, the Nation raised concerns regarding the lack of detailed information on post-construction monitoring for Caribou and other Species at Risk. The response to WFN's initial comment with details on upcoming work and the Wildlife Management and Monitoring Plan (WMMP) have provided enough detail to partially satisfy the Nation pending final EAR/IS. As caribou are a key species for Weenusk, WFN requires inclusion in the development and review of post-construction monitoring and the WMMP to ensure that the views of Weenuski Inninowuk are appropriately incorporated.

WFN raised concerns of sufficient detail related to water monitoring, management and mitigations in the EAR/IS. The response to the Nation's initial comment was satisfactory and provided details in response to the initial comment. Weenusk requests that the response inclusion be made to the final EAR/IS in lieu of the existing statements that lack certainty. WFN is partially satisfied with this comment response, pending updates and inclusions to the final EAR/IS.

In relation to governance, Weenusk commented with the request to be involved in developing and carrying out mitigation measures in collaboration with Webequie First Nation. The comment response was positive to working in collaboration with WFN for the development and carry through of the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP).

### **Not Satisfied**

Included in WFN's initial comments was the lack of a hydrology study as a part of the EAR/IS process. Weenusk Nation members raised concerns regarding potential downstream effects as a result of the Project, including flow patterns and water contamination. A hydrology study would assist with Project planning accuracy and minimize the need for adaptive management as explained in the response to WFN's comment, as a result, Weenusk is not satisfied with the response to the initial comment.

In relation to community health and wellbeing, WFN commented on the potential impacts on harvesting as a result of project related activities and increased human-presence in the area. Increased access and human presence to the territory pose a potential safety risk to harvesters and increased competition for harvested species. It was stated in the EAR/IS that Webequie First Nation would limit outsiders from entering the community via the Project;<sup>3</sup> however, Appendix N only refers specifically to actions specific to Webequie First Nation and is not inclusive of surrounding Nations

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<sup>3</sup> Appendix N Community Readiness Plan



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such as Weenusk. Additional details are required on measures to be undertaken that will reduce human-presence in the area, and therefore, this comment is not currently satisfied.

Further, included in the comment on health and wellbeing was the question regarding economic opportunity for Weenusk in relation to the Project, there were no details provided to satisfactorily answer this question.

### **Commitments for Further Engagement**

Many of WFN's initial comments and Webequie responses require further engagement and collaboration. Weenusk looks forward to working with Webequie First Nation and the Webequie Project Team further. WFN maintains the requests for ongoing community-to-community dialogue to acknowledge WFN's governance and right to manage resources in their traditional areas.

We look forward to continued engagement with the WSR Project Team to ensure the final EAR/IS is sufficient to evaluate potential project effects and adequately proposes and integrates mitigation measures suggested by WFN.

Sincerely,

Chief Joey Hunter  
Weenusk First Nation

### Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Weenusk First Nation (WFN)

Response Satisfaction options:

- A. Satisfied with response;
- B. Partially satisfied pending final EAR/IS; or
- C. Not satisfied.

Comment #	Page/Section # in Draft EAR/IS / Topic	Weenusk First Nation (WFN) Original Comment	Original WFN Recommendation	Proponent Response	WFN Response Satisfaction	Weenusk First Nation (WFN) Response Comment
1.	<b>Species at Risk</b> footnote 1 – Section 27, pg 5	As explained in detail in WFN’s Report, Caribou are a preferred and culturally significant species for Weenuski Inninowuk (WFN members) and are one of the four main species that represent Weenuski Inninowuk’s seasonal round. This is evidenced by the traditional land use sites reported by WFN study Participants, including: <ul style="list-style-type: none"> <li>• Two migration routes that intersect the RSA and one in the LSA,</li> <li>• One birthing ground intersecting the RSA,</li> <li>• Two hunting sites intersecting the RSA and one in the LSA, and</li> <li>• One sensitive wildlife area in the RSA.</li> </ul>	While WFN agrees with the need for pre-construction, and construction monitoring, there appears to be a lack of focus on post-construction monitoring to determine the level of impact the constructed project may have on Caribou and other Species at Risk. Collaborative management of critical species such as Caribou by including WFN monitoring in pre- and post-construction monitoring (capacity dependent), could inform impacts to Caribou through the lens of Weenuski Inninowuk, who may be able to provide insights that are not realized through other data collection methods.	The proposed post-construction monitoring program for wildlife, excluding species at risk, is described in Section 12.12.3 – Operations Monitoring. The proposed post-construction monitoring for Caribou and other species at risk is described in Section 13.10.3 – Operations Monitoring. For Caribou, it is proposed that GPS collars be deployed on female caribou to determine if seasonal movements and habitat use change during and following road construction. The schedule for surveys in terms of number of collars, and the commencement and duration of	Partially satisfied pending final EAR/IS	WFN requests inclusion in/review of post-construction monitoring and review of/involvement in the development of the Wildlife Management and Monitoring Plan (WMMP). Monitoring for Caribou should include Weenuski Inninowuk to not only understand migration patterns, but animal health and reproductive success as this is a critical species of importance to WFN.

		<p>Participants also expressed concern with the declining quantity of Caribou, explaining that they are forced to move further inland for migration; and that it is more difficult to travel to Caribou areas due to sudden thaws on rivers and lakes. Participants reported these concerns to communicate the importance of protecting Caribou and other Species at Risk from potential Project impacts.</p> <p>The EAR/IS states that “there are predicted significant net effects to Species at Risk and specifically changes to predator-prey dynamic for Caribou that may result in injury or death, and habitat loss for Wolverine.”<sup>1</sup> Given these potential impacts, the WSR Project Team proposed a Species at Risk monitoring program, which includes GPS collaring of female Caribou to determine seasonal movements and habitat use to inform construction activities. The WSR Project Team indicated that the commencement and duration of the program will be determined in consultation with the Ministry of Environment, Conservation and Parks and Environment and Climate Change Canada.</p>		<p>the survey program post-construction, will be determined in consultation with the Ministry of Environment, Conservation and Parks and Environment and Climate Change Canada, and will be further developed after the EA/IA in the Operation Environmental Management Plan that will include a component management plan entitled Wildlife Management and Monitoring Plan (WMMP). The WMMP will have a robust long-term monitoring program (e.g., 5-years) to verify and confirm predicted effects to wildlife, including species at risk, examined in the EA/IA for the Project. Monitoring details with regards to post-construction are also expected to be identified and developed as part of the future permitting and detail design stage of the Project where applicable approvals are required, such as an Ontario Endangered Species Act permit. The proponent welcomes WEFN interest in future monitoring efforts and offers to collaborate on implementation of the wildlife monitoring. A draft of the WMMP for the post-construction period will be provided to WEFN for feedback prior to the start of the operations</p>		
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				phase of the project and we are committed to sharing the results of the monitoring program with WEFN to receive their insights.		
2.	<b>Water Quality and Quantity</b> Section 7 Section 8	<b>Intact Environment</b> Respondents to the Report study noted that one of the most important reasons for involving WFN in Project-related decision making is their concern with the potential for downstream effects as flow patterns change from the Project and future foreseeable developments in WFN's traditional areas. Participants reported three fishing sites in the Project RSA, and two in the LSA, and reported significant concerns with the spread of contaminated water and resulting impacts on fish and other important resources. Respondents also spoke about the importance of protecting the peatlands that were reported as intersecting the Project, as they act as natural contaminant filters, and as such, recommended a hydrology study, to be completed in collaboration with WFN. The EA/IS notes that WFN recommended a hydrology study as part of a Project-specific mitigation plan to assess water movement in the peatlands and the circulation of possible contaminants from Project-	WFN still maintains that a hydrology study is important for the EA/IS, especially given that the Project may result in "temporary increases to chemical constituents and exceedances of water quality guidelines in nearby waterbodies", and that "the gravel driving surface may be replaced in approximately 3 to 5 years with chip-seal treatment or asphalt pavement." Relevant studies are needed when the permeability of the road is reduced or eliminated.	As described in Section 7.10 – Follow-up and Monitoring, surface water quality sampling on a seasonal basis (e.g., spring, summer and fall) is recommended on an annual basis at representative waterbody crossings to assess potential changes in chemical constituents and exceedances of water quality guidelines. The monitoring and sampling program for surface water will span pre-, during and post-construction periods (e.g., three years after construction is complete). Monitoring to assess changes to hydrology and drainage with respect to water movement in the peatlands is also proposed, as well as groundwater levels and flow. As described in Section 11.13 – Follow-up and Monitoring, a dedicated Wetlands/Peatlands Function Monitoring Program will be developed and implemented. Details of this proposed program are presented in Appendix K-4. Specific to the WEFN comments	Not satisfied	WFN still maintains that a hydrology study is important for the EAR/IS. A hydrology study would ensure that appropriate planning and preparations for the WSR are embedded into the project design and construction; minimizing the need for adaptive management during and post-construction.

		<p>related development. However, the WSR Project Team determined that the existing groundwater studies are sufficient for evaluating potential changes to the ecological functions of peatlands. Additionally, the WSR Project Team considers the floating gravel road design adequate for preventing impacts to peatlands. When groundwater studies are performed independently, aspects such as surface water movement, flooding, and wetland health are not assessed. Hydrology studies can determine if surface water diversion leads to peatland drying or flooding. Groundwater studies may indicate changes in the water table but do not provide information on surface water variations that could have substantial impact.</p>		<p>received, this monitoring program will include, but not limited, to:</p> <ul style="list-style-type: none"> <li>• <i>Hydrology/Hydrogeology</i> – to identify and assess water sources, inflow and outflow, evidence of groundwater recharge/discharge, flow patterns, inundation frequency, and duration. Data loggers (electronic pressure transducers) will be used to monitor seasonal variations of water levels in monitoring wells or piezometers in peatlands; and</li> <li>• <i>Surface and Groundwater Quality</i> – will collect and analyze groundwater and surface water samples for chemical parameters (i.e., metals, volatile organics, acidity, alkalinity, chlorine, hardness, nitrogen, phosphorus, sulphate, dissolved oxygen, and biological oxygen demand, and biological parameters such as bacteria, algae, and viruses if applicable).</li> </ul>		
3.	<p>Footnote 2 – Section 4, pf 88 Footnote 3 – Section 8, pg 94 Footnote 4 – Section 7, pg 153</p>	<p><b>Mitigation Measures</b> The EA/IS also lacks sufficient detail related to water monitoring, management, and mitigations. Some examples include:</p> <ul style="list-style-type: none"> <li>• “Short-term discharges of construction water, wastewater, or wash water: “The waterbodies have</li> </ul>	<p>The mitigation measures requested in WFN’s Report for involvement in water and fish monitoring, and the development of associated mitigation measures must be carried through to the final EA/IS and applied for post-approval action.</p>	<p>Water monitoring, management and mitigation is discussed in numerous sections of the EAR/IS. Information from the WFN Existing Conditions Report was considered in developing the mitigation measures for the Project. Using the</p>	<p>Partially satisfied pending final EAR/IS</p>	<p>WFN requests that the final EAR/IS be updated to reflect this information and that statements lacking certainty (as noted in the initial comment) are updated. It should be noted in the EAR/IS:</p> <ul style="list-style-type: none"> <li>- A water quality monitoring and sampling program for surface</li> </ul>

	<p>Footnote 5 – Section 8, pg 27 Footnote 6 – Section 7, pg 53 Footnote 7 – Section 10, pg 55</p>	<p>high resilience to this effect because of the mitigation measures and limitations applied to discharges.”<sup>2</sup> This statement appears assumptive and lacks details on what mitigation measures would be applied.</p> <ul style="list-style-type: none"> <li>• “The effect of vegetation clearing and grubbing on groundwater resources (increase of groundwater levels) is considered to be positive as infiltration rates may increase after vegetation clearing and grubbing resulting in higher groundwater levels, which would be beneficial to groundwater resources, as well as to groundwater dependent ecosystems.”<sup>3</sup> This statement lacks certainty, especially without a hydrology study.</li> <li>• “However, the net effect is reversible and water quantity should return to pre-construction levels within a year or less, depending on weather and the change of seasons.”<sup>4</sup> This statement requires additional detail be added to clarify that net effects on surface water quantity are reversible.</li> <li>• “At this stage, the dewatering zone of influence (ZOI) from the construction activities, especially dewatering and pumping operations are not fully known, but it is not anticipated that the ZOI will extend beyond the LSA. Therefore, the LSA</li> </ul>		<p>cited examples we offer the following response:</p> <ul style="list-style-type: none"> <li>• Mitigation for short-term discharges of construction water, wastewater, or wash water are detailed in Sections 7.4.1 – Dewatering, Water Taking and Discharges, 7.4.9 – Disposal of Waste, Sections 8.4.5 – Dewatering/Pumping and 8.4.7 – Disposal of Waste. In summary, short-term discharges of water from dewatering activities will involve use of erosion and sediment control measures, such as sediment traps and filter bags for treatment before water is released to the environment. Where this occur, detailed discharge monitoring plans will include water quality testing, and contingency measures that are typically recommended to support receiving a Permit to Take Water or Environmental Activity Sector Registration. In addition, as noted in the response to Comment #2, a water quality monitoring and sampling program for surface water will span the pre-, during and post-construction periods. Note that mitigation for domestic wastewater and sewage in the form of liquid effluent generated at construction</li> </ul>		<p>water will span the pre-, during and post-construction periods (as mentioned in the Proponent’s response)</p> <ul style="list-style-type: none"> <li>- Sources or study results to demonstrate that short-term dewatering activities during construction do not result in permanent alteration of groundwater levels once the activity is stopped.</li> <li>- That further sampling and testing of surface water is proposed during the detail design phase, prior to construction, to help further understand existing water quality conditions at select waterbodies in the study area.</li> </ul> <p>WFN looks forward to working with the WSR Project Team to further discuss the proposed mitigation and monitoring and participate in the proposed Environmental Committee that will oversee potential impacts to fish and fish habitat.</p>
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		<p>boundaries are expected to be sufficient to capture the potential effects of the Project on groundwater resources.”<sup>5</sup> The determination that the ZOI will not extend beyond the LSA when dewatering and pumping operations are not fully known is assumptive.</p> <ul style="list-style-type: none"> <li>• There are also cases where there was a lack of sampling, such as: <ul style="list-style-type: none"> <li>o “Due to poor weather and access conditions, samples were only collected at the five sampling locations listed in Table 7-8 and shown in Figure 7.2.”<sup>6</sup></li> <li>o “Not all sites were sampled due to high-water levels, which prevented safe access to additional sites.”<sup>7</sup></li> </ul> </li> </ul>		<p>camps and the Maintenance and Storage Facility will be treated to meet water quality standards using a portable treatment facility/plant, conventional septic system or transported off-site by tanker truck for treatment at an approved sewage treatment and disposal facility.</p> <ul style="list-style-type: none"> <li>• The statement on potential effects of vegetation clearing and grubbing on groundwater resources (increase of groundwater levels) will be verified from the Wetlands/Peatlands Function Monitoring Program (refer to Comment #2, Hydrology/Hydrogeology monitoring) and other groundwater monitoring wells along the road outside of the peatlands.</li> <li>• The statement that the net effects of groundwater dewatering are reversible and water quantity should return to pre-construction levels is based on our assessment and understanding of current groundwater levels, foundations of bridges and culvert and zone of influence calculations. Typically, short-term dewatering activities during construction do not result in permanent alteration of groundwater levels once the</li> </ul>		
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				<p>activity is stopped. Further assessment of the ZOI will be conducted during the future detailed design stage of the Project and groundwater monitoring during construction is proposed to verify predicted effects.</p> <ul style="list-style-type: none"><li>• Further sampling and testing of surface water is proposed during the detail design phase, prior to construction, to help further understand existing water quality conditions at select waterbodies in the study area.</li><li>• While Section 10.4 – Mitigation and Enhancement Measures and Section 10.10 – Follow-up and Monitoring provide an overview of mitigation measures and monitoring programs to manage potential effects on fish and fish habitat, the intent is to have Indigenous community members play an active role in developing and implementing environmental management plans through an Environment Committee. WEFN is welcome to engage with the WSR Project Team to further discuss the proposed mitigation and monitoring and participate in the proposed Environmental Committee that will oversee such matters. Further crossing-specific</li></ul>		
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				fish monitoring and mitigation measures are proposed to assist in the detail design phase and will be incorporated into the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) for implementation.		
4.	<b>Community Health and Wellbeing</b> footnote 8 – Section 8, pg 120 footnote 9 – Section 8, pg 91 footnote 10 – Section 4, pg 4-41	WFN’s Report explains that Weenuski Inninowuk rely heavily on harvested resources to maintain our health due to the remote location, our way of life, and relatively intact territory. Resource threats resulting from development, or even perceptions of such threats, can lead to Weenuski Inninowuk avoidance of harvesting activities, which may negatively affect our health and well-being. Report Participants indicated concerns with road safety, as well as potential increased access to the territory by non-Nation members. The EA/IS notes that there are potential effects that may result in significant consequences to community well-being and safety. As a result, the WSR Project Team suggests “enhanced mitigation and monitoring are proposed for these potential effects to manage and prevent significant adverse effects.” <sup>8</sup> However, some of these mitigation measures	WFN requests notification of quarry operations, and would prefer that timing is developed in consultation with WFN land users. Mitigation measures related to health and well-being should be culturally appropriate and include land-based healing methods. Further development of these mitigation measures is needed in collaboration with WFN.	The Project Team is open to further discussion with Weenusk First Nation regarding notification of the quarry operations and culturally appropriate mitigation measures related to health and well being. The Community Readiness Plan (Appendix N) includes the proposed development and implementation of a Stewardship and Environmental Management Strategy to be overseen by a Community Readiness Working Group made up in part by participating communities, that can include Weenusk First Nation, and can provide a means to coordinate the timing of project activities to align with Weenusk First Nation's traditional land and resource use activities. In addition, the Education, Training and Employment Readiness Strategy and a Cultural Enrichment Plan, as well as monitoring of access to	Not satisfied	WFN’s concern regarding the lack of clarity on how Webequie will limit outsiders from entering the surrounding area has not been addressed as Appendix N only refers to actions taken for Webequie First Nation. Please provide additional details on potential measures.  WFN’s comment for clarity on economic growth opportunities as a result of the WSR has not been addressed.  Appendix N: Community Readiness Plan is heavily focused on the Webequie First Nation in terms of health, safety, connection to land, economic development and cultural enrichment, with little information for other Nations within or outside the LSA.

		<p>lack clarity and require further development. For example, the EA/IS states that “Webequie First Nation will aim to limit outsiders from entering the community through the WSR to the extent possible. This may limit the amount of illegal drugs and alcohol from entering the community, and limit impacts to mental health.”<sup>9</sup> There are no details on how Webequie First Nation (“Webequie”) intends to effectively restrict access by outsiders or the specific actions planned to prevent illegal drugs and alcohol. Similarly, the EA/IA lacks clarification regarding the types of economic growth opportunities that will be offered, and which communities will benefit from these initiatives. The EA/IS also notes that “The community of Webequie will be informed (through local radio and or posted material in the community) by the contractor prior to carrying out quarry operations in areas where they are likely to be present or to collect country foods or medicinal plants.”<sup>10</sup></p>		<p>healing options, are outlined in the Community Readiness Plan (Appendix N).</p>		<p>WFN looks forward to working with the Proponent on the development and implementation of the Stewardship and Environmental Management Strategy.</p>
5.	<p><b>WFN Governance</b> footnote 11 – Section 4, pg 18 footnote 12 – Section 4, pg 27</p>	<p>As noted in WFN’s Report, WFN has the right to govern and manage resources in WFN’s traditional areas. WFN recommended community-to-community dialogue, and an agreement to offset Project impacts.</p>	<p>WFN requests that the WSR Project Team commit to developing mitigation measures in collaboration with WFN to address any potential Project impacts that are realized once additional details, studies, and</p>	<p>The WSR Project Team is committed to working collaboratively with other First Nations during the current EA/IA phase and future development phases of the Project. Mitigation</p>	<p>Partially satisfied pending final EAR/IS</p>	<p>WFN looks forward to reviewing the final EAR/IS, the CEMP, OEMP and all other plans, authorizations, or permits that are yet to be developed/finalized. WFN looks</p>

		<p>PDF page 101 of the WFN Report also notes that “while mitigations are typically developed after the identification of impacts, some Participants offered suggestions surrounding preliminary measures for mitigation. Additional mitigation measures will be required in discussion with Weenusk following the assessment of impacts.”</p> <p>There are several Project design details that were not determined at the time of the issuance of the draft EA/IS, such as the potential for the road to be paved, and the potential addition of road intersections.<sup>11</sup> There are also several studies and plans that are outstanding, such as “ The ultimate selection of the foundation for structures will be determined in the Detail Design Phase of the Project and results of future geotechnical investigations to characterize subsoil surface conditions at each waterbodycrossing”<sup>12</sup> and additional mitigation and enhancement measures will be provided in the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP).</p> <p>In addition, WFN determined that there may be significant impacts to several of WFN’s VCs, arising from</p>	<p>plans are developed. WFN also requests ongoing community-to-community dialogue to acknowledge WFN’s governance and right to manage resources in their traditional areas.</p>	<p>and monitoring measures identified during the EA/IA will be further developed in the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) for implementation. In the spirit of collaboration, draft copies of the CEMP and OEMP will be provided to WEFN to receive their feedback. The WSR Project Team welcomes the opportunity to have ongoing community-to-community dialogue to discuss WEFN’s governance and rights to manage resources within the WFN and WEFN shared traditional areas.</p>		<p>forward to working with Webequie First Nation and the Proponent.</p>
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		<p>Project impacts on Species at Risk, water, and community health and well-being. As explained earlier, the mitigation measures presented in the EA/IS do not sufficiently address these impacts.</p>				
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December 09, 2025

**Response to Weenusk First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Chief Hunter,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project.

Please find enclosed the table that provides responses to comments provided in your letter dated October 2, 2025. As noted in our letter to you on October 24, 2025 acknowledging our receipt of comments from Weenusk First Nation, the WSR Project Team is currently undertaking the following steps: 1) Reviewing comments received from Indigenous communities; 2) Providing responses to Indigenous communities; 3) Revising the EAR/IS, where applicable; and 4) after steps 1 to 3 submit the Final EAR/IS to government regulators for decision making, which will include a further opportunity for Indigenous communities to review and provide feedback. During this process the Project Team will continue to offer engagement opportunities to Indigenous communities to discuss the EAR/IS.

At this stage we request that you and your community review the responses to the comments we received and provide a response by **January 9, 2026** as to whether they are

- A: Satisfied with response;
- B: Satisfied for now but will need to see final EAR/IS; or
- C: Not satisfied.

As we move forward, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to review sections of the Draft EAR/IS and technical reports of interest in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the Draft EAR/IS.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the perspective of diverse population groups (women, elders, youth, land users, etc.)

Method	Description
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Fox', with a long horizontal stroke extending to the right.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment,  
Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

### Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Weenusk First Nation (WEFN)

Comment #	Page/Section # in Draft EAR/IS / Topic	Comment	Recommendation	Proponent Response
1.	<b>Species at Risk</b> footnote 1 – Section 27, pg 5	<p>As explained in detail in WEFN's Report, Caribou are a preferred and culturally significant species for Weenuski Inninowuk (WEFN members) and are one of the four main species that represent Weenuski Inninowuk's seasonal round. This is evidenced by the traditional land use sites reported by WEFN study Participants, including:</p> <ul style="list-style-type: none"> <li>• Two migration routes that intersect the RSA and one in the LSA,</li> <li>• One birthing ground intersecting the RSA,</li> <li>• Two hunting sites intersecting the RSA and one in the LSA, and</li> <li>• One sensitive wildlife area in the RSA.</li> </ul> <p>Participants also expressed concern with the declining quantity of Caribou, explaining that they are forced to move further inland for migration; and that it is more difficult to travel to Caribou areas due to sudden thaws on rivers and lakes. Participants reported these concerns to communicate the importance of protecting Caribou and other Species at Risk from potential Project impacts.</p> <p>The EA/IS states that "there are predicted significant net effects to Species at Risk and specifically changes to predator-prey dynamic for Caribou that may result in injury or death, and habitat loss for Wolverine."<sup>1</sup> Given these potential impacts, the WSR Project Team proposed a Species at Risk monitoring program, which includes GPS collaring of female Caribou to determine seasonal movements and habitat use to inform construction activities. The WSR Project Team indicated that the commencement and duration of the program will be determined in consultation with the Ministry of Environment, Conservation and Parks and Environment and Climate Change Canada.</p>	<p>While WEFN agrees with the need for pre-construction, and construction monitoring, there appears to be a lack of focus on post-construction monitoring to determine the level of impact the constructed project may have on Caribou and other Species at Risk. Collaborative management of critical species such as Caribou by including WEFN monitoring in pre- and post-construction monitoring (capacity dependent), could inform impacts to Caribou through the lens of Weenuski Inninowuk, who may be able to provide insights that are not realized through other data collection methods.</p>	<p>The proposed post-construction monitoring program for wildlife, excluding species at risk, is described in Section 12.12.3 – Operations Monitoring. The proposed post-construction monitoring for Caribou and other species at risk is described in Section 13.10.3 – Operations Monitoring. For Caribou, it is proposed that GPS collars be deployed on female caribou to determine if seasonal movements and habitat use change during and following road construction. The schedule for surveys in terms of number of collars, and the commencement and duration of the survey program post-construction, will be determined in consultation with the Ministry of Environment, Conservation and Parks and Environment and Climate Change Canada, and will be further developed after the EA/IA in the Operation Environmental Management Plan that will include a component management plan entitled Wildlife Management and Monitoring Plan (WMMP). The WMMP will have a robust long-term monitoring program (e.g., 5-years) to verify and confirm predicted effects to wildlife, including species at risk, examined in the EA/IA for the Project. Monitoring details with regards to post-construction are also expected to be identified and developed as part of the future permitting and detail design stage of the Project where applicable approvals are required, such as an Ontario Endangered Species Act permit. The proponent welcomes WEFN interest in future monitoring efforts and offers to collaborate on implementation of the wildlife monitoring. A draft of the WMMP for the post-construction period will be provided to WEFN for feedback prior to the start of the operations phase of the project and we are committed to sharing the results of the monitoring program with WEFN to receive their insights.</p>

Comment #	Page/Section # in Draft EAR/IS / Topic	Comment	Recommendation	Proponent Response
2.	<b>Water Quality and Quantity</b> Section 7 Section 8	<p><b>Intact Environment</b></p> <p>Respondents to the Report study noted that one of the most important reasons for involving WEFN in Project-related decision making is their concern with the potential for downstream effects as flow patterns change from the Project and future foreseeable developments in WEFN's traditional areas. Participants reported three fishing sites in the Project RSA, and two in the LSA, and reported significant concerns with the spread of contaminated water and resulting impacts on fish and other important resources. Respondents also spoke about the importance of protecting the peatlands that were reported as intersecting the Project, as they act as natural contaminant filters, and as such, recommended a hydrology study, to be completed in collaboration with WEFN.</p> <p>The EA/IS notes that WEFN recommended a hydrology study as part of a Project-specific mitigation plan to assess water movement in the peatlands and the circulation of possible contaminants from Project-related development. However, the WSR Project Team determined that the existing groundwater studies are sufficient for evaluating potential changes to the ecological functions of peatlands. Additionally, the WSR Project Team considers the floating gravel road design adequate for preventing impacts to peatlands.</p> <p>When groundwater studies are performed independently, aspects such as surface water movement, flooding, and wetland health are not assessed. Hydrology studies can determine if surface water diversion leads to peatland drying or flooding. Groundwater studies may indicate changes in the water table but do not provide information on surface water variations that could have substantial impact.</p>	<p>WEFN still maintains that a hydrology study is important for the EA/IS, especially given that the Project may result in "temporary increases to chemical constituents and exceedances of water quality guidelines in nearby waterbodies", and that "the gravel driving surface may be replaced in approximately 3 to 5 years with chip-seal treatment or asphalt pavement." Relevant studies are needed when the permeability of the road is reduced or eliminated.</p>	<p>As described in Section 7.10 – Follow-up and Monitoring, surface water quality sampling on a seasonal basis (e.g., spring, summer and fall) is recommended on an annual basis at representative waterbody crossings to assess potential changes in chemical constituents and exceedances of water quality guidelines. The monitoring and sampling program for surface water will span pre-, during and post-construction periods (e.g., three years after construction is complete).</p> <p>Monitoring to assess changes to hydrology and drainage with respect to water movement in the peatlands is also proposed, as well as groundwater levels and flow. As described in Section 11.13 – Follow-up and Monitoring, a dedicated Wetlands/Peatlands Function Monitoring Program will be developed and implemented. Details of this proposed program are presented in Appendix K-4. Specific to the WEFN comments received, this monitoring program will include, but not limited, to:</p> <ul style="list-style-type: none"> <li>• <i>Hydrology/Hydrogeology</i> – to identify and assess water sources, inflow and outflow, evidence of groundwater recharge/discharge, flow patterns, inundation frequency, and duration. Data loggers (electronic pressure transducers) will be used to monitor seasonal variations of water levels in monitoring wells or piezometers in peatlands; and</li> <li>• <i>Surface and Groundwater Quality</i> – will collect and analyze groundwater and surface water samples for chemical parameters (i.e., metals, volatile organics, acidity, alkalinity, chlorine, hardness, nitrogen, phosphorus, sulphate, dissolved oxygen, and biological oxygen demand, and biological parameters such as bacteria, algae, and viruses if applicable).</li> </ul>
3.	footnote 2 – Section 4, pg 88 footnote 3 – Section 8, pg 94 footnote 4 – Section 7, pg 153 footnote 5 – Section 8, pg 27	<p><b>Mitigation Measures</b></p> <p>The EA/IS also lacks sufficient detail related to water monitoring, management, and mitigations. Some examples include:</p> <ul style="list-style-type: none"> <li>• "Short-term discharges of construction water, wastewater, or wash water: "The waterbodies have high resilience to this effect because of the mitigation measures and limitations applied to discharges."”<sup>2</sup> This statement appears assumptive and lacks details on what mitigation measures would be applied.</li> <li>• "The effect of vegetation clearing and grubbing on groundwater resources (increase of groundwater levels) is considered to be positive as infiltration rates may increase after vegetation clearing and grubbing resulting in higher</li> </ul>	<p>The mitigation measures requested in WEFN's Report for involvement in water and fish monitoring, and the development of associated mitigation measures must be carried through to the final EA/IS and applied for post-approval action.</p>	<p>Water monitoring, management and mitigation is discussed in numerous sections of the EAR/IS. Information from the WEFN Existing Conditions Report was considered in developing the mitigation measures for the Project. Using the cited examples we offer the following response:</p> <ul style="list-style-type: none"> <li>• Mitigation for short-term discharges of construction water, wastewater, or wash water are detailed in Sections 7.4.1 – Dewatering, Water Taking and Discharges, 7.4.9 – Disposal of Waste, Sections 8.4.5</li> </ul>

Comment #	Page/Section # in Draft EAR/IS / Topic	Comment	Recommendation	Proponent Response
	footnote 6 – Section 7, pg 53 footnote 7 – Section 10, pg 55	<p>groundwater levels, which would be beneficial to groundwater resources, as well as to groundwater dependent ecosystems.”<sup>3</sup> This statement lacks certainty, especially without a hydrology study.</p> <ul style="list-style-type: none"> <li>• “However, the net effect is reversible and water quantity should return to pre-construction levels within a year or less, depending on weather and the change of seasons.”<sup>4</sup> This statement requires additional detail be added to clarify that net effects on surface water quantity are reversible.</li> <li>• “At this stage, the dewatering zone of influence (ZOI) from the construction activities, especially dewatering and pumping operations are not fully known, but it is not anticipated that the ZOI will extend beyond the LSA. Therefore, the LSA boundaries are expected to be sufficient to capture the potential effects of the Project on groundwater resources.”<sup>5</sup> The determination that the ZOI will not extend beyond the LSA when dewatering and pumping operations are not fully known is assumptive.</li> <li>• There are also cases where there was a lack of sampling, such as:               <ul style="list-style-type: none"> <li>○ “Due to poor weather and access conditions, samples were only collected at the five sampling locations listed in Table 7-8 and shown in Figure 7.2.”<sup>6</sup></li> <li>○ “Not all sites were sampled due to high-water levels, which prevented safe access to additional sites.”<sup>7</sup></li> </ul> </li> </ul>		<p>– Dewatering/Pumping and 8.4.7 – Disposal of Waste. In summary, short-term discharges of water from dewatering activities will involve use of erosion and sediment control measures, such as sediment traps and filter bags for treatment before water is released to the environment. Where this occur, detailed discharge monitoring plans will include water quality testing, and contingency measures that are typically recommended to support receiving a Permit to Take Water or Environmental Activity Sector Registration. In addition, as noted in the response to Comment #2, a water quality monitoring and sampling program for surface water will span the pre-, during and post-construction periods. Note that mitigation for domestic wastewater and sewage in the form of liquid effluent generated at construction camps and the Maintenance and Storage Facility will be treated to meet water quality standards using a portable treatment facility/plant, conventional septic system or transported off-site by tanker truck for treatment at an approved sewage treatment and disposal facility.</p> <ul style="list-style-type: none"> <li>• The statement on potential effects of vegetation clearing and grubbing on groundwater resources (increase of groundwater levels) will be verified from the Wetlands/Peatlands Function Monitoring Program (refer to Comment #2, Hydrology/Hydrogeology monitoring) and other groundwater monitoring wells along the road outside of the peatlands.</li> <li>• The statement that the net effects of groundwater dewatering are reversible and water quantity should return to pre-construction levels is based on our assessment and understanding of current groundwater levels, foundations of bridges and culvert and zone of influence calculations. Typically, short-term dewatering activities during construction do not result in permanent alteration of groundwater levels once the activity is stopped. Further assessment of the ZOI will be conducted during the future detailed design stage of the Project and groundwater monitoring during construction is proposed to verify predicted effects.</li> <li>• Further sampling and testing of surface water is proposed during the detail design phase, prior to</li> </ul>

Comment #	Page/Section # in Draft EAR/IS / Topic	Comment	Recommendation	Proponent Response
				<p>construction, to help further understand existing water quality conditions at select waterbodies in the study area.</p> <ul style="list-style-type: none"> <li>While Section 10.4 – Mitigation and Enhancement Measures and Section 10.10 – Follow-up and Monitoring provide an overview of mitigation measures and monitoring programs to manage potential effects on fish and fish habitat, the intent is to have Indigenous community members play an active role in developing and implementing environmental management plans through an Environment Committee. WEFN is welcome to engage with the WSR Project Team to further discuss the proposed mitigation and monitoring and participate in the proposed Environmental Committee that will oversee such matters. Further crossing-specific fish monitoring and mitigation measures are proposed to assist in the detail design phase and will be incorporated into the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) for implementation.</li> </ul>
4.	<p><b>Community Health and Wellbeing</b>  footnote 8 – Section 8, pg 120  footnote 9 – Section 8, pg 91  footnote 10 – Section 4, pg 4-41</p>	<p>WEFN’s Report explains that Weenuski Inninowuk rely heavily on harvested resources to maintain our health due to the remote location, our way of life, and relatively intact territory. Resource threats resulting from development, or even perceptions of such threats, can lead to Weenuski Inninowuk avoidance of harvesting activities, which may negatively affect our health and well-being. Report Participants indicated concerns with road safety, as well as potential increased access to the territory by non-Nation members.</p> <p>The EA/IS notes that there are potential effects that may result in significant consequences to community well-being and safety. As a result, the WSR Project Team suggests “enhanced mitigation and monitoring are proposed for these potential effects to manage and prevent significant adverse effects.”<sup>8</sup> However, some of these mitigation measures lack clarity and require further development. For example, the EA/IS states that “Webequie First Nation will aim to limit outsiders from entering the community through the WSR to the extent possible. This may limit the amount of illegal drugs and alcohol from entering the community, and limit impacts to mental health.”<sup>9</sup> There are no details on how Webequie First Nation (“Webequie”) intends to effectively restrict access by outsiders or the specific actions planned to prevent illegal drugs and alcohol. Similarly, the EA/IA lacks clarification regarding the types of economic growth opportunities that will be offered, and which communities will benefit from these initiatives.</p>	<p>WEFN requests notification of quarry operations, and would prefer that timing is developed in consultation with WEFN land users.</p> <p>Mitigation measures related to health and well-being should be culturally appropriate and include land-based healing methods. Further development of these mitigation measures is needed in collaboration with WEFN.</p>	<p>The Project Team is open to further discussion with Weenusk First Nation regarding notification of the quarry operations and culturally appropriate mitigation measures related to health and well being. The Community Readiness Plan (Appendix N) includes the proposed development and implementation of a Stewardship and Environmental Management Strategy to be overseen by a Community Readiness Working Group made up in part by participating communities, that can include Weenusk First Nation, and can provide a means to coordinate the timing of project activities to align with Weenusk First Nation's traditional land and resource use activities. In addition, the Education, Training and Employment Readiness Strategy and a Cultural Enrichment Plan, as well as monitoring of access to healing options, are outlined in the Community Readiness Plan (Appendix N).</p>

Comment #	Page/Section # in Draft EAR/IS / Topic	Comment	Recommendation	Proponent Response
		<p>The EA/IS also notes that “The community of Webequie will be informed (through local radio and or posted material in the community) by the contractor prior to carrying out quarry operations in areas where they are likely to be present or to collect country foods or medicinal plants.”<sup>10</sup></p>		
5.	<p><b>WEFN Governance</b> footnote 11 – Section 4, pg 18 footnote 12 – Section 4, pg 27</p>	<p>As noted in WEFN’s Report, WEFN has the right to govern and manage resources in WEFN’s traditional areas. WEFN recommended community-to-community dialogue, and an agreement to offset Project impacts. PDF page 101 of the WEFN Report also notes that “while mitigations are typically developed after the identification of impacts, some Participants offered suggestions surrounding preliminary measures for mitigation. Additional mitigation measures will be required in discussion with Weenusk following the assessment of impacts.”</p> <p>There are several Project design details that were not determined at the time of the issuance of the draft EA/IS, such as the potential for the road to be paved, and the potential addition of road intersections.<sup>11</sup> There are also several studies and plans that are outstanding, such as “ The ultimate selection of the foundation for structures will be determined in the Detail Design Phase of the Project and results of future geotechnical investigations to characterize subsoil surface conditions at each waterbodycrossing”<sup>12</sup> and additional mitigation and enhancement measures will be provided in the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP).</p> <p>In addition, WEFN determined that there may be significant impacts to several of WEFN’s VCs, arising from Project impacts on Species at Risk, water, and community health and well-being. As explained earlier, the mitigation measures presented in the EA/IS do not sufficiently address these impacts.</p>	<p>WEFN requests that the WSR Project Team commit to developing mitigation measures in collaboration with WEFN to address any potential Project impacts that are realized once additional details, studies, and plans are developed. WEFN also requests ongoing community-to-community dialogue to acknowledge WEFN’s governance and right to manage resources in their traditional areas.</p>	<p>The WSR Project Team is committed to working collaboratively with other First Nations during the current EA/IA phase and future development phases of the Project. Mitigation and monitoring measures identified during the EA/IA will be further developed in the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) for implementation. In the spirit of collaboration, draft copies of the CEMP and OEMP will be provided to WEFN to receive their feedback. The WSR Project Team welcomes the opportunity to have ongoing community-to-community dialogue to discuss WEFN’s governance and rights to manage resources within the WFN and WEFN shared traditional areas.</p>

# Aroland First Nation





January 12, 2026

**Response to Aroland First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Chief Gagnon,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project. Please find enclosed the table that provides responses to the comments provided in your letter dated October 7, 2025.

As we move forward in the process to submit the Final EAR/IS, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to discuss the findings presented in the Draft EAR/IS in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the WSR Project.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Fox', written over a horizontal line.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment, Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Aroland First Nation (ARFN)

The following categorization of the proponent responses may appear in the comment response table for clarity.

### Proponent Response Legend

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # in Draft EAR/IS	Context	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
1.	Section 1: Introduction 1.1	Based on low population density in the Project study area and the intended stated purpose of the WSR, an average annual daily traffic volume of less than 500 vehicles has been projected; further, the WSR traffic operations are not anticipated to include mineral ore or mine product hauling/transport.	The Proponent has narrowly scoped anticipated traffic flows based on the stated purpose of the WSR, which does not specifically consider future linkage to the NRL and Ontario Road network. AFN is concerned that this approach is flawed in that it does not provide certainty whether ore may be transported via the WSR in the future (in the event the NRL is not built), and further, that if the NRL is built, traffic flows on the WSR, NRL, MFCAR, and Anaconda/Painter Lake roads may collectively increase.	<b>Recommendation:</b> The Proponent must provide a robust, yet accurate estimate of traffic flows and composition under various scenarios through the entire 75-year life of the Project to ensure an appropriate understanding of traffic on the WSR, and facilitated by the WSR (e.g., traffic increases or changes along other reasonably foreseeable roadways).	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).  The projected traffic volumes for the WSR project (volume of less than 500 vehicles per day) are based on the existing population in Webequie and assumed future population growth, the proposed road usage and the intended primary purpose of the WSR, which is to allow for the movement of materials, supplies and people from the Webequie to the mineral exploration and proposed future mine developments in the Ring of Fire area, and provide employment and other economic development opportunities to Webequie First Nation. WSR traffic does not include mineral ore or mine product hauling/transport from the Ring of Fire and even with potential population growth, and mine developments, and other road infrastructure projects in the region (i.e., Northern Road Link and Marten Falls Community Access Roads) the current projected traffic volumes for the WSR are not anticipated to substantially increase. The Ministry of Transportation will be evaluating the impact of all three road projects on roads south of the these three projects as part of their environmental assessment activities.
2.	Section 1: Introduction 1.3.2	The Proponent states: "From the perspective of Webequie First Nation, the WSR could be constructed and operated as a facility that only provides a	AFN is concerned with the level of consideration of the additive or interactive effects of connecting this Project to either the NRL or future mineral development at the Ring of Fire,	<b>Recommendation:</b> AFN does not agree that the cumulative effects assessment conducted within the scope of this EAR/IS appropriately contemplates interactions with other projects through the entire	1) The Regional Assessment (RA) in the Ring of Fire Area (IAAC, 2023) is independent of the EA/IA for the WSR and other IAs in the region and is a separate federal assessment process. As required by the TISG and ToR Notice of Approval requirement (amendment #1.3) for the WSR Project, and the

Comment #	Page/Section # in Draft EAR/IS	Context	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
		connection between Webequie First Nation and the McFaulds Lake area to serve mineral exploration and future mining development activities, with no connection to the provincial highway system. However, with implementation of the Project and should future mining and other road projects (i.e., NRL and MFCAR) proceed to the McFaulds Lake area, Webequie First Nation would gain year-round access to the provincial highway system. It is in this scenario that the socio-economic effects of the WSR Project would likely be realized or felt to the fullest. The EA/IA for each of the WSR, NRL, and MFCAR assesses potential socio-economic effects of these separate projects as well as their potential cumulative effects, should these road projects proceed.”	within the scope of the EAR/IS. Generally, these interactions are only considered to a limited degree within Section 22 of the report outlining cumulative effects. However, there is significant concern that gaps remain between the assessment of cumulative effects conducted for each of the respective projects (at present only the Draft EA/IS Report for MFCAR is available), and the effects which may be identified if the WSR, NRL, and MFCAR were considered as a single road network, or if the WSR were to be considered within the scope of future Ring of Fire development. AFN’s position is that, in lieu of a single comprehensive EA/IA for all of the proposed roads and future mine development, projects must a) make effort to recognize cumulative effects under a range of scenarios; and b) ensure the EA/IA is informed by the Ring of Fire RA recommendations (ongoing).	lifecycle of the Project (e.g., NRL, Ring of Fire development). As a result, we recommend two elements: 1) AFN requests that the EAR/IS not be finalized until it can meaningfully review and incorporate recommendations and other outputs provided by the Ring of Fire RA; and 2) AFN requests that in the instance where the WSR is connected to another project (e.g., a developed Eagle’s Nest Mine, or NRL), a future decision statement for the WSR be reviewed and amended as a material change. This approach will ensure that the cumulative effects of interacting projects are appropriately contemplated enabling opportunity for contemporary re-evaluation and consultation.	IA Act, relevant information from the regional assessment, if available, will be used to inform the Project effects assessment. This may, for example, include informing the baseline studies, effects prediction, cumulative effects assessment, mitigation and enhancement measures, and follow-up programs, as applicable. At this time there are no deliverable outputs available from the Regional Assessment to consider. 2) This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.
3.	Section 1: Introduction 1.4.2.1	The Proponent has committed to, if available, using relevant information from the Regional Assessment to inform the Project effects assessment.	AFN is a strong supporter of the RA and regional planning initiatives aimed at considering and contemplating the interactive, synergistic, and antagonistic effects of the WSR, NRL, MFCAR, and development of the Ring of Fire. With the exception of the MFCAR, we do not support the advancement of these projects until the RA is complete and cumulative effects between projects can be fully characterized. The Proponent has committed to, if available, using relevant information from the RA to inform the Project effects assessment.	<b>Recommendation:</b> While the Proponent provides various examples of how this information could inform the Project, AFN seeks commitment from the Proponent that, rather than using relevant information from the RA to inform the Project effects assessment <i>if available</i> , they commit to acting upon any recommendations made by the Ring of Fire RA <i>when available</i> . This should include recommendations to pause or suspend Project development if such recommendations are made.	Refer to response to Comment #2. The proponent continues to commit to using relevant information and/or recommendations from the federal RA in the Ring of Fire to inform the Project effects assessment where available.
4.	Section 3: Evaluation of Project Alternatives	The Proponent outlines a list of screening factors used to	It is difficult to understand the Proponent's justification for screening out the "Do Nothing Approach" on the	<b>Recommendation:</b> AFN requests the Proponent provide the following to support Project justification:	1) The preliminary estimated capital cost for construction of the WSR is approximately \$700 million dollars (+/- 40%) and is further detailed in Section 4.1.7 of Appendix D of the

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	3.1.2.1	determine the preferred alternative for this Undertaking	<p>basis that it does not meet the goal of delivering goods and services from the Webequie community/airport to support and participate in mineral exploration activities and proposed mine developments near McFaulds Lake. The “Do Nothing” alternative does indeed fail to construct an overland transportation connection between Webequie First Nation/Airport and McFaulds Lake, but does not limit the ability to deliver goods and services to the McFaulds Lake area ( options such as the NRL or airport improvements address this need), or goods and services from Webequie to McFaulds Lake which could be accomplished via a combination of aircraft and existing trails (along with airport improvements etc. to better service Webequie and McFaulds Lake).</p> <p>The core issue that we see is that the Proponent has not offered clear justification for why the construction of the WSR presents a unique opportunity in the public interest, which outweighs the significant impacts from construction and operation of the road.</p>	<ol style="list-style-type: none"> <li>1) Costing for the construction and maintenance of the WSR</li> <li>2) Financial analysis of the economic opportunities associated with the construction and operation of the WSR, including those related to the flow of goods and/or services through Webequie to the Ring of Fire.</li> <li>3) Predicted changes to economic opportunities in the instances the NRL is developed.</li> <li>4) Demonstration of how the Proponent used economic and social factors to influence the selection of the preferred alternative for this undertaking.</li> </ol>	<p>EAR/IS. There is no annual operation and maintenance cost available for the WSR at this time.</p> <p>2) 1. Item is addressed in EAR/IS. Section 15 of the EAR/IS provides an assessment of the economic benefits associated with construction and operations of the Project. This includes predicted changes to employment, business environment and overall economy in the Local Study Area and Regional Study Area, which includes Indigenous communities.</p> <p>3) As stated in Section 21 for the cumulative effects assessment, valued components assessed as having no net effects, positive net effects, negligible to low net effects, and assessed with a likelihood of occurrence as “unlikely” or “possible” are not carried forward to the cumulative effects assessment. The economic valued component is predicted to have net positive effects, and therefore the scope of the cumulative effects assessment has not predicted the economic changes in the event the NRL project is developed.</p> <p>4) The screening factors used to determine the preferred alternative for this Undertaking (the Project) are described in Table 31 of Section 3 where it states that “ although the community will realize social and economic benefits from a number of aspects of building and operating/maintaining any of the alternatives considered, for the purpose of the screening, benefits were generally considered to flow from employment. Generally, the greater the number of jobs and the more sustainable the jobs are (e.g., year-round versus seasonal employment) the greater the benefits for the community. A key social benefit of the Project would need to include the continued ability to practice traditional land and resource use”.</p>
5.	Section 4: Project Description 4.3.2.2.2	The Proponent has proposed to utilize two standards for water crossing design: a 1-in-10- year design flow for minor drainage system design (e.g., roadside ditches), and a 1-in-100-year design flow for major drainage system design and bridge and culvert structures.	<p>Structures are to be designed to meet either a 1-in-10-year (minor crossing) or 1-in-100 (major crossing) year design flow. This blanket approach may not be suitable for two key reasons:</p> <p>First, as the Project is intended to have a life span of 75 years (though it is noted that no plans for closure are provided) it may be anticipated that structures are likely to flood at some point during the life of the Project.</p>	<p><b>Recommendation:</b> AFN recommends that structures be designed to match local site-specific needs and conditions which includes both estimated design flow return period as well as consequence of failure. Given the remote nature of this road, overland flooding leading to erosion or disruption of the roadway surface may present both significant environmental consequence (e.g., sediment runoff into sensitive adjacent waterbodies or environments), and safety consequence</p>	<p>Structures for the WSR exceed the Ministry of Transportation Highway Drainage Design Standards (MTO Standards) for its road classification (i.e., Rural Collector Undivided). For clarity the 1 in 100 year flow used to establish structures sizes for the WSR exceeds the recommended minimum 1 in 50 year flow specified in the MTO standards. The reason for exceeding the minimum MTO Standards for sizing of structures is to mitigate the risk of potential failure from extreme weather events (e.g., flooding), that could lead to the closure of the road and associated significant time period to allow for repairs to be completed to re-open the road, based on its remote location. Minimizing the potential risk of disrupting access to external</p>

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			<p>Second, controlled or anticipated flooding may be acceptable in some instances, however, those instances should be determined by the impacts of flooding rather than a blanket approach to allowing flooding during 1-in-10 or 1-in-100-year events.</p> <p>As a result, AFN is concerned that this approach may lead to preventable environmental impacts (e.g., erosion, sediment mobilization, and degraded water quality), as well as potential threats to those using the roadway (e.g., degradation of a safe roadway).</p>	<p>(e.g., travellers of the road may become stranded, or placed at greater risk of accident due to poor roadway conditions). Therefore, it is recommended that return period design flow be appropriately scaled to consider local/site-specific factors, as well as consider long-term changes in water flow patterns (e.g., such as those caused by climate change) over the entirety of the Project life.</p>	<p>community services (e.g., health) and supplies are considered an important decision-making factor based on the remote location of Webequie First Nation and expected reliance on the road, particularly in the potential future scenario where other road projects proceed (i.e., Northern Road Link and Marten Falls Community Access Road) and connect the WSR to the provincial highway network. Therefore, all water crossings are sized to convey the 100-year design flow. In addition, the sizing of structures has included consideration of the potential effects of climate change on the Project projected over a 75-year life cycle (2100), which from the review of Ontario and Canada specific climate models could result in an increase in precipitation of up to 40% beyond current metrological conditions.</p>
6.	Section 4: Project Description 4.3.3.1.2	<p>The Proponent outlines estimated sources and needs for aggregate material for the construction and ongoing maintenance of the road. Overall, as noted in Table 4-5 a volume of 4,854,500 m<sup>3</sup> of material is assumed to be necessary through the life of the Project.</p>	<p>Aggregate volume estimates from ARA-2 and ARA-4 are intended to satisfy the needs for road development. AFN seeks clarification and confirmation that these quarry sites will be developed only to support road construction, operations, and closure activities. If these sites are intended to serve as commercial sites to service other projects or developments (e.g., other road construction, Ring of Fire activities), this should be clear stated within the scope of this Project and be subject to a material change to this Project in the future if approved.</p>	<p><b>Question:</b> Please confirm whether the Proponent will limit access to aggregate resources solely to activities related to construction and operation of the WSR as described by the EAR/IS.</p>	<p>As this time the planned development of aggregate source areas ARA-2 and ARA-4 are intended solely for use to construct and operate the WSR Project. The extraction of material at ARA-2 and ARA-4 on Ontario Crown land will be regulated through an Aggregate Permit issued under the Ontario <i>Aggregate Resources Act</i>, and for ARA-4, on Webequie First Nation Reserve lands, applicable federal permitting requirements (i.e., Indian Act, Section 58 (4)(b)).</p>
7.	Section 4: Project Description 4.3.3.1.2	<p>The Proponent states that the expected lifespan of ARA-2 and ARA-4 is intended to match that of the 75-year operation and maintenance life cycle of the WSR. Additionally, at the end of this lifespan, “both pits and quarries at ARA-2 will be progressively rehabilitated, as well as decommissioned for a final rehabilitated state.” However, while a requirement under the Ontario <i>Aggregate Resources Act</i>, a similar</p>	<ol style="list-style-type: none"> <li>1) AFN is concerned regarding the uncertainty surrounding the fate of ARA-4 at the end of the Project and/or quarry life.</li> <li>2) Collectively, the quarries/pits at ARA-2 and ARA-4 represent some of the northernmost quarries in Ontario. While there are examples of active and rehabilitated quarries further north in other jurisdictions, rehabilitation of these quarries will face significant challenges given the short growing periods and relatively unique soil conditions.</li> </ol>	<p><b>Question:</b> AFN requests clarification on the proposed lifespan of ARA-4, including additional information regarding plans for use of ARA-4 in the event the WSR life is extended beyond the proposed 75-year operation and maintenance cycle.</p> <p><b>Recommendation:</b> Given the unique growing environment which would face the reclamation of ARA-2 and ARA-4, including limited supplies of organic growth material, short growing seasons, and generally unique local ground/surface water conditions, it is essential that a conceptual closure and reclamation plan</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The Proponent will seek to obtain a permit under the Indian Act, Section 58 (4)(b), where applicable, to remove aggregate from ARA-4 on Webequie First Nation Reserve lands and it will be limited to 75 - year life span. Where an extension beyond this duration is needed approvals will be retained.</p> <p>The recommendation regarding the unique conditions and challenges associated with reclamation of these quarries is noted and will be examined and considered further in the future detail design and permitting stage for the Project. To obtain the required permits for ARA-2 and ARA-4 further supportive technical studies and information are anticipated to include: describing existing features and environmental</p>

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		closure and reclamation plan is not described for ARA-4.	<p>AFN is concerned that the Proponent will not have access to necessary materials and resources to reclaim the road at the end of the Project lifespan, if a decision is made to close it in the future (e.g., Ring of Fire development is not viable and/or NRL connection is never established). The unique environmental conditions of the roadway, especially the eastern section largely comprised of peatlands may be difficult to meaningfully reclaim following loading (compression). The western section will face other challenges, including the need for organic soils to be replaced. If organic soils are not recovered and stockpiled during construction, no viable alternative source exists. As a result, reclamation may not be possible.</p> <p>Collectively, within themselves, ARA-2 and ARA-4 represent significant sources of potential impact for this Project.</p>	for each ARA-2 and ARA-4 be developed and presented for review as part of the EAR/IS process to fully contemplate potential impacts.	<p>sensitivities, mitigation measures (e.g., noise, dust, drainage management), monitoring programs and progressive and final closure and reclamation plan for the land.</p> <p>The text has been updated to read “both pits and quarries at ARA-2 and ARA-4 will be progressively rehabilitated...”</p>
8.	Section 4: Project Description 4.3.3.6	The Proponent states that organic waste will be stored at the camps and Maintenance and Storage Facility until it can be transported to a waste disposal site. Similarly, it is proposed that for disposal, non-hazardous waste will be transported to the landfill site in Webequie. Where landfill capacity concerns are expressed for receiving Project-generated domestic waste in Webequie, the Proponent may consider the use of on-site waste incinerators at construction camps and at the maintenance and storage facility.	<p>More information is needed to understand Project waste management and handling protocol: while the Proponent proposes that organic solid waste at the camps will be stored for later transport to a waste disposal site, where capacity concerns may exist for receiving Project-generated waste in Webequie, the Proponent may consider the use of an on-site waste incinerator at construction camps and the Maintenance and Storage Facility. The same option is not described for non-hazardous, non-organic material.</p> <p>Information regarding the capacity of the Webequie landfill facility was not available for review; however, it is noted that a facility does exist and operates</p>	<b>Question:</b> More information is needed regarding the amount of waste to be generated as there are few options for disposing of non-hazardous, non-organic waste if the development of a new landfill receiving facility is not contemplated. If such a facility is necessary to develop in order to receive Project waste, it is requested that it be considered within the scope of the Project Description for the WSR.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The amount of waste generated during the construction phase of the Project, and to lesser extent during operations, are not fully known at this time. The amount of waste to be generated will be further examined in the future detail design stage of the Project. Based on the waste management options described in Section 4 and elsewhere in the EAR/IS it is assumed that a new waste disposal/landfill facility will not be required. Should this assumption prove incorrect, the Proponent will follow the EA amendment procedure process for managing design changes as outlined in Section 27 that may be included in conditions of the EA Notice of Approval, if received.

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			under CofA A7423001. It is not clear whether the Proponent has conducted analysis regarding the potential amount of waste that will be generated during construction and operations, and whether that will substantially or materially impact the longevity of the Webequie landfill facility.		
9.	Section 4: Project Description 4.4.1	The Proponent states that while there is an anticipated 75-year operation and maintenance lifecycle for the Project, there are currently no plans or need to decommission the WSR. As a result, decommissioning, deactivation, or reclamation is not contemplated within the EAR/IS	Section 3.2.3 of the TISG states: "If the proponent does not anticipate decommissioning and abandonment, it must state clearly under what circumstances decommissioning would occur and demonstrate a commitment to following environmental and social best practice in all its activities." The Proponent's statement insisting that there are no plans to decommission the WSR is not consistent with the TISG, as it does not contemplate potential circumstances in which decommissioning would occur, nor does it contemplate instances where substantial delays or Project cancellation were to occur (e.g., due to a lack of funding, or no further need) during the construction or operations phase. While the Proponent has specifically proposed this Project to stand-alone regardless of future development of the NRL or Ring of Fire projects, the viability of the WSR is intrinsically tied to the advancement of those other projects.	<b>Recommendation:</b> Due to the several factors which may influence the construction and operation of the road, which may result in short-, medium-, or long-term/permanent deactivation resulting in effective decommissioning during either the construction or operational phases of this road, as well as the technical challenges facing decommissioning and reclamation if needed, it is necessary to have a strong understanding of whether such an activity is technically feasible with a goal of restoring full ecological functionality. It is therefore requested that the Proponent outline a meaningful conceptual strategy for short-, medium-, and long-term deactivation, as well as strategy for permanent decommissioning leading to Project reclamation.	As noted there are currently no plans or need to decommission the WSR. As a result, decommissioning, deactivation, or reclamation is not assessed within the EAR/IS, which is consistent with the approved EA Terms of Reference and federal Tailored Impact Statement Guidelines for the Project. It is our opinion, that the decommissioning and reclamation of roads in Ontario, and particularly forestry access roads in the north, are technically feasible using proven reclamation and restoration techniques, and that mitigation measures to do this activity to minimize adverse environmental effects and restore ecological functions would be similar to those identified measures in the EAR/IS. Where medium or long-term deactivation of the WSR is identified in the future, the Proponent will prepare a Road Decommissioning and Monitoring Plan, including opportunities for First Nations to review the draft plan and provide their feedback.
10.	Section 4: Project Description 4.4.2.4	The Proponent notes that during construction of the proposed road, temporary aspects of the Project will be subject to progressive reclamation. Additionally, stockpiles of earth and aggregate material are to be stored a minimum of 30 m from a waterbody or watercourse.	1) It is unclear whether the Proponent is referring to stockpiles of "earth or aggregate material" as material to be used in construction, material removed from site during site preparation, or both. It is anticipated that organic material removed from the ROW will be greater than that which will be immediately required	<b>Question:</b> AFN would like to see and review an account of overburden/organic material utilization through the life of the project. <b>Recommendation:</b> It is requested that a water management plan be developed to consider runoff management and erosion from stockpiles and include the establishment of runoff collection systems	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The volume of surplus organic earth from the Project and its utilization over the life of the project is not fully known at this time but will managed with the mitigation measures and best management practices identified in Section 6, and elsewhere, in the EAR/IS. Excess organics generated during construction in the form of brush or trees will be burned, chipped for use in restoration and reclamation of disturbed areas or offered to

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			<p>for reclamation of temporary supportive facilities and work areas not required for operations. There will be a need to reclaim additional longer-term features such as the ARA-2 and ARA-4 quarry sites, which will have a fixed life even if the WSR operated indefinitely. Because of this, there is interest in understanding how surplus organic material will be stockpiled indefinitely with the assumption that it will be necessary to reclaim the quarry sites and may be necessary to reclaim the WSR itself if the road is decommissioned.</p> <p>2) While storage of aggregate or other stockpiled material a minimum of 30 m from a water course is a standard practice to minimize impacts on water quality, depending on the nature of the environmental setting, stockpile runoff may still allow for significant sediment and contaminant mobilization resulting in local impacts to water quality.</p>	<p>as applicable treatment options to ensure water discharged to the environment meets Provincial Water Quality Objectives or other applicable standards.</p>	<p>community members of Webequie First Nation for their use. In the peatlands, peat material will not be removed; surface organics will be reapplied within the row to support revegetation.</p> <p>The Proponent commits to develop a Surface Water and Storm Water Management and Monitoring Plan and Erosion and Sediment Control Plan during detail design as part of a Construction Environmental Management Plan (CEMP) for implementation in the construction phase of the Project. The Project Team continues to seek guidance from regulatory agencies throughout the EA/IA process on project design requirements and submission requirements for applicable permits, approvals and/or authorizations needed to construct the WSR.</p>
11.	Section 4: Project Description 4.4.2.7	The Proponent anticipates that all materials with the exception of nearby aggregate (ARA-2 and ARA-4 source areas), will be provided by manufacturers located within Northern Ontario with strong supply experience.	The Proponent has anticipated that all materials with the exception of nearby aggregate materials supplied by ARA-2 and ARA-4 will be provided by manufacturers located within Northern Ontario. AFN supports this approach, prioritizing businesses and jobs in Northern Ontario communities; however, we seek a firm commitment to this approach (rather than an anticipation), as well as a plan for how materials and resources will be procured in this manner. Additionally, as the constructor and operator of the road has yet to be identified, there is concern that the Proponent is not in a position to make a	<p><b>Recommendation:</b> As per Sections 2.1, 3.3., 18.3, and 20 of the TISG it is necessary to clarify the workforce and procurement strategies aimed at providing positive (or negative) effects on local and regional communities, workers, and businesses.</p> <p>AFN requests that the Proponent provide commitments on workforce and procurement strategies to achieve the stated assumption regarding all materials being provided by Northern Ontario businesses.</p> <p>See AFN Comment 15.</p>	<p>An Education, Training and Employment Readiness Strategy has been developed and is discussed in Section 14.4.4 (Education and Training) and Section 15.4.1 (Labour Force, Employment and Income). It is also described in Section 7.2.1 of the Community Readiness Plan (Appendix N of the EAR/IS). A Procurement Enhancement Strategy for the Project is described in Section 7.4.2 of the Community Readiness Plan (Appendix N of the EAR/IS).</p> <p>Webequie First Nation is the sole proponent of the Webequie Supply Road Project for the purpose of the EA/IA. At this point in time, it has not been determined who will construct, maintain and operate the Webequie Supply Road and is subject to further discussion between Webequie First Nation and Ontario.</p>

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			statement regarding the specific procurement strategy to be employed.		The ultimate proponent for the construction and operation phases of the Project is expected to meet the obligations and commitments in the EAR/IS.
12.	Section 4: Project Description 4.4.2.7	Table 4-8 outlines a list of expected equipment and vehicles used for Project Construction.	Diesel equipment produces significant amounts of NOx and other potentially harmful gases.	It is requested that the Proponent, where applicable, commit to the use of only equipment that complies with EPA Tier 4 emissions standards for diesel-powered equipment, as a method of limiting harmful atmospheric pollutants, including those which are known to contribute to climate change (e.g., NOx).	The Proponent is committed to making their best efforts in the construction planning and execution to use stationary and mobile equipment with EPA Tier 4 emission standards.
13.	Section 4: Project Description 4.5	The Proponent outlines a generalized strategy for ensuring that the constructor and operator (which have not yet been identified), will employ to favour Indigenous participation, contracting, training, and hiring.	The approach presented by the Proponent, which suggests that set-asides be identified for Indigenous communities, businesses and individuals, is somewhat limiting and constrained. Rather, the expectation should be that the constructor and operator of the project will actively work with local and regional First Nations to understand existing opportunities for job creation and procurement, as well as barriers or limitations for Indigenous workers and businesses to realize opportunities associated with this Project, and co-develop programming aimed and removing barriers or limitations prior to construction. Similar approaches need to be taken to ensure that the Proponent is proactively supporting women, youth, and members of diverse gender or sexual orientation communities, who realize opportunities with this road, as these groups have historically been marginalized or unaccommodated in large- scale development projects.	<b>Recommendation:</b> As per Sections 2.1, 3.3., 18.3, and 20 of the TISG it is necessary to clarify the workforce and procurement strategies aimed at providing positive (or negative) effects on local and regional communities, workers, and businesses.  AFN requests that the Proponent provide commitments on workforce and procurement strategies to specifically demonstrate how local and regional Indigenous workers and businesses will be prioritized for opportunities, how Indigenous workers and businesses will be supported to realize opportunities, and how the Proponent will ensure that any strategies utilized by the future constructor/operator of the road actively remove barriers for vulnerable and underrepresented groups including women, youth, Two-Spirited persons, and persons of diverse gender or sexual orientation identities.  See AFN Comment 15.	An Education, Training and Employment Readiness Strategy has been developed and is discussed in Section 14.4.4 (Education and Training). In addition a Community Readiness Plan (Appendix N of the EAR/IS) has been developed that layouts out a framework to maximize socio-economic benefits, including employment and training opportunities to Webequie First Nation and other communities. As well as a Procurement Enhancement Strategy has been developed for the Project and is described in Section 7.4.2 of the Community Readiness Plan. Collectively, the cited strategy and plan are intended represent the Proponents commitment to maximize project benefits to Indigenous communities, Indigenous workers and business and will be further developed by the Proponent of the construction and operations phases of the WSR. As noted previously, Webequie First Nation is the sole proponent of the Webequie Supply Road Project for the purpose of the EA/IA. At this point in time, it has not been determined who will construct, maintain and operate the Webequie Supply Road and is subject to further discussion between Webequie First Nation and Ontario.
14.	Section 4: Project Description 4.5.1	Currently, the constructor and operator of the WSR are not yet known.  However, the Proponent has speculated important characteristics of the construction	The Proponent is largely limited in identifying benefits, effects, and impacts of economic opportunity, as the constructor and operator are not yet known.  This means that measures aimed at	<b>Recommendation:</b> In contemplating this Project, it will be necessary for the Proponent and IAAC to develop conditions aimed at ensuring a meaningful local/regional hiring and procurement	The Proponent for EA/IA has developed an Education, Training and Employment Readiness Strategy has been developed and is discussed in Section 14.4.4 (Education and Training) and a Community Readiness Plan (Appendix N of the EAR/IS) to maximize socio-economic benefits, including employment, training and procurement opportunities to

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		workforce which is necessary to consider when contemplating Project benefits.	<p>prescribing benefits for local or regional Indigenous workers and businesses, as well as limiting impacts associated with reliance on workers or businesses from outside of the region, are limited for the purposes of this assessment.</p> <p>AFN is concerned by these knowledge gaps as they have a direct impact on the benefits of the project, and as a result should impact the ultimate IA decision process on determining whether the project is in the public interest.</p>	strategy is employed, which maximizes benefits and minimizes impacts.	<p>Webequie First Nation and other communities. This commitment binds the Proponent for the construction and operations phased of the Project to further develop these plans to benefit local or regional Indigenous workers and businesses in collaboration with Indigenous communities.</p> <p>The comment regarding that IAAC develop conditions is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
15.	Section 4: Project Description 4.5.3	The Proponent notes that "as part of maximizing local community participation, Webequie community members are currently in BEAHR (Building Environmental Aboriginal Human Resources) training so that they may work on the Project. The goal of training is to allow for Webequie community members and neighboring Indigenous communities to fully capture the employment and economic benefits from the construction and operations of the WSR."	<p>Similar to other comments made in this section, while the Proponent states that "Webequie community members are currently in BEAHR training so that they may work on this project.</p> <p>The goal of training is to allow for Webequie community members and neighboring Indigenous communities to fully capture the employment and economic benefits from the construction of the WSR," the Proponent fails to speak to how other or "neighbouring" Indigenous communities are being positioned to "fully capture the employment and economic benefits from the construction of the WSR."</p> <p>AFN supports the identification of programming aimed at ensuring opportunities from the roadway are realized, however, such programming needs to be closely tied to a) the local/regional worker and business pool, b) local/regional worker and business interests, c) job and procurement opportunities, and d) barriers or limitations in the ability for local and regional Indigenous workers or businesses to realize opportunities.</p> <p>As presented, programming appears to be limited and focused entirely on</p>	<p><b>Question:</b> AFN requires details from the Proponent regarding programming to realize opportunities from the road are locally/regionally realized that demonstrates how programming will be closely tied to a) the local/regional worker and business pool, b) local/regional worker and business interests, c) job and procurement opportunities, and c) identifying and addressing barriers or limitations in the ability for local and regional Indigenous workers or businesses to realize opportunities, beyond simply supporting WFN members.</p>	<p>1. Item will be addressed in the Final EAR/IS submission. Training and employment are discussed in Sections 14.4.4 (Education and Training) and 15.4.1 Labour Force, Employment and Income) of the EAR/IS. It is also described in the Community Readiness Plan (CRP) (Appendix N) in Section 7.2.1. The CRP will be modified to clarify the LSA and RSA communities may identify training initiatives needed by the local or regional worker and business to meet their interests, opportunities to participate and barriers to participation through the Community Readiness Working Group. Section 4.5.3 will include a link to refer to the CRP in Appendix N.</p>

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			<p>Webequie community members. While Webequie community members (and businesses) may serve as the first priority worker and business pool for opportunities, without adequately preparing regional or neighbouring Indigenous communities (workers and businesses), the Proponent, as well as future constructor, operator, and/or owner will not necessarily be positioned to be able to draw from a pool of workers or businesses prepared to support the Project from neighbouring or even regional communities. As a result, the Proponent, as well as future constructor, operator, and/or owner, may by default rely on skilled labourers or businesses from outside of Northern Ontario, or Ontario altogether, limiting or eliminating local benefits.</p>		

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16.	Section 5: Environmental Assessment/Impact Assessment Approach and Methods 5.2.1.4.2	The Project is proposed to be operated for an indeterminate period of time; therefore, future suspension, decommissioning and eventual abandonment is not considered within the EA/IA. Currently, no constructor or operator/owner of the WSR has been determined.	Currently, there is a lack of certainty regarding how decisions will be made between potential regulatory approval of the WSR and the complete construction, including how the Project will be funded, who will construct it, who will operate it, and who will own it. As a result, there is reasonable concern that the commencement of construction may be delayed significantly following approval, or construction may be suspended during the construction phase.  It is necessary to understand the factors which will ultimately dictate the construction of the WSR, including requirements for funding, selection of a constructor/owner/operator, and the sequencing of the WSR with other approvals or developments (e.g., Eagles Nest Mine, other Ring of Fire development, the NRL, and MFCAR). AFN acknowledges that the WSR is presented as a stand- alone project that does not specifically rely on the development of other projects such as the NRL or further Ring of Fire development; however, these projects are anticipated to have a strong influence on the social and economic case for the road	<b>Question:</b> AFN requests that the Proponent provide insight into the decision-making processes required for ultimately advancing construction of the road, including factors which may delay or prevent construction of the described Project.  See AFN Comment 12 and 13.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). As noted in our response to Comment # 11 Webequie First Nation is the sole proponent of the Webequie Supply Road Project for the purpose of the EA/IA. At this point in time we can not provide insight on the decision-making process as it has not been determined who will construct, maintain and operate the Webequie Supply Road and is subject to further discussion between Webequie First Nation and Ontario. Once the Proponent for the future development stages has been identified it is anticipated that First Nation's who have expressed an interest in the WSR will be updated on the next steps, if the EA/IA is approved.
17.	Section 7: Assessment of Effects on Surface Water Resources 7.0 General Comment, 7.2.2.2	There is poor precedent for measuring and understanding impacts to surface water at a regional scale. Cumulative impacts to surface water from the adjacent projects and the future projects that would be facilitated by the WSR are not well understood. For example, in Section 7.2.2.2, the Proponent states, "the greatest number of exceedances were observed in 2019, and	As stated above, Aroland is a strong supporter of the RA and regional planning initiatives aimed at considering and contemplating the interactive, synergistic, and antagonistic effects of the WSR, NRL, MFCAR, and development of the Ring of Fire. With the exception of the MFCAR, we do not support the advancement of these projects until the RA is complete and cumulative effects between projects can be fully characterized.	<b>Recommendation:</b> AFN does not agree that the cumulative effects assessment conducted within the scope of this EA/IS appropriately contemplates impacts to surface water quality and quantity in relation to other projects through the entire lifecycle of the Project (e.g., NRL, Ring of Fire development). As a result, we recommend two elements:  1) AFN requests that the EAR/IS not be finalized until it can meaningfully review and incorporate	1) As noted in response to Comment # 2, The Regional Assessment (RA) in the Ring of Fire Area (IAAC, 2023) is independent of the EA/IA for the WSR and other IAs in the region and is a separate federal assessment process. As required by the TISG and ToR Notice of Approval requirement (amendment #1.3) for the WSR Project, and the IA Act, relevant information from the regional assessment, if available, will be used to inform the Project effects assessment. This may, for example, include informing the baseline studies, effects prediction, cumulative effects assessment, mitigation and enhancement measures, and follow-up programs, as applicable. At this time there are no

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		<p>exceedances of field pH, aluminum, and iron occurred in all four sampling years. Given the low degree of development in the LSA and RSA, the exceedances were likely naturally occurring from sources such as natural sediment deposition from weathering of rocks and potential atmospheric sources from distant emissions but could originate from a distant upstream source.”</p> <p>Without having a clear understanding of the sources whether natural or anthropogenic, it will be nearly impossible to: a) separate water quality impacts from the WSR and thus, b) properly quantify and understand overlapping impacts at a regional scale.</p> <p>Healthy surface water means healthy rivers, lakes, and fish. Healthy water is essential for traditional food sources, medicines, and the physical and spiritual well-being of AFN's members.</p>	<p>In terms of understanding overlapping regional impacts to water quality, the RA should, at a minimum, examine and quantify the source, fate, and transport of all parameters that are triggering exceedances. For example, deposition from atmospheric sources from distant emissions.</p>	<p>recommendations and other outputs provided by the Ring of Fire RA as the relate to surface water quality and quantity; and</p> <p>2) AFN requests that in instances where the WSR is connected to another project (e.g., a developed Eagle's Nest Mine, or NRL), a future decision statement for the WSR be reviewed and amended as a material change. This approach will ensure that the cumulative effects to surface water quality and quantity from interacting projects are appropriately contemplated, enabling opportunity for contemporary re- evaluation and consultation.</p>	<p>deliverable outputs available from the Regional Assessment to consider.</p> <p>2) This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
18.	Section 8: Assessment of Effects on Groundwater Resources 8.0 General Comment	<p>There is poor precedent for measuring and understanding impacts to groundwater on a regional scale. Cumulative impacts to groundwater from the adjacent projects and the future projects that would be facilitated by the WSR are not well understood.</p> <p>Groundwater resources could change dramatically in the future due to climate change. Regional impacts to groundwater could be magnified in the future as a result.</p> <p>Healthy groundwater means healthy rivers, lakes, and fish.</p>	<p>As stated above, Aroland is a strong supporter of the RA and regional planning initiatives aimed at considering and contemplating the interactive, synergistic, and antagonistic effects of the WSR, NRL, MFCAR, and development of the Ring of Fire. With the exception of the MFCAR, we do not support the advancement of these projects until the RA is complete and cumulative effects between projects can be fully characterized.</p> <p>In terms of understanding overlapping regional impacts to groundwater quality, the RA should at a minimum examine</p>	<p><b>Recommendation:</b> AFN does not agree that the cumulative effects assessment conducted within the scope of this EAR/IS appropriately contemplates impacts to groundwater quality and quantity with other projects through the entire lifecycle of the project (e.g., NRL, Ring of Fire development), as a result, we recommend two elements:</p> <p>1) AFN requests that the EAR/IS not be finalized until it can meaningfully review and incorporate recommendations and other outputs provided by the Ring of Fire RA as the relate to groundwater quality and</p>	<p>1) The cumulative effects has considered effects to groundwater quality and quantity based on consideration of reasonable foreseeable development and activities in the study area. Refer to our responses to Comments # 2 and 17 regarding the federal RA for the Ring of Fire area.</p> <p>2) This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>

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		Healthy water is essential for traditional food sources, medicines, and the physical and spiritual well-being of AFN members.	and quantify the source, fate, and transport of all parameters that are triggering exceedances.	quantity; and 2) AFN requests that in any instance where the WSR is connected to another project (e.g., a developed Eagle's Nest Mine, or NRL), a future decision statement for the WSR be reviewed and amended as a material change. This approach will ensure that the cumulative effects to groundwater quality and quantity from interacting projects are appropriately contemplated, enabling opportunity for contemporary re-evaluation and consultation.	
19.	Section 10: Assessment of Effects on Fish and Fish Habitat 10.1.6 Identification of Project Interactions with Fish and Fish Habitat  Table 10-5: Project Interactions with Fish and Fish Habitat VCs and Potential Effects	The existing road network, including the Anaconda and Painter Lake forestry roads within AFN territory, allows AFN members to access traditional fishing and harvesting locations. The construction of new roads, which are likely to connect to the WSR as well as to the existing road network in AFN Territory, will require regular maintenance to support the anticipated volume of industrial and public traffic. Road maintenance activities, such as grading and resurfacing, increase the likelihood that sediment and other deleterious substances will enter fish-bearing waterways.	Table 10-5 outlines that the operation, maintenance, and repair of the WSR includes repairs/resurfacing of road granular surface and shoulders. The Table indicates that there is the potential for alteration, disruption and/or destruction/loss of in-stream aquatic habitat as well as riparian habitat, change in fish access to habitat (barriers to fish passage), change to water and/or sediment quality and quantity, injury/death of fish, and change in public access to fish/fish habitat (increased harvesting). With these potential negative effects being outlined for the WSR, there is a lack of mention of how these same impacts may result from down-road pressures to roads within AFN territory.	<b>Recommendation:</b> In addition to Table 10-5, include another table or section that identifies the potential effects of Project activities on down-road fish and fish habitat that will be at an elevated risk due to the increased traffic stemming directly from the WSR.	1. Item is considered addressed in the Final EAR/IS submission. Potential down-road effects of the Project activities during the operation phase related to increased traffic is noted. A footnote has been added to Table 10-5 to reflect this comment. It is understood that the Project could result in adverse effects to Aroland First Nation, including fish and fish habitat (and other) effects. This includes communities defined within the RSA, i.e., Aroland First Nation. A Community Readiness Working Group is recommended to be established, as described in the CRP in Appendix N of the EAR/IS, and will provide a framework for Aroland First Nation to participate in further planning of approaches to identify, mitigate and monitor effects of the Project.  The Proponent proposes to meet with Aroland First Nation to discuss further coordination of ongoing planning processes related to the all-season road projects and the Ring of Fire mineral development area, including identifying effects, mitigation and enhancement measures and monitoring.
20.	Section 10: Assessment of Effects on Fish and Fish Habitat Section 10.5.2.2.2	Fish and fish habitat are already considered to be impacted within AFN Territory. Fish are a critical sustenance resource for AFN members and fishing is an essential cultural practice for all generations. With increased access stemming from the Ring of Fire development, there is likely to also be an increase in fishing pressures within AFN territory,	AFN is generally concerned that increased industrial traffic and public access within their territory will result in increased fishing and thus pressure on fish populations and habitat quality. Section 10.5.2.2.2 outlines a prohibition on fishing from construction workers and access restrictions for the public while construction is ongoing within the Project area.	<b>Recommendation:</b> Coordinate with AFN members and other proponents of the road network to apply similar prohibitions that limit access to fishing while construction works are ongoing. Once the WSR is operational, it is recommended that the prohibition outlined in Section 10.5.2.2.2 be extended or at least applied to a degree that protects fish populations not only in the proximity of the WSR but along the road network that will	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The owner/operator proponent will meet with Aroland First Nation to discuss further coordination of ongoing planning processes related to the all-season road projects and the Ring of Fire mineral development area, including identifying effects, mitigation and enhancement measures and monitoring.

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		which will directly impact the rights and interests of AFN members.		experience increased traffic as a result of the WSR. Mitigation plans that are part of the operational phase of the WSR should also consider measures to help offset potential impacts to fish populations throughout the road network.	
21.	Section 11: Assessment of Effects on Vegetation and Wetlands General Comment	<p>The existing road network within AFN territory, including the Anaconda and Painter Lake forestry roads allows AFN members to access traditional plant harvesting locations. The anticipated increase in road traffic as a result of the WSR likely connecting through these roads is expected to result in impacts to the ability of AFN members to safely access these locations.</p> <p>Furthermore, the increased traffic has the potential to introduce dust and other deleterious substances, which may negatively impact the quality of the vegetation to be used as a food source or medicine.</p>	<p>Section 11 of the EAR/IS focuses on the immediate Project footprint and LSA. The RSA is only considered within a 30 - km radius from the WSR.</p> <p>AFN's access to traditional harvesting sites, as well as the quality of their country foods and medicinal plants, will be directly impacted by the activities that will result from the construction and operation of the WSR. Thus, these impacts should be considered within the EAR/IS as net effects of the Project.</p>	<p><b>Recommendation:</b> Consider introducing a zone of Influence in addition to the existing RA area, to encompass all areas that will experience net effects as a result of the WSR.</p> <p>AFN anticipates that the construction and operation of the WSR will result in both direct and indirect impacts to its territory, which should be included within Section 11 of the EAR/IS.</p>	<p>The RSA reflects the area where indirect and cumulative effects may occur, and such is considered adequate to capture the recommendation of a zone of influence. Mitigation measures relating to dust and other deleterious substances are included in the EAR/IS (e.g., an Air Quality and Dust Control Management Plan will be developed). Impacts related to areas outside of the RSA are outside of the scope of this EAR/IS and should be addressed by the Anaconda and Painter Lake Road Upgrade Class Environmental Assessment (currently being prepared by the Ontario Ministry of Transportation).</p>
22.	Section 12: Assessment of Effects on Wildlife and Wildlife Habitat 12.3.3.4 Injury or Death	<p>AFN members rely on certain wildlife species for traditional practices as well as for sustenance. Moose is a common species for AFN members to hunt, and therefore, there is concern regarding how the increased use of the road network will negatively impact moose populations in AFN territory and the surrounding area.</p>	<p>The EAR/IS has outlined several potential causes for death or injury to moose specifically, including collisions with vehicles during both the construction and operation phases of the WSR. The EAR/IS states that there is evidence to support the conclusion that there will be wildlife/vehicle collisions but does not propose mitigation measures to reduce this likelihood.</p>	<p><b>Question 1:</b></p> <ul style="list-style-type: none"> <li>a) Are there any mitigation measures that will be implemented to try to reduce the frequency of wildlife/vehicle collisions?</li> <li>b) Will the mitigation measures target certain species (i.e., large mammals vs small mammals) and will they be implemented only in certain locations?</li> <li>c) If mitigation measures are planned, will they only exist within the Project footprint/LSA or will they consider the extent of Project's influence (including AFN territory)?</li> </ul> <p><b>Question 2:</b> Does the EAR/IS consider the direct and indirect effects of changes to predator-prey dynamics resulting from the</p>	<p>1. Item is considered addressed in the Final EAR/IS submission. Mitigation measures relating to potential vehicle-wildlife collisions are addressed in Section 12.4.2.3 (Alteration in Wildlife Movement) and Section 12.4.2.4 (Wildlife Injury or Death). These include recommendations to enforce speed limits on the right-of-way and access roads and maintaining any wildlife corridors that were identified during construction using signs or other markers.</p> <p>These measures are aimed at mitigating impacts to multiple species or groups; however, additional species-specific mitigation measures are also included in the EAR/IS (e.g., Section 12.4.3, for moose specifically).</p> <p>Mitigation measures have been proposed for the Project Footprint and LSA. Impacts to areas outside of the RSA are outside of the scope of this EAR/IS.</p>

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				<p>extension of linear road features? Are there ways that these impacts can be mitigated or offset?</p> <p><b>Recommendation:</b> Collaborate with other proponents involved in construction and operation of the road network to develop adaptive and consistent mitigation measures to minimize impacts on wildlife and wildlife habitat throughout the extent of the road corridor.</p>	
23.	<p>Section 12: Assessment of Effects on Wildlife and Wildlife Habitat</p> <p>12.7 Predicted Net Effects</p> <p>Table 12-53</p>	<p>Wildlife and wildlife habitat cannot be adequately considered without factoring in the full extent of migration corridors, home ranges, and reliance on other species. To fully consider these elements, a large geographical context must be examined.</p> <p>The EA/IS focused on impacts to wildlife and wildlife habitat within relatively small spatial extents, which fails to consider the full picture of potential net effects.</p>	<p>Table 12-53 identifies that the geographic extent of moose habitat alteration or degradation due to sensory disturbance as a result of operations activities is expected to be within the LSA.</p> <p>This narrow and limited geographic extent does not consider other direct, indirect, and residual impacts to wildlife species from the WSR. Some wildlife species travel large distances and have large home ranges, which negates the efficacy of applying a LSA or project footprint lens to this sort of impact extrapolation.</p>	<p><b>Recommendation:</b> Considering that the road network will eventually connect the WSR to roads within AFN territory, causing a significant increase in traffic volume, it is recommended that the geographic extent of the potential impacts to moose (and other wildlife species) be considered in a broader geographic context.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). Potential effects to areas outside of the RSA are beyond the scope of this EAR/IS and would be addressed through other area specific EA processes (e.g., for the Northern Road Link, Marten Falls Community Access Road and Anaconda and Painters Lake Road study areas).</p>
24.	<p>Section 13: Assessment of Effects on Species at Risk</p> <p>General comment</p>	<p>AFN values the health of its fish, wildlife, and vegetation, and relies on various species for traditional and cultural purposes. Numerous species within these groups are designated to be at varying levels of risk provincially and federally. Considering the potential impacts of the WSR in combination with other stressors such as climate change, the habitat of species at risk are at further risk of</p>	<p>The EA/IS does not address any down-road net effects or threats to SAR outside of the project scope. In order to fully understand the impacts that SAR may be exposed to as a result of the WSR and associated increases in vehicle movement along the road network, WFN must work in collaboration with AFN to develop monitoring and mitigation programs that will inform construction and operation activities.</p>	<p><b>Recommendation:</b> In collaboration with AFN members, develop a monitoring program and mitigation strategy that consider any potential direct, indirect, or residual effects of Project construction and operation on SAR that have residences or habitat within proximity of the road network in AFN territory.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Monitoring programs developed for the Project will fall within the LSA and RSA for Species of Risk. Mitigation measures will include the development and implementation of restoration plans in cooperation with Indigenous communities and groups, Local Rights Holders, and other stakeholders, to the extent practicable.</p> <p>In Section 12.12 (Follow-up and Monitoring), the EAR/IS invites participation in the development and implementation of monitoring programs to assess the effectiveness of proposed mitigation measures.</p> <p>Where effects are considered unacceptable and/or based on concerns raised by Indigenous community members or other</p>

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		degradation. Therefore, it is crucial that special attention is given to developing robust programs to ensure that the WSR Project has as little impact on SAR as possible.			stakeholders, further mitigation options will be considered by the road operator in consultation with Indigenous communities and stakeholders.
25.	Section 19: Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights 19.3.2.3.2	Employment projections for the RSA.	Specific references and plans for employment and training opportunities for AFN has not been provided. Specific reference to how plans for employment and training opportunities for AFN will be integrated into a regional approach was not provided.	<b>Question:</b> What employment and training plans are in place for local populations to ensure consistency and efficiency across all the proposed roads? <b>Recommendation:</b> The Proponent commits to incorporating data and recommendations from the RA when it is complete.	1. Item will be addressed in the Final EAR/IS submission. Mitigation and Enhancement measures related to changes to education, training, and traditional learning programming and facility space can be found in Section 14.4.4 of the EAR/IS. As stated in Section 16.1.1.1.5, "[t]he Regional Assessment is independent of the EA/IA for the WSR and other IAs in the region and is a separate federal assessment process. As required by the TISG for the Project, and the IA Act, relevant information from the Regional Assessment, if available, will be used to inform the effects assessment for the Project.
26.	Appendix N: Community Readiness Plan 5 Community Readiness Working Group	Community Readiness Working Group (CRWG) representative list.	CRWG representatives list does not include representatives from communities in the RSA.	<b>Recommendation:</b> Given that employment opportunities for the RSA communities will be needed to fulfill the human resource need, it is requested that AFN have representation on the CRWG.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Governance structures for the Project have not yet been finalized. The proponent is committed to ongoing dialogue with Aroland First Nation to determine how additional representatives from the RSA can be included in the Community Readiness Working Group.
27.	Section 14: Assessment of Effects on Social Environment 14.3.7.3	VC for Community Well-being and Safety.	Prediction of no effect on community well-being and safety in the RSA during construction and operation as a result of the Project.	<b>Recommendation:</b> It is likely that AFN members will be employed during construction and operation phases, and given a change in income and the 14 days on and 7 days off schedule, it is likely that there will be effects, both positive and negative on AFN. These sections need to be reassessed and a more holistic approach to well-being considered.	1. Item will be addressed in the Final EAR/IS submission. The prediction of no effects on community well being in the RSA relates specifically to the pathway in-migration of temporary workers causing increased non-local population. This assessment does not include MFCAR and NRL all-season roads.
28.	Section 16: Assessment of Effects on Non-Traditional Land and Resource Use 16.3.2.2.2	The Proponent identifies the potential for mining claims to increase due to the increased access to the region provided by the Project but determines that this effect will likely be negligible and will not continue to monitor its effects.	AFN asserts that the Project has a high likelihood to facilitate an increase in mining claims and subsequent prospecting activity, with potential for significant impacts to AFN through increased volume of traffic and road users throughout the operations phase.	<b>Recommendation:</b> The Proponent must determine that this impact pathway has greater than negligible potential of occurrence and must carry it forward for further assessment and monitoring throughout the operational phase of the Project. Results from ongoing assessment and monitoring should be made available to all First Nations that are impacted by	1. Item will be addressed in the Final EAR/IS submission. Table 16-45 assesses the changes to location, number, type of commercial and industrial activities including mining activity as a result of the WSR Project. Table 16-45 illustrates that there will be no to negligible effects as a result of the Project to the RSA, therefore effects to Aroland First Nation and the RSA are noted to be not significant. Any increased volume of traffic and road users as a result of the NRL Project will be assessed as part of the NRL Project and cumulative effects.

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				potential cumulative “down-road” impacts to support their own ongoing monitoring efforts.	
29.	Section 16: Assessment of Effects on Non-Traditional Land and Resource Use 16.3.4.2.2	The Proponent identifies that the WSR’s likely connection to the provincial highway network through the proposed NRL and the MFCAR will likely increase annual daily traffic volume, including personal and commercial vehicles and heavier trucks carrying industrial supplies and equipment. This increase in traffic is identified as a potential pathway to increasing safety issues within the RSA and is an effect that the assessment will carry forward.	AFN agrees that the Project’s likely connection to the provincial highway network through the other proposed road projects identified by the Proponent may result in other users during the operations phase, including outsiders, unfamiliar third parties, exploration and mining companies, non-Indigenous people or people from the “south.” It is reasonable to assume that these prospective users would access the WSR through its connection to the provincial highway network, which would include passing through AFN’s Traditional Territory and directly through AFN’s reserve community. This increase in traffic would result in various impacts to AFN band members and to AFN’s Aboriginal and Treaty Rights, which include but are not limited to noise, dust, social and socio-economic changes, and safety considerations due to increased traffic (especially industrial) and the influx of non-Indigenous road users. AFN asserts that the cumulative down-road impacts that the Project will facilitate must be understood and mitigated.	<b>Recommendation:</b> In considering the potential impacts of increased traffic along the WEBSR, AFN requires that the Proponent also assess and monitor potential cumulative impacts “down road” along the potential corridor to the provincial highway network and include potentially impacted First Nations by sharing collected data and reports.	1. Item will be addressed in the Final EAR/IS submission. Cumulative effects of the Project, including connection to the provincial highway network through the proposed NRL and MFCAR projects, as described in Section 21.4.9 of the EAR/IS, including increased traffic in RSA communities. The CRP provided in Appendix N includes a Road Safety and Traffic Management Strategy (Section 7.1.4) which will be developed to mitigation adverse effects to communities due to increased traffic. Potential impacts to Aroland First Nation of increased traffic along WSR will also be assessed through the proposed NRL Project.
30.	Section 16: Assessment of Effects on Non-Traditional Land and Resource Use 16.4.1	The Proponent identifies federal and provincial mechanisms to potentially control and restrict public access to the roads and cites that members from WFN and MFFN have suggested implementing tolls or Indigenous ownership to better monitor and mitigate negative impacts on the community.	AFN asserts that they must be included in these discussions as decision-makers alongside WFN and MFFN because of their position along the proposed Ring of Fire road corridor that would connect the WSR to the NRL and MFCAR through AFN’s Traditional Territory and reserve community.	<b>Recommendation:</b> The Proponent revise section 16.4.1 to include AFN and any other First Nation that will be impacted by the proposed road corridor that is interested in participating in road governance.	1. Item will be addressed in the Final EAR/IS submission. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Governance structures for the Project have not yet been finalized. The proponent is committed to ongoing dialogue with Aroland First Nation to consider their input in the development of future governance and decision-making frameworks.

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31.	Appendix T – Stage 1 Archaeological Assessment Report – Section 2.3 and 3.0	The buffer for water as a feature of potential was set to 50 m.	The buffer for water as a feature is not in line with current best practices.	<b>Recommendation:</b> The potential model should be revised to increase the buffer attributed to modern waterways to a minimum of 150 m.	The Stage 1 Archaeological Assessment Report has been submitted to the MCM and cannot be revised unless requested by the proponent subcontractor (ASI) to pull the report from the MCM review queue. As per the S&Gs, lands beyond 50m from water do not retain potential unless other criteria such as well draining soils or features of interest are identified.
32.	Appendix T – Stage 1 Archaeological Assessment Report – Section 2.3, 2.4, and 3.0	The remainder of the LSA has been identified as exhibiting low archaeological potential on account of presumed disturbance or being located within vast wetlands and poorly drained permanently saturated soils.	The attribution of low potential for the balance of the LSA due to presumed condition of vast wetlands does not align with the background research and past land use.	<b>Recommendation:</b> The balance of the LSA that was considered to have low archaeological potential should be reevaluated.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Until a visual inspection is conducted to confirm ground conditions, no areas are cleared of archaeological potential. This was an exercise in archaeological modeling to comply with the S&Gs. Background research and land use features available at the time of writing informed the determination of potential. Please see the proposed mitigation measures described in the response to Comment #33 for the potential discovery of previously unidentified archaeological resources.

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33.	Appendix T – Stage 1 Archaeological Assessment Report – Section 2.1 and 3.0	According to S&G Section 1.3.4, Stage 2 survey may be reduced in these areas due to the logistics of accessing these remote locations and their inherent low potential for archaeological materials.	The use of an exemption that will eliminate any assessment without a visual survey could put unknown archaeological resources at risk of destruction.	<b>Recommendation:</b> That the use of the exemption from S&G 1.3.4 be reconsidered. Site visits and the Stage 2 assessment can be completed in phases, aligned with the construction of road segments, to improve access to previously remote areas.	<p>1. Item will be addressed in the Final EAR/IS submission. Once areas have existing transportation infrastructure, they are not considered remote and this standard would not apply in those locations.</p> <p>To address potential discovery of previously unidentified archaeological resources, Section 20 of the EAR/IS has been updated to include the following mitigation measures:</p> <p>“A Cultural Heritage Resources Management Plan will be developed to guide contractors in the event that a previously unidentified heritage or archaeological resources are suspected or encountered unexpectedly during construction. The plan will include the following provisions:</p> <ul style="list-style-type: none"> <li>▪ If previously unidentified archaeological resources are encountered unexpectedly during construction, the proponent or person discovering the archaeological resources shall cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the <i>Ontario Heritage Act</i>.</li> <li>▪ Any person discovering human remains shall cease all activities immediately and notify the police or coroner. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at <a href="mailto:archaeology@ontario.ca">archaeology@ontario.ca</a>) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>.”</li> </ul>
34.	Section 21: Cumulative Effects Assessment 21.3.3.1	<p>Spatial boundaries for the CEA were designed to include the largest extents for each VC (i.e., RSA) in order to determine whether other projects and physical activities were to be included in the CEA. The following spatial criteria were used for screening projects and activities:</p> <ul style="list-style-type: none"> <li>• A project or activity was included if it is within the RSA for the VC; and</li> <li>• A project or activity was excluded if it was outside the</li> </ul>	This approach does not align with the direction provided by Section 22 of the TISG, which prescribes projects to be considered which in our interpretation should be regardless of whether they are within the RSA for the VC. Examining cumulative effects through the geographic extent of effect for a VC is somewhat limited in scope when considering how cumulative effects impact communities. For instance, a project or activity may exist outside of the RSA for the WSR, however, the project or activity's effects from a geographic extent may have overlapping and	<b>Recommendation:</b> The Proponent must evaluate cumulative effects from the perspective of the receptor/VC, rather than the RSA for the VC as it relates to the WSR.	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period. The assessment of cumulative effects on Indigenous Peoples and the exercise of Aboriginal and Treaty rights and interests (ATRI) is still in progress (Section 19). This Section would assess impacts from the perspective of the First Nation as receptor/VC based on their traditional territories mapping. The method (Section 21.3) used includes the RSAs as the largest extent for the effect for each VC. An evaluation of cumulative effects will be undertaken once the severity of potential adverse effects on Indigenous Peoples and ATRI has been fully characterized (Section 19.6).</p> <p>Cumulative effects were considered in Section 21 (Table 21-86) which included increased traffic in First Nations and characterized as significant for community cohesion, safety</p>

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		RSA for the VC.	therefore cumulative effects on a community (e.g., effects from the WSR may impact southern portions of community X's territory, while effects from another project or activity may impact the northern portion of community X's territory. These effects may not geographically overlap, but community X is subject to the experience of additive (cumulative) effects.)		and traffic (Section 21.4.9.5). The CRP in Appendix N includes Section 7.1.4 Road Safety and Traffic Management Strategy. The CRP is a commitment and provides a process to include Aroland First Nation as a participant/member in the working group, which will work to identify, monitor and mitigate effects to communities due to increased traffic. The assessment of cumulative effects will also continue in the proposed NRL Project following requests to agency stakeholders to facilitate the effects download of these transportation studies to the provincial highway network. The proponent is committed to ongoing dialogue with Aroland to integrate the interests and concerns through these road studies.
35.	Section 21: Cumulative Effects Assessment 21.3.4; Table 21-2	The Proponent has outlined a range of past, existing, and RFDs to be considered within the scope of their CEA.	While the Proponent has considered many of the contemporary exploration stage projects associated with the Ring of Fire, it is unclear whether the Proponent has contemplated the entire extent of such projects or projects which are only held as claims at this stage but may reasonably become subject to early exploration at any time. AFN is concerned that if the full extent of projects which are subject to active or reasonably foreseeable future exploration permits is not considered within the scope of the CEA, potential effects may be grossly underestimated.	<b>Question:</b> Please confirm how claims and exploration projects holding active early exploration plans or permits were considered within the scope of the CEA. <b>Recommendation:</b> Include all lands/waters where a mineral claim is currently held within the regional area within the scope of the CEA as a reasonably foreseen exploration project.	The approach that was adopted for mining claims, lease and exploration projects was to conservatively assume that the entire mine claim was assumed to result in a future disturbance. This approach addresses the request that all lands in the lease area are included in the CEA. For waters, we have assumed that all watercourses and waterbodies within the footprint of the mine claims and leases associated with these proposed developments will be affected by changes in surface water quality, surface water quantity, fish access to habitats as well as changes in public access to fish habitats. This is assumed to be a conservative estimate as the development footprints are unavailable but will likely be considerably smaller than the total claims/leases presented in this assessment.
36.	Section 21: Cumulative Effects Assessment 21.4.4	The Proponent identifies only the following as RFDs that overlap and interact with the atmospheric environment RSA: <ul style="list-style-type: none"> <li>Black Horse Project and Big Daddy Project</li> <li>Eagle's Nest Project</li> <li>NRL Project</li> <li>Black Thor, Blackbird, and Black Label mining deposits</li> </ul>	The project list has not considered the reasonably foreseeable connection between the WSR and the Ontario Road network via the NRL/MFCAR/ Anaconda and Painter Lake Roads. As a result, they fail to consider impacts associated with increased traffic that may pass along this route en route to Webequie. AFN is specifically concerned that the additive effect of additional traffic is not captured and considered.	<b>Recommendation:</b> The Proponent should consider the additional contributions to the atmospheric environment (noise, air contaminants) associated with the possible connection of the WSR to the Ontario road network. Consideration should be given to the impacts throughout the corridor connecting Webequie and Ontario Highway 643.	The NRL/MFCAR/Anaconda and Painter Lake connection road linking the WSR to the Ontario road network is not considered a RFD with regard to cumulative effects on Atmospheric Environment since the traffic on the WSR coming from the connection road and mines (when and if in operation) is already covered as a direct impact component in the EAR/IS with regard to the Atmosphere VC (Air Quality Impact Assessment; Appendix G). The Air Quality Impact Study did look at the potential impact of air emissions (exhaust and road dust) on dust deposits and ambient concentrations along the WSR from the passage of vehicles. To do so, a maximum of 500 vehicles per day, which implies that the north-south connection road will be accessible during that period, was

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					<p>applied in calculating the impacts on the Atmospheric Environment.</p> <p>Otherwise, the passage of vehicles several kilometers south of the WSR will not generate noticeable cumulative impact with emissions generated along the WSR. For the vehicles generating emissions on the NRL while approaching the WSR/NRL intersection, it should be considered as the same vehicles causing an impact on the WSR, which therefore cannot be thought as cumulative.</p>
37.	Section 21: Cumulative Effects Assessment 21.4.7.1.2	<p>The Proponent identifies the three most important net effects on moose and moose habitat to be:</p> <ul style="list-style-type: none"> <li>Habitat Loss – Clearance Activities (during the Construction Phase);</li> <li>Injury or Death – Increased Access (during the Operations Phase); and</li> <li>Injury or Death – Changes to Predator- Prey Dynamics (during the Operations Phase).</li> </ul>	<p>The Proponent does not consider other important sources of effects on moose, including those associated with:</p> <ul style="list-style-type: none"> <li>Disturbance caused by noise, vibration, light, or the presence of human activity;</li> <li>Vehicle interactions; and</li> <li>Fragmentation of habitat and/or increase in migration barriers.</li> </ul> <p>As per section 22 of the TISG: A cumulative effect on an environmental, health, social, or economic component may be important even if the Project's effects to this component by themselves are minor.</p>	<p><b>Recommendation:</b> It is essential that the Proponent include all reasonable sources of net effects or otherwise justify why they are not likely a source of effect when considered as a cumulative effect.</p>	<p>1. Item is considered addressed in the Final EAR/IS submission. For the wildlife and wildlife habitat assessment, the net effects in Section 12.9 that are characterized as having a likelihood of occurrence of “probable” or “certain” and a “moderate” to high magnitude” have been carried forward to the cumulative effects assessment. It is our opinion that net effects with this characterization are most likely to interact with other Reasonably Foreseeable Development and activities as identified in Section 21 – Cumulative Effects.</p> <p>Sources of effects such as noise disturbance, vehicle interactions/collisions, habitat fragmentation and other potential Project-wildlife interactions are addressed in 12.8.1 (Moose). Justifications for why some net effects/interactions are excluded (12.8.1) or carried forward to the Cumulative Effects Section 21 is summarized in Section 12.9.</p>
38.	Section 21: Cumulative Effects Assessment 21.4.7.1.4	<p>Based on the Proponent's characterization of cumulative net effects for habitat loss due to clearance activities suggested that at a regional scale, the magnitude is low as suitable habitats are common in the RSA, but the area of effect comprises 512,409.8 ha.</p>	<p>AFN is shocked by this statement. 512,409.8 ha is nearly the size of Prince Edward Island. While the Proponent's statement is correct in that similar habitat is common throughout the RSA, and broader region, it is also misleading in terms of the relationship between moose habitat and populations, and moose as a critical resource and species of cultural significance for AFN.</p>	<p><b>Recommendation:</b></p> <ol style="list-style-type: none"> <li>It is requested that the Proponent consider cumulative effects set against the observed declining trend in population in Northern Ontario</li> <li>It is requested that the Proponent justify the approach to utilize only treed land cover as potential moose habitat in quantifying potential loss.</li> <li>It is requested that the Proponent consider cumulative effects on moose and moose habitat on the basis of how they are managed in Ontario, and how First Nations including AFN harvest moose. This</li> </ol>	<p>1. Item is considered addressed in the Final EAR/IS submission. For the wildlife and wildlife habitat assessment, the net effects in Section 12.9 that are characterized as having a likelihood of occurrence of “probable” or “certain” and a “moderate” to high magnitude” have been carried forward to the cumulative effects assessment. It is our opinion that net effects with this characterization are most likely to interact with other Reasonably Foreseeable Development and activities as identified in Section 21 – Cumulative Effects.</p> <p>Based on the above approach, the predicted net effects of the Project on the moose and moose habitat that were carried forward for the assessment of cumulative effects within the include: Habitat Loss – Clearance Activities; Injury or Death – Increased Access; and Injury or Death – Changes to Predator-Prey Dynamics. The Project Team has considered the</p>

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			<ol style="list-style-type: none"> <li>1) Moose populations have been observed to be in general decline in northern Ontario since the 1990s, and cumulative effects of the WSR and Ring of Fire will only further contribute to this decline (MNR, 2015).</li> <li>2) Due to a lack of data on moose habitat in northern Ontario, the Proponent “conservatively assumed that all treed habitats based on Far North Land Cover (FNLC) were suitable moose habitat”. Moose rely on a range of habitat including those which are aquatic or semi-aquatic which may be classified differently than treed habitat in the FNLC, therefore it is not clear how “conservative” the Proponent’s estimates are.</li> <li>3) In Ontario, moose are managed based on Wildlife Management Units (WMU). The WSR and projects contemplated within the CEA fall within WMU 01D, 17, and 18A. These WMUs represent a combined area of 16,079,006 ha, as a result the area of impact represents approximately 3.2% of the total area of the three WMUs. However, that does not consider lakes, rivers, or other land areas that exclude the presence of moose. The cumulative effect of habitat loss should be viewed through the lens of how moose are managed, as such a substantial total loss of habitat may significantly alter hunting quotas and population sustainability.</li> </ol>	<p>should include consideration of impacts to population sustainability, quotas, and overall density in WMU 01D, 17, and 18A.</p>	<p>recommendations in finalizing cumulative effects for wildlife, and overall our conclusion remain unchanged. We note that a predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself. Based on the results and using the characterization criteria the net cumulative effects on the Moose VC is considered not significant.</p>

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39.	Section 21: Cumulative Effects Assessment 21.4.7.7.2	The Proponent only identifies "Injury of Death – Increased Access" as the predicted net effects of the Project on the Waterfowl VC	AFN is concerned that the Proponent has not quantified or assessed the amount of habitat that will be lost due to cumulative effects from construction of the WSR and other Ring of Fire projects.	<b>Recommendation:</b> Please justify that the WSR does not meaningfully contribute to the cumulative effect to waterfowl habitat, including the establishment of any barriers or deterrent that may modify flight paths of key species of importance (Canada goose, mallard, snow goose).	1. Item is considered addressed in the Final EAR/IS submission. For the wildlife and wildlife habitat assessment, the net effects in Section 12.9 that are characterized as having a likelihood of occurrence of "probable" or "certain" and a "moderate" to high magnitude" have been carried forward to the cumulative effects assessment. Project-wildlife interactions, including potential effects from Increased Access to waterfowl are addressed in 12.8.8. The rationale for why this topic was excluded from the Cumulative Effects Section 21 are also addressed in Section 12.8.8.
40.	Section 21: Cumulative Effects Assessment 21.4.9.2	The Proponent outlines a series of Reasonably Foreseeable Developments or Activities that overlap and interact with the Social Environment in Table 21- 84. Notably, the Proponent suggests that the Construction of upgrades to the Anaconda and Painter Lake Forestry Access Roads does not have Spatial Overlap of Net Effects; however, the MFCAR and NRL, which connect to the Ontario road network via the Anaconda and Painter Lake roads, do.	AFN firmly is of the view that as AFN is the gateway to the Ring of Fire via the Anaconda and Painter Lake forestry access roads, AFN is perhaps among the communities most impacted by the cumulative effects of Ring of Fire development. It is unclear why the Proponent has determined there is spatial overlap of net effects with NRL and MFCAR, but not the Anaconda and Painter Lake roads, as they are all co-dependent, and from a social perspective all act as a single road facilitating opportunities and benefits to and from the Ring of Fire.	<b>Recommendation:</b> AFN requests that the Anaconda and Painter Lake forestry access roads be reassessed within the scope of cumulative effects considering the collective social impact of the NRL, MFCAR, and Anaconda and Painter Lake roads as a single interdependent source of social impact.	1. Item will be addressed in the Final EAR/IS submission. Comment is acknowledged. NRL and MFCAR projects are included in the cumulative effects assessment of the Project on the Social Environment. Through this analysis, the connection of WSR to the provincial highway network is assumed.
41.	Section 21: Cumulative Effects Assessment 21.4.9.2	The Proponent states: "The MFCAR and NRL projects, and mining and related activities in the Ring of Fire development area in the future will drive change through increasing connectivity of the communities of Webequie First Nation and Marten Falls First Nation with the provincial highway network, changing access to traditional territories, and creating new economic opportunities for community members. While the Project aims to generate positive economic outcomes, it is crucial to consider the potential adverse social shifts that may arise,	AFN agrees with this statement and that Ring of Fire and the collective roads projects will have significant benefits and impacts to Marten Falls First Nation and WFN, however, it is simply incorrect to exclude AFN from the list of potentially impacted communities from Ring of Fire and roads projects.  AFN sits at the northern terminus of the Ontario road network. If the MFCAR and NRL are developed to connect the Ontario road network to the Ring of Fire the vast majority of road traffic headed both to and from the Ring of Fire will pass through AFN. Because of this, AFN will experience significant social impacts associated with the movement of traffic,	<b>Recommendation:</b> The Proponent must recognize that social impacts associated with Ring of Fire and roads projects will be experienced at least through the corridor connecting Ring of Fire to the Ontario road network. As a result, a full and complete analysis of the contribution to cumulative effects of the WSR must include the entirety of the overland transportation route between the Ring of Fire and possible receiving locations (e.g., Ferrochrome facility in Sault Ste. Marie, Sudbury Smelter, other reasonably foreseeable end points for ore or mine concentrate).	1. Item will be addressed in the Final EAR/IS submission. It is understood that the Project could result in adverse effects to Aroland First Nation, including social (and other) effects. As described in Section 21, "[t]he combined cumulative net effects to the Social Environment with consideration of other RFDs and activities are predicted to have further significant adverse effects on community cohesion, community safety, and traffic safety". This includes communities defined within the RSA, i.e., Aroland First Nation. The Community Readiness Working Group, recommended to be established, as described in the CRP in Appendix N of the EAR/IS, will provide a framework for Aroland First Nation to participate in further planning of approaches to identify, mitigate and monitor effects of the Project.  The proponent proposes to meet with Aroland First Nation to discuss further coordination of ongoing planning processes related to the all-season road projects and the Ring of Fire

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		particularly for the Webequie First Nation community”	goods, and people. These impacts are likely to be experienced differently than those experienced by MFFN or WFN, but they cannot be discounted.  Exclusion of the Anaconda and Painter Lake roads from the CEA ignores reasonable concerns regarding impacts to the social environment of AFN and prevents analysis to consider the additive or interactive effects of the WSR on AFN.		mineral development area, including identifying effects, mitigation and enhancement measures and monitoring.
42.	Section 21: Cumulative Effects Assessment 21.4.9.3	The Proponent points to the Community Readiness Plan (CRP) as the key framework for developing and implementing programming to address potential adverse cumulative effects related to social issues.	The CRP as outlined in Appendix N primarily focuses on the values and issues which face WSR. AFN recognizes that when viewed in isolation, WFN is the community principally affected by the WSR. However, from a cumulative effects basis, focus on the issues facing WFN alone is not appropriate as it misses the complex interconnection between the various Ring of Fire projects which all contribute interactive effects impacting social issues not just locally, but regionally.	<b>Recommendation:</b> While it may be appropriate to have a CRP which focuses on social issues facing WFN for the purpose of the roadway development, it is necessary that this plan and any mitigation measures described in it be able to effectively interface with similar plans and programs aimed at curbing or minimizing effects with other aspects of the Ring of Fire and roads development. This includes ensuring communication, participation, and oversight of the plan by all parties impacted including AFN.  It is recommended that WFN, MFFN, and AFN at a minimum develop mechanisms to ensure that programming aimed at minimizing cumulative effects on the social be a) proactive and adaptive, b) complementary, and c) reflect the rights, interest, and values of each affected community.	1. Item will be addressed in the Final EAR/IS submission. Comment is acknowledged. As indicated in response to Comment #26, the proponent is committed to ongoing dialogue with Aroland First Nation to determine how additional representatives from the RSA can be included in the Community Readiness Working Group. As noted in response to comment, the proponent proposes to meet with Aroland First Nation to further coordinate ongoing planning processes for the all-season road projects that will affect the community.
43.	Section 21: Cumulative Effects Assessment 21.4.9/21.4.11	The Proponent has focused on three VCs to evaluate cumulative effects of the social environment: <ul style="list-style-type: none"> <li>Community Cohesion;</li> <li>Community Safety; and</li> <li>Traffic Safety.</li> </ul> The Proponent has identified a series of determinants of health: <ul style="list-style-type: none"> <li>Racism and Social Exclusion;</li> </ul>	The Proponent’s assessment of cumulative effects fails to give meaningful consideration to the additive effects of the WSR on a wide number of social and wellness effects related to the change in traffic flows through entirety of the Ring of Fire roads system. These include but are not limited to: <ul style="list-style-type: none"> <li>Change in air quality, noise, vibration, and other aspects of</li> </ul>	<b>Recommendation:</b> The cumulative effects of this project amongst the broader background of the Ring of Fire and Ring of Fire roads are complex and interconnected. In assessing the contribution to cumulative effects, AFN is looking for a significantly more substantial assessment of how the WSR will contribute to changes in the social environment as a result of the Ring of Fire	1. Item will be addressed in the Final EAR/IS submission. As noted in responses to Comment #26 and Comment #41, the proponent proposes to meet with Aroland First Nation to further coordinate ongoing planning processes for the all-season road projects that will affect the community. It is acknowledged that the cumulative effects assessment focuses on “[t]he net VC adverse effects from the Project are characterized as having a magnitude of higher than low within the geographical extent of the VC Regional Study Area (RSA) and likelihood of occurrence of probable or certain” and under

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		<ul style="list-style-type: none"> <li>• Worker Accommodations;</li> <li>• Food Security;</li> <li>• Safety of women and girls (direct and indirect); and</li> <li>• Substance use (direct and indirect).</li> </ul>	<p>traffic- related disturbance on the quality of life;</p> <ul style="list-style-type: none"> <li>• Change in social- spiritual connection with the land;</li> <li>• Change in aesthetic quality and experience;</li> <li>• Change in mental health and behaviour; and</li> <li>• Change in property value.</li> </ul>	<p>and roads network. This should include not only look at the relative addition of the WSR to other projects in the region but also work to understand how those effects will be felt by communities and persons affected.</p> <p>Notably, as shown in Table 21-85, many of the most substantial projects are yet to be developed; as a result, the social baseline is absent of many effects that would be observed in a region which has already experienced substantial development. As a result, each RFD and activity should be examined based on their collective effects and impacts on communities.</p>	<p>this criteria, Community Cohesion; Community Safety; and Traffic Safety were advanced for cumulative effects assessment.</p>
44.	Section 21: Cumulative Effects Assessment 21.4.11	<p>The Proponent has identified a series of determinants of health:</p> <ul style="list-style-type: none"> <li>• Racism and Social Exclusion;</li> <li>• Worker Accommodation;</li> <li>• Food Security;</li> <li>• Safety of women and girls (direct and indirect); and</li> <li>• Substance use (direct and indirect).</li> </ul>	<p>Several important determinants of health are screened out, including:</p> <ol style="list-style-type: none"> <li>1) Colonization and trauma from residential Schools: It is difficult if not impossible to separate colonization and trauma from development in Canada. Although at the time of drafting this document, neither Canada nor Ontario have exercised project exemption powers under Bill C-5/Bill 5, both Canada and Ontario have mused about using these powers to advance Ring of Fire activities publicly. Significant trauma and harm (physically, spiritually, and emotionally) has impacted way of life for many First Nations as a result of colonial rule and decision- making. In contemplating cumulative effects of the Ring of Fire projects, as well as the many other projects outlined in Table 21-2, the Proponent cannot overlook the contributions to cumulative trauma and harm the WSR may pose.</li> <li>2) Safety of LGBTQ2+ and other vulnerable populations: The</li> </ol>	<p><b>Recommendation:</b> It is critical that the Proponent view cumulative effects to human health and wellness through a robust lens. This must consider the cumulative and interactive effects of the Ring of Fire development and roads set against the local, regional, and national context of development as it impacts Indigenous, vulnerable, and other historically marginalized groups.</p>	<p>The cumulative effects assessment focuses on "[t]he net VC adverse effects from the Project are characterized as having a magnitude of higher than low within the geographical extent of the VC Regional Study Area (RSA) and likelihood of occurrence of probable or certain" and under this criteria, Colonization and Trauma from Residential Schools was not carried forward for cumulative effects assessment. Cumulative effects on safety of LGBTQ2+ communities are assessed under the "Worker Accommodations" determinant of health. Section 8.4.2 (Worker Accommodations) and Section 8.4.4 (Safety of Women and Girls) in the Health Impact Assessment Report (Appendix Q of the EAR/IS) include detailed discussions of potential cumulative effects on safety of LGBTQ2+ communities.</p>

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			Proponent has identified safety to women and girls as a determinant of health but has ignored other vulnerable groups including members of LGBTQ2+ communities who may be at elevated risk of impact associated with safety.		
45.	Section 21: Cumulative Effects Assessment 21.4.11	For several identified determinants of health, the Proponent recommends that WFN, MFFN, and AFN work together to develop programming aimed build and maintain strong inter- community relationships, and work within their	AFN agrees and supports this as a starting position to develop meaningful mitigation programming. It is necessary for efforts to minimize environmental, social, and wellness cumulative effects from the Ring of Fire in a manner that proactively identifies potential effects and risks and implements measures to prevent harm. Multi-community programming must work to anticipate issues and prevent harm before it occurs.	<b>Recommendation:</b> It is necessary for efforts to minimize environmental, social, and wellness cumulative effects from the Ring of Fire in a manner that proactively identifies potential effects and risks and implements measures to prevent harm. Multi- community programming must work to anticipate issues and prevent harm before it occurs. It must also be reactive and positioned with tools for communities to respond to emerging or unforeseen issues, monitoring indicators of wellness and adapting as needed. Finally, while collaboration is essential, programming must be tailored to meet the needs of all affected communities to address issues and effects which may be unique in terms of how impacts are felt.  AFN looks forward to continuing to build a strong partnership with WFN, MFFN, and other affected communities to ensure that if development of the Ring of Fire is to occur in the future, it is done so in a manner that respects the rights, values, and needs of each community.	1. Item will be addressed in the Final EAR/IS submission. Comment is acknowledged. See responses to Comment #26 and Comment #41.
46.	Section 21: Cumulative Effects Assessment General	The Proponent has not considered change to traditional land use within the cumulative effects assessment.	AFN notes the importance of not only assessing environmental measures to facilitate traditional land use, but also to measure and assess traditional land use itself.	<b>Recommendation:</b> The Proponent must provide appropriate CEA on traditional land use.	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period. Cumulative effects to Traditional land use are covered in section 21.4.12 (Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights). The assessment of cumulative effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights is still yet to be determined. An evaluation of cumulative effects will be undertaken once the severity of potential adverse effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty rights has been completed. Input from Aroland

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					First Nation and other Indigenous Communities is welcome and will be used for this assessment if provided.
47.	Section 22: Follow up and Monitoring 22.7 Table 22-1	Monitoring programs for the Social Environment VC focus only on the construction phase, with a final evaluation to occur when construction of the road is complete.	AFN anticipates that social and socio-economic impacts will flow down the WSR and through the other proposed all-season road projects during the operational phase of the Project, if the proposed roads are constructed, connecting the WEBSR to AFN's territory and reserve community. AFN asserts that monitoring these impacts during the operational phase of the Project will be crucial to understanding and being able to mitigate impacts to AFN's Aboriginal and Treaty Rights.	<b>Recommendation:</b> If the road is connected to the provincial highway system via the NRL and MFCAR projects, the Proponent should extend the monitoring plan, including the grievance mechanism throughout the operational phase of the Project, to better understand the potential social and socio-economic impacts that may arise from the road after construction is complete, due to increased traffic and new road users coming to the area.	1. Item will be addressed in the Final EAR/IS submission. Table 22-1 makes reference to the Community Readiness Plan (Appendix N) of the EAR/IS. Appendix N (Section 8) describes Monitoring and Adaptive Management which covers both the construction and operations phases of the Project.
48.	Section 22: Follow up and Monitoring 22.7 Table 22-1	The Proponent proposes to establish a Technical Working Group to oversee transportation mitigation activities throughout the construction phase of the Project.	AFN asserts that a Technical Working Group that oversees transportation mitigation activities during the operational phase of the Project would be an important tool for monitoring and addressing potential impacts along the WSR and other proposed all-season road projects in the Ring of Fire.	<b>Recommendation:</b> The Proponent should work with WFN, MFFN, AFN, and other impacted and interested First Nations to establish a Technical Working Group, or sub-group as part of a Joint Roads Governance Board to address ongoing issues that arise from transportation changes and to oversee transportation mitigation activities, which could include addressing road access restrictions and governance.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The proponent is committed to work with MFFN, AFN, and other impacted and interested First Nations to establish a Technical Working Group, or sub-group as part of a Joint Roads Governance Board to address ongoing issues that arise from transportation changes and to oversee transportation mitigation activities, which could include addressing road access restrictions and governance.
49.	Section 25: Project Effects on Canada's Ability to Meet its Environmental Obligations and Its Climate Change Commitments Table 25-1: Summary of Effects and Assessment of Obligations and Commitments	The Proponent's discussion of the potential of the WSR to accelerate mining development in the region, and assessment of effects in this context is limited only to discussing Canada's climate change commitments and is not applied consistently across federal obligations or the associated characterizations of net effects.	AFN remains concerned that potential effects related to accelerated mineral development in the region are not included consistently in the analysis of how the Project may impact Canada's ability to meet its environmental obligations and commitments. While the analysis acknowledges that the carbon footprint of the Project depends on future mining operations, this also remains true for the other potential effects identified in Table 25-1.	<b>Recommendation:</b> AFN requests that the EAR/IS not be finalized until the recommendations and other outputs provided through the ongoing Ring of Fire RA can be adequately reviewed and included with respect to all federal obligations and characterized net effects.	The federal impact assessment process timelines are legislated in the <i>Impact Assessment Act</i> and the <i>Information Management and Time Limit Regulations</i> , and are independent from the timeline of the regional assessment. Relevant studies that are completed for the regional assessment can be considered in project-level assessments only if they are completed in time to inform the relevant project assessment.

Comment #	Page/Section # in Draft EAR/IS	Context	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
50.	Section 25: Project Effects on Canada's Ability to Meet its Environmental Obligations and Its Climate Change Commitments Table 25-1: Summary of Effects and Assessment of Obligations and Commitments	The Proponent acknowledges that the Project will contribute to provincial and national GHG emissions. However, these emissions are considered trivial, insignificant, or low in magnitude and therefore are not expected to hinder Canada's obligations under the <i>Canadian Net-Zero Emissions Accountability Act</i> .	AFN remains concerned about potential GHG emissions from the Project, and loss of natural carbon sinks as a result of the disturbance or development of muskeg and other important areas. Given that there will be GHG emissions as a result of the Project, AFN would like to understand what magnitude of emissions the Proponent would consider significant to better understand this logic.	<b>Question:</b> What magnitude or level of emissions would the Proponent consider significant, or a hindrance to Canada's net-zero emissions commitments?	Based on guidance by Environment and Climate Change Canada's <i>Strategic Assessment for Climate Change (2020)</i> and Canadian Environmental Assessment Agency's <i>Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners (2003)</i> , and professional judgment, the Project Team considers moderate magnitude of GHG emissions where notable changes are expected compared to provincial and national GHG emissions in 2022 (>0.1% but <1% of the provincial emission levels, or <0.1% of the national emission level) as a hindrance to Canada's net-zero emissions commitments.  As described in Section 9 of the EAR/IS, the estimated GHG emissions by the project activities are of low magnitude (<0.1% of the provincial emission levels, or <0.01% of the national emission level in 2022).
51.	Section 26: Project Contributions to Sustainability 26.5	The Proponent notes that "from the perspective of Webequie First Nation, the WSR could be constructed and operated as a facility that only provides a connection between Webequie First Nation and the McFaulds Lake area to serve mineral exploration and future mining development activities, with no connection to the provincial highway system. However, with implementation of the Project and should future mining and other road projects (i.e. Northern Road Link and Marten Falls Community Access Road) proceed to the McFaulds Lake area, Webequie First Nation would gain year-round access to the provincial highway system."	AFN remains concerned that the potential for this Project to facilitate year-round access to the Ontario highway system via the NRL and MFCAR is not adequately included in assessing the Project's contributions to sustainability. AFN recognizes that should this scenario occur, it would have significant implications for the sustainability of the Project as characterized in this assessment, which primarily focuses on the road as providing a connection between Webequie and the McFaulds Lake area.	<b>Recommendation:</b> AFN recommends that the sustainability of the Project be explored under a range of scenarios including the potential for future mining and other road projects proceeding to the McFaulds Lake area. To do so, AFN requests that the EAR/IS not be finalized until the recommendations and other outputs provided through the ongoing Ring of Fire Regional Assessment can be adequately reviewed.	Please see the response to Comment #49.

# Attawapiskat First Nation





January 12, 2026

**Response to Attawapiskat First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Chief Koostachin-Metatawabin,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project. Please find enclosed the table that provides responses to the comments provided in your letter dated October 6, 2025.

As we move forward in the process to submit the Final EAR/IS, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to discuss the findings presented in the Draft EAR/IS in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the WSR Project.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Fox', written over a horizontal line.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment, Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Attawapiskat First Nation (ATFN)

The following categorization of the proponent responses may appear in the comment response table for clarity.

### Proponent Response Legend

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
1.		<p><b>Your regulatory process for approving the WSR project does not meet the Crown's Treaty obligations, nor the duty to consult and accommodate Attawapiskat First Nation. The process we are engaged in here is a one-sided, Crown regulatory process that is at odds with the Treaty relationship.</b></p> <p>Please refer to points 1, 2, and 3 of our June 11, 2025 letter on the Marten Falls Community Access Road draft IS, attached here.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
2.		<p><b>The cumulative effects analysis must include induced developments that are reasonably foreseeable. A cumulative effects analysis of this frontier-opening road project cannot be deferred to the Regional Assessment in the Ring of Fire.</b></p> <p>In nearly every section of the draft IS, we are told by the proponent that we might be able to participate in an Environment Committee to "facilitate communication and engagement during construction and operations of the Project; facilitate use of Indigenous Knowledge in project activities; facilitate evaluation of land use information; and facilitate development of appropriate monitoring programs, protocols and management plans as it relates to [the] VC [Valued Component]."</p> <p>Our concerns about cumulative effects will not be addressed through a post-construction "Environment Committee." As we have repeatedly told Ontario and Canada, Attawapiskat First Nation requires a properly scoped cumulative effects analysis, so that we can determine the impacts to our rights.</p> <p>The WSR is one segment of an industrial access road to the Ring of Fire. If built, it will connect to the provincial highway network via the Northern Road Link (NRL), for which Webequie First Nation is also a proponent. Contrary to what the proponent claims in various parts of the draft IS,<sup>1</sup> the WSR would not work as a stand-alone road. Without a connection to the south the deposits in the Ring of Fire cannot be developed, and Chief Wabasse's stated purpose for this road - "an economic development road that would connect Webequie First Nation to existing and future mineral development in the Ring of Fire area"<sup>2</sup> will not be possible to realize. If the mining frontier is pushed into our territory via an access road to the south, we will inevitably experience multiple waves of development with severe impacts to our rights. These impacts must be considered as part of the cumulative effects analysis of this frontier-</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). We acknowledge AFN's comments regarding communication and engagement and cumulative effects. We respectfully note that neither the federal Impact Assessment Act nor the provincial Environmental Assessment Act contain a clause requiring a proponent to conduct a Regional Level Cumulative Effects Assessment. This matter can only be addressed at the governmental level between Attawapiskat First Nation and Ontario and Canada, as the proponent has no authority or standing regarding this matter.</p> <p>If and when any of the potential developments within the Ring of Fire proceed to either the provincial or federal impact assessment review processes, Attawapiskat First Nation will have the opportunity to review and assess the potential cumulative effects on a case by case basis.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<p>opening road.</p> <p>Please refer to point 5 of our June 11, 2025 letter on the Marten Falls Community Access Road draft IS, attached here.</p>	
3.		<p><b>The proponent's cumulative effects methodology does not follow the guidance provided in the Tailored Impact Statement Guidelines (TISG), nor does it meet the expectations of Attawapiskat First Nations for a properly scoped cumulative effects analysis done in collaboration with affected First Nations.</b></p> <p>The proponent has chosen to include in the cumulative effects analysis only projects that overlap spatially or temporally with the residual impacts of the road, seen in isolation. The proponent refers to the included projects as "known past, present and RFDs [reasonably foreseeable developments] and future activities that could overlap spatially and temporally with the net environmental, health, social or economic effects of the Project" (Section 21, p. 11). The key phrase here is "net effects," meaning that the proponent considers only projects that overlap with the effects of the road if it were a stand-alone project.</p> <p>This is an impossible, illogical abstraction. It results in a narrow cumulative effects analysis that does not match the approach laid out in the TISG for this impact assessment, nor our expectations for a rigorous and meaningful cumulative effects analysis.</p> <p>The TISG issued by Canada advise that "the cumulative effects spatial boundaries will generally be larger than the boundaries for the Project effects alone."<sup>3</sup> We agree with this guidance because it builds on the fact that "a cumulative effect on an environmental, health, social or economic component may be important even if the Project's effects to this component by themselves are minor."<sup>4</sup> It is therefore not defensible for the proponent to exclude projects from the cumulative effects analysis simply because they judge the impacts of the WSR itself to be minor.</p> <p>In general, the proponent's cumulative effect analyses for the valued components has relied on simplistic qualitative summations of individual cumulative effects, expressed as ratings, rather than considering the ecological <u>pathways</u> by which effects to fish, wildlife, land and water, can be described at various spatial scales. <u>There is therefore a major gap between the conservation science that should inform a cumulative effects analysis and the check-box approach the proponent chose to take.</u></p> <p>The cumulative effects analysis in its current state does not allow us to understand the impacts of the proposed WSR to our inherent and Treaty rights.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). For clarification, the CEA methodology is based on the perspective of the receptor/VC, rather than the RSA for the VC as it relates to the WSR. To be included in the CEA there must be an overlap between the residual effects resulting from the WSR (in the RSA) and the residual effects resulting from the past, present and reasonably foreseeable developments (RFDs) or physical activities. The residual effects resulting from the past, present and RFDs or physical activities would occur within their projects' respective RSAs that often extend to spatial boundaries that are generally larger than the boundaries for the Project effects alone. By definition, an overlap would not be anticipated beyond the WSR RSAs, because that is the largest spatial extent of the Project's residual effects.</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period. As described in Section 21.4.12 of the draft EAR/IS, an evaluation of cumulative effects will be undertaken once the severity of potential adverse effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights has been completed. The methodology for assessing severity of impact is described in Section 19.6, with specific criteria provided in Tables 19-17 and 19-18. In keeping with the IAAC Guidance, the Project Team is committed to conducting the cumulative effects assessment collaboratively and iteratively with Indigenous communities and groups, where appropriate and feasible.</p>
4.		<p><b>The effects and cumulative effects analyses for caribou greatly underestimate the impact of the proposed WSR.</b></p> <p>We refer the proponent to our letter of July 28, 2025 on the Marten Falls Community Access Road draft IS, attached here. Please see point 3, in particular the following sections, which apply also to the WSR draft IS:</p> <ol style="list-style-type: none"> <li>a. The proponent underestimates the importance of the project area as winter habitat for boreal caribou.</li> <li>b. The proponent underestimates caribou habitat loss from the project due to sensory disturbance.</li> <li>c. The proponent minimizes the importance of the destruction of nursery habitat, winter</li> </ol>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>It's our opinion the analysis of effects caribou is robust and meets the requirements of the ToR and TISG.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<p>habitat, and eskers in the ecozone boundary.</p> <p>d. The proponent's averaging of linear feature density across the vast area of the regional study area is not legitimate and must be revised.</p> <p>e. The proponent fails to integrate information about the interactive effect of mining development and climate change into the cumulative effects analysis for caribou.</p> <p>f. The proponent fails to consider the effect to caribou of the north-south transmission line that is planned along the road corridor.</p>	
5.		<p><b>The endangered Eastern Migratory caribou and the full extent of its habitat must be included in the effects and cumulative effects analyses. It is not acceptable to use the forest-dwelling boreal caribou as a stand-in for all caribou.</b></p> <p>In 2017, COSEWIC (the Committee on the Status of Endangered Wildlife in Canada) assessed Eastern Migratory caribou as Endangered. Under Section 27 of the Species at Risk Act (SARA), Canada has 9 months from receiving the COSEWIC assessment to make a listing decision. Eight years later, we are still waiting for the listing decision on this species that is at the core of our Kattawapiskak people's cultural, social, and spiritual life.</p> <p>The proposed WSR would pass through habitat used by Eastern Migratory caribou: 27 of the 29 caribou collared by the proponent for their caribou study calved on the coast and were therefore identified as Eastern Migratory caribou (Section 13, p. 61).</p> <p>The proponent makes no mention of Eastern Migratory caribou in Section 21, the cumulative effects analysis. Attawapiskat First Nation requires that Eastern Migratory caribou be included as a separate unit of analysis within the cumulative effects analyses for caribou. Eastern Migratory caribou have unique population dynamics and life histories, and may be differently impacted by the cumulative effects of the proposed road. The particular vulnerabilities of the migratory ecotype, including to climate change, need to be carefully considered as part of a complete cumulative effects analysis. Without this information, we will be unable to determine the impact of the WSR to our rights.</p>	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period.
6.		<p><b>The draft IS contains misleading and contradictory information on the impact of anthropogenic disturbance to caribou, in particular road avoidance and the resulting habitat loss to caribou. This must be corrected and presented in a revised draft to Attawapiskat First Nation.</b></p> <p>Throughout Sections 13 and 21, the proponent uses 500 metres as the relevant distance at which anthropogenic disturbance impacts caribou, referencing on p. 98 various Environment Canada publications in order to justify the choice of the 500m buffer. The 2011 Scientific Guidance referenced by the proponent uses the 500 m buffer because "A sensitivity analysis indicated that the disturbance- recruitment relationship applied with a 500 m disturbance buffer width produced stable estimates of the effect of anthropogenic disturbance on caribou recruitment."<sup>5</sup> This does <u>not</u> mean that the 500m disturbance buffer is an appropriate metric to use when considering the zone of influence of anthropogenic disturbance. In fact, the zone of influence of anthropogenic disturbance on caribou described in the scientific literature is considerably greater, and can extend up to 15km.<sup>6</sup> It is misleading and a misrepresentation of caribou science to take the 500 m buffer zone used in the Environment Canada scientific guidance, where it is used for coming up with a metric of total disturbance within a range, and bring it into the context of habitat loss due to sensory disturbance.</p>	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period.

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<p>On p. 100 of Section 13, and p. 133 of Section 21, the proponent briefly acknowledges that pregnant cows avoid suitable nursery areas due to sensory disturbance at a distance of between 10 and 15 km. On p. 324-325 of Section 13, the proponent again briefly mentions sensory disturbance and the 10 km avoidance zone. Yet, throughout sections 13 and 21 of the draft IS, the proponent falls back on the 500m buffer as the distance at which caribou avoid human developments such as roads, even when discussing "habitat alternation or degradation due to sensory disturbance" (Section 13, p. 98).</p> <p>According to the draft IS, around 30%, or 232 hectares of the existing Category 1 high-use nursery habitats located in the local study area would be directly lost due to clearing activities (Section 13, p. 96). We assume that these clearings are for quarries or other infrastructure to support the road, although this is not explained. It is unclear why the proponent believes that the rest of the Category 1 nursery areas will remain available to caribou, given the impact of sensory disturbance. It would appear that the entire area of Category 1 nursery areas in the Local Study Area will be lost due to the project. Category 1 habitats are high-use areas that have the lowest tolerance to alteration before their function, or usefulness, in supporting caribou is compromised. These areas would normally be protected from development, including road development, by a 10 km buffer zone. <u>The proponent must explain why they chose to include these habitats within the area that will be cleared, given that the Category 1 areas are located several kilometres away from the planned road route.</u></p> <p>The road itself would pass within approximately 5.5 and 2.6 km of two Category 1, high use, caribou nursery areas. <u>Given that the appropriate buffer zone for sensory disturbance is on the order of 10 -15 km, it is wrong for the proponent to suggest that no Category 1 nursery areas will be altered or degraded due to indirect effects (Section 13, p. 97).</u> The 500 m buffer is clearly inappropriate given that road avoidance in the scientific literature has been described to be more than 20 times that distance, and given that Ontario's best management practices for activities in caribou habitat recommend that there be no sensory disturbance within 10 km of known or potential high use (Category 1) nursery areas between May 1 and September 15.<sup>8</sup></p> <p>The proponent offers the following as mitigation measures (Section 13, p. 230):</p> <ul style="list-style-type: none"> <li>Speed limits will be posted in areas where high use is known, or key habitat for Caribou has been identified.</li> <li>Maintenance activities will occur outside of critical life cycle periods, such as calving season for Caribou.</li> </ul> <p>There is no evidence that these measures would change in any meaningful way the impact of this road, which is slated to cross within a few kilometres of Category 1 nursery habitats, and which will remain in place year-round. Again, Category 1 habitats would normally be protected from development, including road development, by a 10 km buffer zone. It is also important to remember that the mapped high-use Category 1 nursery areas represent only a <u>subset</u> of the existing sensitive caribou calving areas in the study area, and that the road will impact sensitive caribou habitats throughout the ecozone boundary.</p>	
7.		<p><b>The proponent acknowledges that new hydroelectric development on the Attawapiskat and Albany Rivers is likely if an access road to the Ring of Fire is built. However, the proponent relegates these future developments to the "social environment valued component," and then proceeds to exclude them from the cumulative effects analysis altogether. This is unacceptable. Potential new dams and transmission lines must be included in the cumulative</b></p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>The hydroelectric generation and transmission connection development opportunities in Albany and Attawapiskat Rivers area are excluded from</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<p><b>effects analysis of the WSR to water, wetlands, fish and fish habitat, wildlife, species at risk, traditional land uses, and Treaty rights.</b></p> <p>During the WSR proponent's Indigenous knowledge sessions, Marten Falls First Nation members commented on planned new hydro developments and transmission lines. The proponent summarized these concerns as: "The community is aware that the Independent Electricity System Operator (IESO) has already started planning potential transmission into the Ring of Fire." (Table 21-1 "Cumulative Effects Assessment - Summary of Inputs Received During Engagement and Consultation", p. 9).</p> <p>This concern on the part of Marten Falls First Nations members is well founded. Just as Wyloo is waiting for the road to be built in order to develop the Eagle's Nest mine, it also considers a transmission line to bring power to the mine as "essential for the development of the Eagle's Nest project."<sup>9</sup> The transmission line, in the words of Ontario's Independent Electricity Operator, "enables connection of new resources including hydro-electric resources (Little Jack Fish and Upper Albany-Attawapiskat river area) through reduced connection costs and providing transfer capability of power to the main transmission network."<sup>10</sup> Hydroelectric development on the Attawapiskat River would therefore be enabled and supported by the right-of-way and transportation corridor provided by the Marten Falls First Nation Community Access Road (MFFN CAR) and its connector, the NRL.</p> <p>On p. 19 (Section 21, Table 21-2), the proponent includes "hydroelectric generation and transmission connection development opportunities in Albany and Attawapiskat Rivers area" in its table of "Future Reasonably Foreseeable Developments and Physical Activities That Will Likely Be Carried Out," but relegates these development to the "Social Valued Component."<sup>11</sup> The proponent does not explain why only the "social valued component," would be affected by hydro dams and transmission lines, and not water, fish and fish habitat, wildlife, wetlands, and traditional land uses. After excluding this future activity from consideration of all valued components other than the "Social Valued Component," the proponent claims that there is no "spatial overlap" of new hydro and transmission lines on the Attawapiskat and Albany Rivers with the WSR project, leading it to be excluded from the cumulative effects analysis (Section 21, Table 21-84, p. 212). The exclusion of these clearly foreseeable developments on spatial grounds is not justified. Without the road connection to the south, the mines to which the WSR hopes to connect would not be viable. The NRL, in turn, would facilitate the building of new hydro developments, as announced by Ontario's Independent Electricity Operator.</p> <p>There is therefore a direct causal link between the building of the Webequie Supply Road and the development of dams on the Attawapiskat River that must be considered.</p>	<p>the cumulative effect as the net social effects from the Webequie Supply Road within the RSA are not envisioned to overlap with these conceptual projects. The methodology used to assess whether Reasonably Foreseeable Developments (RFD's) are considered in the cumulative effects assessment is consistent with federal guidelines and the ToR and TISG.</p> <p>We also note that these hydroelectric development are located outside of the RSA's for all other Valued Components considered in the EA/IA for WSR Project and therefore are excluded in cumulative effects assessment.</p>
8.		<p><b>Climate change is not considered in the proponent's cumulative effects assessment. This is unacceptable and must be corrected.</b></p> <p>In the summary table of Indigenous knowledge in Section 13 (p. 41), in response to concerns from Weenusk First Nation about climate change impacts, the proponent claims that "Cumulative effects on Caribou, including climate change, are discussed in Section 21." <u>Nowhere in the draft IS section on Cumulative Effects, Section 21, is climate or climate change mentioned.</u> The proponent's failure to integrate this important concern, shared by Attawapiskat First Nation, into the analysis of cumulative effects is an example of how Indigenous knowledge, even when provided, is erased from the impact</p>	<p>1. Item will be addressed in the Final EAR/IS submission. Comment is acknowledged. The proponent has revised the cumulative effects assessment in Section 21 and included climate change as a reasonably foreseeable future activity.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<p>assessment process.</p> <p>Our territory is warming at between two and three times the rate of the planet as a whole.<sup>12</sup> Our Kattawapiskak people are already seeing dramatic changes in the timing of seasonal freeze-up and thaw events, drought conditions on our rivers, changes in animal behaviours, and new species in our territory.</p> <p>Climate change does not simply "add" to the cumulative impact of the road; climate change has synergistic effects that will <u>multiply</u> the impacts we experience from development. For example, the combined effect of impacts from development (mining, road construction, etc.) and climate change has the potential to irreversibly destabilize the hydrological functions of peatland ecosystems. This in turn has implications for wildfire frequency and severity, the stability of subsistence fisheries, and the efficacy of carbon sequestration of bogs and fens.<sup>13</sup> None of this is discussed in the cumulative effects section of the draft IS.</p>	

**List of Footnotes are as follows:**

1. See for example p. 13 of the draft IS Executive Summary. "From the perspective of the community, the WSR could be constructed and operated to provide a connection between Webequie First Nation and the McFaulds Lake area to serve mineral exploration and future mining development activities, with no connection to the provincial highway system."
2. Chief's Message, draft IS
3. Webequie Supply Road, Tailored Impact Statement Guidelines, p. 138.
4. Webequie Supply Road, Tailored Impact Statement Guidelines, p. 137.
5. Environment Canada, 2011. Scientific Assessment to Inform the Identification of Critical Habitat for Woodland Caribou (*Rangifer tarandus caribou*), Boreal Population, in Canada: 2011 update. Ottawa, Ontario, Canada. 102 pp. plus appendices. P. 23
6. See for example: Plante, Sabrina, et al. 2018. "Human disturbance effects and cumulative habitat loss in endangered migratory caribou." *Biological Conservation* 224: 129-143. And: Boulanger, John, et al. 2012. "Estimating the zone of influence of industrial developments on wildlife: a migratory caribou *Rangifer tarandus groenlandicus* and diamond mine case study." *Wildlife Biology* 18: 164-179
7. <https://www.ontario.ca/page/general-habitat-description-forest-dwelling-woodland-caribou>
8. See for example: Best Management Practices for Mineral Exploration and Development Activities and Woodland Caribou in Ontario. <https://www.ontario.ca/page/best-management-practices-mineral-exploration-and-development-activities-and-woodland-caribou>. The 10 km buffer zone can also be found in the Best Management Practice documents for the aggregate, tourism, energy, and forestry sectors
9. Wylloo's May 2025 feedback on the Northern Ontario Connection Study is available here: <https://www.ieso.ca/Sector-Participants/Engagement-Initiatives/Engagements/Northern-Ontario-Connection-Study>
10. Northern Ontario Connection Study, Webinar #1- Technical and Economic Option Analysis. May 7, 2025. Available at: <https://www.ieso.ca/Sector-Participants/Engagement-Initiatives/Engagements/Northern-Ontario-Connection-Study>
11. The identified Social Environment VCs are: Population and Demography; Housing and Temporary Accommodations; Community Services; Education, Training and Traditional Learning; Emergency and Protective Services; Community Infrastructure; and Community Well-Being and Safety.
12. [https://www.cbc.ca/news/can-ada/sudbury/climate-cba0ae-10tecoat100a1-covrtwo1ted-nations-1zs9332\\_3](https://www.cbc.ca/news/can-ada/sudbury/climate-cba0ae-10tecoat100a1-covrtwo1ted-nations-1zs9332_3)
13. Sutton, O. F., Balliston, N. E., & Price, J. S. 2024. Mining and climate change alters water storage and streamflow dynamics of northern peatland-dominated catchments. *Water Resources Research* 60 (12), e2024WR037310. P. 16

# Constance Lake First Nation





January 12, 2026

**Response to Constance Lake First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Chief Allen,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project. Please find enclosed the table that provides responses to the comments provided in your letter dated October 6, 2025.

As we move forward in the process to submit the Final EAR/IS, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to discuss the findings presented in the Draft EAR/IS in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the WSR Project.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Fox', with a long horizontal stroke extending to the right.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment, Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Constance Lake First Nation (CLFN)

The following categorization of the proponent responses may appear in the comment response table for clarity.

### Proponent Response Legend

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
<b>General Comments</b>				
1.	General Comment	<p>The WSR passes through a largely undeveloped, pristine region in the Far North. Minimal baseline environmental studies have been conducted for this area, covering only limited aspects of water, soils, wildlife, and vegetation. CLFN is concerned that construction and associated development linked to the Ring of Fire could compromise these pristine conditions, introducing contamination and altering the landscape in a region that currently experiences minimal anthropogenic stressors.</p> <p>It is important to note that the mines in the Ring of Fire that the WSR is purported to be built to access won't be developed until the Marten Falls Community Access Road and Northern Road Link are both constructed and operational. Even under the most optimistic permitting and construction scenarios, there is time for at least 5 years of baseline data gathering along the WSR corridor (including the Ring of Fire area) before construction in the area commences.</p>	<p>A. Before construction proceeds, the Proponent must conduct comprehensive, multi-year baseline studies covering all relevant environmental components (water, soils, vegetation, wildlife, and permafrost).</p> <p>B. The Proponent must establish ongoing monitoring programs to track changes during and after construction, ensuring protection of ecological integrity and minimizing impacts on this sensitive, largely untouched area.</p> <p>C. Regulators should impose a condition of approval on the Project requiring a minimum of five years of baseline monitoring along the WSR corridor before construction commences.</p> <p>D. Regulators must require a minimum 5-year long regional baseline data gathering for the WSR that includes the Ring of Fire area prior to any construction activities north of Marten Falls. This should be afforded to ours and other impacted Nations as an accommodation measure from the Crown for the impacts of the WSR Project on our exercise of rights. Note that this recommendation needs to be harmonized with the findings of the Ring of Fire Regional Assessment.</p>	<p>A. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). The Proponent has completed baseline studies that are considered adequate for the purposes of assessing effects from the Project, and the level of effort is consistent with the requirements stated in the ToR, TISG, and supportive VC Study Plan prepared early in the EA/IA process.</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Monitoring details are expected to be identified and developed as part of the future permitting and detail design stage of the Project where applicable approvals are required. The proponent welcomes CLFN interest in future monitoring efforts and offers to collaborate on implementation of monitoring programs.C, D. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
2.	General Comment	The introduction of Ontario's proposed Bill 5 (2025) raises concerns about the permitting framework for the WSR Project. This legislation could provide exemptions from critical provincial permitting processes, including the Aggregate Resources Act, Permits to Take Water, and Environmental Compliance Approvals. These permits currently serve as key mechanisms for technical review, environmental protection, and Indigenous consultation. Exemptions under Bill 5 would create regulatory uncertainty and elevate environmental and rights-based risks, particularly in a region of high ecological sensitivity and cultural importance to CLFN. The EAR/IS does not address these emerging risks, despite their potential to fundamentally affect how the WSR is reviewed, approved, and monitored.	<p>A. The Proponent should commit to upholding existing environmental and permitting standards, even if future legislative changes provide exemptions. This includes continuing to seek Permits to Take Water, Environmental Compliance Approvals, Land Use Permits and Aggregate Resources Act approvals regardless of exemption status.</p> <p>B. The Proponent should commit to continued meaningful consultation with CLFN throughout all permitting and regulatory phases, regardless of legislative requirements. These commitments should be documented in the Impact Statement and any agreements to ensure accountability and transparency.</p>	<p>A) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>B) 1. Item will be addressed in the Final EAR/IS submission. Continued meaningful consultation in future development phases of the Project is noted in Section 27.</p>
3.	General Comment	CLFN seeks clarification on how Webequie First Nation selected the proposed WSR corridor and whether the Project is supported by the broader community. It is unclear whether decisions were made solely by leadership or with broad input from members, including those living off-reserve. Given the long-term environmental and cultural impacts across shared territory, CLFN must have confidence that the WSR reflects meaningful consultation and informed community support.	<p>A. CLFN requests a meeting with Webequie leadership to understand how engagement with community members was conducted. This includes how members were informed, how input was gathered, and how feedback influenced project planning.</p> <p>B. CLFN recommends that the EA/IS be updated to document internal WFN engagement and decision-making processes, including:</p> <ul style="list-style-type: none"> <li>• Methods used to engage members (e.g., meetings, surveys, mailouts) and participation levels.</li> <li>• Key feedback themes raised by members.</li> <li>• How input informed route selection, community benefit planning, and environmental mitigation.</li> </ul> <p>This information can be redacted as required to protect sensitive information not required to fulfil on this request.</p> <p>C. CLFN requests that Ontario or Canada fund a chartered flight for CLFN members to visit to Webequie First Nation, so that CLFN membership can engage with the Webequie membership directly on the Project and contextualize road development by visual observation through a flyover of the Project site.</p>	<p>A. The Project Team acknowledged the request and have reached out to CLFN to arrange a meeting between CLFN representatives and Webequie leadership. The Project Team is committed to ongoing efforts to engage and consult with potentially affected communities through various activities and initiatives.</p> <p>B. 1. Item will be addressed in the Final EAR/IS submission. The Record of Engagement and Consultation has been for the Final EAR/IS with documentation of engagement and consultation activities and feedback received from potentially affected communities.</p> <p>C. The Ministry of Energy and Mines (MEM) has implemented the Participant Funding Initiative (PFI) which provides funding support for CLFN to participate in consultation engagements related to the WSR project, including allocations to support travel. While there is currently no new funding available from the province, the proposed travel arrangements could be considered eligible as a consultation activity and be covered under CLFN's existing PFI funding agreement, if you so choose.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
4.	General Comment	<p>CLFN has observed cumulative impacts across our Traditional Homelands from decades of industrial activity, including forestry, mining, and road development. Our Territory sustained our traditional way of life for generations, but it is now heavily fragmented and degraded in many areas due to overlapping disturbances.</p> <p>The Proponent's assertion that the impacts on water, fish, and wildlife species are "not significant" does not align with our lived experience over the past century of industrial development. We have witnessed how successive projects have led to widespread degradation of ecosystems and loss of culturally important species.</p> <p>Note that despite our disagreement with the Proponent's conclusions in the residual effects assessment and cumulative effects assessment, we are still supportive of the WSR Project being constructed to allow Webequie First Nation to have road access.</p>	<p>A. CLFN requests that the Proponent revise the residual effects assessment and cumulative effects assessment to take a more conservative approach to the determination of significance. Almost all impacts should be deemed significant.</p> <p>B. CLFN requests that the regulators acknowledge the greater significance of impacts through stronger conditions of approval imposed on the Project. These conditions are discussed in many of CLFN's comments in this review.</p>	<p>A. 1. Item is considered addressed in the Final EAR/IS submission. Adverse federal effects are significant based on characterization along quantitative or qualitative (descriptive) scales that were defined for each VC. The scales that were developed considered benchmarks (e.g., standards, guidelines, descriptors or objectives, where they exist), criteria (e.g., magnitude, geographical extent, timing, frequency, duration, reversibility and uncertainty) and environmental, health, social and economic conditions. If all impacts were deemed significant, it would tend to 'equalize' the importance of the effects and undermine the approach that is intended to focus the assessment on effects that represent larger risk(s) and consequence(s) to the environment.</p> <p>B. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
5.	General Comment	<p>CLFN has been significantly and negatively impacted by unrestricted road access in our traditional homelands. The construction of roads without sufficient access control has led to numerous adverse effects including increased poaching, unregulated hunting, unauthorized industrial activity, and disturbances to our cultural and spiritual sites. These impacts have degraded our lands and infringed on our rights.</p> <p>Given these past experiences, we are deeply concerned that the WSR could result in similar impacts for WFN if appropriate access controls are not implemented.</p>	<p>CLFN recommends that manned checkpoints be installed at both ends of the WSR to prevent unrestricted access. WFN should retain authority over road access, and the road should be actively monitored to deter unauthorized use and protect environmental, cultural, and spiritual values.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Preliminary information on potential road access controls has been included in Section 4 (Project Description) of the EAR/IS. At this time, there are no definitive proposed access controls for road users, however the topic of controls is subject to further discussion and agreement between Webequie First Nation and the Province of Ontario in future development phases of the Project. How, and if, access controls will be executed and enforced will be a function of road ownership and jurisdictional aspects of road operations. It will be particularly important to clarify this for the portion of the roadway that will cross Webequie First Nation Reserve lands, which fall under federal jurisdiction and are controlled by Webequie.</p> <p>Note that Webequie First Nation is the sole proponent of the Webequie Supply Road Project for the purpose of the EA/IA. It has not been determined yet who will construct, maintain and operate the Webequie Supply Road and is subject to further discussion between Webequie First Nation and Ontario. The ultimate proponent for the construction and operation phases of</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
				the Project is expected to have the financial and technical capacity to protect the environment, including meeting the obligations and commitments in the EAR/IS.
6.	General Comment	The assessment does not outline how impacted First Nations will be involved in ongoing environmental monitoring activities. This omission limits the effectiveness of long-term environmental management and fails to reflect Indigenous leadership and rights in caring for their lands and resources.	<p>A. The Proponent should revise the EAR/IS to outline a more coordinated approach that actively involves regional First Nations in air quality and broader environmental monitoring programs. This should include specific mechanisms for engagement, such as defining roles for Indigenous communities in data collection, analysis, and interpretation; establishing consultation frameworks to guide decision-making; and ensuring participation in the design and implementation of monitoring and response measures.</p> <p>B. The EAR/IS should define clear performance metrics for key environmental indicators (e.g., air quality parameters, water quality, wildlife health) and commit to transparent, accessible public reporting of monitoring results.</p>	<p>A. 1. Item will be addressed in the Final EAR/IS submission. The proponent's commitments to establish an Environment Committee and to involve Indigenous community members in developing and implementing appropriate monitoring programs, protocols and management plans to address potential effects of the Project are outlined in Sections 6 to 20. Committee members will include Webequie First Nation Elders and Knowledge Holders, other Indigenous Nations, and appropriate project representatives, to: facilitate communication and engagement during construction and operations of the Project; facilitate use of Indigenous Knowledge in project activities; facilitate evaluation of land use information; and facilitate development of appropriate monitoring programs, protocols and management plans as part of the Construction Environmental Management Plan (CEMP) and Operational Environment Management Plan (OEMP).</p> <p>The Community Readiness Working Group, recommended to be established, as described in the Community Readiness Plan (Appendix N of the EAR/IS) provides a framework for CLFN to participate in further planning of approaches to identify, mitigate and monitor effects of the Project.</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The environmental performance metrics will become clearer during the detail design phase. Monitoring efforts will be based on confirming the validity of those designs. Monitoring details are expected to be identified and developed as part of the future permitting and detail design stage of the Project where applicable approvals are required.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
7.	General Comment	<p>Constance Lake First Nation (CLFN) community members have identified several key concerns with the road design:</p> <p><b>Unsuitable Surface Treatment</b></p> <p>The proposal to chip seal the western segment of the WSR while leaving the eastern segment as gravel raises concerns about inconsistent maintenance and operational regimes.</p> <p>Moreover, the transition point between chip seal and gravel has not been clearly identified, which could pose safety and durability issues. CLFN also has experience on reserve with chip seal paving and have found that it requires intensive upkeep and repeated costly maintenance.</p> <p><b>Insufficient Road Dimensions for Industrial Use</b></p> <p>The proposed design, which includes a 3.5-meter lane width and a 2-meter shoulder, is unlikely to safely accommodate the anticipated volume of heavy industrial traffic. CLFN emphasizes that the road should be constructed to support vehicles that are wide and/or exceeding 18 tons, including mining-related trucks and buses.</p> <p><b>Lack of Wildlife Protection Measures</b></p> <p>CLFN has noted a lack of urgency and prioritization regarding wildlife crossing infrastructure. The current design does not include adequate signage or roadside safety measures to mitigate the risk of wildlife collisions.</p> <p><b>Road Safety and Security Oversights</b></p> <p>Community members expressed concern over the absence of detailed information regarding road safety protocols, particularly in relation to security checkpoints and patrol stations. These elements were notably missing from the Environmental Assessment Report/Impact Statement (EAR/IS).</p>	<p>A. CLFN recommends that the Proponent pave the entire length of the WSR with asphalt and provide a road base suitable for 40 ton trucks to streamline road maintenance and increase vehicle control during unstable conditions.</p> <p>B. CLFN recommends that the Proponent implement additional signage and safety measures related to wildlife crossings, such as explore motion sensors and flashing signals which alert drivers of movement up ahead.</p> <p>C. CLFN recommends that the Proponent consider security checkpoints, equipped with manned shelters intended to determine vehicle use and incoming/outgoing personnel. Shelters will have to accommodate patrol officers full-time.</p>	<p>A) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The entire WSR roadway may ultimately be surfaced with chip seal or a similar treatment. However, the eastern segment is mainly through the peatland, it is anticipated that the roadway will continue to settle for several years. As the surface treatment would potentially have a high failure rate during the active settlement period, the gravel surface will not receive surface treatment. As soon as the active settlement is complete, the eastern segment will likely be surface treated similar to the western half of the Project. If the chip seal surface does not meet performance standards in the future other surface treatment options include asphalt would be evaluated.</p> <p>B) 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). WSR is not anticipated to carry mining related traffic and the proposed design has been developed in accordance with regulatory standards based upon the anticipated traffic volumes and types.</p> <p>C) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Road safety protocols will be evaluated during the detail design period. Signage and roadside safety measures will also be evaluated during detailed design in accordance with regulatory requirements.</p>
<b>Aquatic Ecology</b>				
8.	Section 13: Assessment of Effects on Species at Risk pg. 178	<p>Subsection 13.3.12.1.1 describes water crossing types for each stream intersection with the supply road; the current plan is that there will be 6 bridge structures, 19 steel box culverts, and 6 corrugated steel pipe culverts.</p> <p>There are two main concerns with this section:</p> <ul style="list-style-type: none"> <li>• The language used around habitat destruction.</li> <li>• The vagueness of the culvert designs.</li> </ul>	<p>A. CLFN recommends that the Proponent evaluates substrate composition and spawning redd evidence at crossings where bridge footings are planned. If any redds are found (including but not exclusive to Lake Sturgeon) it would be best to reevaluate the bridge position so that footings would occupy unfavorable rearing and spawning areas (i.e., atop bedrock,</p>	<p>A) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further detailed fish habitat assessment are envisioned as part of the detail design and permitting phase of the Project and structure types or positioning may be reevaluated based on fish/fish habitat sensitivity (e.g., spawning redds).</p> <p>B) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). There</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
		<p>Bridge footings are noted to result in a “small loss” of fish habitat but will destroy over 560 square metres of in-stream substrate (bearing potential rearing microhabitats). Because bridge structures will be built in locations where Lake Sturgeon (<i>Acipenser fulvescens</i>) are known to be present, it’s very possible that the footings could be constructed in and around spawning substrate. It’s rational to prioritize bridge footing placement to meet the structural needs of the bridge; however, it is completely irresponsible to neglect the presence of valuable spawning substrate (gravel, cobble, well oxygenated parts of a stream). There is no mention of any prior research taking place to investigate bridge footing placements, and without proper evaluation and identification of these habitats, several risks arise, including the possibility of degrading and/or destroying those microhabitats.</p> <p>25 of the 31 planned crossing structures are steel plated culverts, but key details about their placement and effect on each stream remain absent. Open bottom culverts are necessary to preserve a natural substratum and water flow for fish and benthic organisms. Closed bottom culverts often intimidate many fish species and make it nearly impossible for effective fish passage. They also pose a corrosion problem, as the bottoms begin to rust out and allow water to flow underneath. This not only denies fish passage completely but also causes sediment deposition downstream.</p>	<p>amongst large boulders, etc.)</p> <p>B. CLFN recommends that the Proponent commits to using only open-bottom culverts or bridges to sustain natural fish habitat and fish passage integrity. Channelization effects up and downstream of any culvert should also be assessed to ensure that the narrowing/widening of the stream’s bankfull width is not detrimental to the different microhabitats (riffles, runs, pools).</p>	<p>are many open bottom culverts and bridges already proposed in the current preliminary engineering design presented in the EAR/IS. Further assessment and ultimate confirmation of structure types at water crossings will be further examined in the detail design and permitting phase of the Project.</p>
9.	Appendix F Natural Environment Existing Conditions Report pg. 224	<p>Subsection Spring Spawning Surveys— While some spawning surveys were undertaken (egg mat monitoring and eDNA sampling), the lack of a baseline substrate analysis in fish spawning areas downstream of proposed water crossings results in a deficient baseline study. How spawning shoals will be affected by sedimentation from road development is not quantified. Most fish in these watersheds depend on a mixture of gravel, cobble, and a well-oxygenated, upwelling- water flow to rear their eggs. When fine sediment fills the gaps between coarse rock, it completely suffocates the redd and gives little chance for successful egg development. The likelihood that road construction increases sedimentation downstream of crossings (during and after construction is complete) is nearly inevitable.</p>	<p>A. To take a proactive approach, the Proponent should conduct a baseline study to assess the percentage of fine sediment downstream of water crossing sites, using the bucket grab/sieve analysis in wadable areas. A simple and effective method to calculate this would be:</p> <ul style="list-style-type: none"> <li>• Locate, by visual observation, 3 to 4 potential spawning sites (per tertiary watershed being affected, for a total of 9-12 study ‘redds’) which bode preferential spawning conditions. This will have to be done in wadable areas.</li> <li>• Using an open-bottom bucket or cylinder, burrow into the substrate 20cm deep (the average depth of a redd) by shimmying and readjusting rocks around the cylinder until the desired depth is reached.</li> </ul>	<p>A) 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The proponent has completed baseline studies that are considered adequate for the purposes of assessing effects from the Project and the level of effort is consistent with the requirements stated in the ToR and TISG, and support VC Study Plans prepared early in the EA/IA process.</p> <p>B) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Detailed monitoring plans for post-construction will be included in the Operations Environmental Management Plan.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
			<ul style="list-style-type: none"> <li>• Remove all substrate, including fine sediment, by hand and or by small scoop/tools. Return sample to a controlled area for processing. Allow it to dry manually or expedite through a heat source.</li> <li>• Weigh the total dry weight of each sample. Shake the sample through a series of aluminum sieves until all fine sediment has been collected in the bottom tray.</li> <li>• Weigh the fine sediment and divide by the total weight of sample (multiply by 100) to get the fine sediment percentage.</li> </ul> <p>B. Post construction of the road, the Proponent must revisit each site and repeat the study in the exact same spawning area. Any substantial increase in fine sediment will quantitatively illustrate sedimentation effects and the possible degradation of interstitial spaces. The fine percentage of each redd can be compared to literature to evaluate if it meets fish specific spawning requirements.</p>	
10.	Appendix F Natural Environment Existing Conditions Report pg. 223 & 292	<p>Subsection 8.3.2.8.4 Spawning Surveys Results and Data Limitations — eDNA was underwhelmingly represented across the 31 sites. Of the 31 total sites, only 9 (29%) were selected for sampling, and 4 of the 9 had already seen previous sampling be undertaken. The decision to leave out 22 sites for eDNA analysis does not satisfy Proponent due diligence and omits what is one of the most valuable tools for determining species biodiversity in an ecosystem.</p> <p>Additionally, pg. 223 references the full sampling protocol for eDNA activities (via Nature Metrics) under “Appendix X”. Having sieved through the entire document and the appendices listed in the “DRAFT package”, this Appendix does not exist.</p>	<p>A. CLFN recommends that the Proponent expand its eDNA sampling to include the majority (&gt;90%) of affected water crossings. In lotic ecosystems, fish assemblages are often much harder to assess, and eDNA is one tool which covers an immense range with minimal time commitment. It’s critical that sensitive species are not missed when altering any habitat.</p> <p>B. CLFN also requests an opportunity to review the “Appendix X” relating to the eDNA sampling protocol.</p>	<p>A) 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The proponent has completed baseline studies that are considered adequate for the purposes of assessing effects from the Project, and the level of effort is consistent with the requirements stated in the ToR, TISG and supportive VC Study Plan prepared early in the EA/IA process.</p> <p>B) 1. Item will be addressed in the Final EAR/IS submission (refer to Appendix 8-E).</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
11.	Section 10: Assessment of Effects on Fish and Fish Habitat pg. 107 and pg. 116	<p>Subsection 10.5.2.2.2 Changes in Public Access to Fish Habitats Construction Increased &amp; Cumulative effects— This section outlines the projected impact of increased harvesting pressure due to road access (increased human presence), but it fails to acknowledge the cumulative impacts that human presence will have on the watercourses and the aquatic life.</p> <p>Road access also translates to more foot traffic and camping activity; these interactions typically take place around rivers and streams, where visitors are very likely to dispose of pollutants like plastic waste, empty metal containers, and petrol/kerosene/oils. Pollution entering these streams could be permanent and have everlasting implications for fish health and diversity.</p>	CLFN recommends that the Proponent evaluate a comprehensive range of potential outcomes related to increased human activity and its effects on the aquatic ecosystem. This would include a comparative analysis using recently developed roads with water crossings to identify signs of anthropogenic pollution. To support this, a series of water samples should be collected within walking distance of the road to analyze for microplastic concentrations, metal contaminants, and hydrocarbon presence. These findings can then be used to model and scale potential impacts on the watercourses intersecting the Webequie Supply Road.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines.
12.	Section 10: Assessment of Effects on Fish and Fish Habitat pg. 35	<p>Subsection 10.2.1.2.1 describes an incomprehensive regime for fish community sampling, similar to the underrepresentation of eDNA. Less than 50% (15 of 31 sites) of water crossings were sampled for fish community assemblages. The rationale for not evaluating the other 16 sites, and the inability to use all of the fish capture tools available, was credited to high-water levels and unsafe site conditions. Were these sites not revisited, or reevaluated for alternative access by foot? There is no detail about what factor was limiting access to these sites. If it's "high- water levels", it's likely the timing of the site visit was poorly scheduled, perhaps in line with a heavy precipitation event. Furthermore, the section goes onto classify each of the 31 waterbodies/crossings through the Fish Habitat Sensitivity rating system of the <i>Ontario Stream Assessment Protocol</i>. Three of the 31 were deemed "rare", 28 were deemed "moderate, and one was deemed "low". How can 16 sites be assigned a rating when they had no apparent data collected on fish community assemblage? Also, the sum of those three numbers does not equal 31, it equals 32.</p>	<p>A. CLFN requests that the Proponent strive to meet a minimum 75% fish community sampling baseline for its water crossings. It's a requirement that if sampling is limited for one reason or another, they provide the exact rationale and a list of alternatives to complete the assessment.</p> <p>B. CLFN requests that the Proponent elaborates on how each crossing was rated through the <i>Ontario Stream Assessment Protocol</i> and which fish community data was used to support this. A clarification on the miscount of 32 will also need to be explained.</p>	A) 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The proponent has completed baseline studies that are considered adequate for the purposes of assessing effects from the Project, and the level of effort is consistent with the requirements stated in the ToR, TISG, and supportive VC Study Plan prepared early in the EA/IA process.
13.	Section 10: Assessment of Effects on Fish and Fish Habitat pg. 35	<p>Subsection 10.2.1.2.1 describes benthic macroinvertebrate collection but fails to provide detail on the exact methodology and the transects which were sampled (Northings and Eastings). Was <i>CABIN protocol</i> followed during kick netting? A standard kick netting period is 3 minutes which keeps uniformity between samples' catch per unit effort.</p>	CLFN recommends that the Proponent to share its methodology which was followed for their macroinvertebrate collection activities, including precise geographical locations of wadable transects.	1. Item will be addressed in the Final EAR/IS submission. Sample sites were selected to target representative waterbody types and habitat and to provide a baseline of diversity and abundance. In general, all benthic invertebrate sampling was conducted in accordance with the Ontario Benthic Biomonitoring Network Manual (Jones et al., 2007). Details on the methodology and results of the benthic invertebrate

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				sampling are contained in Appendix F – Natural Environment Existing Conditions Report, Section 8.2.2.4 and Appendix 8F.
<b>Terrestrial Ecology</b>				
14.	Section 12.4.2.1.1: Construction	CLFN is concerned that the proposed restoration success criteria of 70–75% tree/shrub richness and density and 50% herbaceous cover are not appropriate for wetland ecosystems. Wetlands are typically dominated by herbaceous vegetation, with woody species playing a limited role, and their functionality depends on hydrology, soil conditions, and plant community composition rather than simple cover percentages. Using upland targets risks underestimating the level of effort required to restore wetlands to a state that provides meaningful habitat for wildlife and supports ecological and cultural functions.	CLFN requests that wetland restoration criteria be developed separately from upland criteria.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The proponent notes that Section 12 is Assessment of Effects on Wildlife and Wildlife Habitat. The 70-75% value mentioned in the text in Section 12 specifies it is an <i>example</i> of a target that might be used in upland habitats. Success criteria for wetland and/or riparian environments will be developed independently as part of the CEMP and OEMP in the future development phases of the Project. These may include targets relating to % cover by native wetland species, assessments of structural diversity, vegetation richness and evenness (i.e., abundance). Indigenous community members will have an active role in developing and implementing these plans.
15.	Section 12.4.2.1.1: Construction	The proposed sensory disturbance mitigation in the Noise and Light Management Plans are directed primarily toward meeting regulatory requirements and human receptors, while lacking wildlife-specific measures.	CLFN requests that the Proponent include wildlife-specific measures in the Noise and Light Management Plans.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
16.	Section 12.4.2.2.2: Operations	CLFN is concerned that the Proponent has not proposed clear, ongoing monitoring for invasive species during either the construction or operations phases. While prevention and control measures are listed, there is no commitment to systematic monitoring that would ensure early detection and rapid response if invasive species establish along the ROW or in restored areas. Without a defined monitoring program, there is no way to confirm whether mitigation is effective or to adapt management if invasive species spread.	To address this gap, CLFN recommends that the Proponent strengthen the Invasive Species Management Plan to ensure that invasive species risks are managed proactively rather than reactively. The plan should not only outline preventative measures but also commit to long-term surveillance and response actions that can demonstrate effectiveness and protect culturally important habitats and species. Specifically, the plan should include: <ul style="list-style-type: none"> <li>• Defined monitoring timelines extending through both construction and operations, with surveys repeated at regular intervals (e.g., annually) to ensure early detection.</li> <li>• Standardized survey methods and reporting requirements so results can be consistently tracked, verified, and shared with regulators and Indigenous communities.</li> <li>• Adaptive management triggers that require immediate additional control measures if invasive species are detected, including</li> </ul>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). In Appendix E (Mitigation Measures) of the EAR/IS, the framework for a Vegetation Management and Invasive Species plan is discussed. Proactive measures will form part of this plan (e.g., measures to control the introduction of invasive species or noxious plants). While the plan would be initially be developed prior to construction, it will be adaptive, with a thorough review occurring prior to operations (i.e., CEMP -> OEMP).

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			follow-up monitoring to confirm that removals or treatments are successful.	
17.	Section 12.4.2.2.2: Operations	CLFN acknowledges that watering can be an effective method of reducing dust emissions; however, we do not believe it to be practical for the Webequie Supply Road given its remoteness and the challenges of maintaining water trucks and accessing sufficient water sources along the corridor. In CLFN's experience, consistent implementation of watering in remote northern environments is highly unlikely. Therefore, while CLFN supports watering as a method in principle, we do not support its justification as a primary dust mitigation approach for this Project.	CLFN recommends that the Proponent pave the entirety of the road.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The surface treatment proposed for the WSR is fully discussed in Section 4 (4.3.1.3). The timing and extent of a chip seal or asphalt pavement of the road will be determined by the future owner/operator of the WSR.
18.	Section 12.4.2.1.1: Construction	The Proponent's conclusion that spills will be "generally localized in nature" does not reflect the realities of a remote northern road with numerous water crossings. In CLFN's experience, even small spills of fuel or oil can quickly enter waterways and travel significant distances downstream, particularly during spring melt or high-flow events. Once contaminants enter aquatic systems, they can persist in wetlands and accumulate in soils, vegetation, and wildlife. This has direct implications for fish, waterfowl, mammals, and culturally important species that rely on these habitats. The remoteness of the road also means that spill response times will be slow and limited in capacity, further increasing the risk of long-term effects to wildlife and wildlife habitat.	A. The Proponent should carry <i>Accidental Spills</i> forward into the residual effects analysis, with explicit consideration of potential impacts on wildlife and wildlife habitat. B. The Proponent should describe in detail measures to identify pollutive effects from spills in a remote area where detection/response time is prolonged.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). A) The net effects as result of potential accidental spills, with consideration of mitigation and clean-up, do not meet the threshold established to be carried forward to the cumulative effects assessment. B) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
19.	General Comment	Prolonged exposure to dust, the risk of spills along the WSR, and the anticipated increase in industrial activity from the Ring of Fire all create significant risks to wildlife health and the safety of country foods. These combined pressures may lead to reduced availability of healthy, uncontaminated country foods for local indigenous land users and threaten the long-term sustainability of traditional harvesting practices.	The Proponent should implement a country foods monitoring program to assess whether wildlife, fish, and plants harvested for food are being contaminated by dust deposition, accidental spills, or cumulative industrial activity. Findings from this study would be beneficial as baseline for mining development at the Ring of Fire.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The Proponent commits to develop and implement monitoring programs including monitoring changes in patterns of behavior among game animals and growth patterns of traditional plants as a result of the WSR.
20.	Section 12.4.2.4.2: Operations	CLFN is concerned that there is no structured collision monitoring system in place to account for wildlife collisions and mortality. Opportunistic reporting by Project personnel will not provide reliable data on the frequency, location, or severity of collisions. Without a systematic approach, the Proponent cannot identify mortality hotspots, evaluate the effectiveness of mitigation, or implement adaptive	The Proponent should implement a structured collision monitoring and reporting. Data must be shared transparently with impacted Indigenous Nations to ensure accountability and to support the protection of culturally important wildlife.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Regular inspections of the road and rest areas will occur during construction and throughout operations. 1. Item will be addressed in the Final EAR/IS submission. Refer to Section 12.4.3.3.2, 12.4.4.4.1 where the development of wildlife sighting and incident reporting procedures are

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		measures to reduce wildlife deaths.		mentioned and Section 12.4.6.4.1 where collision reporting and tracking is specifically identified.
21.	Section 12.8.1: Moose	CLFN disagrees with the conclusion that the Project's effects on moose are "not significant." The EAR/IS report itself acknowledges that local Indigenous communities have noticed declines in moose populations connected to growing pressures from human activity and tourism. Based on local knowledge and our lived experience, CLFN maintains that the WSR will have significant adverse impacts on moose populations on its own. Further, industrial expansion tied to the Ring of Fire will only magnify and compound these already significant effects. CLFN also emphasizes that our definition of what is "significantly negatively impacted" is different from the western perspective used in environmental assessments, as it reflects the cultural importance of moose and the role they play in our food security, traditions, and way of life.	The Proponent should recognize moose as being significantly impacted by the Project and revise the EAR/IS accordingly to reflect this determination.	1. Item will be addressed in the Final EAR/IS submission. Further assessment details on moose are presented in Section 21 – Cumulative Effects Assessment (refer to 21.4.7.1.6). The determination of significance of net cumulative effects on the Moose VC is based on the process of significance determination outlined in Section 12.8 for net effects. A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself. Based on the results and assessment the cumulative net adverse effects on the Moose VC is considered not significant in our opinion.
22.	General Comment	CLFN is concerned about the potential loss of habitat for a range of species at risk, including boreal caribou and wolverine. These species rely on intact, undisturbed landscapes, and even small amounts of habitat loss or fragmentation can have disproportionate impacts on their survival and recovery. The EAR/IS does not commit to offsetting residual habitat loss, despite the likelihood that an Overall Benefit Permit will be required under the Endangered Species Act.	A. The Proponent should commit to offsetting residual impacts to species at risk habitat, to be determined through an Overall Benefits Permit (as would have been permitted prior to Ontario Bill 5). B. This OBP must identify means by which the Proponent can successfully mitigate the impacts to caribou and moose travel routes that the WSR will cross.	A and B) Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Permitting for species at risk effects, including habitat offsetting where required, will be developed in the future detail design and permitting phase of the Project.
23.	Section 13.4.3.2.1: Construction and Operations	CLFN disagrees with the conclusion that sensory disturbance to caribou will be "effectively mitigated" and therefore not carried forward in the residual effects assessment. Woodland caribou are known to avoid roads at distances of at least 4 km (Vors, Schaefer, Pond, Rodgers, & Patterson, 2010). This is consistent with CLFN's lived experience and knowledge, which confirms that caribou are displaced well beyond the immediate Right-of-Way (ROW) and avoid areas of increased noise, light, and human activity. Excluding sensory disturbance from the residual effects analysis underestimates the true scale of displacement and fails to account for the residual and cumulative impacts on caribou survival and recovery.	The Proponent should recognize sensory disturbance as a significant residual effect on caribou and revise the EAR/IS accordingly to reflect this determination.	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period.
24.	Section 13.6.1.1: Habitat Loss (Caribou)	CLFN disagrees with the Proponent's conclusion that the effects of habitat loss on caribou will not be significant, as this determination results from the exclusion of sensory disturbance from the residual effects analysis and the	A. The Proponent should recalculate functionally lost caribou habitat using a range of buffer distances—from 500 meters to 15 kilometers—based on proximity to known or potential high-	A,B. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). Parts of the reviewers comments around habitat loss and

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		<p>underestimation of habitat loss through the use of an inadequate 500 m buffer.</p> <p>Environment and Climate Change Canada (2023) identifies 500 m as a reference buffer distance, but this represents the low end of the scientific consensus and does not align with current understanding of caribou behavior or jurisdictional best practices (Environment and Climate Change Canada, 2024).</p> <p>Woodland caribou are known to avoid both physical and sensory disturbances at significantly greater distances than 500 m (Vors, Schaefer, Pond, Rodgers, &amp; Patterson, 2010), with Ontario’s guidance recommending that Proponents minimize sensory disturbance within 10 km of known or potential high-use areas. These avoidance behaviors are well-documented and underscore growing concerns about the persistent underestimation of disturbance effects in environmental assessments (Collard, Dempsey, &amp; Holmberg, 2020); (Cameron &amp; Kennedy, 2023). By limiting the analysis to a 500 m buffer and disregarding the broader zone of influence from sensory disturbance, the assessment fails to capture the ecological sensitivity of these areas or the full spatial extent of functional habitat loss experienced by caribou.</p>	<p>use areas and ecologically sensitive locations such as calving grounds, wintering habitat, and key travel corridors. This approach reflects well-documented variability in caribou responses to disturbance and aligns with both jurisdictional guidance and peer-reviewed literature demonstrating that avoidance can occur at distances far greater than 500 meters.</p> <p>B. These revised calculations should then be used to inform the determination of significance, which CLFN believes to be significant.</p>	<p>sensory will be addressed through habitat disturbances contained in an addenda to the Final EAR/IS submission that will be completed by the end of the review period.</p>
25.	General Comment	<p>The WSR will fundamentally change access to the region. Once constructed, the road will connect Webequie to the national highway system through the Marten Falls Community Access Road and the Northern Road Link, creating continuous vehicle access into an area that has never before been open in this way. CLFN is deeply concerned about the potential for unregulated access to our lands, which poses risks of increased hunting, trapping, and other forms of human disturbance without oversight or management.</p> <p>In addition, the WSR will directly connect Webequie to the Ring of Fire, where the potential scope of development could bring large numbers of outside workers and associated traffic. These workers would have ready access to the road and may use it in ways that increase pressure on wildlife populations and further erode the cultural relationship impacted Indigenous Nations maintain with these lands and resources.</p>	<p>The Government of Ontario is providing major funding for the WSR and has a direct interest in advancing Ring of Fire development.</p> <p>With this role comes the duty to ensure that access along the WSR is strictly controlled and effectively monitored to prevent unregulated use and the resulting harm to wildlife and culturally important species. CLFN must be directly involved in the design, implementation, and oversight of these measures, which should include:</p> <ul style="list-style-type: none"> <li>• Establishing access control measures (e.g., gates, checkpoints, or other restrictions) with direct involvement of CLFN to oversee and regulate use of the road.</li> <li>• Developing and implementing a monitoring and enforcement program, with CLFN involvement, to detect, document, and respond to illegal activities (e.g., unauthorized hunting, trapping, or other forms of human disturbance) along the</li> </ul>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Webequie First Nation is the sole proponent of the Webequie Supply Road Project for the purpose of the EA/IA. At this point in time, it has not been determined who will construct, maintain and operate the Webequie Supply Road and is subject to further discussion between Webequie First Nation and Ontario. The future Proponent will engage First Nations to receive feedback on implementation and oversight of access control measures and monitoring/enforcement where applicable.</p> <p>This comment is also partially outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>

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			WSR.	
26.	Section 13.4.6.4: Injury or Death (Bald Eagle)	<p>The proposed mitigation measures for Bald Eagles do not identify what actions will be taken if a nest is accidentally damaged or destroyed during construction or operations. This is a critical omission. Bald Eagles are protected under both provincial and federal law, and disturbance or destruction of nests can cause direct loss of eggs, chicks, or future nesting opportunities. Without clear contingency protocols, there is no assurance that such an incident would be managed properly, nor that ecological or cultural impacts would be addressed.</p> <p>CLFN recommends that Indigenous Nations must be directly involved in decision-making if Bald Eagle nests are harmed, given the cultural significance of this species.</p>	The Proponent should establish a clear contingency protocol and reporting to regulatory authorities and direct notification of impacted Indigenous Nations if a Bald Eagle nest is disturbed or destroyed.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Contingency protocols and/or reporting to regulatory authorities and notification to impacted First Nations if a Bald Eagle nest is disturbed or destroyed will be addressed in the Construction Environmental Management Plan (Wildlife Management and Monitoring Plan).
27.	General Comment	The EAR/IS does not include wildlife crossings as a mitigation measure, despite the fact that roads are known to fragment habitat and disrupt movement for both large animals (such as caribou, moose, and wolverine) and smaller species (such as martens, hares, and other small mammals). While CLFN acknowledges that large-scale overpasses are not practical for a remote gravel road, other effective and lower-cost options exist. The absence of any consideration of such measures suggests that habitat connectivity and safe passage for wildlife have been overlooked.	<p>A. The Proponent should incorporate wildlife crossings into the Project design to support connectivity and reduce mortality risks for both large animals (e.g., caribou, moose, wolverine) and small mammals and other species.</p> <p>B. The Proponent should assess the feasibility of different options such as modified culverts, underpasses, or wildlife-compatible bridge designs and commit to implementing appropriate measures.</p> <p>C. The Proponent should present conclusive evidence that migration routes of mammals will not be severely compromised (particularly caribou) in light of the selected path for the WSR.</p>	1. The comments are addressed in the Final EAR/IS. Wildlife crossings are identified in Section 12.4.2.3.1, Section 12.4.2.3.2 and Table 1241, in association with 'alteration in wildlife movement - loss of connectivity' and 'changes to abundance and distribution of wildlife'.
28.	Section 13.2.1.1.4: Wolverine Occupancy Study	The Wolverine Occupancy Study relied on only two years of data collection. This timeframe is inadequate for a Threatened species that occurs at very low densities, ranges across thousands of square kilometers, and has slow reproductive rates. Interannual variability in prey availability, snow conditions, climate extremes, and industrial disturbance can cause major fluctuations in wolverine presence and detectability. Relying on such a limited data set to inform road design and predict impacts risks underestimating both baseline population conditions and the long-term consequences of habitat fragmentation and increased access.	The Proponent should extend the timeframe of wolverine baseline studies and monitoring (i.e. 5 years) to capture variability over longer periods and provide a more reliable basis for assessing impacts.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The proponent has completed baseline studies that are considered adequate for the purposes of assessing effects from the Project on wolverine, and the level of effort is consistent with the requirements stated in the ToR, TISG, and supportive VC Study Plan prepared early in the EA/IA process.

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29.	General Comment	<p>CLFN is of the opinion that the EAR/IS does not provide sufficient temporal baseline data across wildlife species. Many surveys were carried out over a timeframe of just a few years. Wildlife populations in the region are influenced by long-term cycles, seasonal variability, and cumulative changes from human activity. Short-term surveys cannot capture these dynamics and therefore underestimate potential Project effects.</p> <p>It is important to note that the mines in the Ring of Fire that the WSR is purported to be built to access won't be developed until the Marten Falls Community Access Road and Northern Road Link are both constructed and operational. Even under the most optimistic permitting and construction scenarios, there is time for at least 5 years of baseline data gathering along the WSR corridor (including the Ring of Fire area) before construction in the area commences.</p>	<p>The Proponent should extend the temporal scope of wildlife baseline studies and monitoring to reflect multi-year and seasonal variability, ensuring that impact predictions are based on reliable and representative data. The minimum length of baseline studies should be 5 years.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The proponent has completed baseline studies that are considered adequate for the purposes of assessing effects from the Project on wildlife, and the level of effort is consistent with the requirements stated in the ToR, TISG, and supportive VC Study Plan prepared early in the EA/IA process.</p>
30.	Section 11.4.2: Loss or Alteration of Wetland Function	<p>CLFN takes the loss of habitat very seriously. For our Nation, plants and ecosystems are not only ecological resources but also medicines and sacred parts of our cultural and spiritual identity. Any offsetting activities should respect this relationship and cannot be approached as a purely technical exercise.</p>	<p>The Proponent should ensure the Ecological Restoration Plan is designed and implemented in a manner that reflects both ecological and cultural priorities by:</p> <ul style="list-style-type: none"> <li>• Ensuring restoration targets include culturally significant and medicinal plants, guided by Indigenous knowledge.</li> <li>• Establishing clear timelines, monitoring requirements, and adaptive management measures.</li> <li>• Aligning offsetting activities with the recovery needs of Species at Risk.</li> </ul>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The proposed wetland monitoring program would be designed to collect data to facilitate the evaluation of hydrological and hydrogeological conditions, as well as the assessment of soil characteristics, water quality, vegetation and wildlife.</p> <p>Proposed restoration approaches are aimed at maintaining robust vegetation communities composed of self-sustaining indigenous species, which would include those that have been identified as being culturally significant and/or having medicinal value.</p> <p>The proposed Ecological Restoration Plan will be developed in consultation with Indigenous communities and will include plans for construction oversight and effectiveness monitoring.</p>
31.	Section 21.3.4: Other Projects and Physical Activities Considered	<p>CLFN believes that the EAR/IS underestimates the cumulative effects of development due to the under-accounting of projects likely to be associated with the Ring of Fire. The Cumulative Effects Assessment (CEA) considered only a narrow scope of projects currently proposed or deemed "reasonably foreseeable." This approach is flawed, as it excludes the many projects that are likely to emerge over the longer term but have not yet been formally proposed. Given the scale of mineral deposits and the rapid pace of claim staking and</p>	<p>To properly address these deficiencies, CLFN recommends that the EAR/IS adopt a scenario-based approach to cumulative effects. This method would consider multiple plausible development pathways over the long term, rather than restricting the analysis to projects that have already been proposed.</p> <p>Each scenario should be assessed for its cumulative effects on key values such as wildlife populations. This approach would allow decision-makers and</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The Cumulative Effects Assessment (CEA) methodology in the EAR/IS followed the requirements defined in the approved TISG and ToR. Per the Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act (the Policy Framework) the CEA should consider future physical activities that are either certain or reasonably foreseeable. Without publicly available</p>

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		<p>investment, it is unrealistic to assume that development will be limited to the small set of projects included in the CEA.</p> <p>By limiting the scope of projects assessed, the EAR/IS fails to capture the full cumulative effects of widespread industrial activity in the Ring of Fire. This narrow approach does not provide decision-makers or Indigenous communities with a meaningful understanding of the environmental, social, cultural, and ecological consequences of development. CLFN's perspective is that cumulative effects should be assessed over a much longer time frame that reflects the likelihood of multiple mines, road networks, transmission lines, and processing facilities being advanced sequentially and in combination.</p> <p>Of particular concern are the long-term implications for wildlife. Short-term scoping misses the broader picture of how overlapping projects across decades will fundamentally alter ecosystems and undermine the ability of Indigenous communities to maintain harvesting practices. A broader and forward-looking cumulative assessment is therefore essential to adequately evaluate long-term effects.</p>	<p>Indigenous communities to understand not only the impacts of currently proposed projects, but also the likely trajectories of development over decades. A scenario-based assessment provides a more realistic and precautionary framework for evaluating risks, planning mitigation, and ensuring that Indigenous rights and ecological integrity are protected in the long term.</p>	<p>information relating to these future physical activities, the ability to predict cumulative effects will lack reliability.</p> <p>If the reasonably foreseeable projects enter the impact assessment review process, affected stakeholders (including CLFN) will have the opportunity to participate in the process including the assessment of cumulative effects.</p> <p>The Federal <i>Impact Assessment Act</i> does include a mechanism for a regional assessment to examine the positive and adverse effects (impacts) of past, existing and/or future activities within a specific region. CFLN may choose to request a regional assessment following the instructions provided here: <a href="https://www2013.international.gc.ca/regions-regions/regions-regions.aspx">Regional Assessments - Canada.ca</a>.</p>
<b>Water Resources and Geochemistry</b>				
32.	Section 7: Assessment of Effects on Surface Water Resources pg.37	<p>Subsection 7.2.2.2 notes that aluminum concentrations between 2019-2023 measured across the 3 watersheds (Winisk River, Ekwan River, and Attawapiskat River watersheds) had multiple exceedances of the 100 µg/L limit, outlined in the CCME Water Quality Guidelines for the Protection of Aquatic Life (some sites as high as 379µg/L). Because there were several pH readings below 6.5 in each year, the CCME limit drops even lower to an acceptable 5µg/L. The digging, clear cutting, and removal of riparian vegetation around watercourses may significantly reduce each watershed's ability to:</p> <ul style="list-style-type: none"> <li>• Stabilize aluminum-bearing soils, which prevents erosion and leaching into the stream.</li> <li>• Absorb and filter acid rain, which helps buffer stream acidity.</li> </ul> <p>Exposing streams to increased aluminum will only further diminish water quality. It's important to note that aluminum combined with acidic pH levels (pH&lt;6.5) are extremely toxic</p>	<p>CLFN recommends that the Proponent conduct a soil sampling study using a 20m buffer at each water crossing before breaking ground on the road's construction. It was mentioned that the high concentrations of aluminum are likely "naturally occurring from sediment depositions and weathering". It's critical that the construction of the road does not further exacerbate aluminum toxicity (or other contaminants documented in the report, such as iron) through runoff into these watersheds.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The CLFN proposed soil sampling program will be considered by the ultimate owner/operator in future development stages of the Project.</p>

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		to fish health, especially early life-stage salmonids and Acipenseridae.		
33.	Appendix F Natural Environment Existing Conditions Report pg. 107	<p>Subsection 5.3.2.2 acknowledges that the Proponent has only completed 77% (24 of 31 Water Crossings) of surface water quality monitoring. Water quality was taken in Summer 2019, Fall 2020, Spring 2021, and Summer 2023, which offers very little comparability when looking at seasonal changes.</p> <p>This level of effort is far below what is considered best practice. It is typical to conduct multi-season, multi-year baseline studies to adequately characterize water quality variability, especially given the erratic weather phenomena and influences onset by climate change year to year.</p>	CLFN recommends additional baseline sampling to adequately characterize water quality at each water crossing. Each water crossing should have at least 4 sample points per season over several consecutive years to calculate seasonal variability and more in-depth statistics.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The proponent will consider additional surface water quality sampling at high priority and select water crossing locations to capture seasonal variability and visit the locations that have not been visited yet, prior to construction.
34.	Section 7: Assessment of Effects on Surface Water Resources pg. 29	<p>Peak discharge estimates are based on generalized regional methods (Index Flood, Rational Method) without calibration to local hydrometric data. This approach assumes regional representativeness, but ignores the unique hydrologic regime of the James Bay Lowlands, where low-relief terrain, muskeg systems, and seasonal variability strongly influence flows.</p> <p>Without calibration or validation, peak flow estimates may be unreliable, creating risks of under-design of waterbody crossings and drainage infrastructure. This uncertainty presents significant environmental risk if any water crossings or infrastructure are damaged or destroyed from flows greater than anticipated in the EAR/IS.</p> <p>Gathered data on flows would also be of value in informing the spacing of equalization culverts along the route.</p>	<p>A. The Proponent should validate hydrologic models using local field data (e.g., temporary gauging stations) or proxy stations with comparable watershed conditions.</p> <p>B. The Proponent should conduct sensitivity analysis on key parameters (e.g., rainfall intensity, antecedent soil moisture, snowpack) to quantify uncertainty in design flows.</p> <p>C. The Proponent should document their model calibration process and disclose uncertainty ranges to support risk-informed decision-making.</p> <p>D. IAAC and MECP should require hydrologic model calibration be completed as part of the Impact Statement phase of the Project, ensuring that the findings are considered properly in the Impact Assessment process.</p>	<p>A, B, C - The proponent has updated the hydrologic approach to incorporate a new hydrological modeling approach that has been validated and calibrated using local data. The Project Team met with MTO Highway Standards Branch to review hydrology, hydraulics, drainage, and climate change requirements, and agreed on the project approach. The comprehensive hydrologic assessment of the study area was conducted focusing on key watershed characteristics and flow behavior under both current and future climate conditions. The method adopted for peak flow calculations varied based on their drainage areas:</p> <ul style="list-style-type: none"> <li>- the Regional Flow Frequency Analysis was used for areas greater than 100 km<sup>2</sup></li> <li>- the Hydrological Model was used for areas 1 km<sup>2</sup> to 100 km<sup>2</sup></li> <li>- Rational Method was used for areas less than 1 km<sup>2</sup> (when catchment areas are quite small, it can be assumed that the peak runoff event would result from a summer rainstorm).</li> </ul> <p>D – This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter. The proponent has also shared the new hydrological modeling approach with MTO which is the regulator of highway planning, development and operation.</p>
35.	Section 7: Assessment of Effects on Surface Water Resources	The assessment of hydraulic alterations at waterbody crossings is based on simplified 1D models with assumed channel geometry and roughness coefficients. These methods are inadequate in flat, peatland-dominated	A. The Proponent should apply 2D hydraulic modeling (e.g., HEC- RAS 2D) for major crossings to simulate velocity, depth, and sediment transport under a range of flow	A. The Project Team met with MTO Highway Standards Branch to review hydrology, hydraulics, drainage, and climate change requirements, and agreed on new and updated modelling approach more appropriate for this area. 2D Hydraulic

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	pg. 31	systems where overbank flooding, braiding, and sediment transport occur in multiple flow pathways. Relying on simplified assumptions risks underestimating localized erosion, fish habitat disruption, and cumulative downstream effects.	<p>conditions.</p> <p>B. The Proponent should collect high-resolution bathymetry and channel geometry data to replace assumptions with field-verified parameters.</p> <p>C. The Proponent should include Indigenous knowledge about local flood dynamics and ice jams in modeling scenarios.</p> <p>D. IAAC and MECP should require the use of 2D modeling for all crossings.</p>	<p>modeling will be undertaken for crossing locations that require bridges with widths of 20 m or more. 1D modeling is deemed sufficient for the rest of the water crossings.</p> <p>B. High resolution bathymetry for several locations has been collected, and additional collection continues throughout the detailed design process by the future ultimate owner/operator.</p> <p>C. Ice jam studies are available, and results are being incorporated (see the response to Comment #36).</p> <p>D. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
36.	Section 7: Assessment of Effects on Surface Water Resources pg. 31	The Proponent does not evaluate how ice formation, breakup, or freeze-thaw cycles could affect crossings. In rivers and streams in the Project area, ice jams and frost heave significantly alter hydraulics, potentially causing crossing blockage, bank erosion, and infrastructure failure. Excluding these processes underestimates risks to water quality, fish passage, and exercise of rights.	<p>A. The Proponent should conduct ice dynamics modeling to assess frazil ice, breakup jams, and culvert freeze-up scenarios.</p> <p>B. The Proponent should evaluate structural resilience of culverts and bridges under freeze-thaw stress and provide contingency designs (e.g., overflow channels, debris/ice control structures).</p> <p>C. The Proponent should incorporate Indigenous knowledge about ice travel hazards and spring breakup flooding into risk assessments.</p> <p>D. IAAC and MECP should require the Proponent to explicitly assess ice-related impacts to aquatic systems and safety to exercise of Treaty and Aboriginal rights.</p> <p>E. IAAC and MECP should require in the conditions of approval for the Project that the Project monitoring plans include post-breakup inspections and adaptive management triggers.</p> <p>F. MECP or MNR should require emergency response protocols for ice-jam flooding at Project-related crossings.</p>	<p>A, B. The proponent has conducted studies with Northwest Hydraulic Consultants (NHC) to evaluate ice jam risk. This involved regional analysis of available ice data to evaluate breakup conditions (completed) and a per crossing evaluation of breakup water levels using breakup parameters established in the regional analysis (in progress). The EA/IA Project Team have identified that ice issues may be present at Winisk Lake and additional analysis will be undertaken during detail design by the ultimate owner/operator.</p> <p>C. The Project Team offered and continues to communicate the opportunity for Indigenous communities to undertake and/or share Indigenous Knowledge. Input from CLFN and other Indigenous Communities is welcome and will be used, if provided for the future studies and to inform the detail design for the Project.</p> <p>D, E, F. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
37.	Section 7: Assessment of Effects on Surface Water Resources pg. 33	Sediment sampling was limited to a few crossings, failing to assess downstream depositional areas where fine particles and contaminants may accumulate. This approach underrepresents potential long-term sedimentation risks, including burial of spawning habitat and contaminant bioaccumulation in fish species.	<p>A. The Proponent should complete additional sediment sampling to include all water crossings and adding additional sampling in depositional areas downstream of all crossings. This should occur before construction commences.</p> <p>B. The Proponent should assess sediment contaminant binding potential and evaluate long-</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The ultimate owner/operator will consider and evaluate the need for sediment sampling at water crossings and potentially downstream of the project area.</p> <p>B. 4. Item will not be addressed as considered out of the scope</p>

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			<p>term accumulation risks under various flow regimes (that are yet to be modeled) prior to making a decision on the Project.</p> <p>C. IAAC and MECP should require the Proponent to undertake basin-wide sediment transport modeling (for each of the three primary watersheds) to identify high-risk depositional zones prior to making a decision on the Project.</p> <p>D. IAAC and MECP should ensure the additional sediment sampling and modeling results are integrated into cumulative effects assessments.</p> <p>E. IAAC and MECP should require long-term sediment monitoring at depositional area downstream of crossings as a condition of approval for the Project.</p> <p>F. IAAC and MECP should require transparent thresholds for sediment quality and erosion/ sedimentation that trigger adaptive management as a condition of approval for the Project.</p>	<p>of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). The proponent cannot commit to basin-wide sediment transport modeling as this considered outside of original scope of ToR, TISG and Study Plan that was developed in the early stages of the EA/IA process.</p> <p>C, D, E, F. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
38.	Section 7: Assessment of Effects on Surface Water Resources pg. 46	<p>The Proponent does not forecast potential changes to water quality conditions during the construction or operations phases, nor does it account for land use change, climate change, or cumulative development in the watershed. This omission prevents informed assessment of Project risks over the lifespan of the road.</p> <p>It is hard to believe the conclusions in the assessment given the extremely limited baseline data set and the lack of modelling upon which the conclusions are based. This lack of rigor and detail in the assessment undermines much of the purpose and intent of the environmental assessment process, which is intended to bring thorough analysis to the conclusions drawn.</p>	<p>A. The Proponent should develop predictive water quality models incorporating climate scenarios, land disturbance, and operational inputs. The model should also run scenarios of potential accidents such as spills.</p> <p>B. The Proponent should provide 20–50 year forecasts of key parameters, with uncertainty analysis.</p> <p>C. IAAC and MECP should require the Proponent to revise the hydrologic and water quality modeling for the Project to incorporate climate change projections prior to IAAC making a decision on the Project.</p> <p>D. IAAC and MECP should include a condition of approval for the Project that stipulates that water quality forecasts inform adaptive management triggers.</p>	<p>Climate change projections were incorporated into the hydrologic modeling of each water crossing and are reflected in the current road design that support the EA/IA. Modelling was undertaken to predict future flows under different precipitation scenarios; and that information was used to develop structure opening sizes and requirements.</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The ultimate owner/operator will consider and evaluate if predictive water quality model with 20 to 50 year forecasts is required or beneficial to assess during detail design phase of the Project.</p> <p>C, D. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
39.	Section 7: Assessment of Effects on Surface Water Resources pg. 78	<p>The Proponent concludes that water quality impacts are not significant but provides shockingly little data or analysis upon which these conclusions have been drawn. The report does not forecast future water quality trends under operational conditions, nor does it account for land use change, climate change, or cumulative development in the</p>	<p>A. The Proponent should commit to gather at least 5 years of quarterly baseline data from all water crossings, both upstream and downstream.</p> <p>B. The Proponent should conduct statistical analyses (e.g., ANOVA, Mann-Kendall trend</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The ultimate owner/operator will consider and evaluate the need for or additional water quality sampling prior to construction and need for continuous monitoring afterwards.</p>

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		<p>watershed. These glaring omissions prevent informed assessment of Project risks over the lifespan of the road. Other sections of the EAR/IS, such as Section 8, take a more analytical approach to scoring the residual effects from the Project. While the approach in Section 8 is still inadequate, it at least has a veneer of objectivity and systematic analysis.</p> <p>The potential impacts to surface water are one of the key considerations for CLFN from the Project and this should be assessed with dramatically greater rigor in the EAR/IS for appropriate mitigation and accommodations to be planned for the Project.</p>	<p>test) on the existing baseline data and the additional baseline data that we have recommended that the Proponent gather.</p> <p>C. The Proponent should provide a decision matrix or scoring system linking magnitude, duration, frequency, and reversibility to significance ratings.</p> <p>D. The Proponent should revise the significance conclusions based on the updated decision matrix and document rationale for each significance conclusion, including uncertainties.</p> <p>E. IAAC and MECP should require updated water quality modelling on a regular basis (i.e. every three years) for the life of the Project based on updated modelling assumptions and gathered water quality data.</p> <p>F. IAAC and MECP should require the Proponent to provide quantitative water quality significance determinations based on additional water quality baseline data, statistical analyses, future climate predictions, hazards assessed in Section 23 and reasonably foreseeable future development <u>prior to issuing a decision on the Project.</u></p> <p>G. IAAC and MECP should include a condition of approval for the Project that adaptive management triggers for water quality are informed by the updated water quality modelling based on 5 years of additional baseline data collection.</p>	<p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The ultimate owner/operator will consider if a Mann-Kendall analysis or other analysis will be performed on the baseline data results, including whether additional data collection is necessary.</p> <p>C. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). The evaluation of significance has used a prescribed series of criteria to determined significance and no further decision matrix with statistical analysis is proposed.</p> <p>D. See above comment. No further modifications are proposed for the significance conclusions.</p> <p>E, F, G. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>

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40.	Section 7: Assessment of Effects on Surface Water Resources pg. 46	The potential for altered shading, runoff, and dust deposition from road construction to affect stream temperatures has not been assessed. In northern systems, even small thermal changes can affect cold-water fish such as brook trout and whitefish. Shading conditions can also alter spring freshet.	<p>A. The Proponent should model potential thermal and habitat impacts of road runoff, altered shading, and dust deposition.</p> <p>B. The Proponent should assess implications for temperature- sensitive species and critical spawning/rearing habitats.</p> <p>C. IAAC and MECP should require thermal impact assessments and mitigations as a condition of approval for the Project.</p> <p>D. IAAC and MECP should require monitoring temperature changes at the crossings identified to be the most sensitive to change from the Project.</p> <p>E. IAAC and MECP should require adaptive design measures (e.g., riparian planting, thermal refugia protection) if thresholds are exceeded as a condition of approval for the Project.</p>	<p>A. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). We note that the ultimate surface treatment of the road (chipseal or asphalt) will limit dust impacts on surface water.</p> <p>B. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>C, D, E. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
41.	Section 8: Assessment of Effects on Groundwater Resources pg. 23	The report discusses potential changes to groundwater levels and flow directions but does not include a numerical groundwater model. Without groundwater flow modeling, predictions of drawdown, contaminant migration, and groundwater-surface water interactions remain speculative. This is particularly important for having a detailed understanding of the shallow flow of the peatlands where the road will alter shallow groundwater flows and equalization culverts will be required.	<p>A. The Proponent should prepare a MODFLOW (or similar) based numerical model to simulate flow paths, drawdown zones, and interactions with surface water. This should be completed as part of the Impact Statement phase of the Project to ensure the effects assessment is based on rigorous analysis of potential impacts.</p> <p>B. The Proponent should provide an uncertainty analysis and model calibration documentation to inform the assessment of impacts to groundwater. The should be completed during the Impact Statement phase to ensure that it informs the Project decision.</p> <p>C. IAAC and MECP should require that a defensible, calibrated groundwater model is submitted and reviewed prior to Project approval.</p> <p>D. IAAC and MECP should include a condition of approval in the Project decision requiring model updates and recalibration as new monitoring data become available.</p>	<p>A and B) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). There was insufficient data available during the EA/IA to set up, run and calibrate numerical models to simulate and predict the effects on groundwater resources with a high level of confidence (including groundwater flow and contaminant/fate transport). The ultimate owner/operator will this consider the need for enhanced modelling to support the detail design and permitting for the Project where data is available, particularly at water crossings, peatland areas and aggregate sites.</p> <p>C, D. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
42.	Section 8: Assessment of Effects on	The Proponent describes groundwater recharge reduction from ground hardening (roads, camps, pits) only qualitatively, without volumetric or percentage estimates. This weakens	<p>A. The Proponent should apply water balance modeling to quantify recharge loss under multiple scenarios (construction, operation,</p>	<p>A and B. 1. Item will be addressed in the Final EAR/IS submission. The quantitative (volumetric) changes to recharge</p>

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	Groundwater Resources pg. 23	<p>the ability to assess aquifer sustainability and long-term water balance. It is certain that the road will alter the hydrology of the peatlands, however the extent to which shallow groundwater flow will be altered by the Project is highly speculative due to the lack of primary data gathering and modelling of changes to existing conditions from the Project.</p> <p>Similar projects building floating roads on peat have not operated as predicted, with much more subsidence and additional gravel required to maintain the road than predicted. This will inevitably have a range of impacts on surface water flow in the region.</p>	<p>climate change) and incorporate this into the MODFLOW modelling that the Proponent should complete as part of the final EAR/IS and assessment of residual effects.</p> <p>B. The Proponent should assess the implications for aquifer storage, shallow groundwater flows in the peatlands and discharge to streams/wetlands in their MODFLOW model.</p> <p>C. IAAC and MECP should require volumetric recharge reduction estimates and their implications for aquifer sustainability within the final EAR/IS to inform the Project Decision</p> <p>D. IAAC and MECP should impose as a condition of approval that the Proponent develop a groundwater recharge and shallow groundwater flow monitoring and adaptive management program for the Project that is informed by the MODFLOW model and updated during the life of the Project.</p>	<p>volumes due to construction and operation have been provided in Section 8.3.2.2 using the water balance method.</p> <p>Refer to the response for Comment #41 on numerical modelling.</p> <p>C, D. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
43.	Appendix F: Natural Environment Existing Conditions Report pg. 133	<p>The groundwater baseline sampling completed by the Proponent is extremely limited, with only 3 sampling events at 12 newly installed groundwater wells completed within a period of a single year. With such a limited dataset, interannual variability and climate sensitivity are not analyzed, and could not be reasonably analyzed. This limits understanding of long-term changes to groundwater levels and quality and calls the road design and planning into question given the lack of certainty around groundwater levels and baseline groundwater quality in the vicinity of the Project.</p> <p>In short, it is impossible for the Proponent to minimize changes to the environment from the Project with such a limited dataset of what the existing conditions around the Project are.</p>	<p>A. The Proponent should extend groundwater monitoring to be a minimum of quarterly (including winter) over a period of five years to capture variability and refine baseline conditions. This should be completed as part of the EAR/IS.</p> <p>B. Once the 5 years of data have been gathered, the Proponent should apply time-series and trend analyses to refine the understanding of baseline conditions in the area.</p> <p>C. IAAC and MECP should require that the Proponent present the refined baseline conditions (based on 5 years of regular data gathering) and updated the engineering design for the Project before construction commences as a condition of approval for the Project.</p> <p>D. IAAC and MECP should impose a condition of approval that long-term groundwater monitoring (quantity and quality) continue through operations and be incorporated into the groundwater management plan for the Project.</p>	<p>A and B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)The EA/IA has establish baseline conditions with preliminary results. The collected data and interpreted results reflect some seasonal changes or variations and are considered adequate for the effects assessment. More groundwater data may be collected during the detail design phase of the Project by the ultimate owner/operator to provide more information on seasonal variations over a longer period of time.</p> <p>C, D. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
44.	Section 8: Assessment of Effects on Groundwater	<p>In the groundwater assessment, the Proponent uses qualitative categories (low, moderate, high) without quantitative thresholds, even though a scoring framework was applied for other VCs.</p>	<p>A. The Proponent should define significance thresholds with measurable criteria (e.g., % change in water table, exceedance of drinking water quality guidelines) that are applied in the</p>	<p>A and B. 1. Item will be addressed in the Final EAR/IS submission. Section 5.2.6 has been revised to provide updated criteria for determining the significance of the net effects. A</p>

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	Resources pg. 62	This reduces transparency and consistency.	<p>final version of the EAR/IS.</p> <p>B. The Proponent should apply a similarly quantitative method to scoring the other VCs in the final EAR/IS.</p> <p>C. IAAC and MECP should require the Proponent revise the EAR/IS to include quantitative significance thresholds for each VC in the final EAR/IS.</p> <p>D. IAAC and MECP should, as a condition of approval, impose annual reporting of measured effects against the anticipated effects for groundwater and all other VCs.</p>	<p>qualitative aggregation method is used, instead of quantitative method, to define the significance throughout various VCs.</p> <p>C, D. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
45.	Section 8: Assessment of Effects on Groundwater Resources pg. 31	<p>The Proponent has acknowledged dewatering at aggregate pits but not modeled for aquifer drawdown or lateral extent. This omission underestimates risks to water users, wetlands, and streams.</p> <p>CLFN wishes to remind the Proponent and the Crown that it will be a number of years before construction can commence on the Ring of Fire mines (which are the destination of this road) given the Ring of Fire's dependency on the Marten Falls Community Access Road and Northern Road Link. Given the timelines for the construction of these other road projects there is ample time to undertake all of the additional baseline and modelling work recommended in our review without delaying the WSR Project.</p>	<p>A. The Proponent should simulate pit dewatering impacts using MODFLOW or FEFLOW to inform the final EAR/IS. This can be part of the overall MODFLOW model for the Project.</p> <p>B. Based on the groundwater modelling, the Proponent should revise the EAR/IS to assess the potential for aquifer depletion, flow reversal, and cumulative drawdown from the aggregate pits.</p> <p>C. IAAC and MECP should require that the Proponent prepare groundwater dewatering models for the final version of the EAR/IS.</p> <p>D. Alternatively, the Proponent could commit to staying above the water table for all aggregate areas. Note that this would require detailed groundwater baseline monitoring at each aggregate site to ensure that this is feasible.</p>	<p>A, B. 1. Item will be addressed in the Final EAR/IS submission. Groundwater drawdown and zone of influence (lateral extent) for dewatering at aggregate sites have been provided in Section 8.3.5.2 (Table 8-14 and Table 8-15).</p> <p>Refer to the response for Comment #41 on numerical modelling.</p> <p>C. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p> <p>D. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). As noted in Section 8.3.5, extraction of materials will not extend below measured/documented groundwater levels at the proposed aggregate sites. The ultimate owner/operator will be conducting further hydrology/hydrogeology analysis to support aggregate permit applications and a monitoring program will be developed and implemented to assess changes to groundwater levels and flow. The monitoring program will span pre-, during and post-construction periods (e.g., three years after construction is complete).</p>
46.	Appendix F: Natural Environment Existing Conditions Report pg. 152	The Proponent has not mapped groundwater-dependent wetlands or assessed these wetlands for vulnerability to changes in groundwater levels. These ecosystems are highly sensitive to small changes in groundwater levels, especially in the portion of the Project located within the James Bay Lowlands ecosystem.	<p>A. The Proponent should map and classify groundwater-supported wetlands within the Project footprint and local study area. The findings of this study should inform the final version of the EAR/IS. Note that this will likely require substantial additional primary data gathering of groundwater levels and hydraulics.</p> <p>B. The Proponent should model impacts of water</p>	A and B. 1. Item is addressed in the Final EAR/IS submission as wetlands are mapped identified in Section 11. The effects assessment related to groundwater interaction with wetland is collectively addressed Section 8 and Section 11. More detailed mapping, field investigations and data collection may be completed during the detailed design phase by the ultimate owner/operator.

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			<p>table drawdown and altered flow direction on these wetlands. The findings of this work should inform the final version of the EAR/IS.</p> <p>C. IAAC should require that the Proponent identify and assess groundwater-dependent wetlands in the final version of the EAR/IS.</p> <p>D. IAAC should impose a condition of approval that mandates long-term monitoring of wetland hydrology and vegetation health.</p>	<p>Refer to Response #41 for comment on numerical modelling. C, D. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
47.	Appendix F: Natural Environment Existing Conditions Report pg. 132	<p>The groundwater monitoring network is extremely sparse and unlikely to capture spatial variability across different hydrogeological settings. This creates significant uncertainty in baseline characterization and future monitoring, undermines the Proponent's ability to minimize changes to the environment from the Project and calls into question the engineering decisions made around the spacing of shallow groundwater flow equalization culverts.</p>	<p>A. The Proponent should commit to expanding the groundwater monitoring network with nested wells and piezometers in key hydrogeological zones.</p> <p>B. IAAC and MECP should require, as a condition of approval, that the Proponent provide evidence that the monitoring network captures the full extent of potential impacts.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Note that additional boreholes and monitoring wells are being completed at water crossings and peatland areas as part of the ongoing geotechnical investigations to support detail design phase for the Project. This includes groundwater/hydrogeological investigations proposed in 2026, and in 2027 (if required), prior to construction to support permitting requirements.</p> <p>B. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
48.	Appendix F: Natural Environment Existing Conditions Report pg. 158	<p>CLFN notes that the Proponent has only assessed the vulnerability of aquifers to surface contamination through a conceptual model outlined in Section 6.4 of Appendix F, rather than through analysis and modelling based on primary data.</p> <p>Without the conceptual model being validated through data and third party review of the modeled results, it is impossible to prioritize high-risk zones for mitigation or monitoring or even understand the nature and extent of risks to surface water and to road stability.</p>	<p>A. The Proponent should undertake aquifer vulnerability mapping using DRASTIC or equivalent methods, and have the findings of this work inform the final EAR/IS.</p> <p>B. The Proponent should use the findings of the modelling results to design protective measures and monitoring networks for high-risk areas, and incorporate these findings into the mitigation measures for the Project in the final EAR/IS.</p> <p>C. IAAC and MECP should, as a condition of approval, require that vulnerability mapping inform adaptive spill response planning and monitoring site selection.</p>	<p>A, B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further detailed mapping and numerical modelling will be considered by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>C. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>

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49.	Section 6: Assessment of Effects on Geology, Terrain and Soils pg. 50	<p>The Proponent's assessment identifies terrain instability risks (e.g., erosion, slumping, slope failure, subsidence) but does not provide quantitative slope stability modeling or geotechnical risk mapping. This omission underestimates risks at water crossings, aggregate pits, cut-and-fill areas and in peatlands, where failure could threaten water quality, road safety, and community use.</p> <p>The environment where the Project is proposed is extremely sensitive and vulnerable to damage from Project activities that need to be carefully and thoroughly planned for in advance to prevent serious environmental destruction</p>	<p>A. The Proponent should conduct slope stability modeling (limit equilibrium or finite element analysis) for the entire route with a focus high-risk segments. The findings of this analysis should inform the final version of the EAR/IS.</p> <p>B. The Proponent should prepare geotechnical hazard maps identifying failure-prone zones based on the slope stability modelling.</p> <p>C. The Proponent should develop contingency stabilization measures and a monitoring plan based on the slope stability modelling that should be included in the mitigation measures in the final version of the EAR/IS.</p> <p>D. IAAC and MECP should, as a condition of approval for the Project, require independent verification of slope stability at major crossings and in the peatlands during detailed design.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further slope stability numerical modelling will be considered by the ultimate owner/operator during the detail design and permitting phase for the Project.</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The need for geotechnical hazard maps to identify failure-prone zones will be considered by the ultimate owner/operator during the detail design and permitting phase for the Project.</p> <p>C. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Contingency measures related to potential slope stability issues will be considered by the ultimate owner/operator during the detail design and permitting phase for the Project.</p> <p>D. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
50.	Section 6: Assessment of Effects on Geology, Terrain and Soils pg. 27	<p>The Proponent's Acid Rock Drainage /Metal Leaching (ARD/ML) assessment relies on limited Acid Base Accounting (ABA) testing and Synthetic Precipitation Leaching Procedure (SPLP) on a very small number of samples from proposed aggregate pits. Without increasing the number of samples to make the findings statistically significant and also incorporating kinetic testing, the long-term risks of acid generation and metal release remain poorly constrained.</p>	<p>A. The Proponent should expand the geochemical sampling program to include representative lithologies at pits and cuts, with enough samples collected to ensure that the findings are statistically representative. These findings should be incorporated into the final version of the EAR/IS.</p> <p>B. The Proponent should include kinetic tests (e.g., humidity cell, leach columns) on all to evaluate long-term leaching potential. The findings of this work should be incorporated into the final EAR/IS.</p> <p>C. The Proponent should integrate the results from this additional work into ARD/ML management plan for the Project.</p> <p>D. IAAC and MECP should require robust ARD/ML predictive testing prior to accepting the EAR/IS as complete and final.</p> <p>E. IAAC and MECP, as a condition of approval for the Project, should mandate ongoing ARD/ML monitoring and adaptive waste rock handling protocols.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further geochemical sampling will be undertaken by the ultimate owner/operator during the detailed design and permitting phase for the Project, and prior to construction.</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further kinetic test will be considered by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>C. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further additional work into ARD/ML management will be considered by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>D, E. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>

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51.	Section 6: Assessment of Effects on Geology, Terrain and Soils pg. 51	The Proponent's soil loss estimates are based only on footprint area, without modeling erosion rates or sediment transport. This fails to reflect real risks of sedimentation to streams, wetlands, and water quality under construction and storm events.	<p>A. The Proponent should apply erosion prediction models (e.g., RUSLE, WEPP) under multiple climate scenarios and incorporate the findings into the final EAR/IS.</p> <p>B. The Proponent should use the prediction models to assess sediment delivery to downstream waterbodies and incorporate these findings into the final EAR/IS.</p> <p>C. The Proponent should revise the Project mitigation measures and site-specific erosion control designs in the final EAR/IS based on the findings from the predictive modelling.</p> <p>D. IAAC should require, as a condition of approval, that the Proponent measure sediment loading against model predictions and presents the findings as part of annual reporting for the Project.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The use of erosion prediction models will be considered by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). See above response on use of prediction models.</p> <p>C. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Site specific erosion control plans will developed by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>D. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
52.	Section 6: Assessment of Effects on Geology, Terrain and Soils pg. 51	<p>In the EAR/IS the Proponent has dismissed the risks to (and from) permafrost because no permafrost was observed in the extremely limited investigations. The presence of permafrost would significantly alter the design and operation of the road (especially in the peatlands where the road will be built overtop the existing soils, especially if the presence of the permafrost is not identified in advance of detailed engineering and construction.</p> <p>The lack of identified permafrost does not indicate a lack of permafrost, it demonstrates a lack of effort to confirm the presence or absence of permafrost in the Project area.</p> <p>If permafrost is present and not designed for, this could affect the stability of the road and lead to unintended environmental effects (erosion, sedimentation, spills, other contamination).</p>	<p>A. The Proponent should undertake a detailed investigation to identify the presence or absence of permafrost along the entirety of the WSR route.</p> <p>B. IAAC and MECP should require as a condition of approval for the Project that this detailed permafrost investigation have its findings incorporated into the detailed engineering and design for the road.</p> <p>C. The Proponent should assess climate-driven risks to any permafrost identified along the route through the detailed investigation.</p> <p>D. IAAC should, as a condition of approval for the Project, mandate monitoring of ground temperature along segments of the road where permafrost is identified in the detailed investigation.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further assessment of permafrost conditions, as part of the geotechnical program, will be undertaken by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>C. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further assessment of permafrost conditions will be undertaken by the ultimate owner/operator during the detailed design and permitting phase for the Project, and considered the detailed engineering design for the road.</p> <p>B, D. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
53.	Section 6: Assessment of Effects on Geology, Terrain and Soils pg. 32	Eskers are identified as aggregate sources but not assessed for ecological or hydrological functions, including as a source of water used for ceremonial purposes, and also as a wildlife migration corridor. By nature of being made of loose sand, eskers are extremely vulnerable to disturbance and require special attention to ensure that impacts to them are minimized.	<p>A. The Proponent should conduct detailed baseline geological, ecological and hydrological assessments of all eskers on the WSR route. The findings of this work must be incorporated into the final EAR/IS so that the findings are incorporated into the decision on the Project.</p> <p>B. IAAC and MECP should require integrated assessment of esker functions in the final EAR/IS and prioritize consideration of the</p>	A. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The proponent has completed baseline studies that are considered adequate for the purposes of assessing effects to eskers, and the level of effort is consistent with the requirements stated in the ToR, TISG, and supportive VC Study Plan prepared early in the EA/IA process. Further assessment of eskers will considered

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			<p>findings in the decision for the Project.</p> <p>C. IAAC and MECP should impose a condition of approval on the Project that ensures that ecological and hydrological function of any impacted eskers are not altered by the Project.</p>	<p>by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>B, C. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
54.	Section 6: Assessment of Effects on Geology, Terrain and Soils pg. 22	<p>The road alignment traverses extensive peatlands in the James Bay Lowlands. This habitat is extremely sensitive to disturbance. Building directly on muskeg creates inherent instability, as peat compresses under load, shifts seasonally, and can fail under thaw or flooding. Reliance on “floating road” designs may provide short-term stability but is unlikely to withstand long-term climate and hydrological changes without significant maintenance and periodic washouts or other alterations that may leads to spills or erosion/sedimentation.</p> <p>Given the likely need to apply large volumes of additional aggregate to the floating roads over time, it is entirely possible that there will be insufficient aggregate material for road maintenance without additional ground disturbance. Other roads constructed in similar environments in Canada have seen dramatically greater volumes of aggregate required for road maintenance than initially forecast during the EA phase of the Project.</p>	<p>A. The Proponent should present alternatives to the floating road approach that compare road performance under different scenarios.</p> <p>B. The Proponent should review their calculations around aggregate volumes required using more conservative assumptions for additional aggregate applications required to maintain the road over time (i.e. triple the assumed volumes of aggregate for road maintenance).</p> <p>C. If the reassessment of required aggregate (assuming at least triple the amount of aggregate material required for ongoing maintenance) determines that the proposed aggregate sources will be insufficient for the Project, the Proponent should demonstrate where the additional aggregate will be supplied from. This should be completed during the Impact Statement phase of the Project.</p> <p>D. The Proponent should evaluate the alternative construction styles against alternative routes for the road to see if there is a combination of construction style and route that significantly reduces impacts from the road.</p> <p>E. IAAC and MECP should, as a condition of approval, mandate long-term monitoring of road settlement and adaptive management plans for peatland sections.</p> <p>F. The Proponent should consider an alternative route that heads south to connect directly to the Marten Falls Community Access road. This route could almost entirely avoid road construction in peatlands, remaining in the uplands.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further assessment of the floating road design and any alternative deign refinements will be considered by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>B. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. Further assessment of the aggregate deposits and volumes will be undertaken by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>C. See above response to Item B.</p> <p>D. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further assessment construction execution strategy will be developed by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>E. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p> <p>F. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. Alternative routes/corridors carried forward to the EA/IA for further analysis were identified in the EA ToR.</p>
<b>Cultural and Social Resources</b>				

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55.	Section 19: Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights	There is no discussion regarding Free, Prior and Informed Consent (FPIC). While a summary exists regarding the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), FPIC is a critical component of UNDRIP that warrants discussion in any document assessing impacts to Aboriginal and Treaty Rights. FPIC is critical for ensuring Indigenous rights and interests are respected in major projects, such as the currently proposed Project, which affect their lands, territories and resources.	How is FPIC being considered as part of the Project and the assessment of Aboriginal and Treaty rights?	<p>1. Item will be addressed in the Final EAR/IS submission. The following text was added to section 19.1.1.1.4: Free, Prior and Informed Consent (FPIC) is a foundational principle of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). FPIC means that Indigenous Peoples have the right to give or withhold consent to projects that may affect their lands, territories, resources, cultures, or rights. It must be:</p> <ul style="list-style-type: none"> <li>• Free: Without coercion, intimidation, or manipulation.</li> <li>• Prior: Before any authorization or commencement of activities.</li> <li>• Informed: Based on full disclosure of the project scope, risks, and impacts.</li> <li>• Consent: Indigenous Peoples have the right to approve or reject the Project.</li> </ul>
56.	Section 19: Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights; Section 14: Assessment of Effects on Socio-Environment	Many of the proposed mitigations (e.g., enhancing housing stock, supporting language programs, strengthening cultural traditions, potential expansion of community services, creating a community kitchen for teaching, etc.) seem to be specific to Webequie.	Clarify if any of the proposed mitigations such as those identified here are also proposed to be implemented in other impacted Nations, and if so, which ones.	<p>1. Item will be addressed in the Final EAR/IS submission. Mitigation measures are found throughout the EAR/IS and environmental mitigation measures are summarized in Appendix E while measures discussed in Chapters 14 to 20 are summarized in the Community Readiness Plan (Appendix N). The measures apply to all areas that will be impacted in both the LSA and RSA. It is acknowledged that many of the mitigation and enhancement measures are focused on Webequie First Nation, due to the proximity of the Project's effects to the community.</p> <p>The proponent proposes to meet with Constance Lake First Nation to discuss further coordination of ongoing planning processes related to the all-season road projects and the Ring of Fire mineral development area, including identifying effects, mitigation and enhancement measures and monitoring. The proponent encourages Constance Lake First Nation to bring forward proposed mitigation and enhancement measures that could contribute to community readiness of Constance Lake First Nation related to all-season road projects and the Ring of Fire mineral development area; however, currently the EAR/IS for WSR has not defined these specific measures, but provides a path to discuss further via the proposed Community Readiness Working Group, as described in Section 5 of the Community Readiness Plan (Appendix N).</p>
57.	Appendix T	It is unclear whether historical shorelines are present within the Study Area, and whether they were assessed.	<p>A. Clarify whether LiDAR data is available of the Study Area.</p> <p>B. Clarify whether historical shorelines were assessed as being present within the</p>	<p>A. LiDAR data was collected by the Project Team for target areas along the preferred route.</p> <p>B. Based on available geological data, areas of well draining soils were identified and constitute the zone of potential,</p>

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			Study Area.	other than 50 metres from any modern water source. Without a property inspection the presence of historical shorelines cannot be confirmed. Further archaeological assessments will be conducted by the ultimate owner/operator during the detailed design and permitting phase for the Project, as recommended in the Stage 1 Archaeological Assessment Report.
58.	General Comment	CLFN members expressed the importance of controlled access if the WSR connects Webequie to mining sites. Community members raised frequent concerns about increased alcohol and drug trafficking, risks to Indigenous women, and potential conflicts with outsiders. Members stressed that access control is essential to protect community wellbeing, while ensuring that Webequie members themselves retain freedom of movement.	The Proponent must develop and implement a comprehensive access management plan. This should include manned checkpoints, security screening protocols, and other measures to restrict unauthorized use, while preserving unimpeded access for community members.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further development of road governance structure and access controls will be considered by the ultimate owner/operator during the detailed design and permitting phase for the Project.
59.	General Comment	CLFN notes that the EAR/IS provides little clarity on how employment and procurement will be managed. Members expressed concern about the risk of Indigenous workers being excluded from meaningful roles, consistent with past experiences of discrimination in large-scale development projects.	The Proponent must establish a transparent employment and procurement framework that prioritizes qualified Indigenous workers and businesses, includes clear targets for participation, and incorporates mechanisms to monitor, evaluate, and report on progress.	1. Item will be addressed in the Final EAR/IS submission. Education, Training and Employment Readiness are discussed in Section 14.4.4 (Education and Training) and Section 15.4.1 (Labour Force, employment and Income) of the EAR/IS. It is also described in Section 7.2.1 of the Community Readiness Plan. Monitoring of the Community Readiness Plan including evaluation, reporting and adaptive management are discussed in Section 8 of the Community Readiness Plan.  The Community Readiness Plan has been modified as needed to clarify that LSA and RSA communities may identify education and training initiatives needed for the community such as those described in Section 7.2.1 through the Community Readiness Working Group.

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<b>Air, Noise, Vibration</b>				
60.	Table 9-11 Project Interactions with Atmospheric Environment VC and Potential Effects	<p>Table 9-11 identifies the Project activities that may interact with the Atmospheric Environment VC; however, for both construction and operation phases, only “Emissions, Discharges and Wastes” is carried forward as having an effect.</p> <p>Activities such as road construction, quarrying, blasting, and vehicle traffic will clearly generate dust, noise, vibration, and lighting that directly interact with the atmospheric environment. By limiting the scope to emissions and discharges, the Proponent understates the range of potential effects and creates an incomplete picture of atmospheric impacts. This omission reduces the transparency of the assessment and downplays pathways that are of direct concern to Indigenous land users.</p>	<p>A. CLFN strongly recommends that Table 9-11 be revised to explicitly include dust, noise, vibration, and lighting as Project activities with the potential to affect the atmospheric environment.</p> <p>B. The Proponent must ensure that all pathways of effect are carried forward in the assessment so that their significance can be evaluated transparently and in relation to Indigenous concerns.</p> <p>C. The assessment should explicitly link these pathways to culturally important receptors, including country foods, wildlife habitat, and traditional land use activities, to ensure their relevance to Indigenous communities is fully considered.</p>	<p>A. All activities listed in Table 9-11 generate in various ways air emissions, noise, and other wastes. This is the reason why they were combined within a single activity “Emissions, Discharges and Wastes (e.g., air, noise, light, solid wastes, and liquid effluents)” applicable to each project phase. It encompasses all the concerns noted by the commenter as checkmarks were added for air quality, GHG emissions, sound level, vibration levels and light levels. Based on the above no revisions to Table 9-11 are proposed.</p> <p>B. As cited in the notes for Table 9-11, “Emissions, Discharges, and Wastes (e.g., air, noise, light, solid wastes, and liquid effluents)” are generated by many project activities. Rather than acknowledging this by placing a checkmark against each of these activities, “Emissions, Discharges, and Wastes” is included as an additional component under each project phase.</p> <p>C. The impact of air and dust emissions and noise during the construction and operation phases was reviewed with regard to identified culturally sensitive receptors along the WSR footprint. It included existing residences, existing institutions in Webequie, identified locations for future residences near the WSR, and culturally sensitive areas including spiritual or sacred spaces identified by Webequie First Nation community members and other Indigenous communities, and locations important for harvesting country-food/plans, fishing or hunting. The impact results at these locations are provided and discussed in details in the Air Quality Impact Assessment (Appendix G) and Noise/Vibration Impact Assessment (Appendix J).</p>
61.	Section 9.2.1.1: Air Quality – Methods	<p>The Proponent excluded the Ring of Fire Baseline Monitoring Program (2013–2017) dataset, which contains locally collected measurements of PM<sub>2.5</sub> and metals, from the air quality baseline assessment. Instead, the assessment relies primarily on distant regional monitoring stations (NAPS, RSQAQ) that do not capture local sources of exposure (e.g., diesel generators, wood burning, winter road traffic, wildfire smoke). Excluding this local dataset results in a baseline that does not accurately represent conditions experienced by nearby communities and land users and therefore underestimates actual exposure risks. The reliance on distant monitoring stations fails to capture</p>	<p>A. CLFN recommends that the Ring of Fire Baseline Monitoring dataset, including PM<sub>2.5</sub> and metals, be fully incorporated into the baseline assessment. Excluding these data underestimates local conditions and does not reflect the real exposures experienced by community members.</p> <p>B. The Proponent should establish a one-year, pre-construction local monitoring program for PM<sub>2.5</sub>, NO<sub>2</sub>, O<sub>3</sub>, VOCs, and metals. This program should be co-developed with impacted Indigenous communities to ensure that</p>	<p>A. We acknowledge that the following sentence in Section 9.2.1.1 could lead to confusion: “<i>Local air quality data are not available with the exception of limited data collected from a station operated by the MECP (2019) as part of Ontario’s Ring of Fire Baseline Monitoring Program (2013-2017) providing data on PM<sub>2.5</sub> and metals which are excluded from this assessment.</i>” For clarity, the PM<sub>2.5</sub> data from the Ring of Fire monitoring program was used to characterize baseline PM<sub>2.5</sub> concentrations since the Project will generate particulate emissions. The various metals monitored were not considered however, as the Air Quality Impact Assessment did not included metals. Although the</p>

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		<p>local conditions that are central to community health and land use, including emissions from diesel generators, wood burning, winter road traffic, and recurring wildfire smoke. By omitting locally collected data, the assessment underrepresents the actual exposure risks faced by community members and land users.</p>	<p>Indigenous knowledge and seasonal land use patterns are integrated into the monitoring design and locations.</p>	<p>road surface will be composed of aggregates and silt that may contain trace amounts of metals, it is not feasible with accuracy to characterize such emissions since the individual metals content in dust can be highly variable and currently is undetermined.</p> <p>B. Although a local pre-construction monitoring program would provide valuable data to the community, it would most likely not change the conclusions of the Air Quality Impact Assessment which uses baseline concentrations that are already elevated (using for instance the 98<sup>th</sup> percentile of monitored results at stations considered representative of the Project site conditions). This approach tends to generate conservative results considering that the high background concentration is added to the maximum modelled concentration from the Project, without knowing if both situations occur simultaneously. Also, as part of the Dust Monitoring and Management Program to be developed for the construction phase, a local monitoring station near Webequie is currently under consideration along with other protocols to monitor air quality impacts and rapidly mitigate potential issues.</p>
62.	Section 9.1.2: Engagement Input; Tables 9-4 and 9-5	<p>Indigenous concerns documented in Section 9.1.2 (Engagement Input; Tables 9-4 and 9-5) highlight that dust from roads, quarries, and blasting could affect vegetation, water quality, sturgeon, caribou, and berries. Section 9.3.1.2.2 (Air Quality – Dustfall Results) concludes that dust deposition will remain below the Ontario Ministry of Environment, Conservation and Parks (MECP) criterion of 7 g/m<sup>2</sup>/30 days.</p> <p>CLFN notes that provincial guidelines do not consider cultural thresholds. Even relatively low levels of dust may render snow, berries, and plants unsuitable for harvesting, and could discourage land users from traditional activities.</p>	<p>A. CLFN recommends that culturally relevant dust thresholds be developed in close consultation with impacted Indigenous Nations. These thresholds must reflect visible deposition on snow, vegetation, and water, as provincial criteria do not account for cultural values or land-use realities.</p> <p>B. IAAC and MECP should require a Dustfall Monitoring Program that directly measures deposition on snow, vegetation, and water at culturally important harvesting and trapping areas. Indigenous Guardians should be central to this program, both in sampling and interpretation of results.</p> <p>C. IAAC and MECP should impose adaptive management triggers as a conditions of approval so that immediate dust suppression measures—such as reduced hauling, blasting restrictions, or operational pauses.</p>	<p>A. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). The Ontario dustfall criteria was developed to account for soiling impacts. Inclusion of cultural values and land-use would require lengthy discussions on how to relate a these observation/knowledge in the selection of a threshold, which is not straightforward and would not in our opinion add significant value to the EA/IA. Other than soiling, dust deposition can have an impact on vegetation and human health. For that reason, dustfall results from the Air Quality Impact Assessment (Appendix G) was used in the Human Health Impact Assessment and assessment of potential effects on other valued components.</p> <p>B,C. These comments are outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
63.	Section 9.3.1.2.3: Construction Phase Results Tables 9-18 through 9-21	<p>Concentrations of airborne contaminants and NO<sub>2</sub> are predicted to exceed Ontario Ambient Air Quality Criteria (AAQC) and Canadian Ambient Air Quality Standards (CAAQS) at certain locations during construction. These exceedances are characterized as short-term (1–2 days) and therefore not significant.</p> <p>CLFN disagrees with this conclusion as even short-duration exceedances may adversely affect vulnerable individuals, and they may interfere with Indigenous harvesting or community use of the land.</p>	<p>A. CLFN recommends that the Proponent revisit the significance determination for predicted exceedances of PM and NO<sub>2</sub>. Even short-term exceedances can represent significant adverse effects to human health, cultural practices, and community well-being.</p> <p>B. The Proponent should develop a clear notification and exceedance management protocol with Impacted Indigenous Nations. This protocol should include advance notice of blasting or heavy hauling activities, and suspension of work during sensitive harvesting or ceremonial periods.</p> <p>C. Indigenous health and land use indicators should be included in determining the significance of exceedances, rather than relying solely on regulatory thresholds.</p>	<p>A. The exceedances noted by the reviewer would occur at culturally sensitive receptors that are closest to the road. Whereas we understand that the receptors are of importance for indigenous people, such exceedance would occur only for a short period of time when construction activities occur along the road near the receptor. This short-term disturbance will disappear when machinery and activities moves further down the road. Based on the assessment and limited receptors it is our opinion the significance determination remains valid.</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further notification, management and/or monitoring procedures for air quality exceedances will be described in Construction Environmental Management Plan to be developed by the ultimate owner/operator during the detailed design and permitting phase for the Project.</p> <p>C. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p>
64.	Section 9.3.2: GHG Emissions Assessment; Section 9.11.2: Follow-up and Monitoring – GHGs	<p>The Project will release greenhouse gases (GHGs) from construction activities, equipment uses, and vegetation and peatland disturbance. The loss of carbon stored in peatlands is irreversible, and yet the Proponent characterizes the effect as low in magnitude and not significant.</p> <p>Peatlands in this region are globally important carbon sinks, and their destruction has lasting climate consequences. The absence of a monitoring or offset strategy signals a lack of accountability. CLFN stresses that the Project should not move forward without a credible plan to account for and mitigate GHG emissions, including peatland and forest loss.</p>	<p>A. CLFN recommends that the Proponent conduct a baseline peatland and forest carbon inventory prior to construction in order to quantify carbon storage losses associated with vegetation removal and peatland disturbance.</p> <p>B. The Proponent should develop and implement a GHG monitoring and offset strategy that includes reforestation, wetland restoration, and protection of intact peatlands to ensure no net loss of carbon storage.</p> <p>C. The Project should demonstrate compatibility with Canada’s net-zero commitments and the Strategic Assessment of Climate Change (2020), including transparent reporting of all emissions and offsets.</p>	<p>A. 4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). It is acknowledged that site-specific peatland and forest carbon inventory through additional onsite sampling activities may provide a better picture of removed carbon stock from the land, but the road footprint inevitably still needs to impact forests in the uplands and peatlands in the lowlands. It is also important to note that the carbon from disturbed peatland will not be removed but rather compacted or locally displaced under the filling material and aggregates placed on peat to form the elevated floating road. Although this disturbance will generate methane (CH<sub>4</sub>) and carbon dioxide (CO<sub>2</sub>) emissions until the nearby peat settles, it has the advantage of avoiding water drainage that would generate much larger amounts of methane (CH<sub>4</sub>) in the process. Wet peat generates CO<sub>2</sub> and CH<sub>4</sub> very rapidly in absence of a water layer.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
				<p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator) Development, and the need for, a monitoring program to address regulatory requirements will be considered by the ultimate owner/operator during the detail design and permitting phase of the Project. We note that a habitat offsetting commitment for forest and wetlands is contained in Section 11 of the EAR/IS.</p> <p>C. See above response to Item B.</p>
65.	Section 9.3.3: Noise and Vibration	<p>Noise and vibration from road construction, blasting, and quarrying are predicted to affect only designated “Noise Sensitive Areas” such as residences, camps, and spiritual sites. Indigenous knowledge provided during engagement raised concerns about noise and vibration impacts on wildlife such as caribou, moose, sturgeon, and birds, as well as on cultural practices requiring quiet and solitude. The failure to assess these receptors represents a major gap.</p> <p>For CLFN members, disruptions to wildlife behavior and the quiet of the land directly affect harvesting, ceremonies, and cultural well-being. Noise and vibration cannot be considered insignificant when they alter how the land is used and experienced.</p>	<p>A. CLFN recommends that Proponent expand the scope of the noise and vibration assessment to include wildlife receptors such as caribou calving grounds, sturgeon spawning areas, and bird nesting habitats, which are essential to Indigenous harvesting and cultural continuity.</p> <p>B. The Proponent should formally recognize ceremonial, teaching, and harvesting sites as Noise Sensitive Areas (NSAs) in consultation with Indigenous communities, rather than limiting the assessment to residences and seasonal camps.</p> <p>C. The Proponent should restrict blasting and aggregate extraction to avoid sensitive periods for wildlife (e.g., calving, spawning, nesting).</p> <p>D. The Proponent should fund and facilitate community-triggered noise and vibration monitoring, with results shared in real time with Indigenous communities to ensure transparency and accountability.</p>	<p>A. Noise sensitive areas (NSAs) which are representative of potential effects from noise and vibration at a group or cluster of receptors were identified and used in the assessment. Specific to the comment from CLFN, the NSAs included:</p> <ul style="list-style-type: none"> <li>Seasonal residences, such as trapper cabins or hunting and fishing campsites, which are used by members of the Webequie First Nation, other Indigenous communities, and stakeholders;</li> <li>Spiritual or sacred spaces which members of the Webequie First Nation, other Indigenous communities, and stakeholders may identify as requiring quiet or being sensitive to disruptions from noise;</li> <li>Other locations which members of the Webequie First Nation, other Indigenous communities, and stakeholders and/or other Project disciplines may identify as requiring quiet or being sensitive to disruptions from noise (e.g., wildlife – Caribou), and include for instance locations important for harvesting of country foods.</li> </ul> <p>Results of the Noise Impact Modelling indicate that during operations phase, changes in sound levels resulting from the proposed Project are expected to be negligible for all identified noise sensitive locations.</p> <p>Results of the Noise Impact Modelling for construction also indicate that the most affected noise sensitive locations are found within 150 m of the proposed roadway, or 300 m of a waterbody crossing (involving pile driving/bridge construction). Noise impacts from roadway construction are only expected to affect identified noise sensitive locations for approximately one week based on an approximate 100 metre/day rate of construction.</p> <p>We have considered the recommendation of CLFN for expanding the scope of the noise and vibration assessment</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
				<p>completed by the proponent and it is our opinion this is not warranted based on the following:</p> <ul style="list-style-type: none"> <li>• The Proponent has adhered to the assessment requirements in the federal Tailored Impact Statement Guidelines and EA Terms of Reference for the project;</li> <li>• The Proponent has considered ceremonial, teaching, and harvesting sites, etc. as NSAs where this information has been provided by Indigenous communities;</li> <li>• The stated modelling results above, with consideration of mitigation, concluded that the overall noise and vibration effects are anticipated to be negligible; and</li> <li>• The effects assessment and conclusions of sensory disturbance completed for Wildlife and Wildlife Habitat (Section 12), Species at Risk (Section 13), Fish and Fish Habitat (Section 10 – Vibration) and Indigenous Peoples and Impact on the Exercise of Aboriginal and/or Treaty Rights (Section 19).</li> </ul> <p>B. See above response. The Proponent has considered ceremonial, teaching, and harvesting sites, etc. as NSAs where this information has been provided by Indigenous communities.</p> <p>C. Mitigation with respect to blasting at aggregate extraction sites to minimize and avoid impacts to sensitive periods for wildlife is documented in Section 12.4.2.3 (Alteration in Wildlife Movement under Sensory Disturbance) of the existing draft EAR/IS and states “Avoiding activities that are likely to disturb wildlife during sensitive periods in their life cycle (e.g., activities such as blasting or heavy machinery use). Species specific and group specific timing windows are described in Sections 12.4.3 – 12.4.7 (Moose, Furbearers, Bats, Birds, Reptiles and Amphibians)”. Mitigation for blasting and equipment at aggregate pit operations is also contained in the Species at Risk (SAR) Section 13.4.2.3 - Injury or Death of SAR; and 13.4.3.2 – Habitat Alteration or Degradation under Sensory Disturbance, which commits to restricting activities during critical life cycle activities.</p> <p>D. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Please see response to Comment #66. The predicted noise and vibration effects to NSA’s are expected to have negligible adverse effects. That said, the Proponent commits to conducting a noise and vibration monitoring program at</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
				aggregate extraction and blasting sites, and to the development of a complaint response protocol.
66.	Section 9.11.3: Follow-up and Monitoring – Noise and Vibration	<p>The Proponent states that noise monitoring will only occur if complaints arise, effectively placing the burden on Indigenous communities to identify and prove impacts.</p> <p>Proactive monitoring should be conducted at aggregate extraction, quarry, and blasting sites, with results shared in real time with Indigenous communities. A transparent complaint- response protocol should also be in place, with clear timelines for investigation and corrective action, so that communities are not left to bear the responsibility for identifying harm.</p>	<p>A. CLFN recommends that the Proponent carry out proactive noise and vibration monitoring at aggregate extraction and blasting sites, with results shared in real time with Indigenous communities.</p> <p>B. The Proponent should establish a clear complaint response protocol with defined timelines for investigation and corrective actions, to ensure that community concerns are addressed quickly and effectively.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The predicted noise and vibration effects to NSA's are expected to have negligible adverse effects. That said, the proponent commits to conducting a noise and vibration monitoring program at aggregate extraction and blasting sites. Details of the proposed monitoring program will be documented in the Noise and Vibration Management Plan to be developed and implemented for the construction and operation phases of the Project. CLFN will be provided with an opportunity to review the draft Noise and Vibration Management Plan and provide feedback.</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). A Complaints Protocol will be developed by the proponent for use during construction and operations of the Project. The purpose protocol will be to ensure timely, transparent and consistent handling of community complaints, including noise and vibration, related to the project. This protocol will include: intake channels to receive complaints (e.g., email, phone #); logging and categorization of complaints into a tracking system (e.g., type – noise, safety, location, severity, etc.); and response timelines/standards for acknowledgment and target to resolve a complaint.</p>
67.	Section 9.7: Cumulative Effects	Section 9.7 (Cumulative Effects) carries forward dust and noise as cumulative pathways but concludes the effects are not significant. This determination overlooks the fact that moderate- to-high magnitude dust and noise effects, when combined with wildfire smoke, diesel emissions, and other regional activities, create meaningful cumulative stressors for Indigenous land use and health.	CLFN recommends that the Proponent participate in a regional cumulative effects study for atmospheric stressors across the Ring of Fire, integrating Indigenous knowledge and long-term community observations. Coordinated regional mitigation strategies, such as a dust monitoring network and scheduling of blasting activities, should also be developed in collaboration with Indigenous communities.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
<b>Climate Change</b>				
68.	Section 24: Effects of the Environment on the Project	<p>Section 24 of the EAR/IS provides a comprehensive assessment of environmental hazards that may affect the Project, including extreme weather events, climate change trends, permafrost degradation, and wildfires. However, the section does not explicitly address the potential presence or impact of invasive species, which may pose a significant environmental risk to the Project during both construction and operations phases.</p> <p>Invasive species be introduced or spread through construction activities, equipment movement, soil disturbance, and altered hydrology. Their establishment can lead to:</p> <ul style="list-style-type: none"> <li>• Disruption of native ecosystems;</li> <li>• Increased erosion and sedimentation;</li> <li>• Damage to infrastructure;</li> <li>• Reduced effectiveness of restoration efforts; and</li> <li>• Impacts on Indigenous land use and traditional harvesting.</li> </ul> <p>Given the ecological sensitivity of the Hudson Bay Lowlands and the importance of maintaining biodiversity and ecosystem function, the absence of invasive species considerations in the environmental hazard assessment represents a gap in the current analysis.</p>	<p>A. CLFN recommends Section 24 of the EAR/IS be revised to include invasive species as a potential environmental hazard that could affect the Project. Specifically, Section 24 should recognize invasive species as a distinct environmental hazard alongside climate-related and geotechnical risks; assess how invasive species could affect project components, including road surfaces, drainage infrastructure, and vegetation buffers; and evaluate the likelihood and consequence of invasive species establishment and spread over the 75-year operational life of the Project.</p> <p>B. The Proponent should extend the existing Vegetation and Invasive Species Management Plan to include:</p> <ul style="list-style-type: none"> <li>• Adaptive management strategies for responding to invasive species that affect infrastructure.</li> <li>• Long-term monitoring protocols to detect and respond to invasive species that may compromise project integrity.</li> <li>• Integration with maintenance schedules and emergency response planning.</li> </ul>	<p>A. 1. Item will be addressed in the Final EAR/IS submission. Potential effects of invasive species are discussed in Section 11.3 (Potential Effects, Pathways and Indicators).</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Development/implementation of a Vegetation and Invasive Species Management Plan is identified in Section 11.4, with recommended components of the plan being included in 11.4.1.3.2. - indirect effect pathways. Invasive species are also discussed in Section 12 (Wildlife and Wildlife Habitat). Currently, few invasive species have been documented in the RSA, and studies suggest their spread along transportation corridors in the boreal forest is limited. However, recent studies in Alaska have shown species moving from travel corridors into adjacent burn areas. Fires, logging and other disturbances can make adjacent habitats more vulnerable. Management of roadside edges (e.g., monitoring, mowing, other removal mechanisms) will form a part of Vegetation and Invasive Species Management and Monitoring plan.</p>
69.	Section 24: Effects of the Environment on the Project; Appendix I and Appendix E	<p>Section 24 and Appendix I include technical assessments and climate risk analyses, but do not describe how impacted First Nations will be involved in ongoing climate monitoring and response.</p> <p>Additionally, Appendix I lacks specific performance indicators and public transparency in its follow-up and monitoring plans. Climate change will have widespread and interconnected impacts across the region, and the WSR may become a critical link for northern communities during climate-related emergencies.</p> <p>The EAR/IS should outline a more inclusive and coordinated approach that actively involves regional First Nations in climate monitoring, management, and adaptation.</p>	<p>A. The Proponent should revise the EAR/IS to outline a more coordinated approach that actively involves regional First Nations in climate monitoring, management, and adaptation processes. This should include specific mechanisms for engagement, such as establishing consultation frameworks, identifying roles for Indigenous communities in data collection and analysis, and ensuring participation in climate risk response and planning.</p> <p>B. The Proponent should define clear performance metrics for erosion, flooding, and freeze-thaw damage, and commit to transparent public reporting of monitoring results.</p>	<p>A. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Recommendation to involve First Nations in climate monitoring, management, and adaptation processes will be considered by the ultimate owner/operator in future development stages of the Project.</p> <p>The proponent's commitments to establish an Environment Committee and to involve Indigenous community members in developing and implementing appropriate monitoring programs, protocols and management plans to address potential effects of the environment on the Project are outlined in Section 24.4 (Mitigation Measures) and Section 24.8 (Follow-up and Monitoring).</p> <p>B. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Recommendation	Proponent Response (Refer to Proponent Response Legend)
				All design criteria is based on minimizing the difference between pre- and post-construction for water levels and subsequently flooding and erosion at water crossings. The exact performance metrics will become clearer during the detail design phase. Monitoring efforts, where applicable, will be based on confirming the validity of those designs and will be examined by the future ultimate owner/operator of the Project.
70.	Section 26: Contributions to Sustainability	The EAR/IS lacks explicit alignment with Canada's national sustainability targets, including the UN Sustainable Development Goals (SDGs) and Net-Zero Emissions by 2050. Additionally, the section does not provide measurable indicators or a monitoring framework to track progress toward these goals.	The Proponent should clearly map Project components to specific SDGs and national climate goals. A summary table or matrix showing this alignment, alongside defined performance metrics and a sustainability monitoring and adaptive management framework, would enhance the EAR/IS's transparency and alignment with national commitments.	1. Item will be addressed in the Final EAR/IS submission. The comment and recommendation are noted. The revised section will include a summary table illustrating the Project's alignment with UN Sustainable Development Goals and national climate objectives. As part of Project implementation, WFN will adopt a Sustainability Management Plan, providing a framework for evaluating and monitoring sustainability throughout construction, operation, and maintenance.

# Fort Albany First Nation





January 12, 2026

**Response to Fort Albany First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Chief Nakogee,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project. Please find enclosed the table that provides responses to the comments provided in your letter dated October 28, 2025.

As we move forward in the process to submit the Final EAR/IS, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to discuss the findings presented in the Draft EAR/IS in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the WSR Project.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Fox', written over a horizontal line.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment, Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Fort Albany First Nation (FAFN)

The following categorization of the proponent responses may appear in the comment response table for clarity.

### **Proponent Response Legend**

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
FAFN-001	Section 19.2.2.3.3, pp.19-152 to 19-165	The Draft EA/IS notes FAFN's traditional and governance structure, membership in Mushkegowuk Council and Nishnawbe Aski Nation, and stewardship role through the Omushkego Wahkohtowin Conservation Plan. However, it does not clearly explain how this governance authority will be included in project oversight or decision-making. Please revise the EA/IS to include: 1. A commitment to include FAFN in any project-related governance and decision making frameworks developed through future processes. 2. This commitment should name FAFN explicitly, outline roles across planning/construction/operations/decommissioning, and reflect a Treaty 9-aligned representation model that includes inherent, community-based leadership (not only regional Chiefs).	1. Item will be addressed in the Final EAR/IS submission. Governance structures for the Project have not yet been finalized. The proponent is committed to ongoing dialogue with Fort Albany First Nation to consider their input in the development of future governance and decision-making frameworks. This dialogue will include discussions on potential roles across all phases of the project planning, construction, operations, and decommissioning.
FAFN-002	Section 19.2.2.3.3, pp.19-152 to 19-165	The project traverses Treaty 9 homelands shared among multiple Nations. The Draft EA/IS does not explain how Treaty 9 will be respected in decisions that could affect shared lands, waters, rights (e.g., portages, estuaries). Please revise the EA/IS to include: 1. An explicit Treaty 9 -relevant clause stating that decisions affecting shared homelands will be made with impacted Treaty 9 Nations (co-decision-making), not merely after consultation, and that no project phase will advance where it would prejudice rights or proceed without agreement/consent. 2. FAFN-named roles in any joint committees/oversight with multi-year resources and authority to trigger adaptive management where Treaty interests are at risk.	1. Item will be addressed in the Final EAR/IS submission. Governance structures for the project have not yet been finalized. The proponent is committed to ongoing dialogue with Fort Albany First Nation to consider their input in the development of future governance and decision-making frameworks. This dialogue will include discussions on potential roles across all phases of the project planning, construction, operations, and decommissioning.
FAFN-003	Section 19.1.2 and 19.1.4, pp. 19-15, 19-23 to 19-26	The Draft EA/IS includes a summary of engagement activities with FAFN and confirms that consultation occurred. However, these inputs are not meaningfully reflected in the subsequent effects analysis, conclusions, or mitigation planning. Please revise the EA/IS to include:	1. Item will be addressed in the Final EAR/IS submission. Information from Fort Albany First Nation was received during the development of the Terms of Reference (ToR) for the Environmental Assessment Report/Impact Statement (EAR/IS), and responses to Fort Albany First Nation's concerns and issues

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<ol style="list-style-type: none"> <li>1. A clear explanation of how FAFN's input shaped the scope, methods, analysis, and conclusions of the EA/IS.</li> <li>2. Identification of any unresolved concerns and a plan for addressing them going forward.</li> </ol>	<p>were addressed by the proponent at that time. The information included in the Draft EAR/IS regarding Fort Albany First Nation's cultural and traditional existing conditions has been limited.</p> <p>The proponent acknowledges the receipt of the Indigenous Knowledge and Land Use (IKLRU) Study report from Fort Albany First Nation following the review period for the Draft EAR/IS. The Project Team has reviewed the IKLRU report and incorporated information shared into the Final EAR/IS as appropriate.</p>
FAFN-004	Section 19.1.2 and 19.1.4, pp. 19-15, 19-23 to 19-26	<p>The Draft EA/IS does not describe how FAFN's right to give or withhold consent to the project will be respected for decisions that may affect their lands, rights, and way of life. Although consultation is mentioned, the report does not explain how FAFN will be part of deciding whether or how the project should proceed in ways that could affect the community now or in the future.</p> <p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. Acknowledge FAFN's Right to Free, Prior, and Informed Consent (FPIC) with respect to decisions that could affect FAFN's lands, waters, and way of life.</li> <li>2. Clearly explain how the proponent will seek consent before moving forward with any decisions that affect FAFN's rights including documentation of outcomes and what occurs if consent withheld.</li> </ol>	<ol style="list-style-type: none"> <li>1. Item will be addressed in the Final EAR/IS submission. The Project is committed to following the principles outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the United Nations Declaration Act (UNDA). Section 19.1.1.4 of the EAR/IS specifically addresses these principles, including Free, Prior, and Informed Consent (FPIC). It is important to note that while the Project recognizes and respects these principles, the determination of how the inherent rights of First Nations – including FPIC – are applied and upheld is the responsibility of the Crown. The Crown has the constitutional duty to consult and accommodate Indigenous Nations and to make decisions regarding consent in accordance with applicable laws and policies.</li> </ol> <p>The Project Team will continue to engage with Fort Albany First Nation in a manner consistent with UNDRIP and UNDA principles and will provide transparent information to support meaningful participation throughout the process.</p>
FAFN-005	Section 19, pp. 19-182 to 19- 205	<p>The Draft EA/IS identifies pathways such as land clearing, noise, and increased access that may affect Indigenous rights. For example, it describes how noise or construction may disrupt hunting or ceremonial practices for other Nations. However, the assessment does not apply these same pathways to FAFN. For instance, the baseline (section 19.2.2.3.3) confirms that FAFN exercises rights to hunt, trap, and maintain traplines in the region. Yet, the assessment does not analyze how construction noise, road access, or habitat disturbance might affect FAFN trapline use specifically. This makes it difficult for FAFN to understand how their rights might be impacted.</p> <p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. Clear pathway analysis showing how specific project actions (e.g., construction noise, vegetation clearing, blasting) could affect FAFN's rights: trapline integrity and success, safe access to spiritual areas, harvesting (including impacts mediated by wildlife movements, birds, insects, fish, plant availability), and intergenerational teaching.</li> <li>2. Where similar effects are acknowledged for other Nations, assess whether and how they may apply to FAFN and adjust impact ratings accordingly.</li> </ol>	<ol style="list-style-type: none"> <li>1. Item will be addressed in the Final EAR/IS submission. Effects and mitigation related to vegetation clearing, noise, wildlife, and other valued components (VCs) are described in Sections 6 to 21 of the EAR/IS. These sections outline potential pathways such as habitat disturbance, construction noise, and increased access, and the mitigation measures proposed to reduce or avoid adverse effects.</li> </ol> <p>The assessment of potential impacts on the current and historical use of lands and resources for traditional purposes in the Local Study Area (LSA) and Regional Study Area (RSA) has been completed using the information currently available. Based on this information, the EAR/IS concludes that there will be negligible effects.</p> <p>The assessment of impacts on Aboriginal and Treaty Rights was not completed for the Draft EAR/IS. This assessment will be</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
			addressed through an addenda to Final EAR/IS submission that will be completed by the end of the review period and will be made available for FAFN review.
FAFN-006	Section 19 and 20.3.1, pp. 20-25 to 20-30	<p>The Draft EA/IS discusses the potential for project impacts on spiritual and cultural practices raised by other Indigenous Nations and considers how land use may be disrupted in general terms. However, it does not apply these considerations specifically to FAFN. There is no clear assessment of how the project may affect FAFN's ceremonies, spiritual life, language use, or ability to pass on cultural knowledge. These aspects are vital to FAFN's identity, governance, and well-being.</p> <p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. Include an assessment of impacts on FAFN's spiritual and ceremonial practices and places, with attention to noise, lighting, access, policing presence, and traffic.</li> </ol>	<p>1. Item will be addressed in the Final EAR/IS submission. Information received from Fort Albany First Nation to date has been incorporated into the Technical Cultural Heritage Report and summarized within the Cultural Heritage Valued Component (VC) section of the EAR/IS. At this time, Fort Albany First Nation has not identified any specific spiritual or ceremonial sites within the project area; therefore, a site-specific assessment has not been completed.</p> <p>The proponent acknowledges the receipt of the Indigenous Knowledge and Land Use (IKLRU) Study report from Fort Albany First Nation following the review period for the Draft EAR/IS. The Project Team has reviewed the IKLRU report and incorporated information shared into the Final EAR/IS as appropriate.</p>
FAFN-007	Section 21	<p>The Draft EA/IS lists past, present and future development projects in the region, including major projects in the Ring of Fire area such as the Eagle's Nest Project, Black Thor, Big Daddy, and related road and transmission proposals (Table 21-2). These projects are considered in terms of spatial and temporal overlap, but the assessment does not explain how these various developments, when considered together, could affect FAFN's ability to continue exercising its rights over the long term. For example, if this project leads to increased access, traffic, or future mining, it could add pressure on areas used for hunting, trapping, or gathering by limiting access or changing land use patterns. The assessment does not explore how these developments may interact to affect the community's land stewardship responsibilities, or how they may influence the ability to transmit knowledge or maintain land-based governance. FAFN's concerns about how this project could open the door to more intense development pressures—especially in culturally and ecologically important areas—are not addressed in a way that supports long-term rights protection.</p> <p>Please revise the EA/IS to:</p> <ol style="list-style-type: none"> <li>1. Assess how the project, in combination with foreseeable mining/roads/transmission and service corridors, will change land use patterns, increase access/traffic, and place long-term pressure on rights practice, governance, and intergenerational knowledge transfer (including and not limited to impacts on estuaries, medicine-bearing areas, portages, and traplines used by FAFN).</li> </ol>	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period. Cumulative effects on Traditional Land Use are addressed in Section 21.4.12 (Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights) of the EAR/IS. The assessment of cumulative effects on Indigenous Peoples and the exercise of Aboriginal and Treaty rights is still in progress.</p> <p>An evaluation of cumulative effects will be undertaken once the severity of potential adverse effects on Indigenous Peoples and rights has been fully characterized. This will include consideration of foreseeable projects such as mining developments, roads, transmission lines, and service corridors, and how these may interact with the Project to influence land use patterns, access, and long-term rights practice.</p> <p>Additional information recently provided by Fort Albany First Nation – from the Indigenous Knowledge and Land Use (IKLRU) Report – will be used to update analysis of potential effects on Fort Albany First Nation interests and rights, including trapline use, harvesting, and cultural practices.</p>
FAFN-008	Section 19	<p>Section 19.2.2.3.3 contains FAFN-specific knowledge compiled from public sources and limited engagement, but this information is not clearly integrated into the effects analysis or mitigation planning in later sections. As a result, it is unclear whether this knowledge meaningfully influenced impact ratings, mitigation, or monitoring plans.</p>	<p>1. Item will be addressed in the Final EAR/IS submission. Information received from Fort Albany First Nation to date has been incorporated into the Technical Cultural Heritage Report and summarized within the Cultural Heritage Valued Component</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. Integration of FAFN's land use and cultural knowledge into pathway analysis, impact ratings, and mitigation e.g., medicines such as tamarack, birch, red willow, spruce gum, labrador tea; estuary use and travel.</li> <li>2. Clear explanation and or a short "traceability table" showing how each piece of baseline knowledge informed conclusions and mitigations and where uncertainties led to precautionary ratings.</li> </ol>	<p>(VC) section of the EAR/IS. At this time, Fort Albany First Nation has not identified specific sites or detailed cultural knowledge beyond what is publicly available; therefore, a site-specific or pathway-specific assessment has not been completed.</p> <p>The proponent acknowledges the receipt of the Indigenous Knowledge and Land Use (IKLRU) Study report from Fort Albany First Nation following the review period for the Draft EAR/IS. The Project Team has reviewed the IKLRU report and incorporated information shared into the Final EAR/IS as appropriate.</p>
FAFN-009	Section 19.4, 20.3, and 20.4, pp. 19-173 to 19-205, pp. 20-25 to 20-30	<p>Section 20.4 introduces an Environmental Management Committee, but FAFN is not named as a potential participant, making it unclear if these measures will apply to the Nation's sites and values.</p> <p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. Confirmation of FAFN's potential role in the Environmental Management Committee or other oversight structures</li> </ol>	<p>1. Item will be addressed in the Final EAR/IS submission. Governance structures for the Project have not yet been finalized. The proponent is committed to ongoing dialogue with Fort Albany First Nation to consider their input in the development of future governance and decision-making frameworks. This dialogue will include discussions on potential roles across all phases of the Project – planning, construction, operations, and decommissioning.</p>
FAFN-010	Section 19.2.2.3.3, pp.19-152 to 19-165	<p>The baseline in Section 19.2.2.3.3 describes FAFN's cultural, language, and governance practices. These practices are essential for supporting FAFN's resilience to project-specific impacts. However, the Draft EA/IS does not identify measures to strengthen and restore these practices.</p> <p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. Initiatives that support language, cultural practices, and land-based learning identified in the baseline e.g., elder–youth land camps, winter travel support, portage maintenance, storywork programs.</li> </ol>	<p>1. Item will be addressed in the Final EAR/IS submission. "Initiatives that support language, cultural practices, and land-based learning identified in the baseline e.g., elder–youth land camps, winter travel support, portage maintenance, story-work programs." has been added as a bullet in Section 19.4.2.5 (Change to Cultural Traditions and Practices) after the sentence "The following measures can be considered:"</p>
FAFN-011	Section 20.4 and 21.5, pp. 20-30 to 20-31, pp. 21-49 to 21-50	<p>Section 21.5 references potential Indigenous participation in future environmental management, but it does not name FAFN or explain what kind of role the community could have, how decisions would be made together, or whether any resources would be available to support that involvement. Without this information, it is unclear how FAFN would be involved in ensuring that mitigation measures are working or that community values are being respected over the life of the project.</p> <p>Please revise the draft EA/IS as follows:</p> <ol style="list-style-type: none"> <li>1. Clearly describe opportunities for FAFN's involvement in project monitoring (e.g. guardian programs), follow-up, and management.</li> <li>2. Provide dedicated multi-year resources and support for the FAFN to carry out its responsibilities and participate meaningfully throughout the project's lifespan.</li> </ol>	<p>1. Section 22 of the EAR/IS (Follow Up and Compliance Monitoring) provides an overview of the follow-up and compliance monitoring programs that will be developed and implemented for the Project. As part of the ongoing engagement and consultation activities and noted in various sections of the EAR/IS, the Project Team invites community members to participate in developing and implementing monitoring programs to assess the effectiveness of proposed mitigation measures and potential adverse effects to the environment. The proponent is committed to working collaboratively with First Nations in the future development phases of the Project. Mitigation and monitoring measures identified during the EA/IA will be further detailed in the Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) for implementation. In the spirit of collaboration, draft copies of</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
			<p>the CEMP and OEMP will be provided to FAFN to receive their feedback.</p> <p>2. This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.</p>
FAFN-012	Section 19.6, Tables 19-16 to 19-18, pp. 19-206 to 19-208	<p>The Draft EA/IS uses general technical criteria (geographic extent, frequency, reversibility) to assess the severity of impacts but does not explain how these thresholds were adapted for FAFN. For example, Tables 19-16 and 19-17 define low, moderate, or high impacts using parameters that may not capture seasonal access, intergenerational knowledge transfer, or the cultural importance of certain areas. As a result, conclusions about “significance” impact may not align with the FAFN’s values or experiences on the land.</p> <p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. An explanation of how evaluation criteria take into account: <ol style="list-style-type: none"> <li>a. Seasonal harvesting or ceremonial cycles.</li> <li>b. Intergenerational knowledge transfer.</li> <li>c. The cultural or spiritual importance of an affected site, beyond archeological classification.</li> </ol> </li> </ol>	<p>1. Item will be addressed in the Final EAR/IS submission. The proponent has identified a process consistent with IAAC guidance (Practitioner's Guide to Federal Impact Assessments, 2023) in Section 19.6 for evaluating impact severity. This process considers geographic extent, frequency, and reversibility as outlined in the EAR/IS. We welcome any input from Fort Albany First Nation regarding how these criteria could better reflect seasonal harvesting or ceremonial cycles, intergenerational knowledge transfer, and the cultural or spiritual importance of specific sites. Your feedback will help ensure that the assessment aligns with Fort Albany First Nation’s values and experiences on the land.</p>
FAFN-013	Section 19.5, pp. 19-194 to 19-165 to 19-206	<p>The Draft EA/IS assigns low or negligible significance to effects, but does not explain how these ratings were determined. For example, Table 19-12 lists registered traplines potentially fragmented by the road, and Table 19-14 includes cultural and spiritual sites potentially affected by noise, but both tables assign minimal impact without explaining the basis for these ratings or considering how changes in pathways (e.g., wildlife movement, noise, or access restrictions) may affect rights-based practices.</p> <p>In Section 20, concerns about sacred and ceremonial sites are acknowledged in general terms, but redactions (blacked-out sections) prevents from knowing which sites were assessed, how they were valued, or whether they relate to FAFN. Cultural sites are grouped with archaeological features and assessed using heritage standards, rather than community-specific values.</p> <p>Without seeing the explanations or community-informed criteria, these ratings are difficult to interpret and do not help FAFN understand how its concerns were considered. Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. A rationale to support each impact rating showing evidence, assumptions, and uncertainties and an explanation of how redactions will be managed so FAFN decision-makers can securely review site-specific assessments.</li> </ol>	<p>1. Item will be addressed in the Final EAR/IS submission. The redacted information pertains to other Indigenous communities and is specific to their traditional territories (e.g. Marten Falls, Weenusk and Webequie First Nations). No information related to Fort Albany First Nation or its traditional territory has been redacted. At this time, no site-specific information for Fort Albany First Nation has been provided to the Project Team.</p>
FAFN-014	Section 7, pp.7-13	<p>The Draft EA/IS recognize that FAFN members raised strong concerns about effects on the Albany River system, and it acknowledges that the WSR does not directly cross the Albany watershed. However, FAFN continues to emphasize that indirect and cumulative changes in water quality, flow and ice conditions could affect FAFN’s rights and interests relating to the river. Further, traffic from Webequie First Nation moving from the WSR to the Northern Road Link and Marten Falls Community Access Road would directly cross the Albany watershed.</p>	<p>1. Item will be addressed in the Final EAR/IS submission. Cumulative effects of the WSR, the Northern Road Link, and the Marten Falls Community Access Road on surface water resources are assessed in Section 21.4.2.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		Please revise the EA/IS to include the Albany River system within the cumulative effects assessment, so that indirect and downstream risks are fully analyzed, rather than excluded on the basis of direct footprint (including and not limited to estuaries, health, fall peak flows, travel safety/ice regimes, navigation, water quality, and risks related to climate change).	
FAFN-015	Section 21.3.4 and 21.4, pp. 21-35 to 21-41	<p>The Draft EA/IS includes a list of foreseeable projects in Table 21-2, such as mineral exploration activities, future mines (e.g., Eagle’s Nest, Black Thor), new roads (e.g., Northern Road Link), and transmission lines. Section 21.3.4 acknowledges that this project may enable additional development in the Ring of Fire region.</p> <p>However, the assessment does not explain how these future developments, together with the Webequie Supply Road, may affect FAFN’s ability to exercise its rights or maintain long-term control over its territory. The community is especially concerned that the road could increase access, industrial activity, and traffic over time—potentially leading to environmental degradation, reduced use of culturally important areas and interference with FAFN’s stewardship and governance responsibilities. These potential impacts on FAFN’s rights, governance responsibilities, and cultural continuity are not fully assessed.</p> <p>Note: The Ring of Fire Regional Assessment is expected to examine how this project and others in the region may collectively influence development patterns and Indigenous rights. It would be helpful for the EA/IS to clarify how findings from the Regional Assessment will inform the mitigation, monitoring, or planning processes for this project.</p> <p>Please revise the EA/IS to:</p> <ol style="list-style-type: none"> <li>1. A clear plan for how foreseeable connected developments will be addressed through project-specific mitigation and management, including monitoring programs, adaptive management triggers, and decision-making process that involve FAFN.</li> <li>2. Evaluate how foreseeable connected developments could cumulatively affect FAFN’s territory, land use, cultural continuity over time.</li> </ol>	1. Item will be addressed in the Final EAR/IS submission. The Regional Assessment for the Ring of Fire, announced by the Minister in 2020, is being co-developed and co-led with Indigenous communities from Matawa and Mushkegowuk Territories. This process is independent of the EAR/IS for the Webequie Supply Road but, as required by the <i>Impact Assessment Act</i> and the Tailored Impact Statement Guidelines, relevant information from the Regional Assessment will be incorporated into the Project’s cumulative effects analysis, mitigation planning, and follow-up programs should this be provided during the EA/IA process for the Project. At this time there is no information available from the Ring of Fire Regional Assessment to consider in the EA/IA for the Project.
FAFN-016	Section 21.2 and 21.3.3, pp. 21-10 to 21-20	<p>The Draft EA/IS discusses how the project may interact with climate change, including effects on vegetation, water systems, and wildlife. It also acknowledges that Indigenous communities may be especially vulnerable to seasonal changes caused by warming temperatures. However, the report does not describe how these changes may specifically affect FAFN’s ability to travel safely, harvest food, or pass on cultural knowledge.</p> <p>For example, warmer winters and unpredictable freeze/thaw cycles may reduce access to traplines, harvesting grounds, or spiritual areas. Shifts in the availability of moose, caribou, or fish may disrupt harvesting practices and affect food security. Sudden weather changes may interfere with teaching youth or conducting ceremonies. These changes are already being felt in many northern communities, and they are likely to increase over time.</p> <p>The report does mention these issues generally, and in relation to some Indigenous groups, but it does not assess how these climate-related pressures may interact with project-specific impacts for FAFN. The request is not for climate modeling, but for a clearer explanation of how changing weather and land conditions may affect FAFN’s rights and way of life when combined with project development.</p>	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period. Assessment of effects on the atmospheric environment are described in Section 9 of the EAR/IS. The section concluded that there are no significant project-related effects anticipated in relation to climate change. While broader climate variability (e.g., warmer winters, freeze/thaw cycles, species shifts) is acknowledged, these changes are not predicted to interact with the Project in a way that would result in significant adverse effects. We recognize the importance of understanding how climate-related changes may affect rights and practices over time and welcome any input from Fort Albany First Nation on specific concerns or observations that could inform future planning of the Project.

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
		<p>Please revise the EA/IS to include:</p> <ol style="list-style-type: none"> <li>1. An assessment of how climate-related changes—such as unstable ice, changing species (moose/caribou/fish/birds/insects), extreme weather and shoulder -season volatility—may interact with the project to affect FAFN’s ability to exercise rights over time.</li> </ol>	
FAFN-017	Section 19	<p>Section 19.1.1.2.3 should be updated to reflect that FAFN members also harvest red sucker, ling, perch, pickerel/walleye and almost all other fish, gooseberries, raspberries, strawberries, mooseberries/high/low bush cranberries, fox, partridge, weasels, wolf, bear, most migratory birds, red willow, spruce gum, fungus that grows on trees, moss, sap from trees, tamarack, birch, and other trees. It should also note that muskeg water is an important source of purified drinking water. It should also clarify that many other communities are reached by river travel, and river travel takes place on both the Albany River system and others. It should mention the use of portaging for travel to destinations such as the Attawapiskat, Ghost River, and Thunder Bay areas.</p>	<p>1. Item will be addressed in the Final EAR/IS submission. Section 19.1.1.2.3 has been reviewed and updated to reflect the additional species, plants, and resources identified, as well as the importance of muskeg water as a source of purified drinking water. The section will also clarify the use of river travel on the Albany River system and other waterways, including portaging to destinations such as Attawapiskat, Ghost River, and Thunder Bay areas. Fort Albany First Nation’s input will help ensure the description accurately represents traditional harvesting practices and travel routes.</p>
FAFN-018		<p>An Elder has requested information about how the clearing of trees for the WSR would contribute to GHG emissions and climate change, and what would be done with the trees that are felled, including to manage any risks of mercury contamination in surrounding areas and water sources.</p>	<p>The Project’s contribution with regard to GHG emissions was estimated as part of the EA/IS (Appendix H). The assessment did look at the impact of clearing trees on climate change by covering the following matters:</p> <ul style="list-style-type: none"> <li>- living biomass removal (carbon contained in trees that are felled). It is expected, although to be confirm confirmed by ultimate owner/operator, that 25% of trees felled will be hauled to the Webeque community for their own use. The remaining vegetation (trees, branches, etc.) will be piled and burned on-site under controlled conditions, and chipped and reused as mulch as part of the site rehabilitation;</li> <li>- dead organic material removal (lying and standing dead trees and vegetation litter) – this material will be mostly piled and burned on-site under controlled conditions;</li> <li>- loss in CO<sub>2</sub> uptake from the atmosphere by the living biomass that will be removed (known as carbon sink loss).</li> </ul> <p>The overall impacts, as described in Appendix H, are summarized below:</p> <ul style="list-style-type: none"> <li>- living biomass removal: 19,127 t CO<sub>2</sub>e occurring during the first two years of construction;</li> <li>- living biomass on site burning: 2,778 t CO<sub>2</sub>e occurring during the first two years of construction;</li> <li>- dead organic material burning: 43,322 t CO<sub>2</sub>e occurring during the first two years of construction;</li> </ul>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
			<p>- carbon sink loss: 9,160 t CO<sub>2</sub> occurring over 20 years after clearing.</p> <p>The maximum annual GHG emissions are estimated to approach 45,000 tCO<sub>2</sub>e which is equivalent to 0.00067% of total Canadian emissions and less than 0.0001% of worldwide emissions. Being more of a global issue as GHGs do not cause localized global warming, the Project would not have a direct impact on climate change.</p> <p>Due to the inherent nature of road construction, the ground along the WSR corridor, especially in the upland area, will be disturbed through cut and fill activities which can inevitably result in the leaching of mobilized mercury present in soil into nearby groundwater and surface water. However, mitigation measures are incorporated to minimize soil erosion and reduce the likelihood and duration of mercury concentrations exceeding water quality guidelines. Groundwater and surface water monitoring will be included in the Groundwater Management Plan and the Surface Water and Storm Water Management and Monitoring Plan during detail design stage of the Project for implementation during the construction and operation phases.</p>
FAFN-019	Section 9	An Elder has shared a teaching from his late father, which is that loud noise will attract a negative spiritual entity to the area where it can be heard. He explained that noise can be heard from farther distances in the spring. This negative spiritual entity will result in negative spiritual and mental impacts for people, including negative ideas in their minds, which can expand.	1. Item will be addressed in the Final EAR/IS submission. Potential effects of project-related activities on cultural, spiritual, sacred, burial, and language sites and areas are assessed in Section 19 of the EAR/IS.
FAFN-020	Section 9	An Elder explained that turtles, fish, and plants communicate underwater and may be impacted by vibration there. He asked if fish's sources of food, such as insects, could be impacted. He cautioned that the vibrations caused by blasting of rock could be destructive underwater and requested information about how this has been considered.	1. Item will be addressed in the Final EAR/IS submission. Potential effects of blasting on aquatic resources are assessed in Section 10 of the EAR/IS. All blasting activities be undertaken in accordance with applicable guidelines and permit requirements to protect aquatic species and their habitats.
FAFN-021		In FAFN's comments on the draft TOR, we emphasized the importance of insects in terms of both ecosystem functions and as pests, and we asked for information about how effects on insects would be included. The Proponent acknowledged the importance of insects, but said it would take too much effort to study insects specifically, and rather the effects assessment would be based on incidental observations would be made during other studies and on review of existing literature. FAFN considers this a flaw in the draft EA/IS methodology. A number of FAFN members asked about impacts on insects during member discussion of the draft EA/IS. FAFN requests a summary of how and where effects on insects are considered in the draft, and the proponent's view on the sufficiency and reliability of that effects assessment in supporting a fulsome understanding of potential net and cumulative effects on insects.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). We respectfully note that the approved ToR and federal TISG for the Project did not specify requirements for assessment of insects and therefore is excluded from the EA/IA at this time.

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response (Refer to Proponent Response Legend)
FAFN-022	Section 10	An Elder explained that there is a downflow of fish from rivers downstream from the Ring of Fire area (e.g., Attawapiskat River), and these fish travel into the James Bay and then south to estuaries and rivers closer to FAFN, including the Albany River system. He explained that reductions in fish populations near the WSR could ultimately affect fish populations in the James Bay and more southern river systems. Please explain if and how this has been considered in the draft EA/IS.	1. Item will be addressed in the Final EAR/IS submission. Potential effects of the Project and its contribution to cumulative effects on fish populations are assessed in Sections 10.3.2, 10.4.2, 10.5.2.2, 10.6.4, 10.6.5, and in Section 21.4.5.
FAFN-023		An Elder has requested an explanation of how seasonal effects have been studied, including effects that may interact with or worsen wildfire season and breakup/flooding season.	1. Item will be addressed in the Final EAR/IS submission. A climate risk assessment was prepared to examine the different project elements (e.g., road, culverts, bridges, roadside ditches, etc.) with regard to different climate hazards relevant to the region, such as seasonal hazards like spring freshets, wildfires, and others. The assessment looked at the potential interaction and impact of each climate hazard on project elements, including the sustainability and operation of the road, the safety of drivers, the impact on the natural environment, and the impact on existing built components. The objective was to verify if, based on the road design criteria selected for the WSR, the Project would be vulnerable to climate change in the future and if it could have an indirect impact on the environment.
-- (from FAFN's Oct 28, 2025 letter)	General	<p><b><u>Indigenous Knowledge and Land Use Study</u></b></p> <p>We have an Indigenous Knowledge and Land Use Study that we wish to share with the proponent separately, in support of our comments.</p> <p>We are in the process of finalizing an Indigenous Knowledge Sharing Agreement with Webequie First Nation and we will share our Study promptly after that is signed.</p> <p>We ask that information in the Study be reviewed and the EA/IS be updated as appropriate.</p>	1. Item will be addressed in the Final EAR/IS submission. The proponent acknowledges the receipt of the Indigenous Knowledge and Land Use (IKLRU) Study report from Fort Albany First Nation following the review period for the Draft EAR/IS. The Project Team has reviewed the IKLRU report and incorporated information shared into the Final EAR/IS as appropriate.
-- (from FAFN's Oct 28, 2025 letter)	General	<p><b><u>Protect Ontario by Unleashing Our Economy Act and Building Canada Act</u></b></p> <p>This comment period has coincided with the alarming passage of the <i>Protect Ontario by Unleashing Our Economy Act</i> and <i>Building Canada Act</i>, which are intended to expedite developments in and around the Ring of Fire. We oppose these pieces of legislation as attacks on the rights and jurisdiction of all Treaty 9 First Nations, and are challenging them in court.</p> <p>We ask for Webequie First Nation's assurance that it will not support the Crown using these laws to speed up, limit, or remove the regulatory processes that apply to the WSR.</p>	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). A response to the comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA.

# Kashechewan First Nation





December 05, 2025

**Response to Kashechewan First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Chief Wesley,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project.

Please find enclosed the table that provides responses to comments provided in your letter dated October 2, 2025. As noted in our letter to you on October 24, 2025 acknowledging our receipt of comments from Kashechewan First Nation, the WSR Project Team is currently undertaking the following steps: 1) Reviewing comments received from Indigenous communities; 2) Providing responses to Indigenous communities; 3) Revising the EAR/IS, where applicable; and 4) after steps 1 to 3 submit the Final EAR/IS to government regulators for decision making, which will include a further opportunity for Indigenous communities to review and provide feedback. During this process the Project Team will continue to offer engagement opportunities to Indigenous communities to discuss the EAR/IS.

At this stage we request that you and your community review the responses to the comments we received and provide a response by **December 19, 2025** as to whether they are

- A: Satisfied with response;
- B: Satisfied for now but will need to see final EAR/IS; or
- C: Not satisfied.

As we move forward, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to review sections of the Draft EAR/IS and technical reports of interest in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the Draft EAR/IS.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Fox', written in a cursive style.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment,  
Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Kashechewan First Nation (KFN)

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response
1.		<p><u><i>Inclusion in EA/IS</i></u></p> <p>Despite provision of the draft Kashechewan First Nation Existing Conditions Report to the Webequie Supply Road team on March 6, 2025, via FTP link there was no inclusion of information from this report integrated into the EA/IS. Indeed, Section 2: Engagement and Consultation specifies that “[t]o date, the following First Nations have provided IKLRU information to the project team: Webequie First Nation; Marten Falls First Nation; and Weenusk First Nation”.</p> <p>This is of relevance as the conclusion of the Kashechewan First Nation Existing Conditions Report requests three things: (1) continued engagement between Kashechewan First Nation and Webequie Supply Road Project Team and Webequie First Nation, (2) incorporation of the provided report into the EA/IS, and (3) development of mitigation and monitoring programs that reflect KFN feedback, where required.</p> <p>KFN requires that the Kashechewan First Nation Existing Conditions Report be adequately integrated into the final EA/IS to address the conclusions of the report and ensure that engagement with KFN is meaningful.</p>	<p>The proponent appreciates that KFN shared the draft Kashechewan First Nation Existing Conditions Report to the Project Team. At the time of receipt of the report, the Draft EAR/IS was in production for its early circulation for review by Indigenous communities prior to its release to the public and stakeholders for formal review. Therefore, we were unable to integrate information from the draft Kashechewan First Nation Existing Conditions Report into the Draft EAR/IS.</p> <p>For the Final EAR/IS, information and concerns identified within the Kashechewan First Nation Existing Conditions Report have been integrated and discussed in the following sections of the EAR/IS:</p> <ul style="list-style-type: none"> <li>▪ Section 7 (Surface Water Resources);</li> <li>▪ Section 8 (Groundwater Resources);</li> <li>▪ Section 9 (Atmospheric Environment);</li> <li>▪ Section 10 (Fish and Fish Habitat);</li> <li>▪ Section 11 (Vegetation and Wetlands);</li> <li>▪ Section 12 (Wildlife and Wildlife Habitat);</li> <li>▪ Section 13 (Species at Risk);</li> <li>▪ Section 14 (Social Environment);</li> <li>▪ Section 15 (Economic Environment);</li> <li>▪ Section 16 (Non-Traditional Land and Resource Use);</li> <li>▪ Section 19 (Aboriginal and Treaty Rights and Interests); and</li> <li>▪ Section 20 (Cultural Heritage Resources).</li> </ul> <p>As part of the ongoing engagement and consultation activities, the Project Team invites community members to participate in developing and implementing monitoring programs to assess the effectiveness of proposed mitigation measures and potential adverse effects to the environment.</p> <p>The proponent is committed to maintain regular contact with Indigenous communities to keep them informed of activities relating to the Project, including but not limited to:</p> <ul style="list-style-type: none"> <li>▪ Progress of the Environmental Assessment / Impact Assessment for the Project;</li> <li>▪ Opportunities for community to provide feedback. Including in- community information meetings; and</li> <li>▪ Other items of special interest.</li> </ul>
2.		<p><u><i>Water Quality and Monitoring</i></u></p>	<p>Monitoring and sampling programs are proposed during the construction and post construction periods of the Project to evaluate surface water and groundwater quality.</p>

Comment #	Page/Section # in Draft EAR/IS	Comment	Proponent Response
		<p>The continued safety of water was noted as a key concern in the Kashechewan First Nation Existing Conditions Report. Section 7, which includes consideration of changes in surface water quality not that “short-term discharges of construction water, wastewater, or wash water could result in temporary increases to chemical constituents and exceedances of water quality guidelines in nearby waterbodies.” Further, the section on sediment quality notes that “Local sediment quality within Winisk River, Ekwan River, and Attawapiskat River watersheds may experience increases of potential contaminants of concern above one or more of the CCME PEHH, ISQG and MOE LEL; however, these changes are expected to be of low magnitude and contained within the boundaries of the LSA.”</p> <p>Both identified changes in water quality and sediment quality are of concern to KFN as there is potential for these changes to extend beyond the Local Study Area without proper mitigation application and sufficient monitoring.</p> <p>Within the Kashechewan First Nation Existing Conditions Report it is noted that KFN would like to be informed throughout the project lifecycle on any follow-up/monitoring programs identified. This was in relation to water, muskeg, and flow patterns. It was requested that monitoring be conducted regularly and that KFN could be informed of the results to ensure the water remains safe. Section 22: Follow-up and Monitoring of the EA/IS does not include any information on Kashechewan or this request.</p> <p>Please update the final EA/IS to include this information in the relevant sections and ensure the commitment is made and noted to be carried forward post-approval.</p>	<p>Post-construction monitoring will continue for the appropriate duration as stipulated in approvals for the Project. Annual follow-up monitoring and compliance reporting is also proposed to provide Indigenous communities and groups, the public, government agencies, and stakeholders with information as the Project progresses. The proponent will also ensure reporting and communication activities are conducted in accordance with requirements in the approvals under the Ontario Environmental Assessment Act and Canada Impact Assessment, if granted, including all other applicable permits, authorizations and/or approvals for the Project.</p> <p>Section 22 of the EAR/IS (Follow Up and Compliance Monitoring) provides an overview of the follow-up and compliance monitoring programs that will be developed and implemented for the Project. As part of the ongoing engagement and consultation activities, the Project Team invites community members to participate in developing and implementing monitoring programs to assess the effectiveness of proposed mitigation measures and potential adverse effects to the environment. Best management practices and site-specific mitigation measures as outlined in Section 7.4, Section 8.4, and Appendix E of the EAR/IS will be implemented during construction and operations of the Project to minimize the potential impacts to the surface water and groundwater quality.</p>
3.		<p><u><i>Additional KFN Concerns</i></u></p> <p>In addition to the above noted items, there were some identified KFN concerns within the Kashechewan First Nation Existing Conditions Report which should be integrated and addressed within the EA/IS. For example, water levels in the muskeg and how this will be maintained; noise levels from construction and road traffic during operations impacting wildlife movement patterns; changes to wildlife migration patterns from the operation of the road; increased vehicle strikes with wildlife on the road; and opening up the region to more development. KFN asks that these concerns be integrated and discussed in the appropriate relevant Sections of the EA/IS.</p>	<p>KFN concerns identified within the Kashechewan First Nation Existing Conditions Report have been integrated and discussed in the following sections of the EAR/IS:</p> <ul style="list-style-type: none"> <li>▪ Section 7 (Surface Water Resources);</li> <li>▪ Section 8 (Groundwater Resources);</li> <li>▪ Section 9 (Atmospheric Environment);</li> <li>▪ Section 10 (Fish and Fish Habitat);</li> <li>▪ Section 11 (Vegetation and Wetlands);</li> <li>▪ Section 12 (Wildlife and Wildlife Habitat);</li> <li>▪ Section 13 (Species at Risk);</li> <li>▪ Section 14 (Social Environment);</li> <li>▪ Section 15 (Economic Environment);</li> <li>▪ Section 16 (Non-Traditional Land and Resource Use);</li> <li>▪ Section 19 (Aboriginal and Treaty Rights and Interests); and</li> <li>▪ Section 20 (Cultural Heritage Resources).</li> </ul>

# Marten Falls First Nation





January 21, 2026

**Response to Marten Falls First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Chief Achneepineskum,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project. Please find enclosed the table that provides responses to the comments provided in your letter dated November 11, 2025.

As we move forward in the process to submit the Final EAR/IS, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to discuss the findings presented in the Draft EAR/IS in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage in discussing the WSR Project.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Fox', with a long horizontal stroke extending to the right.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment, Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Marten Falls First Nation (MFFN)

*MFFN's Note: The version of the Sections of the WSR reviewed are from the zip file version available on the WSR website except for Section 19. Section 19 was downloaded directly from the WSR website as a stand-alone document file version of the EAR/IA Report. It should be noted that there are no redactions in this version and there are numerous errors in Section numbers. The corresponding section numbers from the zip file version of Section 19 are included where appropriate.*

The following categorization of the proponent responses may appear in the comment response table for clarity.

### **Proponent Response Legend**

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
1.	Section ES1.0 Introduction Page 1-8	Text Box	It is not clear from where the definitions of environmental assessment and impact assessment come from as there is no citation, but environmental assessment is usually defined as a process used to evaluate potential effects of a proposed project on the environment, not just the <b>natural</b> environment, and environment is broadly defined to include natural, social, cultural, economic, built etc. In looking at numerous definitions of environmental assessment, not one definition focused solely on the natural environment. All definitions used a broadly defined environment. An impact assessment is more specific in that it focuses on the effects of a specifically defined project. To suggest that an impact assessment looks at a broader definition of the environment is misleading.	Please reconsider how you are defining environmental assessment and impact assessment and please cite the sources of the definitions.	1. Item will be addressed in the Final EAR/IS submission. Text defining the environmental assessment has been revised within the text box.
2.	Section ES 2.0 Project Overview Page 2-9	Par. 1	Location of the road in the first paragraph does not include reference to Marten Falls First Nation Traditional Territory in the McFaulds Lake area.	Suggest adding a sentence at the end of the paragraph acknowledging that some of the Crown land is actually Marten Falls First Nation's traditional territory.	1. Item will be addressed in the Final EAR/IS submission.
3.	Section ES 7.0 Project Description Page 7-35	Par. 1, Line 1	Location of the road in the first paragraph does not include reference to Marten Falls First Nation Traditional Territory in the McFaulds Lake area.	Suggest adding after Ontario Crown Lands, an acknowledgement that some of the Crown land is actually Marten Falls First Nation's traditional territory	1. Item will be addressed in the Final EAR/IS submission.

Comment No.	Page/Section/Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
4.	Section ES 8.14.3 Page 8-98 – 8-99	Table	Marten Falls First Nation members use the land in the LSA and RSA for traditional purposes, including harvesting. There is no mention of direct collaboration with Marten Falls First Nation members and land users on mitigation measures.	Please include explicit mention of engagement with Marten Falls First Nation in determining mitigation measures. If this was not done, then please provide rationale as to why not.	1. Item will be addressed in the Final EAR/IS submission. Section 5.2.1 of the Executive Summary outlines that Marten Falls First Nation (MFFN) was identified by Webequie First Nation as a community that could potentially be most impacted by the Project, and thus requiring greater level of effort for consultation and dialogue throughout the EAR/IS preparation, which included ongoing engagement during the development of mitigation measures, as well as integration of input provided by Marten Falls First Nation from the Indigenous knowledge study it submitted to the Proponent for input into the EAR/IS. Engagement included discussions on potential effects and input on strategies to minimize impacts on traditional land use within the Local Study Area (LSA) and Regional Study Area (RSA). These consultations informed the mitigation measures presented in the report. Consultation Round 3 of the engagement and consultation program occurred from April 21 to September 13, 2024, included proposed impact management, mitigation, and follow-up monitoring program as areas of focus.
5.	Section 1.1 Project Overview Page 1-3	Par. 1, Line 5-6	“A total of 17 km of the WSR is within the Webequie First Nation Reserve lands, with the remainder of the road on un-surveyed Ontario Crown lands”. There should be an acknowledgement that some of these Crown lands are Marten Falls First Nations’s traditional territory.	Suggest adding a sentence at the end of the paragraph acknowledging that some of the Crown land is actually Marten Falls First Nation’s traditional territory.	1. Item will be addressed in the Final EAR/IS submission.
6.	Section 1.1.1 Project Location Page 1-4	Par.1 Line 2	“The Project is located in northwestern Ontario on un-surveyed Ontario Crown lands and Webequie First Nation Reserve lands (refer to <b>Figure 1.1</b> and <b>Figure 1.2</b> ).” This does not acknowledge that some of these Crown lands are Marten Falls First Nation’s traditional territory.	Suggest adding a sentence at the end of the paragraph acknowledging that some of the Crown land is actually Marten Falls First Nation’s traditional territory.	1. Item will be addressed in the Final EAR/IS submission
7.	Section 1.2.5 Proposed of Anticipated Financial Support Page 1-9	Par. 2, Line 2-3	“The Province of Ontario is providing support and resources for Webequie First Nation to plan the proposed WSR, including conducting the coordinated federal IA and provincial EA in <b>accordance with the Memorandum of Understanding between Ontario and Webequie First Nation that identifies the roles and responsibilities with respect to</b>	Please delete “ <b>in accordance with the Memorandum of Understanding between Ontario and Webequie First Nation that identifies the roles and responsibilities with respect to the procedural aspects of consultation on the Project.</b> ” The MOU on Shared Consultation Responsibilities does not	1. Item will be addressed in the Final EAR/IS submission. Requested deletion was made.

Comment No.	Page/Section/Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
			<p><b>the procedural aspects of consultation on the Project.”</b>  This is incorrect. The support and resources for the conduct of the EA/IA is through a transfer payment agreement with Ontario. It has no relationship to the MOU on Shared Consultation Responsibilities. No funding is directly available through the MOU.</p> <p>It is also noted that there is no mention of the province’s Participant Funding Initiative (PFI) for eligible First Nations which provides support to participate in the EA process.</p>	<p>speak to funding or capacity. Nor does the MOU apply to the federal IA.</p> <p>Please add a sentence or two about the Participant Funding Initiative and please check with Paul MacInnis at MEM for appropriate wording. The PFI also has nothing to do with the MOU on Shared Consultation Responsibilities.</p>	
8.	Section 1.3.1 Background and Context Page 1-12	MFCAR and NRL (2018 and 2021) Par. 1 Line 6	<p>“In addition, as a separate project, <b>Marten Falls First Nation and Webequie First Nation</b> in 2021 initiated a federal-provincial EA/IA for an all- season road that would link the MFCAR and WSR, referred to as the Northern Road Link (NRL) project.” It should be made clear that Marten Falls and Webequie First Nations are co- proponents on the NRL.</p>	<p>Please insert “as co-proponents” after Webequie First Nation.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p>
9.	Section 1.4.2.1 Regional Assessment of the Ring of Fire Area Page 1-19	Par. 1, Line 6	<p>“The draft Terms of Reference for the RA has been approved”. This should be updated.</p>	<p>Please update to include that the ToR for the Regional Assessment has been approved (with the date) and that work is underway on the RA.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p>
10.	Section 1.4.3 Figure 1.4 Coordinated Webequie-Federal-Provincial EA/IA Process Page 1-20		<p>The location of the “<b>We Are Here</b>” star is in a different location in the Executive Summary than it is in Section 1.4.3. They should be in the same location for consistency.</p>	<p>Please amend Figure 1.4 in Section 1 and ES Figure 4.1 in Section ES4.1 in the Executive Summary so that they are consistent.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p>
11.	Section 2.4.4.1 Round 1 Engagement and Consultation Activities Table 2-4 Consultation Activities During Consultation Round 1 Page 2-28	Chief and Council Meetings and First Nation On-Reserve Community Meetings	<p>“Chief and Council meetings were offered to all Indigenous communities to provide Project update and discuss topics identified for Consultation Round 1 or other topics of interest”.</p> <p>It does not appear that there were any Chief and Council meetings with MFFN in Round 1, nor on-reserve community meetings.</p>	<p>Please include an explanation of why there were not Chief and Council or on-reserve community meetings with most of the 8 core communities including Marten Falls First Nation.</p> <p>If this was because of COVID this needs to be noted, and alternative methods used should be indicated in the table.</p>	<p>The Record of Engagement and Consultation details the meetings held with Chief and Council based on the numerous offers from the Project Team to meet with MFFN to discuss the Project. No explanation will be provided as to why Chief and Council did not accept Project Team engagement opportunities.</p>

Comment No.	Page/Section/Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
12.	Section 2.4.4.2 Round 2 Engagement and Consultation Activities Table 2-5 Consultation Activities During Consultation Round 2 Page 2-31	Chief and Council Meetings	“Chief and Council meetings were offered to all Indigenous communities to provide Project update and discuss topics identified for Consultation Round 2 or other topics of interest”. It does not appear that there were any Chief and Council meetings with MFFN in Round 2.	Please include an explanation of why there were not Chief and Council meetings with many of the 8 core communities including Marten Falls First Nation.	Refer to response under Item 11.
13.	Section 2.4.4.3 Round 3 – Engagement and Consultation Activities Table 2-6 Consultation Activities During Consultation Round 2 Page 2-36	Chief and Council Meetings	There were no Chief and Council meetings with any community (including MFFN) other than Weenusk First Nation during Round 3. What was the reason for that?	Please include an explanation as to why there were no Chief and Council meetings with the 8 core communities during Round 3, other than Weenusk First Nation.	Refer to response under Item 11.
14.	Table 2-6 Consultation Activities During Consultation Round 2 Page 2-36	Last row of page FN On Reserve Community Meetings	There were no on-reserve meetings with any of the 8 core communities, including MFFN during Round 3.	Please include an explanation as to why there were not any on-reserve meeting with the 8 core communities including MFFN.	The Record of Engagement and Consultation documents the level of effort related to offers of engagement available to communities to discuss the Project, including willingness of the Project Team to conduct on-reserve meetings. No explanation will be provided as to why some First Nations did not invite the Project Team to their community.
15.	Section 3.2.2.1 Identification of Alternate Concept-Level Corridors Page 3-19	Par. 4, Line 6	“In this context, it is important to note that Marten Falls First Nations is in the process of preparing its own CBLUP and a portion of the project area is included in the Marten Falls ToR.” While it is good to have acknowledged that part of the project area is included in Marten Falls Area of Interest for its own CBLUP, it should be acknowledged that the WSR terminates on Marten Falls traditional territory, which overlaps with Webequie’s territory. For example, Marten Falls First Nation, as proponent of the	Please consider acknowledging in the EAR/IS that the WSR terminates at the east end on Marten Falls First Nation traditional territory which overlaps with Webequie’s territory.	1. Item will be addressed in the Final EAR/IS submission.

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
			<p>MFCAR project acknowledged Aroland's traditional territory in the EAR/IS. This was a shared understanding held by both communities and further acknowledged through the CBLUP process. Based on Aroland's request, Marten Falls First Nation acknowledged that the MFCAR project terminated on Aroland territory and that some of that territory was shared.</p> <p>Marten Falls First Nation has that shared understanding with Webequie First Nation and this was reiterated through the CBLUP process when both communities' CBLUP teams met to discuss areas of shared interest. Marten Falls reiterates the outcomes of those discussions and asks that Webequie First Nation acknowledge that the WSR terminates on Marten Falls traditional territory which overlaps with Webequie's territory. MFFN would like a similar acknowledgement in the WSR EAR/IS.</p>		
16.	Section 3.2.2.1 Identification of Alternate Concept-Level Corridors Page 3-22 to 3-23	Various Alternative Concepts	It is noted that there was extensive discussion with WFN members about the various alternative concepts; however, there does not appear to have been any discussion with MFFN on the alternative concepts when some of the Project area falls within MFFN's Area of Interest for its CBLUP.	Please include how the Project Team worked with MFFN on the alternative concepts on the portion of the project area that falls within MFFN's Area of Interest for its CBLUP.	<p>In a letter sent to MFFN on December 21, 2021, the proponent formally requested IK LRU information. Follow up letters were sent to request the information after it was not provided to the Proponent by MFFN. This information would have been incorporated into the multiple criteria analysis used in the alternative assessment had it been provided.</p> <p>Similarly, the proponent sent email requests for MFFN to supply CBLUP data to be incorporated into the multiple criteria analysis used in the alternative assessment. This information was either not available or not provided to the Proponent.</p> <p>Project Team requests to MFFN regarding IKLRU and associated other information (CBLUP) are document in the Record of Engagement and Consultation.</p> <p>Alternatives assessment specific meetings and presentations included:</p> <ul style="list-style-type: none"> <li>• June 5/23 Round 2 Part 2 12pm - Marten Falls (Virtual Community Meeting)- Alternatives Assessment- Evaluation of Alternative Supporting Infrastructure and Road Design</li> <li>• August 24/23 Round 2 Part 2- Marten Falls (in-person)- Alternatives Assessment-</li> </ul>

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
					<p>Evaluation of Alternative Supporting Infrastructure and Road Design</p> <ul style="list-style-type: none"> <li>March 20/23 12 pm Round 2 Part 1- Alternatives Assessment</li> </ul> <p>Appendix A Praxis Record of Consultation Reports in Consultation Progress Report – Round 2, documents emails, letters and other in person communications where the following topics were covered:</p> <ul style="list-style-type: none"> <li>A presentation by the Project Team followed by a question and answer period. The presentation consisted of a brief project description, followed by descriptions of the EA Process, Alternatives Assessment, Evaluation of Alternative Supporting Infrastructure and Road Design, and the need for feedback from Indigenous communities.</li> <li>WSR Newsletter – Issue 25. The newsletter provided information about the alternatives assessment and construction camps. The newsletter provided a link to the WSR Project website for finding additional information about the Project.</li> <li>Virtual Information Sessions for Round 2 Part 2 where the Project team will share information about the EA/IA activities including consultation and engagement to date, study plans, assessment approach, valued components, Indigenous knowledge, consideration and evaluation of alternatives, and consultation approach and next steps.</li> <li>Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on July 5, 2023. The letter and poster provided access links and a toll-free call-in phone number and explained that the sessions will include a presentation on construction camps, along with a question-and-answer period.</li> </ul>

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
					<ul style="list-style-type: none"> <li>• Newsletter – Issue 23. The newsletter provided information about the alternatives assessment process, the proposed criteria for the evaluation of road corridor alternatives, and the livestream and radio schedule for July 2023.</li> <li>• Virtual information session as part of the Consultation Round 2 for Marten Falls First Nation (MFFN) on June 05, 2023. This session discussed the Project team's work on the evaluation of alternatives for supportive infrastructure which includes aggregate rock sources for pits and quarry access roads and construction camps. Don presented information on how various</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on June 6, 2023. The sessions will include a presentation on the Proposed Criteria and Indicators for Evaluation of Alternatives for Supporting Infrastructure, along with a question-and-answer period.</li> <li>• Wawatay radio session from 6:00pm-7:00pm EST and livestream from 7:30pm-8:00pm EST on May 24, 2023. The presentation covered the Evaluation of Alternatives for Supportive Infrastructure (i.e., camps, laydown areas, aggregate/rock sources, access roads), along with a question-and-answer period.</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on May 9, 2023. The presentation included the Analysis of Alternatives and Multiple Accounts Analysis, along with a question-and-answer period.</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on April 25, 2023. The sessions covered Proposed Criteria and Indicators for Evaluation of Road Corridor</li> </ul>

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
					<p>Alternatives, along with a question-and-answer period.</p> <ul style="list-style-type: none"> <li>• Wataway radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on April 12, 2023. The sessions covered Evaluation of Alternative Road Corridors, along with a question-and-answer period.</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on March 28, 2023. The sessions covered an overview of Alternatives Routing in the Preferred Corridor, along with a question-and-answer period. The letter provided various community.</li> </ul> <p>Details of the above are contained in the Record of Engagement and Consultation.</p>
17.	Section 3.2.2.1 Identification of Alternate Concept-Level Corridors Table 3-6 Comparative Analysis of Supply Road Corridor Alternative Concepts – Screening Level Assessments Page 3-29	Factor: Socio- Ec Environment: Areas Used Intensively for Traditional Activities and Seasonal Hunting Areas	<p>A disadvantage for all alternatives was that the “<b>alternative runs through traditional land use area for 10-20 km</b>”. Assuming this means the traditional lands of WFN, why is there no consideration of MFFN traditional lands at the eastern end of the proposed alternatives – less intensive use?</p> <p>Similarly for seasonal hunting areas “<b>alternative runs very close to significant hunting areas...</b>”. Assuming this means the significant hunting areas of WFN, why is there no consideration of MFFN significant hunting areas at the eastern end of the proposed alternatives – less significant?</p>	<p>Please include MFFN traditional lands at the eastern end of the alternatives or explain why MFFN traditional lands and traditional activities were not considered and the source of information to reach your determination.</p> <p>Please include MFFN significant hunting areas at the eastern end of the alternatives or explain why MFFN significant hunting areas were not considered and the source of information to reach your determination</p>	<p>In a letter sent to MFFN on December 21, 2021, the Proponent formally requested IK and LRU information. Follow up letters were sent to request the information after it was not provided to the Proponent by MFFN. This information would have been incorporated into the multiple criteria analysis used in the alternative assessment had it been provided.</p> <p>Similarly, the proponent sent email requests for MFFN to supply CBLUP data to be incorporated into the multiple criteria analysis used in the alternative assessment. This information was either not available or not provided to the Proponent.</p> <p>In the time between the request for data in 2021 and the submission of the EAR/IS in June 2025, MFFN either did not have the data or were not willing to share the data to allow it to be incorporated in the Alternatives Assessment.</p>
18.	Section 3.2.4.1 Alternative 1 Page 3-36	Par 1, line 4	“...and engagement during the current EA/IA process”. It is not clear with whom the engagement was during the EA/IA. Did it include only WFN or other communities as well.	Please be more specific with whom the engagement was with during the EA/IA process.	<p>Indigenous Groups that were consulted and/or engaged included the following:</p> <ul style="list-style-type: none"> <li>• Webequie First Nation</li> <li>• Aroland First Nation</li> </ul>

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					<ul style="list-style-type: none"> <li>• Ginoogaming First Nation</li> <li>• Long Lake #58 First Nation</li> <li>• Marten Falls First Nation</li> <li>• Neskantaga First Nation</li> <li>• Nibinamik First Nation</li> <li>• Constance Lake First Nation</li> <li>• Eabametoong First Nation</li> <li>• Kashechewan First Nation</li> <li>• Fort Albany First Nation</li> <li>• Attawapiskat First Nation</li> <li>• Kasabonika Lake First Nation</li> <li>• Kingfisher Lake First Nation</li> <li>• Wapekeka First Nation</li> <li>• Wawakapewin First Nation</li> <li>• Wunnumin Lake First Nation</li> <li>• Kitchenuhmaykoosib Inninuwug First Nation</li> <li>• Weenusk (Peawanuck) First Nation</li> <li>• North Caribou Lake First Nation</li> <li>• Mishkeegogamang First Nation</li> <li>• Métis Nation of Ontario – Region 2</li> </ul>
19.	Section 3.4.3 Construction Camps Page 3-68	Par. 2, Line 6	Of the 4 camps selected, it appears that Camp 3A and 4B are likely on the traditional lands of MFFN. Have there been any discussions with MFFN about the location of the camps?	Please include whether there were discussions with MFFN on the location of the camps on MFFN traditional lands during this phase of the process.	<p>Alternatives assessment specific meetings and presentations that included discussion on the 4 camps included:</p> <ul style="list-style-type: none"> <li>• June 5/23 Round 2 Part 2 12pm - Marten Falls (Virtual Community Meeting)- Alternatives Assessment- Evaluation of Alternative Supporting Infrastructure and Road Design</li> <li>• August 24/23 Round 2 Part 2- Marten Falls (in-person)- Alternatives Assessment- Evaluation of Alternative Supporting Infrastructure and Road Design</li> <li>• March 20/23 12 pm Round 2 Part 1- Alternatives Assessment</li> </ul> <p>Appendix A Praxis Record of Consultation Reports in Consultation Progress Report – Round 2, documents emails, letters and other in person communications where the locations of camps were covered:</p>

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					<ul style="list-style-type: none"> <li>• A presentation by the Project Team followed by a question and answer period. The presentation consisted of a brief project description, followed by descriptions of the EA Process, Alternatives Assessment, Evaluation of Alternative Supporting Infrastructure and Road Design, and the need for feedback from Indigenous communities.</li> <li>• WSR Newsletter – Issue 25. The newsletter provided information about the alternatives assessment and construction camps. The newsletter provided a link to the WSR Project website for finding additional information about the Project.</li> <li>• Virtual Information Sessions for Round 2 Part 2 where the Project team will share information about the EA/IA activities including consultation and engagement to date, study plans, assessment approach, valued components, Indigenous knowledge, consideration and evaluation of alternatives, and consultation approach and next steps.</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on July 5, 2023. The letter and poster provided access links and a toll-free call-in phone number and explained that the sessions will include a presentation on construction camps, along with a question-and-answer period.</li> <li>• Newsletter – Issue 23. The newsletter provided information about the alternatives assessment process, the proposed criteria for the evaluation of road corridor alternatives, and the livestream and radio schedule for July 2023.</li> <li>• Virtual information session as part of the Consultation Round 2 for Marten Falls First Nation (MFFN) on June 05, 2023. This session discussed the Project team's work on the evaluation of alternatives for</li> </ul>

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
					<p>supportive infrastructure which includes aggregate rock sources for pits and quarry access roads and construction camps. Don presented information on how various</p> <ul style="list-style-type: none"> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on June 6, 2023. The sessions will include a presentation on the Proposed Criteria and Indicators for Evaluation of Alternatives for Supporting Infrastructure, along with a question-and-answer period.</li> <li>• Wawatay radio session from 6:00pm-7:00pm EST and livestream from 7:30pm-8:00pm EST on May 24, 2023. The presentation covered the Evaluation of Alternatives for Supportive Infrastructure (i.e., camps, laydown areas, aggregate/rock sources, access roads), along with a question-and-answer period.</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on May 9, 2023. The presentation included the Analysis of Alternatives and Multiple Accounts Analysis, along with a question-and-answer period.</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on April 25, 2023. The sessions covered Proposed Criteria and Indicators for Evaluation of Road Corridor Alternatives, along with a question-and-answer period.</li> <li>• Wataway radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on April 12, 2023. The sessions covered Evaluation of Alternative Road Corridors, along with a question-and-answer period.</li> <li>• Wawatay radio session from 12:00pm-1:00pm EST and livestream from 2:00pm-2:30pm EST on March 28, 2023. The</li> </ul>

Comment No.	Page/Section/Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
					<p>sessions covered an overview of Alternatives Routing in the Preferred Corridor, along with a question-and-answer period. The letter provided various community.</p> <p>Details of the above are contained in the Record of Engagement and Consultation and in Section 2 of the EAR/IS and not proposed be included in Section 3.</p>
20.	Section 4.1 Project Overview and Location Page 4-5	Par. 1, Line 2	<b>“The project is located on un-surveyed Ontario Crown lands...”</b> . There should be an acknowledgement that some of these Crown lands are Marten Falls First Nations’s traditional territory.	Suggest adding after “...Ontario Crown lands...” an acknowledgement that some of the Crown land is actually Marten Falls First Nation’s traditional territory.	We have previously acknowledged this statement in the Executive Summary and in Section 1 - Introduction and is not proposed to be repeated in Section 4. We note that that other First Nations also have shared territory with Webequie First Nation.
21.	Section 4.4.2.9 Environmental Monitoring Page 4-64	Par. 1, Line 2	<b>“...and will include the presence of relevant Indigenous community members (e.g. Webequie First Nation) to ensure at a local level that no traditional sites of value and/or interest are adversely affected during construction...”</b> It is noted that MFFN is not included as an example even though a substantial part of the route is in MFFN traditional territory. MFFN monitors should be monitoring construction on their traditional lands.	Please include MFFN members as monitors on the sections of the road that are within MFFN traditional territory and please include them in the CEMP.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
22.	Section 6.4.2 Mitigation Measures Page 6-54	Text in red	<b>“An Environment Committee will be established.... Committee members will include Webequie First Nation Elders and Knowledge Holders, other Indigenous Nations....”</b>	Representatives from Marten Falls First Nation would like to be included on the Environmental Committee as a significant portion of the proposed road is located on Marten Falls First Nation traditional lands. This would apply to every section in the EAR/IS which mentions the Environment Committee.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
23.	Section 7.10 Follow-Up and Monitoring Page 7-80	Text in red	<b>“Indigenous community members will have an active role in developing and implementing management plans”</b>	Representatives from Marten Falls First Nation would like to be included in the development and implementation of management plans as a significant portion of the proposed road is located on Marten Falls First Nation traditional lands. This would apply to every section in the EAR/IS which mentions the inclusion of Indigenous communities having an active role in developing and implementing management plans.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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24.	Section 9.3.1.3.4 Eastern Section of the WSR Page 9-77	Par. 1	The paragraph describes that the modeling domain is restricted to the western section due to its proximity to the to the community of Webequie and that the majority of culturally sensitive areas and land uses are located in the western portion of the study area. It is not clear if the focus was just on Webequie values or does it include potential Marten Falls values at the eastern end which is either shared territory with Webequie or Marten Falls traditional lands. It is understood that there may be values in the eastern portion of the study area.	Please confirm whether any Marten Falls values etc. were considered at the eastern end of the proposed route to determine if any values would be affected by the air, noise, vibration or dust – and therefore should be included in the modeling.	<p>The sensitive areas considered in the Noise and Air Quality Impact Assessments were selected for the following points of impingement:</p> <ul style="list-style-type: none"> <li>- Existing permanent residences in Webequie;</li> <li>- Existing institutions in Webequie (schools, hospitals, community centres, retirement complexes, assisted care homes);</li> <li>- Seasonal residences, such as trapper cabins or hunting and fishing campsites, which are used by members of the Webequie First Nation, other Indigenous communities or other stakeholders (e.g., outfitters);</li> <li>- Spiritual or sacred spaces and other locations which members of the Webequie First Nation, other Indigenous communities and/or stakeholders may identify as being sensitive to disruptions to air quality, for instance locations important for harvesting country food/plans or hunting.</li> <li>- Future residence plots projected by Webequie First Nation.</li> </ul> <p>These sites were selected in collaboration with Webequie First Nation to meet expectations of the provincial/federal EA/IA. As part of the IKLRU program and engagement and consultation Indigenous communities, including MFFN, were encouraged to identify areas or sites of value or importance for consideration in the EA/IA.</p>
25.	Section 9.11 Follow-Up and Monitoring Page 9-126	Red Text	<b>“The Project invites community members to participate in developing and implementing monitoring programs to assess the effectiveness of proposed mitigation measures and potential adverse effects to the environment. Where effects are considered unacceptable and/or based on concerns raised by Indigenous community members or other stakeholders, further mitigation options will be considered by the road operator in consultation with Indigenous communities and stakeholders”</b>	Representatives from Marten Falls First Nation would like to be included in the development and implementation of monitoring programs to assess effectiveness of mitigation measures as a significant portion of the proposed road is located on Marten Falls First Nation traditional lands. This would apply to every section in the EAR/IS which mentions development and implementation of monitoring programs to assess the effectiveness of proposed mitigation measures.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
26.	Section 14.1.1 Table 14-1: Key Regulations,	Webequie First Nation	It is noted that Webequie First Nation includes its draft Community Based Land Use Plan (CBLUP) as a policy that is guiding the Social Environment VC work described in this chapter. It is also noted that Marten Falls First Nation has a	Consider adding Marten Falls First Nations policies such as the draft CBLUP in the list as a significant portion of the eastern end of the proposed WSR is on Marten Falls First Nation’s	1. Item will be addressed in the Final EAR/IS submission

Comment No.	Page/Section/Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
	Legislation, and Policies relevant to Social Environment Page 14-12		draft CBLUP that is not included in this list. This is noteworthy as a significant portion of the eastern end of the proposed WSR is on Marten Falls First Nation's traditional territory.	traditional territory. This may apply to the same table in other VC sections in the report.	The draft in-progress Webequie First Nation is referenced in the Final EAR/IS; however, the contents have been substantially reduced, as it is acknowledged that discussions between communities in the Far North are ongoing and land use plans are not finalized. Marten Falls has not provided its draft in-progress CBLUP to-date.
27.	Section 14.2.1.2.2 Primary Data Collection – Focus Groups and Knowledge holder interviews Page 14-33 and 14-34		<p><b>“Although all 22 Indigenous communities were invited to participate in the focus group discussions, only Webequie First Nation engaged in these discussions”.</b></p> <p><b>“Although all 22 Indigenous communities were invited to participate in the Key informant interviews, only Webequie First Nation engaged in these discussions”.</b></p> <p>Why did only Webequie First Nation participate in the focus group/key informant interviews? Why did Marten Falls not participate as a significant portion of the eastern end of the proposed WSR is on Marten Falls First Nation's traditional territory. What follow-up was undertaken to get Marten Falls to participate? Were there any roadblocks?</p>	Please provide rationale for limiting the focus groups/key informant interviews to Webequie First Nation and not including Marten Falls First Nation as a significant portion of the eastern end of the proposed WSR is on Marten Falls First Nation's traditional territory.	Marten Falls First Nation was invited to participate in the socio-economic primary data collection program for the Project in a letter to dated December 20, 2021 and follow-up letters on April 26, 2022, and July 26, 2022 (please refer to Consultation Report 1 in the Record of Engagement and Consultation). No rationale as to why MFFN declined the Project Team's offer to participate in focus groups and key informant interviews will be included in the EAR/IS.
28.	Section 14.2.1.4 Indigenous Knowledge and Land and Resources Use (IKLRU) Page 14-35	Par. 3	This paragraph notes that there was one community visit to Marten Falls First Nation in August 2023. The eastern portion of the proposed road is on Marten Falls First Nation traditional lands or shared territory with Webequie First Nation, yet there were 3 visits to Constance Lake First Nation, a nation whose lands and community are nowhere near the proposed road.	Please explain why there was only one meeting in Marten Falls First Nation, a community who may very well be affected by the proposed road, as a significant portion of it is on Marten Falls First Nation traditional lands.	Engagement meetings in community varied according to preference and availability of the community, and restrictions including from the Covid-19 pandemic (in 2021 and 2022). Engagement invitations sent to Marten Falls First Nation included letters, emails, phone calls, invitations to virtual open houses (even during Covid-19 pandemic), invitations to open houses, invitations to chief and council meetings, invitations to community meetings (on-reserve and off-reserve), invitations to three road project gathering and invitations to Aboriginal and Treaty Rights Forums. Please refer to the Record of Engagement and Consultation for a comprehensive record of engagement and consultation measures taken to communicate with Marten Falls First Nation. No rationale as to why MFFN declined offers to meet with the Project Team will be included in the EAR/IS.

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29.	Section 14.2.2.3 Community Services Page 14-60	Table 14-17 Community Services Availability, Marten Falls First Nation	It is noted that there is a heavy reliance on the 211 Ontario North website for information about Community Services Availability in First Nation communities. Is this a reliable source for up-to-date information? Was it verified by the communities? Was the list complemented by direct information from the community?	Suggest noting that the information from the 211 Ontario North website was verified by the relevant communities before relying on it, especially since many of these communities were only visited once.	1. Item will be addressed in the Final EAR/IS submission. Information regarding community services was sought from all communities within the Local Study Area (LSA). To date, direct information has been received from Webequie First Nation, Marten Falls First Nation, and Weenusk First Nation. The 211 Ontario North website was used as a supplementary source to provide baseline information where community-specific details were not available. The proponent welcomes and encourages any additional information from communities in the LSA to further verify and complement existing conditions related to community services.
30.	Section 14.2.2.4 Education, Training and Traditional Learning Page 14-81	Under Marten Falls First Nation: Learning of Traditional Knowledge, Par. 3	<p>“Trapping is a large part of the way of life of Marten Falls First Nation community members, with the First Natin being known as a community of trappers in the past. Families go for ventures in the land up to 3 months for trapping activities, and families generally take their children to these journeys to teach them starting at a young age. Trapping, crucial for their survival as well as traditions, is also an aspect of the family unit as well.</p> <p>Sometimes dog units are also used during these activities. Apart from trapping, hunting, fishing, foraging and gathering are also traditional activities which children are taught, with the values and traditions as well as the spiritual nature of these activities experienced by the younger generations. In addition, skills of craftmaking, such as tools, means of transportation and crafts are also practised and taught, along with the skills of storytelling, and spiritual and traditional ceremonies (Suslop Inc., 2024)”</p> <p>If this entire paragraph is based on MFFN’s IK Study, then some caution should be exercised...</p> <p>First, through the IK Study, MFFN members communicated that trapping <b>was</b> a large part the of the way of life of MFFN people. However, it has declined considerably over the years for several reasons.</p> <p>There is also a typo with ‘Natin’ – it should be Nation.</p> <p>Second, families used to travel/hunt/trap for weeks or months</p>	<p>Suggest reframing this paragraph to more accurately reflect the past and current situation. For example, be careful when using past- and present- tense. When MFFN members, specifically Elders, discussed trapping, semi-nomadic lifestyles, dogsledding, etc. through the IK Study, they were mostly referring to activities and lifestyles of the past. This does <i>not</i> necessarily mean that such activities do not occur today, but they are less common for various reasons which the IK Study explains. If exclusively citing MFFN’s IK Study for this paragraph, then refer to the Study and provide clarification on when these activities may have occurred and why they may no longer be as prominent.</p> <p>Marten Falls First Nation through Suslop would be happy to sit down with your Project team to more accurately represent trapping in the community.</p>	1. Item will be addressed in the Final EAR/IS submission. The paragraph has been reworded to more accurately reflect the past and current situation.

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			<p>at a time; they were semi-nomadic. It is less common today for MFFN families to be away for (say) 3 months at a time for trapping, hunting, or fishing due to various reasons. The semi-nomadic lifestyle is less common today.</p> <p>Thirdly, trapping is not as crucial for survival as it was in the past. There are other ways for MFFN members to obtain food today, albeit some may still trap, hunt, and fish for sustenance. Further, trapping is not a common profession or commercial practice among members today as it was in the past, since fur prices are low, diesel prices are high, and certain species are less abundant or are further away from where members live.</p> <p>Moreover, dog sled teams are less common today than they were in the past.</p>		
31.	Section 15.2.2 Results Page 15-42	Red Text	<p><b>“Section 15.2.2 presents the baseline existing conditions considered in the EAR/IS as it relates to the Economic Environment, as requested by Federal Economic Development Initiative, Neskantaga First Nation and Ministry of Heritage, Sport, Tourism and Culture Industries during engagement and consultation activities.”</b></p> <p>The way this is written implies that the only reason you are including this section is because of the request of the three organizations listed. Is it not a requirement in the ToR and TISG to describe the baseline conditions related to the economic environment?</p> <p>The ask from Table 15-2 is as follows: “Commented that a community specific and local economic baseline should be established <b>to understand the private sector activities taking place and the income from government expenditures</b>. The effects assessment should consider potential price fluctuation of goods and local businesses that could be impacted.”</p> <p>This is more specific that what is being suggested in the red text, so the red text is a bit misleading as they are asking that specific information be included in the baseline report. In this light, it is not clear why this is being highlighted.</p>	<p>Suggest that this red text be removed or modified to more accurately reflect what the ask of the 3 organizations actually was.</p> <p>There are numerous other examples of red text where it is stated that these sections are included due to requests from various entities during engagement and consultation. All of these should be reviewed and edited to indicate that they were requirements, but also these issues were brought up during engagement. You are not including these sections because of what was commented on and asked for during engagement.</p> <p>Also good to go back to the original ask to make sure that it is being accurately reflected.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The text has been revised to provide additional clarity on nature of the section and related comments received from First Nations and other organizations.</p>
32.	Section 15.2.2.2.2 Economic Development –	Capacity Par. 2, Line 2	<p>“On-Reserve Land Use Plans” (CBLUPs) (with some communities having developed the ToR currently and planning to proceed to develop the CBLUPs) ...”</p>	<p>Suggest removing ‘CBLUPs’ after “On Reserve Land Use Plans.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p>

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	Other Local Study Area Indigenous Communities Page 15-67		On reserve land use plans are <b>not</b> CBLUPs. CBLUPs are a joint process between the community and MNR and cover defined areas of interest which are broader than on-reserve. A number of Indigenous communities within the LSA are in the CBLUP process at various stages (eg. Marten Falls First Nation). It would be beneficial to name those Indigenous communities within the LSA who are in the CBLUP process. Some of these communities may also be in the process of developing a CCP. These are 2 separate processes and should be distinguished.	Also suggest that you name the other communities in the LSA who are engaged in CBLUP work with MNR of which one would be Marten Falls First Nation.	The sentence has been changed to now say: "Current requirements on the communities have been identified through plans and studies conducted by the community, such 'On-Reserve Land Use Plans' and 'Community Based Land Use Plans (CBLUPs)."
33.	Section 15.2.2.2.2 Economic Development – Other Local Study Area Indigenous Communities Page 15-68	Major Project and New Projects Par 3, Line 1	<p>“Funding was <b>planned</b> in 2021 to provide \$5.6M in federal and provincial infrastructure investments to improve COVID-19 resilience in community schools...”</p> <p>It is not clear whether the funding was ever made available, as it states that it was just “planned”. Please confirm.</p> <p>On Page 15-66, Par. 3 under “New Projects”, it speaks of Webequie and Marten Falls First Nations becoming parties to an agreement with Ontario for community infrastructure projects. This is in the section specific to Webequie First Nation. Yet, in the following section on Other LSA Indigenous Communities in the section on Major Project and New Projects, there is no mention of this agreement to which Marten Falls First Nation will be a party. As a result, it does not look like Marten Falls has a lot of new projects. While it may appear repetitive, please include the same paragraph on page 16-68</p>	<p>Suggest changing the language as appropriate, once there is confirmation about whether the funding was just planned or whether it was ever made available.</p> <p>Please include paragraph 3 under New Projects on page 15-66 to page 15-68 under Major Projects and New Projects and attribute it to Marten Falls First Nation as it signifies the potential for a substantial number of new projects.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been modified to "Funding was planned in 2021 to provide \$5.6M in federal and provincial infrastructure investments to improve COVID-19 resilience in community schools which included.....However it is not clear if the funding was ever made available."</p> <p>Page 15-68 has been modified to add the paragraph from 16-66. "On March 05, 2024, Webequie First Nation and Marten Falls First Nation became parties to an agreement focused on development of community infrastructure projects to assist with future development opportunities in the area, including the development of all-season roads to the Ring of Fire region. The agreement was signed at the Prospectors and Developers Association of Canada convention in Toronto, and the development focus will be on health and training facilities, recreation centres, commercial buildings and labour force development programs to improve the well-being and economy of First Nations communities (King’s Printer for Ontario, 2024a)."</p>
34.	Section 15.2.2.2.2 Economic Development – Other Local Study Area Indigenous	Equipment Availability, Par. 3	<p>Marten Falls First Nation has been under a long-term boil water advisory which began in 2005. In response the water treatment facility was replaced in 2019. The system was commissioned in June 2019. It is understood that there are issues with the raw water intake at this time and there is a project currently underway to address the issue, after which the boil water advisory can be lifted.</p> <p>It should also be noted that the wastewater treatment plant is</p>	Please update paragraph 3.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Paragraph 3 has been rewritten: "Marten Falls First Nation has been under a long-term boil water advisory which began in 2005. In response the water treatment facility was replaced in 2019. The system was commissioned in June 2019. It is understood that there are issues with the raw water</p>

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	Communities Page 15-68		in urgent need of upgrades.		intake at this time and there is a project currently underway to address the issue, after which the boil water advisory can be lifted. It is also understood that the wastewater treatment plant is in urgent need of upgrades. "
35.	Section 15.2.2.2.3 Traditional Indigenous Economy Page 15-73	Other Local Study Area Communities – Non-Commercial, Par. 3	The surveys carried out in Webequie First Nation indicate that respondents had concerns about the loss of traditional culture in Webequie which included loss of traditional land use activities. Were there similar concerns in the surveys carried out in Marten Falls First Nation. If so, it should be included here as well.	Please confirm whether surveys completed by Marten Falls respondents also indicated concerns with loss of traditional land use activities. If so, please include that information here.	1. Item will be addressed in the Final EAR/IS submission. Section 15.2.2.2.3 has been updated with survey information from Marten Falls First Nation.
36.	Section 15.2.2.3.3 Mining, Aggregate and Forestry Activity Page 15-81	Local Study Area; Webequie First Nation Par. 2, line 1-2	<p>“Based on the Webequie First Nation Community Based Land Use Plan (CBLUP), an Area of Interest for Planning (AIP) <b>was identified for mining and related development.</b>”</p> <p>An Area on Interest defines the areal extent that the CBLUP will cover. Within the AOI different land use areas will be proposed that will either protect land, allow activities, or allow activities under certain conditions. An Area of Interest would not be identified for mining and related activity, rather land use areas would be.</p> <p>It would also be good to reorganize this section so that the CBLUP information and the CCP information are not mixed together as it is confusing.</p>	<p>Suggest correcting this for accuracy. Please refer to MNR’s online resources for assistance.</p> <p>Suggest reorganizing the section to separate information about the CCP and CBLUP to provide more clarity and avoid confusion as they are two very different documents and processes.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The section has been revised for accuracy and removal of information that is still considered "draft" from the Webequie First Nation CBLUP.</p>
37.	Section 15.2.2.3.3 Mining, Aggregate and Forestry Activity Page 15-81	Other Local Study Area Communities	<p>“There are minimal to no existing mining, aggregate, and forestry industries in the other LSA communities, and limited information is available from public sources regarding the existing conditions.”</p> <p>While the Ogoki Forest itself is not within the LSA communities, three communities manage the forest including Marten Falls First Nation, Eabametoong First Nation and Aroland First Nation. By not including it in the discussion, it minimizes activities in which Marten Falls is engaged.</p>	<p>Please include that Marten Falls First Nation is engaged in forestry activities in the Ogoki forest. In March 2015, the 3 communities entered into a cooperation agreement to work together on forest management and business ventures through the Agoke Development Limited Partnership.</p> <p>You can mention that the forest itself may be outside of the LSA, but LSA communities are engaged.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The text has been changed to "While there are minimal to no existing mining, aggregate and forestry industries in the other LSA communities, and information from public sources is limited regarding the existing conditions, Marten Falls First Nation manages the Ogoki forest although the forest is located outside of the LSA."</p>
38.	Section 16.1.5.1 Spatial Boundaries Page 16-21	Par. 1, Bullet 2	It indicates that the LSA extends approx.1 km from the centreline of the preliminary recommended preferred route and 500 m from the boundary of temporary and/or supportive infrastructure and also includes the community of Webequie First Nation. It is noted that Marten Falls First Nation is not included in the LSA for this VC when a significant portion of the proposed road is in Marten Falls traditional territory or shared territory with Webequie First Nation. It is noted that Marten Falls First Nation is included in the LSA for almost all	Consider adding in Marten Falls First Nation or provide rationale as to why it is not included in the LSA for this VC when it has been for almost all other VCs.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The assessment of Marten Falls First Nation has been moved to the LSA section.</p>

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			other VCs,		
39.	Section 16.2.1.2.2 Primary Data Collection Page 16-30	Bullet 1 and 2: Focus groups and Knowledge holder interviews	For both these activities, it is noted that all 22 Indigenous communities were invited to participate in the focus group discussions and knowledge holder interviews, but in the end, only Webequie First Nation engaged in these activities. It is not clear why. Was no interest expressed? Was there not enough time?	Consider adding in rationale as to why in the end, only Webequie participated in these activities.	1. Item will be addressed in the Final EAR/IS submission. A statement providing an overview of efforts to engage Indigenous communities has been added.
40.	Section 16.2.2.1.6 Provincial Plans and Policies: Far North Act Page 16-39	Par. 1	“Additionally, through the Webequie First Nation CBLUP, Webequie identified some areas of shared land uses with Nibinamik First Nation, Kasabonika Lake First Nation and Neskantaga First Nation.” Has there not been any identification of areas of shared land uses/areas of interest with Marten Falls First Nation?	Please confirm whether there has been any identification of shared land uses with Marten Falls First Nation, and if so, please amend the paragraph to include. Please note that the last paragraph on page 16-41, Line 3-4, Figure 16-3 on page 16-42 and Table 16-7 on page 16-45 all suggest that there is shared territory with Marten Falls First Nation.	1. Item will be addressed in the Final EAR/IS submission. The paragraph was not intended to exclude Marten Falls First Nation; rather it was intended to include other First Nations in the effects assessment that do not have CBLUP information available publicly.
41.	Section 16.2.2.2.2 Regional Study Area: Attawapiskat First Nation Page 16-51		It is understood that Attawapiskat First Nation is not planning under the MNR Far North Act. Rather, they are doing their own independent planning. There is no record on the MNR website that Attawapiskat signed a ToR in 2015. It is misleading as the way it is written; it suggests that they are planning under the MNR program. Please confirm.  It is also noted that the reference (Attawapiskat First Nation, 2015) is not included in the list of References for this Section, so it is not possible to check the reference.	Please confirm whether Attawapiskat is planning under MNR process or independently and update the section to reflect your findings. You may also have to update other components of Section 16 to accurately reflect the status of Attawapiskat land use planning. (eg. Page 16-38 – Attawapiskat First Nation submitting a ToR to MNR, Table 16-38 etc)  Please clarify the reference (Attawapiskat First Nation, 2015) and include in the list of references. What is it and where does it come from?	1. Item will be addressed in the Final EAR/IS submission. Thank you for this clarification. Instances of Attawapiskat First Nation's plan will be noted as separate under the FNA and MNR or through their own independent planning. The reference is in Section 16.11.2 and will be clarified with source from GIS data.
42.	Section 16.2.2.3.2 Regional Study Area: Mineral Resources Page 16-80	Par. 2	There appear to be a number of agreements that are missing here with respect to partnerships between exploration and mining companies and MFFN. While it is noted that Table 16-6 provides some additional and more up to date information, it should also be listed in Par. 2 so as not to appear to be misleading.	Please include updated list of agreements in Par 2 or at least provide a link to Table 16-6 where additional information is available. It is also suggested that you choose more current examples for Par. 2 rather than older ones which may or may not be active. Please feel free to contact Marten Falls First Nation through Suslop Inc to get an updated list of agreements.	1. Item will be addressed in the Final EAR/IS submission. A link to Table 16-6 will be added to Paragraph 2. Additional agreements have been included.
43.	Section 16.2.2.3.2 Regional Study Area: Energy Resources and	Table 16-18 Status of Energy Resources	Marten Falls First Nation is supposed to be included in the RSA. It does not appear to be included in Table 16-18. What is the reason for this? It is also noted that Kashechewan is proposing to be	Please update Table 16-18 to include Marten Falls First Nation.	1. Item will be addressed in the Final EAR/IS submission. Table 16-18 has been updated to include Marten Falls First Nation and the reference to Kashechewan has been updated to "Connection to

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	Transmission Page 16-84		connected to the Ontario power grid. Is it not already connected through 5 Nations Energy?	Please also check the status of Kashechewan and update appropriately.	the Ontario Power Grid through the Five Nations Energy Inc. (FNEI)."
44.	Section 16.2.2.4.2 Regional Study Area Page 16-93	Table 16-22 Recreation in First Nation Communities in RSA	It is noted that the only recreation facility in Marten Falls First Nation is the arena. There are additional facilities that should also be mentioned.	Please update the list to include the following: <ul style="list-style-type: none"> <li>- Powwow grounds</li> <li>- Boat launch</li> <li>- Playground</li> <li>- School gym</li> </ul>	1. Item will be addressed in the Final EAR/IS submission. Table 16-22 has been updated to include: <ul style="list-style-type: none"> <li>- Powwow grounds</li> <li>- Boat launch</li> <li>- Playground</li> <li>- School gym</li> </ul>
45.	Section 19: General		<p>Throughout Section 19 there are a number of errors with grammar, quotations, citations, etc. when discussing MFFN's IK Study or perspective(s) on land and resource use and valued components. <b>The issue with these errors is that they can leave the impression that MFFN and its members are perceived to be less capable and knowledgeable.</b> While it is understood and appreciated that this document is in draft form, there is concern that if this is not brought to your attention, these errors will find their way into the final version. This may also affect other rights holders who have provided IK Studies.</p> <p>The following is one example from Section 19.3.1.1.1: Preferred and Culturally Important Species, under 'Preferred and Culturally Important Species', Paragraph 4</p> <p>"Marten Falls First Nation has commented to have wildlife crossings, particularly for Caribou and moose, and signage for wildlife crossings (<i>Caribou/Aatiik</i> and <i>moose/Moonz</i>). Noise will also affect wildlife and would benefit from more regulations. Some members suggested not to build the roads, and to build it away from <i>moose/Moonz</i> and sensitive animal habitats if there is not a viable option. Environmental monitoring is also recommended so that "government ... should share authority with First Nations." This would also require technical training for their members who are involved in monitoring (Suslop Inc., 2024)."</p> <p>Regarding the above paragraph, there are a couple things that stand out. First: "Noise will also affect wildlife and would benefit from more regulations." How would noise itself benefit from more regulations? It is people and wildlife that would benefit from having regulations around noise pollution in</p>	Please review the entire section to address all grammatical, quotation, citation etc. errors throughout Section 19 (and other sections) to avoid potentially leaving an impression that Marten Falls First Nation and its members (and possibly other rights holders) who have contributed IK are perceived to be less capable and knowledgeable. It is critical to accurately use quotations and to not liberally interpret or misinterpret them.	1. Item will be addressed in the Final EAR/IS submission. Comment noted. Section 19 has been revised to address errors identified.

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			place. Second: "Environmental monitoring is also recommended so that "government ... should share authority with First Nations."" This statement is not cited properly, nor does it make much sense. MFFN members want to be involved in monitoring to help monitor and minimize or prevent negative impacts to wildlife. They also suggest that federal and provincial governments share this responsibility/authority with them.		
46.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	Par. 1, Line 2	"The report on the study was authored by a third-party retained to complete a community-led participatory process to review Marten Falls traditional land use" Marten Falls is a physical place so it cannot have a traditional land use, but a First Nation can.	Suggest adding in <b>First Nation</b> after Marten Falls for clarity. "...to review Marten Falls <b>First Nation</b> traditional land use.	1. Item will be addressed in the Final EAR/IS submission. "First Nation" has been added after "Marten Falls" in paragraph 1, line 2 to add clarity.
47.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	Current and Historical Land Use... Par. 1, Line 3	"An Area of Interest in Planning (AIP) was identified in the CBLUP Terms of Reference for Marten Falls First Nations and shows the approximate size of their AIP"  There's a typo: CBLUP Terms of Reference for Marten Falls First Nations	It should read Marten Falls First Nation, with no 's'. Please correct.	1. Item will be addressed in the Final EAR/IS submission. Paragraph 1, Line 3 has been edited to remove the 's' after Marten Falls First Nation.
48.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	Current and Historical Land Use... Par. 4	"Marten Falls First Nation members shared that "Modern conveniences and technology have also negatively impacted land and resource use (Suslop Inc., 2024). The dependence on the land has been reduced, and many things are store- bought with the younger generations not on the land as much as they previously were" (Suslop Inc., 2024)" Quotation marks are not applied correctly.	Please refer back to MFFN IK Study and adjust quotation marks accordingly to accurately reflect the quote.	1. Item will be addressed in the Final EAR/IS submission. The quotation marks have been adjusted as "Modern conveniences and technology have also negatively impacted land and resource use" (Suslop Inc., 2024).
49.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Traditional Land and Resource Use' Par. 1	"Marten Falls First Nation members practice a traditional way of life, which includes hunting, trapping, fishing, and plant gathering. Currently, members have cabins and camps which they use for harvesting and hunting within their traditional territory ... The IK study noted that "Marten Falls First Nation [community members] do not live off the land like their ancestors once did, especially younger members" (Suslop Inc. Inc., 2024)"  This paragraph is unclear, confusing and contradictory. The last quote is also taken out of context.	Please reframe this paragraph to clarify.  MFFN members do not live off the land like their ancestors once did, because of settler colonialism (e.g., early capitalist development via the fur trade, displacement due to residential schools, etc.). However, this does not mean that MFFN members don't use the land to support themselves (e.g., sustenance). They still do use the land.	1. Item will be addressed in the Final EAR/IS submission. The paragraph has been reworded as such: "MFFN members have long been stewards of the land, historically playing a vital role in maintaining the natural balance or "natural law." One Elder explained, "We were our own MNRs," describing how community members actively managed wildlife populations, such as beaver. This balance was disrupted by the fur trade, which led to the near elimination of species like beaver and undermined traditional stewardship practices.

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					Today, the challenge is different: fewer members live off the land through hunting and trapping due to displacement and disconnection from traditional ways, creating new ecological imbalances. In sum, MFFN people once kept ecosystems in balance, but colonial forces—first through the fur trade and later through systemic changes—disturbed that harmony." (Suslop Inc. 2024).
50.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Traditional Land and Resource Use' Par. 2	<p>"The ancestral relationship with the land included ways to care, steward and/or manage lands and resources. The experience and history of the Northwest Company and Hudson's Bay Company on one Marten Falls First Nation Indigenous Knowledge, Land use and Occupancy Study for the Northern Access Roads (Marten Falls First Nation IK Study) participant's father noted that finding beaver/<i>Amik</i> took "two weeks into the land" and that the beaver/<i>Amik</i> were "getting all wiped out" (Suslop Inc., 2024). This altered their role which they described as "[w]e were our own MNRs taking care of the land ... [s]o we governed ourselves ... [t]aking care of the land, taking care of the animals, you know, respecting, respecting the animals" (Suslop Inc., 2024)"</p> <p>The paragraph is confusing and lacks clarity.</p>	<p>Suggest reframing the paragraph to focus on the following:</p> <ul style="list-style-type: none"> <li>- MFFN members have been, and <b>are</b>, stewards of the land</li> <li>- Historically, members played a critical role in maintaining the balance of nature or 'natural law' – a participant/Elder expressed "We were our own MNRs" when speaking to community members' role in maintaining beaver populations, for example</li> <li>- With the fur trade, certain species/populations, such as beaver, were decimated – the natural balance was ruined</li> <li>- With the fur trade in the past, the challenge now is that there are not enough members living off the land (e.g., trapping, hunting, etc.) as they once did, and so there are still imbalances in nature, but for a different reason now (i.e., displacement, disconnection from land and traditional ways of living)</li> <li>- In sum, the people of MFFN kept the natural balance intact, but the fur trade and other colonial impositions threw off that balance</li> </ul>	<p>1. Item will be addressed in the Final EAR/IS submission. See comments above (line 49)</p>
51.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Hunting' Par. 1, Line 2	<p>"Lifestyles were semi-nomadic and moose, Caribou geese, duck, partridge and other animals' species were hunted (Suslop Inc., 2024)"</p> <p>The sentence above currently reads like a limited number of species were hunted or trapped. It should be made clear that families/community members hunted and trapped a wide</p>	<p>Please reframe the sentence and adjust language to make it clear that a wide range of species were hunted and trapped. Provide more examples of species hunted/trapped. Try to list species that are most significant or popular – e.g., moose, marten, beaver, etc. Reviewing the MFFN</p>	<p>1. Item will be addressed in the Final EAR/IS submission. Sentence revised to make clear wide range of species were hunted and trapped.</p>

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			<p>range of species, including but not limited moose, caribou, beaver, marten, and partridge, among others.</p> <p>The sentence also has grammatical errors.</p>	<p>IK Study may help with this.</p> <p>Please fix grammar as well.</p>	
52/53	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Hunting' Par. 2	<p>"Marten Falls First Nation members have identified moose as a traditionally important part of their diet and Caribou as a culturally significant species (Suslop Inc., 2024). Harvesters use the majority of the animal to minimize waste, with fur used for clothing and blankets. One fish and wildlife area was identified within the WSR study area, but this only based on the account of two Marten Falls First Nation members (Suslop Inc., 2024). This area was identified as a migratory route for Caribou during the spring and fall.</p> <p>There were concerns raised that the WSR would impact this route, as Caribou will continue to use this route."</p> <p>The paragraph above seems to conflate 'Animal Harvesting' and 'Fish and Wildlife Use Areas' identified in the MFFN IK Study when they should be treated as separate but related. The concerns that MFFN members have for each valued component vary.</p> <p>For example, concerns regarding animal harvesting focus on sustenance and cultural identity, whereas concerns related to wildlife use areas (such as migration routes) focus on conservation. For some members, conservation is critical to ensure that future harvesting is possible, but for others, there is intrinsic value in conservation (i.e., protecting nature and wildlife for their own inherent worth, independent of their usefulness to humans).</p>	<p>Suggest reframing the paragraph to avoid the conflation of different valued components. Acknowledge that valued components are separate but related. Acknowledge that MFFN members are not only concerned about conservation to meet harvesting needs but also recognize the intrinsic value of conservation.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The paragraph has been reworded as such: "Marten Falls First Nation members identify moose as a traditionally important food source and caribou as a species of deep cultural significance. Harvesting practices emphasize respect and sustainability, with most parts of the animal used to minimize waste, including fur for clothing and blankets. Within the WSR study area, one fish and wildlife zone was noted by two community members as a seasonal migratory route for caribou during spring and fall. Concerns were raised that the proposed road could disrupt this route, as caribou are expected to continue using it. These concerns reflect not only the need to sustain harvesting opportunities but also the recognition of the intrinsic value of conserving species and maintaining ecological balance. (Suslop Inc. 2024) "</p>
54.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Hunting' Par. 2, Line 3-4	<p>"One fish and wildlife area was identified within the WSR study area, but this was only based on the account of two Marten Falls First Nation members (Suslop Inc., 2024)"</p> <p>Although the statement above is technically accurate, the phrasing of the second part of the sentence seems to downplay MFFN's Knowledge. As a reminder, only 25 members were interviewed due to various constraints. It is possible that more wildlife areas would have been identified if more MFFN members were interviewed.</p>	<p>Suggest reframing language to avoid downplaying MFFN's Knowledge of (or presence) in the region. Be clear that this information is only based only a handful of MFFN members who provided insight into the WSR study area and that this may be a product of a limited sample.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Wording in paragraph 2 has been reworded to: "One fish and wildlife area within the WSR study area was identified based on insights from two Marten Falls First Nation members. This reflects the knowledge shared by a small portion of participants, as only 25 members were interviewed due to constraints. It is likely that additional areas would have been identified if more community members had been consulted, underscoring that the current information represents a limited sample rather than the full extent of MFFN's knowledge and presence in the region. (Suslop, 2024). "</p>

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55.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Fishing' Par. 1	<p>"Fishing also played an important role in sustaining Marten Falls First Nation members and happened throughout the different seasons, but especially in the summer months. Pickerel, walleye, whitefish and sturgeon were commonly caught. Sturgeon is deemed to be culturally significant for Marten Falls First Nation (Suslop Inc. Inc. 2024)"</p> <p>The first two sentences are written in past-tense while the 3<sup>rd</sup> sentence is written in the present. While these sentences are factual, it is important to highlight that fishing continues to sustain MFFN members and members continue to catch pickerel, walleye, etc.</p>	Please reframe to acknowledge past and present tenses.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Wording in paragraph 1 (Fishing) has been reworded to state: "Fishing has long played—and continues to play—an important role in sustaining Marten Falls First Nation members throughout the seasons, particularly in summer. Community members have traditionally caught, and still catch, species such as pickerel, walleye, whitefish, and sturgeon. Sturgeon remains culturally significant for Marten Falls First Nation, reflecting both historical and ongoing connections to the land and water (Suslop Inc., 2024)."</p>
56.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Trapping' Par. 1, Line 4	<p>"Beaver, muskrat, marten and otter were trapped, and trapping was seen as critical to survival and maintaining the family unit (Suslop Inc., 2024). Small game (e.g. skunks and rabbits) was also trapped and used for medicinal or healing purposes (Suslop Inc., 2024)."</p> <p>The first sentence reads as if beaver, muskrat, marten, and otter were the only mammals trapped and/or were the most critical species trapped. However, MFFN's IK Study clearly states that other furbearing mammals were trapped as well.</p> <p>How the sentences are structured also creates disconnect. The species trapped should be acknowledged, following by the importance of trapping.</p> <p>On a related note, trapping was critical for survival, but also important for maintaining the family unit. 'Critical' implies a higher degree of necessity and urgency, whereas 'important' does not necessarily demand immediate attention.</p> <p>As for the last sentence regarding small game, this reads as if both skunks and rabbits were used for medicinal and healing purposes, but this is not true.</p> <p>Rabbits were a food source and their furs used to create clothing and blankets.</p>	<p>Please reframe these sentences to acknowledge that MFFN members trapped/trap other furbearing species as well. Also, modify language to distinguish between 'critical' and 'important'.</p> <p>For example: Beaver, muskrat, marten, and otter, among other furbearing species, were/are trapped. For example, small game like rabbits were/are trapped to be used as a food source and to make clothing and blankets from their furs. Skunks were/are also occasionally trapped to create skunk oil for medicinal and healing purposes. In the past, trapping was critical for survival, but also important for maintaining the family unit</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as such: "MFFN members have traditionally trapped—and continue to trap—a variety of furbearing species, including beaver, muskrat, marten, otter, among others (Suslop Inc., 2024). Small game such as rabbits were/are trapped primarily as a food source, and their fur was/ is used to make clothing and blankets. Skunks were/are occasionally trapped to produce skunk oil for medicinal and healing purposes. Historically, trapping was critical for survival, providing food and materials essential to life, and it was also important for maintaining family and cultural connections (Suslop Inc., 2024)."</p>
57.	Section 19.1.1.1.4 Marten Falls First Nation	'Trapping' Par. 2	<p>"In 1946, the Ontario Registered Trapline System was implemented, which imposed sole ownership of trapping areas. This signalled a new path of land tenure and government regulation in the region ... Marten Falls First</p>	Please reframe paragraph to avoid correlation between RTS and less people trapping. Please also modify language to avoid leaving the	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as such: "In 1946, the Ontario Registered Trapline System was</p>

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
	(Section 19.2.2.2.4)		<p>Nation members also outlined that they see less people trapping, and there is an ecological imbalance with people not as involved in traditional activities (Suslop Inc., 2024)”</p> <p>How this paragraph is organized and worded seems to imply that the RTS led to less people trapping. Is this accurate?</p> <p>MFFN members have communicated that a decline in trapping has resulted from a decline in furbearing species, a decline in fur prices, an increase in costs for tools and resources required for trapping (including fuel), Traditional Knowledge not being passed down to younger generations, a lack of interest among younger generations, and so on.</p> <p>Additionally, saying “there is an ecological imbalance with people not as involved in traditional activities” does not come across well. It leaves the impression that those who are not involved with traditional activities are ecologically imbalanced. To be clear,</p> <p>MFFN members have noticed that less people are trapping, and this has resulted in what they believe to be ecological imbalances. However, this is not necessarily or exclusively the result of the RTS per se, but rather a consequence of settler colonialism at large.</p>	<p>impression that Marten Falls First Nation people are ‘ecologically imbalanced’.</p>	<p>implemented, introducing sole ownership of designated trapping areas and signaling a shift toward government-regulated land tenure (Suslop Inc., 2024). Marten Falls First Nation members have observed a decline in trapping over time, which they attribute to multiple factors, including a decrease in furbearing species, lower fur prices, rising costs for tools and resources such as fuel, Traditional Knowledge not being passed down to younger generations, and a lack of interest among youth. Community members also expressed concern that reduced participation in trapping and other traditional practices has contributed to ecological imbalances in the region. These changes are understood as part of broader impacts of settler colonialism rather than being solely linked to the RTS (Suslop Inc., 2024)."</p>
58.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	‘Drinking Water’ Par. 1, Line 1	<p>“While the existing water treatment facility was updated in June 2019, the community does not have the resources to operate the facility. Contaminated water is not drinkable, can result in repugnant smells, and affect the overall health (and taste) of species living in or using the water”</p> <p>The second sentence seems a bit out of place when it comes to wild animal species, unless you are referring to the dumping of raw sewage into nearby waterways.</p> <p>When MFFN members have discussed contaminated water in relation to animal species, the focus has mainly been on illegal dumping and oil or chemical spills from outsiders/people/crews engaging in activities in the area. They have not spoken to the dumping of raw sewage in Marten Falls much, at least not in the context of the MFFN IK Study.</p>	<p>Please reframe this paragraph for clarity and accuracy. If you are specifically referring to sewage affecting species living in or using the water, then make this clear. However, keep in mind that sewage was not referenced in MFFN’s IK Study, so another source would need to be cited for this.</p> <p>If you are making a general statement about how contaminated water can affect species, and want to reference MFFN’s IK study, then separate this from the discussion regarding drinking water and water treatment and perhaps include it in a section focussed on pollution/impacts to wildlife.</p> <p>Please make sure that Section 19 is the best place for this type of statement or if it is better placed in a different section of the EAR/IA Report.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reframed as such: "Although the existing water treatment facility was upgraded in June 2019, the community lacks sufficient resources to operate it effectively (Suslop Inc., 2024). As a result, residents continue to face challenges accessing safe drinking water. When Marten Falls First Nation members have discussed contaminated water in relation to wildlife, their concerns have primarily focused on pollution from illegal dumping and oil or chemical spills by external parties operating in the area. Contaminated water from such sources is believed to negatively affect aquatic ecosystems and species that rely on these waterways for survival."</p>

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59.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Travel and Access' Par. 2	<p>"Travel routes along water were identified as areas that are utilized by Marten Falls First Nation members that should remain accessible. One travel route was mapped in the study area, and it is an access route to WabamikoZakaihgan/ White Beaver Lake (Suslop Inc., 2024). One historic trail was also identified, which was used to visit family in Attawapiskat, as well as one historic village site. The Marten Falls First Nation members who identified the historical trail and village sites did not have concerns about the impacts of WSR on the sites"</p> <p>It should be made clear that, the member who identified the access route to White Beaver Lake has concerns about road development hindering access to this route and recommended that pathways be created to enable access. This was suggested in the first sentence above but should be more explicit. Further, it is not only access that members are concerned about, but safety as well. Access to travel routes is important for the safe movement of members.</p> <p>As for the historic trail identified, it might be worth noting that this trail has been used for hundreds of years by the people of MFFN. Additionally, it is unlikely that the trail was only used to visit family in Attawapiskat – it likely has other uses, but the member who mapped it used it specifically for that. Avoid language that potentially minimizes the significance of the trail.</p> <p>For the last sentence, it's 'village site' not 'village sites'. Only 1 site was identified.</p>	Please reframe this paragraph based on the information provided to the left.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The paragraph was rewritten as the following: "Travel routes along water were identified as important areas used by Marten Falls First Nation (MFFN) members and should remain accessible for safe movement. One member who mapped an access route to WabamikoZakaihgan (White Beaver Lake) expressed concerns that road development could hinder access and recommended creating pathways to maintain connectivity. In addition to access, safety was emphasized as a key consideration for these routes.</p> <p>A historic trail was also identified, which has been used by MFFN people for hundreds of years. While the member who mapped it noted using the trail to visit family in Attawapiskat, its significance extends beyond that purpose and reflects a long-standing cultural connection.</p> <p>Finally, one historic village site was identified, and the member who shared this information did not express concerns about potential impacts of the WSR on the site."</p>
60.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Cultural Continuity' Par. 1, Line 3	<p>"Residential schools created a disconnect and the intergenerational sharing of knowledge and land and resource use was impacted"</p> <p>To be clear, knowledge sharing and land and resource use was <b>negatively</b> impacted.</p>	Please add ' <b>negatively</b> ' impacted, before impacted. "...and land and resource use was <b>negatively</b> impacted"	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as: Residential schools created a disconnect and the intergenerational sharing of knowledge and land resource was negatively impacted."</p>
61.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Sites and Areas Used for Cultural and Spiritual Purposes' Par. 2	<p>"When Marten Falls First Nation members do not use their traditional territory, they risk losing important aspects of their cultural identity. It is therefore important to protect the ecological integrity of Marten Falls First Nation's traditional territory to ensure that future generations have the option and opportunity to engage in land and resource use which helps define them as an Indigenous person." (Suslop Inc., 2024)"</p> <p>Would it not make more sense to include the above quote under Cultural Continuity instead of this section?</p>	Suggest moving this to Cultural Continuity and rethink what should be included in the 'Sites and Areas Used for Cultural and Spiritual Purposes' sub-section.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>This was a formatting glitch. The title "Sites and Areas Use for Cultural and Spiritual Purposes" is now a subheading underneath "Cultural Continuity" as such:</p> <p><b>Cultural Continuity</b>  <b>Sites and Areas Used for Cultural and Spiritual Purposes</b></p>

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					"Before European Contact..... tied to their Indigenous culture and person (Suslop Inc. 2024). "Conservation....."
62.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Sites and Areas Used for Cultural and Spiritual Purposes' Par. 4	<p>"Waterways were and are important to Marten Falls First Nation members.</p> <p>Lakes and rivers served as highways for transportation and travel (Suslop Inc., 2024). The Ogoki River and Albany River are waterways of importance for travel for Marten Falls First Nation members and other communities. Marten Falls First Nation members noted that prior to contact and settlement, they could drink the water from the rivers and streams flowing through their traditional territory (Suslop Inc., 2024). Today, Marten Falls First Nation members living in the community rely on a water treatment system that is not operational"</p> <p>Wondering if the above should be included under Travel and Access <i>and</i> Drinking Water instead?</p>	Suggest moving this to 'Travel and Access' <i>and</i> 'Drinking Water' and rethink what should be included in the 'Sites and Areas Used for Cultural and Spiritual Purposes' sub-section.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence "Waterways were and are important to Marten Falls First Nation members. Lakes and rivers served as highways for transportation and travel (Suslop Inc., 2024). The Ogoki River and Albany River are waterways of importance for travel for Marten Falls First Nation members and other communities." has been moved to <b>"Travel and Access"</b> and the sentence "Marten Falls First Nation members noted that prior to contact and settlement, they could drink the water from the rivers and streams flowing through their traditional territory (Suslop Inc., 2024). Today, Marten Falls First Nation members living in the community rely on a water treatment system that is not operational" has been moved to <b>"Drinking Water"</b>.</p>
63.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Sites and Areas Used for Cultural and Spiritual Purposes', Par. 5, Line 3	<p>"IK Study mentioned that there are also a number of known burial and birth locations, which are currently unknown and not identified within the Indigenous Knowledge study (Suslop Inc, 2024)"</p> <p>The above is confusing. How are burial and birth locations simultaneously known and unknown? Additionally, grammar could be improved – e.g., The IK Study, MFFN's IK Study, etc.</p>	Please clarify what is meant by known versus unknown locations to improve clarity and accuracy. Please also address grammatical issues as well.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence in paragraph 5, line 3 has been changed to remove the word 'unknown' as following: " IK Study mentioned that there are also a number of known burial and birth locations, which are currently not identified within the Indigenous Knowledge study (Suslop Inc, 2024)"</p>
64.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Sites and Areas Used for Cultural and Spiritual Purposes' Par. 6	<p>"Previous development has significantly reduced water levels in the Albany River, changing wildlife habitat and how Marten Falls First Nation members use the Albany River today (Suslop Inc., 2024)"</p> <p>How does this affect culture and spirituality?</p>	Please reframe this to explain how this affects culture and spirituality. If this is not possible, consider moving this to a more appropriate section or deleting it.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been moved to Traditional Land and Resource Use (in Section 19.2.2.2.4).</p>
65.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Cultural and Traditional Practices Par. 2, Line 4-6	<p>"Younger generations acquired skills by observing Elders, learning not only traditional harvesting methods, but also how to harvest wood, build tipis, tan moosehide, prepare for winter, deliver babies, and make foods like pemmican and medicines"</p>	Please reframe this and related sentences to clearly communicate that MFFN members, but especially Elders, acquired certain skills by observing their Elders living off the land, whereas younger generations today learn from participating	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence in paragraph 2 line4-6 has been reworded "Marten Falls First Nation members—particularly Elders—acquired essential skills by</p>

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			<p>The above seems to suggest that younger generations today have learned and acquired these skills when this may not be the case. For example, today's younger generations (e.g., students participating in the Elders program) are probably not learning how to deliver babies.</p> <p>The quote above, which is derived from MFFN's IK Study, refers to today's Elders learning from their Elders; this should be made clear.</p>	<p>in special programs as well as observing their Elders engage in traditional activities.</p>	<p>observing their own Elders living off the land, learning traditional harvesting methods as well as practices such as harvesting wood, building tipis, tanning moosehide, preparing for winter, delivering babies, and making foods like pemmican and medicines. Today, younger generations typically learn through participation in special cultural programs and by observing Elders engage in traditional activities, rather than acquiring the full range of historical skills."</p>
66.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Cultural and Traditional Practices Par. 5	<p>"There are several ceremonies that Marten Falls First Nation members have identified. Traditional and spiritual ceremonies for Marten Falls First Nation are important for the development of children and youth (Suslop Inc., 2024). Ceremonies outlined in the Indigenous Knowledge study include..."</p> <p>The ceremonies listed following the above quote (e.g., walking out ceremony, fasting ceremony, etc.) are presented in a way that makes it seem like these ceremonies are still taking place today when some might not be. When Elders referred to these ceremonies in their IK interviews, they were explaining events that they witnessed, participated in, or heard of in the past. Although some ceremonies may still take place at the community or individual level, it is not guaranteed that all these ceremonies continue to take place, and their absence is a consequence of colonialism.</p> <p>More broadly, the cultural traditions and practices of the past and present should be delineated throughout this section to avoid confusion around what MFFN members experienced or did in the past versus today.</p>	<p>Please reframe this paragraph and adjust language to provide clarity and avoid confusion around which activities occurred and when.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded to provide clarity: "Marten Falls First Nation members have identified several traditional and spiritual ceremonies that hold cultural significance, particularly for supporting the development of children and youth (Suslop Inc., 2024). The ceremonies outlined in the Indigenous Knowledge study—such as the walking out ceremony and fasting ceremony—were described by Elders based on events they witnessed, participated in, or heard about in the past. While some of these ceremonies may still occur at the community or individual level today, it is not guaranteed that all continue to be practiced. Their decline reflects the impacts of colonialism on cultural continuity."</p>
67.	Section 19.1.1.1.4 Marten Falls First Nation (Section 19.2.2.2.4)	'Traditional Laws, Roles, Responsibilities, and Governance (Self-governance)' Par. 1	<p>"Marten Falls First Nation faces several challenges within the Marten Falls community because of a lack of self-government and economic independence. Despite these challenges, it should not be discounted the importance of governance, traditional laws and the roles and responsibilities of its community members and, chief and council (Suslop Inc., 2024)"</p> <p>The above is not quoted correctly. The second sentence is not mentioned in MFFN's IK Study. Furthermore, it seems that self-government and (self- governance) are being conflated here.</p>	<p>Please make sure that you are quoting the MFFN IK study correctly and avoid conflating self-government with self- governance by reframing the paragraph.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reframed as such: "Marten Falls First Nation has identified challenges related to political and economic limitations imposed by the Indian Act and its status as a First Nation, which restrict opportunities for self-government (Suslop Inc., 2024). These challenges are not a reflection of the community's ability to govern itself; rather, they stem from colonial systems of laws, policies, and institutions that have constrained economic independence and decision-making</p>

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			<p>The quote taken from MFFN's IK Study regarding self-government was referring to political and economic limitations because of the Indian Act and MFFN's status as a First Nation. Self-government is typically a formalized arrangement between the Crown and Indigenous Nations, whereas self-governance is broader in scope and inherent. It is important to not conflate or confuse the two.</p> <p>For example, MFFN does not face challenges like housing shortages, low education outcomes, high unemployment rates, etc. because it doesn't know what it's doing, that is, how to regulate its affairs or make decisions. It faces these challenges because of the system of colonial rules, laws, and institutions imposed on it.</p>		<p>authority. Despite these limitations, MFFN continues to uphold traditional governance systems, laws, and community roles and responsibilities."</p>
68.	Section 19.2.1.2.1 Construction Activities... (Section 19.3.1.2.1)	'Wildlife and Wildlife Habitat' Par. 1, Line 3-5, Sentence 3	<p>"Participants emphasized the importance of protecting the species – the "negative impact on the health and size of animal population, particularly the moose"; therefore, "[i]t is critical that species like moose and Caribou are protected as much as possible"</p> <p>The above is unclear. It should be specified that MFFN members are concerned that road construction and related development activities in the region could negatively impact moose <b>and</b> caribou</p>	Please reframe to provide clarity that both moose <b>and</b> caribou could be negatively impacted by road construction and related development activities in the region.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded to clarify that both moose and caribou could be negatively impacted by road construction and related development activities in the region.</p>
69.	Section 19.2.1.2.1 Construction Activities... (Section 19.3.1.2.1)	'Wildlife and Wildlife Habitat' Par. 1, Line 6,	<p>"The project was "going to go through a place where there is a lot of moose every Fall season, where they mate, where they calf, and I had to put my two cents on that. You can't go there, I [said]. Those are my concerns.""</p> <p>The above is not quoted correctly.</p>	The correct quote is as follows: "They were going to go through a place where there is a lot of moose every fall, where they mate, where they calf, and I had to put my two cents on that. You can't go there, I [said]. Those are my concerns.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been revised and the word 'season' removed.</p>
70.	Section 19.2.1.2.1 Construction Activities... (Section 19.3.1.2.1)	'Fish and Fish Habitat' Par. 1, Line 2, Sentence 2	<p>"Fishing was carried out as a year-round practice and had an important role in sustaining Marten Falls First Nation"</p> <p>Fishing is an activity still carried out today.</p>	Please reframe to include that fishing is an activity still carried out today.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as the following "Fishing has long been a year-round practice essential to sustaining Marten Falls First Nation and continues to be an important activity today."</p>
71.	Section 19.2.1.2.1 Construction Activities... (Section 19.3.1.2.1)	'Fish and Fish Habitat' Par. 1, Line 2-4 Sentence 3	<p>"One of their concerns is the disruption to fish habitat would "change, the fish would change location if, if their habitats are disturbed because I think it's, I think it's the trees that feed the rivers and [they] feed the rivers and the fish and everything else that's in it."</p>	Please reframe this sentence and the quote used to provide more clarity and accuracy around MFFN members' concerns.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded: MFFN members expressed concern that clearing land for road development—particularly tree removal—could</p>

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			The above quote lacks context and is therefore confusing. It should be made clear that MFFN members are concerned about the clearing of the land (e.g., tree- clearing) to accommodate road development. They believe that the clearing of trees will not only negatively affect species on land but could also negatively affect aquatic species.		disrupt fish habitats. They believe trees play a vital role in maintaining river ecosystems, which support fish and other species. As one member explained, if their habitats are disturbed, the fish will move. "it's the trees that feed the rivers and [they] feed the rivers and the fish and everything else that's in it."
72.	Section 19.2.1.2.1 Construction Activities... (Section 19.3.1.2.1)	'Fish and Fish Habitat', Par. 1, Line 4-7, last sentence	<p>"Another participant shared an example from a reservation in Red Lake, Minnesota where they have a "dam [that] blocked off the river, but the river s[t]ill goes through. It's not a big dam, it's just – people go there [to] fish, and you can see the fish jumping ... I think what they should have done when they built the mines up north – at the bottom of the dam by the riverbed, you should have left an opening for the fish to swim back and forth to their spawning grounds."</p> <p>Again, context is lacking here. MFFN members are concerned about the potential negative impacts that road development could have on fish and fish habitat. MFFN members have frequently referred to dams in northern Ontario (e.g., at Lake St. Joseph) that were built without their knowledge or consent which have negatively impacted fish and fish habitat. Some MFFN members believe that negative effects can be mitigated with proper planning. The dam at Red Lake (Minnesota) is just one example of how infrastructure can be developed in a way that can accommodate the movement of fish. It has been argued that something similar should have been put into effect with the dams in northern Ontario.</p>	Please reframe to provide some context around MFFN's concerns regarding fish and fish habitat and the Red Lake, Minnesota example.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as the following "MFFN members are concerned that road development could negatively impact fish and fish habitat, similar to past experiences with dams in northern Ontario (e.g., Lake St. Joseph) that were built without their consent and disrupted fish movement. Some members believe these impacts can be mitigated through proper planning. One participant referenced Red Lake, Minnesota as an example of better design:</p> <p>"They have a dam [that] blocked off the river, but the river s[t]ill goes through. It's not a big dam, it's just – people go there [to] fish, and you can see the fish jumping ... I think what they should have done when they built the mines up north – at the bottom of the dam by the riverbed, you should have left an opening for the fish to swim back and forth to their spawning grounds."</p>
73.	Section 19.2.1.2.4 Operations and Maintenance Activities... (Section 19.3.1.2.4)	'Environmental Contamination and Resource Quality', Par. 1 Line 2, Last Sentence	<p>"A particular concern is the potential for fuel spills—such as from a tipped gasoline truck—which could cause <b>"irreversible"</b> damage to wildlife habitats, aquatic species, and drinking water sources"</p> <p>Having 'irreversible' damage in quotation marks without an in-text citation to follow seems to suggest that there is doubt about its validity.</p>	Please reframe for clarity and accuracy. If not questioning the validity of this claim, that is, fuel spills could cause irreversible damage, then remove the quotation marks or add an in-text citation.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Quotations have been removed from the word "irreversible"</p>
74.	Section 19.2.1.2.4 Operations and Maintenance Activities... (Section 19.3.1.2.4)	'Sensory Disturbance and Wildlife Displacement', Par. 1	"Noise and vibration from road traffic and maintenance activities may disturb wildlife and disrupt traditional harvesting. As one community member explained, unfamiliar vibrations can create fear and trauma—not only for people but for all living beings. These disturbances may alter animal behavior, making them more difficult to locate and harvest"	Please cite the MFFN IK Study when using information directly from it.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded referencing the MFFN IK Study. "Noise and vibration from road traffic and maintenance activities may disturb wildlife and disrupt traditional harvesting. As one</p>

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			This information, or at least the community member's concern, is from the MFFN IK Study. Cite accordingly		community member explained, unfamiliar vibrations can create fear and trauma—not only for people but for all living beings. These disturbances may alter animal behavior, making them more difficult to locate and harvest” (Suslop, 2024).
75.	Section 19.2.1.2.5 Operations and Maintenance Activities... (Section 19.3.1.2.5)	'Operations and maintenance activities → Loss of and/or alteration of sites and areas used for traditional harvesting', Par. 3, Line 2, Sentence 2	<p>“A parent of one participant in the Marten Falls First Nation IK Study <del>participant's parents</del> who were so afraid of MNR that they would whisper at night to make plans to set their fishing nets and collect them before they could be seen in the morning, “before the planes start flying. That’s psychological warfare. We got to get out of that way of thinking” (Suslop Inc., 2024)”</p> <p>First, there are grammatical errors in the first sentence. Second, it may be worth providing some additional context here.</p> <p>MFFN’s culture and way of life was banned by government and the churches. There were serious repercussions for those who didn’t obey the rules of government or the church (e.g., jail time); hence why some were fearful of the MNR. According to one MFFN member, members are “just beginning to learn to heal from [past trauma].” Healing might become more difficult if there is additional government surveillance and enforcement with the road.</p>	Please fix grammatical errors and consider reframing the sentence to provide additional context for clarity and accuracy.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as such: "A participant in the Marten Falls First Nation IK Study recalled how they were fearful of the Ministry of Natural Resources (MNR) that they whispered at night to plan when to set fishing nets and retrieve them before being seen in the morning—“before the planes start flying. That’s psychological warfare. We have to get out of that way of thinking” (Suslop Inc., 2024).</p> <p>This fear stems from historical trauma: MFFN's culture and way of life were banned by government and churches, and those who disobeyed faced severe repercussions, including jail time. As one member explained, people are “just beginning to learn to heal from [past trauma].” Additional government surveillance and enforcement related to the road could make this healing process more difficult."</p>
76.	Section 19.2.1.5 Indigenous Knowledge and Land and Resource Use Page 19-34	Last paragraph, Line 2	<p>“Marten Falls First Nation completed a draft version of the Marten Falls First Nation Indigenous Knowledge, Land Use and Occupancy Study for the Northern Access Road”</p> <p>There is a typo in the title of the study.</p>	Please correct the title of the study as follows: Marten Falls First Nation Indigenous Knowledge, Land Use and Occupancy Study for the Northern Access Roads	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The title of the study has been reworded.</p>
77.	Section 19.2.2.2.1 Construction activities... (Section 19.3.2.2.1)	'Construction activities →Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes', Par. 3, following the	<p>“The participant expressed concern that this would be impacted and that a safe pathway be created so this access route can continue to be used. Another historic trail was mapped within the study area, which leads to Attawapiskat First Nation but impacts to this trail are not anticipated (Suslop, 2024)”</p> <p>The placement of the in-text citation seems to suggest that the MFFN Study stated that WSR’s impacts to the trail are not anticipated – it did not state this.</p>	Please adjust placement of in-text citation to accurately reflect what the MFFN IK Study stated, versus what the WSR Draft EAR/IS is stating.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The in text citation (Suslop, 2024) has been moved to after the first sentence "The participant expressed concern that this would be impacted and that a safe pathway be created so this access route can continue to be used (Suslop, 2024)."</p>

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		bullet points, Line 6, sentence 6			
78.	Section 19.2.2.2.1 Construction activities... (Section 19.3.2.2.1)	'Construction activities →Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes', Par. 3 following the bullet points, Line 8, Sentence 8	<p>"[T]he ecological integrity of Marten Falls First Nation's traditional territory <b>is</b> to ensure that future generations have the <b>open</b> and opportunity to engage in land and resource use" (Suslop Inc., 2024)."</p> <p>The above is not quoted correctly. The IK Study says: "the ecological integrity of MFFN's traditional territory to ensure that future generations have the <b>option</b> and opportunity to engage in land and resource use." Also, quotes should not stand alone as sentences; they must be grammatically integrated into your own sentences.</p>	<p>Please reframe so that the quote is integrated into your own sentence to illustrate whatever point you are trying to make.</p> <p>Please also make sure that the quote is accurately quoted.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reframed as the following: "The Marten Falls First Nation IKLRU Study underscores the need to maintain "the ecological integrity of MFFN's traditional territory to ensure that future generations have the option and opportunity to engage in land and resource use" (Suslop Inc., 2024), highlighting the community's long-term vision for sustainable land stewardship."</p>
79.	Section 19.2.2.2.1 Construction activities... (Section 19.3.2.2.1)	'Construction activities →Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes', Par. 3 following the bullet points, Line 14, Last Sentence	<p>"No sites of cultural importance within the 50km study area from the WSR were identified within the Marten Falls First Nation IKLRU Study (Suslop Inc., 2024)"</p> <p>While the above statement is true, it is important to remember that only 25 members were interviewed for this Study. It is therefore possible that members who were not interviewed may have some sites of cultural importance in the study area.</p>	<p>Please reframe language around statements such as this one to acknowledge that the knowledge provided vis-à-vis the MFFN IK Study is a merely a sample of MFFN's Knowledge and that there could be more sites of cultural importance.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The statement has been rephrased as the following: "Although the Marten Falls First Nation IKLRU Study reported that "no sites of cultural importance within the 50 km study area from the WSR were identified" (Suslop Inc., 2024), it is important to recognize that this finding reflects input from only 25 members. As such, the study represents a sample of MFFN's knowledge, and additional sites of cultural importance may exist that were not captured through these interviews."</p>
80.	Section 19.2.2.2.3 Operations and maintenance activities... (Section 19.3.2.2.3)	'Operations and maintenance activities →Loss and/or alteration of access to lands and resources used for cultural and spiritual purposes', Par. 3, Line 3, Sentence 3	<p>"The Project could potentially impact Marten Falls First Nation members <b>well-being rights</b> with easier access to lands and resources used for cultural and spiritual purposes"</p> <p>What are 'well-being rights'?</p>	<p>Please reframe sentence to clarify what you mean by well-being rights.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Comment acknowledged. The sentence has been reworded: "The Project could potentially impact Marten Falls First Nation's cultural continuity, with easier access to lands and resources used for cultural and spiritual purposes."</p> <p>Socio-economic, health and well-being rights as Indigenous rights are intended to capture rights that are described under the United Nations Declaration on the Rights of Indigenous Peoples, including: minimum standards for survival, dignity,</p>

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					and well-being; Right to improve economic and social conditions; Right to the highest attainable standard of physical and mental health; Access to traditional medicines and conservation of medicinal resources.
81.	Section 19.3.1 Change to Current and Historical Use of Lands and Resources for Traditional Purposes (Section 19.4.1)	'Change to Current and Historical Use of Lands and Resources for Traditional Purposes', Par. 4, second last sentence	<p>"Environmental monitoring was also recommended so that "government ... should share authority with First Nations." and would require technical training for their members to be involved in monitoring"</p> <p>The above is unclear, not cited, and has grammatical errors.</p> <p>To be clear, MFFN's IK Study said: MFFN members recommended that MFFN (and other First Nations) should be responsible for monitoring the environment. From their perspective, government (i.e., the Government of Ontario, the Government of Canada) should share authority with First Nations when it comes to environmental monitoring (M3009, 2023). This will require technical training for members interested in environmental monitoring.</p>	Please reframe to provide clarity and accuracy and cite MFFN's Ik Study. Please also correct grammatical errors.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reframed as: "Marten Falls First Nation's IKLRU Study notes that members recommended Marten Falls First Nation (and other First Nations) take responsibility for environmental monitoring. From their perspective, the Government of Ontario and the Government of Canada should share authority with First Nations in this process. To enable meaningful participation, technical training will be necessary for members interested in environmental monitoring (Suslop, 2024)."</p>
82.	Section 19.3.1 Change to Current and Historical Use of Lands and Resources for Traditional Purposes (Section 19.4.1)	'Change to Current and Historical Use of Lands and Resources for Traditional Purposes', Par. 4, Line 8, last sentence	<p>"In connection with concern regarding over harvesting, Marten Falls First Nation also recommended that "fishing locations or sensitive areas should be at least a 1- hour walk from the roads" as far away as possible (Suslop Inc., 2024)"</p> <p>Some MFFN members suggested a 1- hour walk, while others said as far as possible. The above does not adequately acknowledge the spectrum of responses provided through the Study. The language used in the above statement is also unclear and therefore confusing.</p>	Please reframe sentence to provide clarity and accuracy by acknowledging the spectrum of responses provided by MFFN members.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The text has been replaced as: "In response to concerns about overharvesting, Marten Falls First Nation members recommended that fishing locations and other sensitive areas be located away from roads. Suggestions varied, with some members proposing a minimum distance of about a one-hour walk, while others emphasized placing these areas as far away as possible (Suslop Inc., 2024)."</p>
83.	Section 19.3.1.1.1 Preferred and Culturally Important Species (Section 19.4.1.1.1)	'Preferred and Culturally Important Species', Par. 2	<p>"Caribou was the species selected for cultural keystone species for Marten Falls First Nation, Weenusk First Nation and Webequie First Nation, based on their IKLRU reports"</p> <p>How is 'cultural keystone species' defined and what is the selection criteria?</p> <p>Although caribou holds cultural value to MFFN members, members have also identified moose and sturgeon to be culturally significant. In fact, some may even argue that moose is even more significant than caribou. There may be</p>	<p>Please reframe to include the selection criteria for 'cultural keystone species' which should be defined. For clarity and accuracy</p> <p>Be transparent on the selection criteria for cultural keystone species and consider other species like moose and sturgeon for MFFN, in addition to caribou.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as: Caribou may be considered a cultural keystone species for Marten Falls First Nation, Weenusk First Nation and Webequie First Nation, based on their IKLRU reports, since it is a species of high importance to culture of the First Nations.</p>

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			other species too that members identify as culturally significant.		
84.	Section 19.3.1.1.1 Preferred and Culturally Important Species (Section 19.4.1.1.1)	'Preferred and Culturally Important Species', Par. 3	<p>"The following recommendations and suggestions have been made in the IKLRU studies shared by Weenusk First Nation, Webequie First Nation and Marten Falls First Nation related to reducing impacts to Caribou (Stantec, 2025, Suslop Inc., 2024 and MNP LLP, N.D) ..."</p> <p>For the bullet points to follow, it would be helpful to know who said what – cite accordingly.</p> <p>Furthermore, some of the bullet points are vague and fail to explain how the recommendation or suggestion would protect caribou. For example, "Minimize activities that would increase mortality" is vague. What activities? How should they be minimized?</p>	<p>Please reframe for clarity and accuracy by:          Providing in-text citations for each bullet so that it is clear which community(ies) made the recommendation          Providing clarity on explaining how the recommendations would work as some of them are so vague that they are not helpful.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.          The section has been revised to include citations from communities that provided input.</p>
85.	Section 19.3.1.2.1 Stewardship and Environmental Management Strategy (Section 19.4.1.2.1)	'Stewardship and Environmental Management Strategy', Par. 3 Bullet Point 2	<p>"A structure "or expectation" to respond to oil spills, such as a trench lined with cement to prevent seepage or burning the oil"</p> <p>First, the above is misquoted. MFFN members contend "that there should be some structure or expectations around responding to oil spills." In other words, MFFN members advocate for an organized response structure with clear expectations for addressing oil spills.</p> <p>Some MFFN members also noted that existing government policies and protocols for oil or chemical spills should be referred to and implemented.</p> <p>Second, MFFN's IK Study does <b>not</b> mention trenches. For oil spills, MFFN members have recommended holding bays, gravel or cement-lined holes or pits where oil can be stored safely, and/or burning the oil (if necessary). That said, it is important to keep in mind that not all members who provided recommendations are familiar with the technicalities of storing and disposing of oil. For example, cement and gravel are porous and can allow for seepage.</p> <p>Burning oil, on the other hand, results in air pollution and contributes to climate change.</p> <p>Throughout the MFFN IK Study, it is made clear that MFFN members are very concerned about oil seeping into nearby waterways and the earth. They are also concerned about</p>	<p>Please reframe this (and possibly other) recommendations to accurately reflect what was communicated in MFFN's IK Study. When presenting recommendations, consider how they work with (or against) concerns or ideas highlighted in the Study.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.          The bullet has been reworded as: "an organized response framework with clear roles and responsibilities for oil or chemical spills."</p>

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			<p>climate change. The producers of WSR's Draft EAR/IS should take these concerns into consideration when identifying MFFN members' recommendations. They should use their best judgement to highlight or prioritize certain recommendations based on other content and feedback in the Study.</p> <p>In this case, it would be sensible to highlight: having an organized oil response structure, implementing existing government policies and protocols for oil or chemical spills, and having holding bays installed. You could then explain how some members also recommended gravel or cement-lined holes or pits where oil can be stored safely or burning the oil, noting that these recommendations may go against members' concerns regarding oil seepage and climate change, but nevertheless are better than no action at all.</p>		
86.	Section 19.3.1.2.1 Stewardship and Environmental Management Strategy (Section 19.4.1.2.1)	'Stewardship and Environmental Management Strategy', Par. 3, Bullet Point 3	<p>"Fuel stations "should monitor how people are filling their tanks or cans" with foremen and/or security <b>devise</b> as people tend to overflow"</p> <p>MFFN members specifically referred to security cameras. You could say "security <b>devices, such as security cameras...</b>" or something to that effect.</p>	Please fix the typo (devise) and reframe to be more specific with the recommendation – refer to what was said in the IK Study.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The bullet has been reworded: "Fuel stations 'should monitor how people are filling their tanks or cans' with foremen and/or security devices, such as security cameras as people tend to overflow".</p>
87.	Section 19.3.1.2.1 Stewardship and Environmental Management Strategy (Section 19.4.1.2.1)	'Stewardship and Environmental Management Strategy', Par. 3, Bullet Point 7	<p>"Implement stricter noise regulations"</p> <p>When reviewing this section, specifically the bullet point list related to pollution, spills, contaminants, one cannot help but ask: What does noise regulation have to do with oil spills? All the recommendations provided up to this point have been focused on oil spills.</p> <p>There is a lack of organization and clarity when it comes to the recommendations listed here.</p>	<p>Prior to listing recommendations, be clear that MFFN members are concerned about various types of pollution, including oil and chemical spills, noise, and dust, among other types of pollution.</p> <p>Please reorganize the list of recommendations grouped in the same order as noted above. All the recommendations related to spills would be grouped together, followed by noise recommendations grouped together, followed by dust etc.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The bullet has been moved to the bottom of the list and the sentence preceding the bullet has been reworded: "The Marten Falls First Nation IKLRU Study identified the following recommendations related to pollution, spills, contaminants and <b>nuisance.</b>"</p>
88.	Section 19.3.2.4 Change to Sufficiency of Lands and Resources for Cultural Practices (Section 19.4.2.4)	'Change to Sufficiency of Lands and Resources for Cultural Practice' Par. 1 Lines 1-3, Sentences 1-2	<p>"Webequie First Nation and Marten Falls First Nation, along with other First Nations, have concerns related to stewardship regarding sufficiency of lands and resources. The communities have requested to be involved and have authority to make decisions that allow them to protect their resources, not only for harvesting wildlife but also waterbodies as many people prefer a source of water for consumption"</p> <p>Regarding the last part of the last sentence, what does "as many people prefer a source of water for consumption"</p>	Please reframe this paragraph to clarify what is meant by "as many people prefer a source of water for consumption." Please refer to MFFN's IK Study again for accuracy.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as such "Webequie First Nation and Marten Falls First Nation, along with other First Nations, have concerns related to stewardship regarding sufficiency of lands and resources. The communities have requested to be involved and have authority to make decisions that allow them to protect their resources, not only for harvesting</p>

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			<p>mean? Do communities want certain water bodies to be safe to drink from, as they once were in the past? If so, is this even possible, considering the use of gas-powered boats today?</p> <p>When discussing water consumption (i.e., drinking water), the MFFN IK Study mentions that, prior to contact, the people of MFFN could drink from rivers and streams flowing through MFFN's traditional territory. Today, the community must buy bottled water to drink because its new water treatment facility is not operational. The Study doesn't say anything regarding preferring a source of water for consumption.</p>		wildlife but also waterbodies as a source of water for consumption".
89.	Section 19.3.2.4 Change to Sufficiency of Lands and Resources for Cultural Practices (Section 19.4.2.4)	Change to Sufficiency of Lands and Resources for Cultural Practices', Par. 3	<p>"Marten Falls First Nation is also concerned with over harvesting and/or outside and external influences that would have a negative effect on lands and resources for future generations. Regulations or controls to prevent these issues from occurring are recommended and suggested "that something like a <i>Public Lands Act</i> be put into place" along with stricter licensing measures. Part of this effort includes enhanced enforcement which is balanced with the least disruption and harassment from them too, and so, suggested a "police force (or tribal police)" (Suslop Inc., 2024)"</p> <p>Regarding the last sentence, the following is confusing: "enhanced enforcement which is balanced with the least disruption and harassment from them too." Who is 'them'? It might be worth explaining that MFFN members would like to see governmental authorities have an enhanced presence in the region, albeit without further encroachment on or interference with traditional activities and/or Aboriginal and Treaty rights. Thus, a balance needs to be struck between enhanced presence and encroachment. To help strike this balance, some MFFN members have recommended having a tribal police force put into effect.</p>	Please reframe the paragraph using the comments provided to the left as a guide.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The paragraph has been reframed as such: "Marten Falls First Nation has expressed concerns about overharvesting and external influences that could negatively impact lands and resources for future generations (Suslop Inc., 2024). To address these issues, community members have recommended implementing regulations or controls, such as measures similar to a Public Lands Act, along with stricter licensing requirements. They also emphasized the need for enhanced enforcement to prevent these impacts. However, members stressed that any increased enforcement presence should avoid further encroachment on or interference with traditional activities and Aboriginal and Treaty rights. To help strike this balance, some members suggested establishing a tribal police force as an alternative to relying solely on external authorities."</p>
90.	Section 19.3.2.4 Change to Sufficiency of Lands and Resources for Cultural Practices (Section 19.4.2.4)	Change to Sufficiency of Lands and Resources for Cultural Practices', Par. 4	<p>"A physical deterrent such as a road toll would "limit the number of people using the roads and using Marten Falls First Nation's traditional territory" would also address their concern of overharvesting, along with 'no hunting or fishing' signage, fences built along the rivers to prevent boat access. Another deterrent for outsiders or unknowledgeable travelers included signage around hazardous landscape elements for boulders, rapids, whirlpools and other unsafe conditions"</p>	Please reframe paragraph to accurately reflect Marten Falls First Nations' view. Please use language to properly identify deterrents recommended. See comments to the left with suggestions. Please move recommendations related to health and safety concerns to an appropriate section.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded: "To address concerns about overharvesting, Marten Falls First Nation members recommended both financial and physical deterrents to limit or prevent outsiders from overhunting or overfishing. These deterrents include, but are not limited to, implementing road</p>

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			<p>First, a road toll might be a financial deterrent – not a physical deterrent. If it is a financial deterrent, you may want to say that MFFN members recommend financial and physical deterrents to limit or prevent outsiders from overhunting or overfishing, which include but are not necessarily limited to, road tolls, signage (e.g., ‘no hunting or fishing’), and fences built along rivers to prevent boat access.</p> <p>Second, input regarding signage for unknowledgeable travelers is related to health and safety concerns – not overharvesting concerns.</p>		<p>tolls as a financial measure, installing signage such as “no hunting or fishing,” and constructing fences along rivers to restrict boat access (Suslop Inc., 2024).”</p>
91.	Section 19.3.2.4 Change to Sufficiency of Lands and Resources for Cultural Practices (Section 19.4.2.4)	‘Change to Sufficiency of Lands and Resources for Cultural Practices’, Par. 5	<p>“The following measures are proposed in addition to the above: ...”</p> <p>The bullet-point list provided here follows immediately after MFFN’s recommendations, without specifying where these measures come from (e.g., Webequie, Weenusk, MFFN). The reader may therefore assume that these additions come from MFFN exclusively when in fact they do not. For example, the MFFN IK Study does not mention adopting a landscape-scale approach or implementing adaptive management practice. If such approaches or practices are inferred from the Study, then this should be made clear. If they are not from MFFN’s IK Study, then this should also be made clear.</p>	Please reframe the bullet list to make it clear who has made these recommendations to avoid potentially attributing them all to MFFN.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The paragraph has been revised for clarity on the sources of proposed mitigation measures.</p>
92.	Section 19.3.2.5 Change to Cultural Traditions or Practices (Section 19.4.2.5)	‘Change to Cultural Traditions or Practices’, Par. 2	<p>“Marten Falls First Nation is concerned with overall access to drugs and recommended that recommended “limiting road access to outsiders and providing security along the roads” which would include tolls and/or inspection areas. Safety features with the road such as First Nation or Tribal police force, and mental health services and treatment covered by government and industry for First Nation community members would allow healing and reduce substance misuse. They would like to see healing “address[es] the mental or physical pain or distress ... [and] not supplement [...] members with prescription drugs to treat addictions”. In alignment with this is educational programming for younger generations on the effects of alcohol and drug misuse (Suslop Inc., 2024).</p> <p>Enforcement would also address drunk driving”</p> <p>Regarding the above, it should be made clear that MFFN members are first and foremost concerned about health and safety when it comes to alcohol or drug use. Second, some have noted that drug use also prevents members from using</p>	Please reframe for clarity and accuracy that MFFN has two main concerns when it comes to drug (including alcohol) use: 1) negative impacts to health and safety, 2) negative impacts to land use. Clarify what MFFN’s expectations or recommendations are for healing – refer to MFFN’s IK Study.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The paragraph has been revised as such: “MFFN members expressed two primary concerns regarding drug and alcohol use:  (1) Negative impacts on health and safety, and  (2) Negative impacts on land use and traditional activities.</p> <p>To address these concerns, members recommended limiting road access to outsiders and providing security along roads, which could include tolls and/or inspection areas. They also suggested enforcement measures to prevent impaired driving and improve overall safety, such as establishing a First Nation or Tribal police presence.</p> <p>Additionally, members emphasized the need for healing and prevention strategies. They recommended that government and industry (e.g.,</p>

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			<p>the land. As one member explained:  <i>“Unfortunately, the drugs, the addictions [play] a big factor of people not going out camping or whatever ... I don't know, it's just different, the way we were growing up”</i> (M3008, 2023).</p> <p>Secondly, the quote about healing is unclear. For reference, the MFFN IK Study says the following: Additionally, some members have recommended that government and industry (e.g., mining companies) should offer mental health services and treatment centres to First Nation members, so substance misuse can be reduced, and healing can take place (M3011, 2023). From the perspective of MFFN members, the answer to addressing drug use is to address the mental or physical pain or distress that is encouraging usage, not supplementing members with prescription drugs to treat addictions (M3020, 2023). MFFN members have also pointed out that there should be educational programs in place to educate younger generations about the effects of alcohol and drug (mis)use.</p>		<p>mining companies) provide mental health services and treatment centres to reduce substance misuse and support healing. From their perspective, healing should focus on addressing the underlying mental or physical pain or distress that leads to substance use, rather than relying on prescription drugs to treat addictions. Educational programs for younger generations about the effects of alcohol and drug misuse were also strongly encouraged. Some members noted that substance misuse prevents community members from engaging in traditional land-based activities. As one member explained:  <i>“Unfortunately, the drugs, the addictions [play] a big factor of people not going out camping or whatever ... I don't know, it's just different, the way we were growing up”</i> (Suslop, 2024).</p>
93.	Section 19.3.2.5 Change to Cultural Traditions or Practices (Section 19.4.2.5)	'Change to Cultural Traditions or Practices', Par. 4	<p>“The Marten Falls First Nation IK Study also included the following additional concerns and recommendations (Suslop Inc., 2024): ...”</p> <p>The additional concerns and recommendations that follow do not necessarily pertain to 'Change to Cultural Traditions or Practices'. For example, driver training, unions, revenue sharing, etc. do not fit neatly under the category of 'Change to Cultural Traditions or Practices', at least not without some additional explanation.</p>	Please consider if some of the additional concerns and recommendations would fit better under another section/category or provide additional explanation to	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Paragraph 4 has been reworded as the following:          "The Marten Falls First Nation IKLRU Study also identified additional concerns and recommendations (Suslop Inc., 2024). While some of these, such as driver training, unionization, and revenue sharing, may appear primarily economic, they also have cultural implications. For example:  <b>Driver Training:</b> Members emphasized that safe driving practices are essential to protect community members and traditional land users. Increased traffic without proper training could disrupt hunting, fishing, and gathering activities, which are integral to cultural traditions.  <b>Unions and Employment Structures:</b> Recommendations for unionization and fair employment practices were linked to maintaining community well-being and preventing exploitation. Economic stability supports cultural continuity by enabling members to participate in traditional activities without undue financial stress.  <b>Revenue Sharing:</b> Members viewed revenue sharing as a way to fund cultural programs, land</p>

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					stewardship, and community initiatives that preserve traditional practices. Without equitable sharing, economic changes could erode cultural autonomy."
94.	Section 19.4.1.2 Impacts on the Exercise of Aboriginal and Treaty Rights (Section 19.5.1.2)	Under 'Other LSA Communities', Par. 2	<p>"Participants emphasized the of protecting the species – the "negative impact on the health and size of animal population, particularly the moose"; therefore, "[i]t is critical that species like moose and Caribou are protected as much as possible (Suslop Inc., 2024)"</p> <p>What exactly is being said here? Only the last quote makes sense... The MFFN IK Study says: MFFN members worry that road construction and related development and activities in the region will have a negative impact on the health and size of animal populations, particularly moose and caribou populations. Moose and caribou are culturally significant to MFFN members for various reasons, including those related to clanship.</p>	Please reframe this paragraph to provide better clarity and accuracy.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The paragraph has been reworded as: "MFFN members worry that road construction and related development and activities in the region will have a negative impact on the health and size of animal populations, particularly moose and caribou populations. Moose and caribou are culturally significant to Marten Falls First Nation members for various reasons, including those related to clanship." (Suslop Inc., 2024).</p>
95.	Section 19.4.1.2 Impacts on the Exercise of Aboriginal and Treaty Rights (Section 19.5.1.2)	'Other LSA Communities', Par. 3, Sentences 1-2 'Other LSA Communities', Par. 11 (or third last)	<p>"The Marten Falls First Nation IK Study also indicated their concern related to the Project's effects on Caribou migration. (Suslop Inc., 2024). If the Project causes changes to the health of the Caribou or wildlife populations, it will affect how community members can harvest them"</p> <p>The IK Study communicated that the road could disrupt or intersect with caribou migratory routes, thereby endangering them further. It further noted that caribou are culturally significant to MFFN members. Negative impacts to caribou could negatively affect culture (and identity).</p> <p>In general, participants of the Study were more concerned about cultural impacts than harvesting when it came to caribou. In fact, one member even said: "I found out earlier in life that the caribou is our clan ... [F]or us, we don't we don't shoot caribou."</p> <p>Although some members have (and possibly continue to) harvest caribou, this might not be common practice.</p> <p>"Freedom" was also another term that ties into the experience and connection with land. It is a core aspect of traditional harvesting. Concern that the development will incur more regulations and controls, that "the roads will bring more rules and restrictions around where members can go, what</p>	<p>Please reframe paragraph to more clearly and accurately communicate that MFFN's concerns related to caribou are mainly cultural in scope, but in some cases, could apply to harvesting as well.</p> <p>Please reframe to help ensure that it is clear the feedback is coming from MFFN, not Weenusk FN</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The paragraph has been reframed as such: "Marten Falls First Nation members expressed significant concern about the Project's potential effects on caribou migration routes, noting that the proposed road could intersect or disrupt these routes and further endanger the species (Suslop Inc., 2024). Caribou hold deep cultural significance for Marten Falls First Nation, and participants emphasized that impacts to caribou would negatively affect cultural identity and traditions. While some members have harvested caribou in the past, this practice is not widespread; for many, the relationship with caribou is primarily cultural rather than subsistence-based. One participant explained: "I found out earlier in life that the caribou is our clan ... [F]or us, we don't shoot caribou."</p> <p>Members also raised broader concerns about how development could restrict access to traditional lands and activities. The concept of "freedom" was described as central to traditional harvesting and</p>

Comment No.	Page/Section/Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
			<p>type of activities they can engage in, and so on” (Suslop Inc., 2024). This experience of restrictions to access their traditional territory would be comparable to the trauma of “residential schools” or “prison” (Suslop Inc., 2024)”</p> <p>The above comes directly after a paragraph discussing Weenusk, without specifying that the above feedback is from MFFN. This should be made clear.</p>		land connection. Participants feared that new roads would bring additional regulations and controls, limiting where members can go and what activities they can engage in. These restrictions were compared to the trauma of “residential schools” or “prison” (Suslop Inc., 2024). This feedback comes directly from Marten Falls First Nation and reflects their perspective on cultural impacts and land access."
96.	Section 19.4.1.2 Impacts on the Exercise of Aboriginal and Treaty Rights (Section 19.5.1.2)	'Other LSA Communities', Par. 12 (or second last)	<p>“The experience of place and being on the land, which is also one source of healing for Marten Falls First Nation members, as the community is “just beginning to learn to heal from [past trauma]” and emphasize that their connection to nature makes their Ta “real healing place to be” (Suslop Inc., 2024)”</p> <p>What is ‘<b>Ta</b>’ supposed to be? Traditional territory?</p>	Please fix typo if it is indeed a typo or reframe to provide more clarity and accuracy.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been revised to clarify that the typo is ‘traditional territory’.</p>
97.	Section 19.4.2.2 Rights related to Cultural Continuity (Section 19.5.2.2)	'Other LSA Communities', Par. 1, Line 1, Sentence 1	<p>“[T]he ecological integrity of Marten Falls First Nation’s traditional territory is to ensure that future generations have the open and opportunity to engage in land and resource use” (Suslop Inc., 2024).</p> <p>This is misquoted. The IK Study says: “the ecological integrity of MFFN’s traditional territory to ensure that future generations have the <b>option</b> and opportunity to engage in land and resource.”</p> <p>Additionally, direct quotes cannot stand alone – they must be integrated or embedded into your own writing. The same mistake is made with the last two sentences in the paragraph.</p>	<p>Please reframe so that the quote is integrated into your own sentence to illustrate whatever point you are trying to make.</p> <p>Please also make sure that the quote is accurately quoted.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded as, "The Marten Falls First Nation IKLRU Study notes that the ecological integrity of Marten Falls First Nation's traditional territory is to ensure that future generations have the option and opportunity to engage in land and resources."</p>
98.	Section 19.4.2.2 Rights related to Cultural Continuity (Section 19.5.2.2)	'Other LSA Communities', Last Par., Sentence 3	<p>“The Project could potentially impact Marten Falls First Nation members <b>well-being rights</b> with easier access to lands and resources used for cultural and spiritual purposes”</p> <p>It is still unclear what ‘<b>well-being rights</b>’ are.</p>	Please reframe sentence to clarify what you mean by well-being rights.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The sentence has been reworded: "The Project could potentially impact Marten Falls First Nation's cultural continuity, with easier access to lands and resources used for cultural and spiritual purposes."</p> <p>Socio-economic, health and well-being rights as Indigenous rights are intended to capture rights that are described under the United Nations Declaration on the Rights of Indigenous Peoples, including: minimum standards for survival, dignity, and well-being; Right to improve economic and social conditions; Right to the highest attainable standard of physical and mental health;</p>

Comment No.	Page/Section/ Subsection No. in EAR/IS	Paragraph/ Line	Comment & Rationale	Proposed Action/Solution	Proponent Response (Refer to Proponent Response Legend)
					Access to traditional medicines and conservation of medicinal resources.
99.	Section 21.4.9.3 Mitigation of Cumulative Effect Page 21-219	Par. 1, Line 4	While it is acknowledged that there maybe a risk of compounding effects on vulnerable groups in particular in Webequie First Nation and Marten Falls First Nation, it is suggested that Webequie First Nation and the proponents of the RFDs should consider broader strategies that anticipate long- term pressure and enhance local services for Webequie First Nation. Marten Falls First Nations is not considered here.	Suggest including Marten Falls First Nation in the consideration of broader strategies that anticipate long-term pressure and enhance local services, not just on Webequie First Nation.	1. Item will be addressed in the Final EAR/IS submission. The sentence has been rephrased as "Webequie First Nation, Marten Falls First Nation and proponents of the RFDs should consider broader strategies that anticipate long-term pressures and enhance local services for Webequie First Nation."
100.	Section 21.4.11.2: Contribution of Project-Related Net Effects		There are numerous references in this section with respect to proposed Mitigation and Enhancement Measures where it is suggested that Webequie First Nation work together with Marten Falls and Aroland First Nations, Ring of Fire Road operators and/or mining companies on various aspects that will help ensure the safety and well-being of Indigenous community members	Marten Falls First Nation agrees with and supports this approach and would be pleased to collaborate on these matters.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
101.	Section 22: Follow-Up And Monitoring Programs Pages 22-5 to 22-16	Table 22-1: Summary of Proposed Follow-Up and Monitoring Programs	In the Table there are numerous references to the CEMP and OEMP, various management plans, environmental monitors, other project stakeholders and rights-holders. There is no specific mention of any First Nation or Indigenous community/group.	Marten Falls First Nation would like to be involved in the drafting of the CEMP, OEMP and the various management plans as appropriate, be included as environmental monitors, be kept informed and be able to review monitoring reports since a significant portion of the proposed WSR is on Marten Falls First Nation traditional lands	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

# Mushkegowuk Council





January 13, 2026

**Response to Mushkegowuk Council Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Mr. James Tegler,

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project. Please find enclosed the table that provides responses to the comments provided in your letter dated October 7, 2025.

As we move forward in the process to submit the Final EAR/IS, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to discuss the findings presented in the Draft EAR/IS in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the WSR Project.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

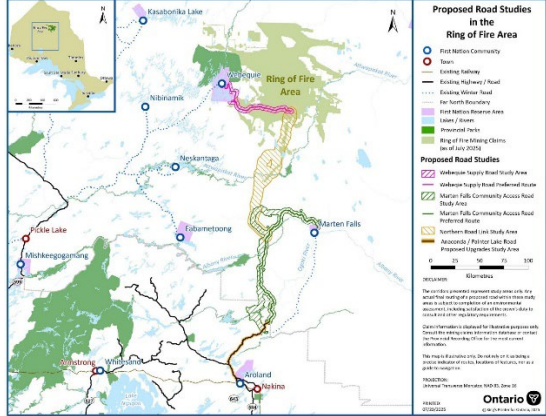
**Comments from:** Mushkegowuk Council (MC)

The following categorization of the proponent responses may appear in the comment response table for clarity.

### Proponent Response Legend

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # in Draft EAR/IS	Comment <small>(Black font: Text from the Draft EA/IS Webequie Access Road Document Green font: Mushkegowuk Council Environmental Coordinator Review)</small>	Proponent Response <small>(Refer to Proponent Response Legend)</small>
1.	<b>General</b>	<p>Mushkegowuk Council has noted how different the WSR Draft EA/IS is versus the Marten Falls CAR Draft EA/IS. We have never come across any accommodation for non-English speakers in the WSR Draft EA/IS and there are no Plain Language Summaries. Are these documents available anywhere?</p> <p>Why do the project's indigenous proponents insist the WSR is an economic development project and ignore the fact that it is being planned due to the mining occurring in Wawangwajing(the Ring of Fire)?</p> <p>In many sections of the document(s) there is a lack of appropriate environmental mitigation planned due to a failure to consider cumulative effects to which road construction is clearly linked. What is known by biologists as the "precautionary principle" naturally aligns with the desire to apply Mino-Bimaadiziwin (+ planning for 7 generations) to all development planning. It is explained well in the Canadian Environmental Protection Act as follows, Precautionary principle: The government's actions to protect the environment and health are guided by the precautionary principle, which states that "where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.</p> <p>It is unacceptable that the plans speak so little to measures that will ensure the environment continues to be habitable by all your relations now living there. Proponents will assert that much mitigation is being planned but this is merely required in existing rules and regulations for such construction projects and not projects of this nature.</p> <p><b>Environmental Protection – shared by Kasabonika Lake FN Chief and Council</b>  <i>(response translated to English): Community members have survived on this land all their life, so the land is very important to them. There needs to be measures in place to ensure that animals are protected, and land and water are not degraded because that is how community members survive on the land. Benefits that people may receive from the development from the government does not concern them as much; they are so connected to the land, as many of them are born and raised here their entire life, members want to ensure that traditional activities like trapping continue because it connects to their health, the animals, plants, and the water that they use. This all relates to community members' health and well-being and the environment is a determining factor in health, activities,</i></p>	<p>The mitigation measures identified in Sections 6 to 20 of the EAR/IS, and also as contained Appendix E, were considered in the context of the project specific study area and are anticipated to avoid and/or minimize potential adverse effects from the Project. We are disappointed that Mushkegowuk Council finds the mitigation and protection measures are lacking and welcome any suggestions they may have for specific mitigation that should be considered by the Project Team.</p>

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		<p><i>medicine and water that they have on the land. The environment is our survival. When developers come to survey the land and begin construction, usually nothing is left at the end. There are no ongoing benefits and we do not want to see that here. There will be no survival without animals, and traditional activities will be diminished. Once development begins and expands it will affect wildlife, the traplines, and the fisheries.</i></p> <p>This feeling is shared by Mushkegowuk Council and many indigenous groups in Ontario</p>	
2.	<p><b>Draft Executive Summary</b> Pg 10</p>	<p>It would be progressive to speak of the Ring of Fire as Wawangwajing and McFauld's Lake by a similarly less-colonialist name.</p> <p>If we assume your # of &lt;500 vehicles per day as meaning ~ 250/day we have one vehicle every 10 minutes 24 hours a day. This is significant for the area's wildlife. There are also many prospective mines located in areas nearer and north of Webeque as the map shows and therefore the road traffic will consist of mine trucks. To say otherwise is false.</p>  <p>Also, on the road to Webeque will be transported store stock, housing materials, infrastructure materials will all be transported to Webeque by heavy truck presumably? What fraction of the tonnage travelling the road will this represent? 50%? 75%</p>	<p>Your statement on the Ring of Fire as Wawangwajing is noted and appreciated.</p> <p>The traffic volumes and mix of heavy and light vehicles using the WSR is considered a reasonable projection. We acknowledge that the frequency and volumes of traffic on the WSR during its operation has the potential to impact wildlife and mitigation measures to minimize these impacts (e.g., wildlife collision mortality) are included in Section 12.4. As noted in Section 4 the WSR traffic operations will not include mineral ore or mine product hauling/transport.</p>
3.	<p><b>Draft Executive Summary</b> Pg 13</p>	<p>The proposed WSR is also relevant in the context of broader, long-term provincial growth, development, and multimodal transportation initiatives in the region as well as provincial government plans that include policies and initiatives for an improved transportation system and community access in northern Ontario. From the perspective of the community, the WSR could be constructed and operated to provide a connection between Webeque First Nation and the McFaulds Lake area to serve mineral exploration and future mining development activities, with no connection to the provincial highway system.</p> <p>Does this agree with your earlier statement on page 10?</p> <p>Based on the low population density in the area and the intended stated purpose of the WSR, an average annual daily traffic volume of less than 500 vehicles has been predicted during the road operations phase, comprised primarily of light to medium personal and commercial vehicles, with limited heavier truck traffic carrying industrial (mining) supplies and equipment. WSR traffic operations are not anticipated to include either mineral ore or mine product hauling/transport.</p> <p>Based on the extensive claim staking north and west of Webeque and some of the IBAs(confidential) that Webeque has signed with Juno Corp this statement seems incorrect (or at least soon to be).</p>	<p>The statements on page 10 and 13 are considered complementary and consistent.</p> <p>The information on traffic volumes is based on the use of the road by the community of Webeque and potential mineral exploration activities. The IBAs' are confidential and have not been integrated into the EA/IA. It is unclear if the IBA's would change the predicted traffic volumes.</p>

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4.	<p><b>Draft Executive Summary</b> Pg 26</p>	<p>A rail line would likely achieve the desired level of social and economic benefits; however, it would command much higher costs, and its environmental impacts would be similar to those caused by construction and operation of an all-season road.</p> <p><i>We understand that rail construction is costlier than road construction but are you saying that operating costs would also be greater? What about greenhouse gas emissions or environmental costs? Seeing as a train would transit areas with less frequency + use significantly less energy to move goods it seems unbelievable that environmental impact would be "similar." A rail connection would serve to address many concerns that a road brings. For example, the rail line that runs from Cochrane to Moosonee has had a significant part in maintaining the unique culture of the community.</i></p> <p><i>(4) Manage travel demand:</i> Travel demand management mechanisms, such as modifying or reducing the need for travel by encouraging the use of alternatives to trip making (e.g., videoconferencing, providing more digital access to training opportunities), are deemed to be an auxiliary benefit associated with any long-term plan for introducing a road corridor within which enhanced communications technology (broadband) can be installed. Under the correct circumstances, this alternative could be implemented in combination with a road ROW and within the same timeframe.</p> <p><i>Looking at the time/cost of running the 810kms of RapidLynx Broadband cable we don't see this as an argument that building the WSR is much of a good way to build connectivity. Have you considered the cost of just offering satellite downlinks at reduced cost in Webequie? Iqaluit, Nunavut functioned for decades with this direct satellite as the only data link for a community 10-20x the size of Webequie that was the seat of government for the entire territory!</i></p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). A detail discussion of alternatives to the undertaking (the Project ), such as rail, are presented in Section 3.</p>
5.	<p><b>Draft Executive Summary</b> Pg 38</p>	<p>Based on the low population density in the project study area, proposed road usage and the intended stated purpose of the WSR, an average annual daily traffic (AADT) volume of less than 500 vehicles has been projected for the Project.</p> <p><i>What variance is there for this # of 500?</i></p> <p>Design criteria were established for developing the preliminary engineering design for the WSR in context of the above primarily MTO standards and guidelines, and in some cases design standards have been exceeded to include resiliency to address the effects of climate change.</p> <p><i>This adherence to MTO standards hardly seems impressive with MTO standards being designed for southern Ontario conditions and considering anything north of Orillia "Northern Ontario" in many design criteria. We assume you'll change(adjust?) these "standards" to reflect the very different local conditions.</i></p>	<p>Although there are no current traffic volumes, the projections were developed based upon current air and winter road volumes, traffic volumes from similar sized communities and induced demand from similar new road situations. The projected traffic volume of 500 AADT is conservative and it is anticipated that daily volumes will be less than 500.</p> <p>Design criteria and modelling were adjusted based upon local conditions to ensure appropriate highway standards used are suitable for the area.</p>
6.	<p><b>Draft Executive Summary</b> Pg 38</p>	<p>Routine scheduled grading and resurfacing of the road, asphalt road surface repairs (e.g., potholes).</p> <p><i>Would this road have paved portions?</i></p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The western section of the road will be surface treated and if additional measures are required, those will be implemented once the road is operational. The eastern section, which is mainly constructed on peatlands, will be gravel surfaced until active settlement has ceased at which point it will be surface treated as well. The roadway will be maintained to Ministry of Transportation standards during its operations by the ultimate owner/operator.</p>
7.	<p><b>Draft Executive Summary</b></p>	<p>Cross-culverts will be installed at regular intervals along the road (non-waterbody areas) within the lowlands/peatlands to convey surface drainage and movement subsurface groundwater flow through the road.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>

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	Pg 47	What approximate distance is considered a regular interval and what size will these be?	The interval and size of cross-culverts will be determined during the detail design phase of the Project by the ultimate owner/operator and will be based on the detailed analysis of groundwater flow and surface water flow in areas along the road.
8.	<b>Draft Executive Summary</b> Pg 52	<p>Greenhouse Gas Emissions completed by AtkinsRéalis (Appendix H)</p> <p>There is no Appendix H – What is the greenhouse gas emission before during and after the project? Would GHG emissions include the mining?</p> <p><b>Proposed Mitigation Measures During Construction and Operations</b></p> <ul style="list-style-type: none"> <li>• Transport construction materials in vehicle convoys rather than having the environment continually disturbed by vehicle traffic</li> <li>• Construction cessations during times of high animal use(bird nesting, moose rut, caribou calving, frog migration, fish spawning)</li> <li>• Use time of freezing temperatures as more opportune time to reduce environmental impact on many habitats for transporting heavy goods.</li> </ul>	<p>Information on greenhouse gas emissions from the Project are described in detail in Section 9 and in Appendix H of the EAR/IS, which is standalone to the Executive Summary.</p> <p>The Project Team appreciate Mushkegowuk Council’s proposed mitigation measures and these have been considered in the Final EAR/IS.</p>
9.	<b>Draft Executive Summary</b> Pg 55	<p><b>Project Effects and Key Mitigation Measures: Fish and Fish Habitat VC</b></p> <p>Scheduled examination of riverbanks/shallows at crossings constructed to remove invasive plant species introduced by the construction</p> <p>All vehicles and equipment will be stored at least 30 m from waterbodies and operated in a way that prevents the release of deleterious substances into a waterbody, irrespective of their fish-bearing status.</p> <p>Is there a meaning to the “storing” of vehicles? 5 minutes or 5 days??</p>	<p>Measures to avoid the introduction and spread of invasive plant species are discussed in Section 11.4.1.3.2.</p> <p>The storage of equipment near waterbodies would be of variable duration and would be based on the construction activities and schedule.</p>
10.	<b>Draft Executive Summary</b> Pg 57	<p>These effects are considered to be low to negligible magnitude, generally reversible, and occur infrequently, with the exception of increased harvest, which is moderate in magnitude and with a likelihood of occurrence ranging from possible to probable.</p> <p>We believe the probability of there being an increased fishing pressure is certain and not as described.</p> <p>Overall, the predicted net effects on the Fish and Fish Habitat VC are considered not significant after the implementation of mitigation measures.</p> <p>The cumulative net adverse effects of the Project with other RFDs and activities on the Vegetation and Wetlands VC are predicted to be not significant.</p> <p>As humans expand into new environments the entire world is seeing unprecedented reductions in populations and in biodiversity. Your prediction of effects being insignificant seems very unlikely.</p>	<p>The determination of significance was based on a set of criteria developed from established guidelines and professional judgement. For the Vegetation and Wetlands VC, a net effect was considered significant if it was assessed as high in magnitude, local or regional in extent, long-term to permanent in duration, represents a management concern (i.e., net effects would alter the sustainability of the VC beyond a manageable level, or result in change not in accordance with provincial and federal guidelines) and has been identified as a key concern or interest by Indigenous communities and groups. In other words, project effects would alter biological diversity and/or ecosystem function to such a degree that species and/or vegetation communities could not sustain themselves.</p> <p>Although net effects on vegetation and wetlands are expected to result from project activities, it is anticipated that project planning, design and proposed mitigation measures will prevent significant losses of plant species or vegetation communities and therefore are unlikely to affect the ability of vegetation or wetlands to sustain themselves.</p>

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11.	<b>Draft Executive Summary</b> Pg 63	<p><b>Proposed Mitigation Measures During Construction</b></p> <p>Gated compounds for vehicles at night. Limited nighttime driving would <u>hugely</u> reduce animal impact (literally as well as figuratively)</p> <p><b>Proposed Mitigation Measures During Construction and Operations</b></p> <p>Blasting will be conducted will adhere to the restrictive activity periods and/or timing windows recommended by the MNR and Environment and Climate Change Canada (ECCC). For example, in Ontario calving season for Moose occurs from late May to early July. During this period, Moose cows are highly sensitive to disturbance. Between December and March, Moose rely on specific habitats for shelter and food. As such, vegetation clearing in such habitats should be avoided.</p> <p>Don't you mean will be avoided or even must be avoided?</p> <p>Temporary and permanent waterbody crossings will be designed and constructed to accommodate anticipated water flows during their lifespan.</p> <p>Designing bridges to accommodate water flows anticipated seems like very little as regards mitigation for moose. Bridges must be designed clear span such that moose and other wildlife can forage and move with road crossing being unnecessary.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Security fencing and lighting at construction camps will be determined by the ultimate owner/operator during the construction phase and will adhere to the mitigation measures to minimize impacts to wildlife. Its anticipated there will be minimum and limited night time construction activity.</p> <p>The proponent will adhere to the restricted activity periods to minimize impacts to wildlife and fish. Where this is not possible or feasible, the proponent will seek advice from regulatory agencies and obtain approvals/permits, where applicable.</p> <p>The final vertical clearance at bridges will be determined at the detail design stage of the Project and currently the design has considered and accommodated for wildlife movement.</p>
12.	<b>Draft Executive Summary</b> Pg 64 Pg 65	<p>Cross-culverts will be installed at regular intervals in lowland areas to prevent water from ponding on either side of the roadway and associated effects to habitat.</p> <p>Movement corridors for wildlife will be identified, signage and reduced speeds posted.</p> <p>Animal crossings of various types (designs for furbearers, reptiles/amphibians or ungulates) have been built <u>after</u> problems were discovered (dead animals due to vehicles). We need to have the foresight and care that has the crossings built as part of the road's planning/construction so that these animals remain alive. You are well aware that species at risk have been identified as being negatively impacted by the road and the mines it engenders and need act to prevent animals being extirpated.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Further details on location of designated culverts for wildlife passage and signage to minimize potential injury/death to wildlife from collisions with vehicles will be determined in the detail design phase of the Project.</p>
13.	<b>Draft Executive Summary</b> Pg 66	<p>Blasting will be conducted outside sensitive windows (migratory bird nesting period).</p> <p>Does this mean it will occur during other bird's nesting periods?</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Refer to response to Comment # 11.</p>
14.	<b>Draft Executive Summary</b> Pg 67	<p>Prohibit firearms in camps and construction areas to avoid increase in hunting.</p> <p>Won't firearms be needed as otherwise bears may be a threat to workers?</p>	<p>The prohibition of firearms is to prevent potential unauthorized hunting. As clarity the use of firearms by the proponent's subcontractor may be required in circumstances where health and safety are concern to workers.</p>
15.	<b>Draft Executive Summary</b> Pg 68	<p><b>Project Effects and Key Mitigation Measures: Reptiles and Amphibians</b></p> <p>One of the greatest factors that has lead to the extirpation of amphibians/reptiles/birds from inhabited areas are <u>loose pets</u>. Insuring that construction staff do not have camp pets would greatly lessen the likelihood many local animals will die. Feral cats kill much native wildlife in many less developed areas.</p> <p>Install eco-passages in high potential wetland habitat fragmented by construction of road and temporary exclusion fencing.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Note is envisioned that pets will not be permitted in construction camps. Details on eco-passages will be considered in the future detail design and permitting phase of the Project.</p>

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		<p>Fantastic to see that you are planning to build in these structures. We won't bother to include the many examples seen online. We urge you to apply the same thinking to other species to avoid them coming into catastrophically lethal conflict with vehicles.</p>	
16.	<p><b>Draft Executive Summary</b> Pg 71</p>	<p>Annual eDNA monitoring conducted in July pre-construction, during construction and during operation to detect for presence of ranavirus in waterbodies in the Project Footprint.</p> <p>This seems pretty specific. What about other invasive organisms that may threaten existing wildlife?</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Annual eDNA will undertake and would identify non-native/invasive aquatic species if present.</p>
17.	<p><b>Draft Executive Summary</b> Pg 72</p>	<p>If clearing or construction activities are required to take place within Category 1 Caribou habitat during sensitive periods (May 1 to September 15 for Nursery use areas and December 1 to March 31 for Winter use areas) aerial caribou sweeps will be conducted prior to construction activities to ensure that there are no caribou within activity buffer areas. Minimum flight separation distances will be maintained to minimize potential disturbance.</p> <p>If caribou are present will construction not occur?</p> <p>Where feasible clearing activities will occur outside of the migratory bird breeding window for nesting zone C6 (between August 30 and April 24) some clearing may be required during the nesting season. If clearing is required, pre-clearing nest sweeps will be conducted by qualified avian biologists with support from indigenous monitors.</p> <p>If nests are present what will happen?</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Refer to response to Comment # 11.</p>
18.	<p><b>Draft Executive Summary</b> Pg 73</p>	<p>Qualified project personnel will identify sensitive habitats that are important to SAR prior to and during construction (e.g., critical habitat, areas of high use). Should any be found, they will be assessed by a qualified biologist or resource specialist and an appropriate course of action will be determined, in consultation with regulatory agencies (e.g., MECP, CWSECCC) as required.</p> <p>This does not tell us what will be decided? Go around? Wait for freeze up? Wait for a non-sensitive time?</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Refer to response to Comment # 11.</p>
19.	<p><b>Draft Executive Summary</b> Pg 74</p>	<p>Where practicable, compatible vegetation will be retained on steep slopes and areas prone to wind erosion.</p> <p>These would be native species – correct?</p> <p>Regular inspections and maintenance activities will be completed so roadway continues to meet standards.</p> <p>What standards?</p> <p>Timing windows and restrictions will be implemented to avoid sensitive life-cycle periods (e.g., breeding, overwintering). If adherence to the timing windows and restrictions is not possible, the proponent's contractor will develop site-specific mitigation and monitoring in consultation with appropriate regulatory agencies (e.g., MNR, CWS-ECCC).</p> <p>This adherence to sensitive timing windows as convenient for contractors is not acceptable. SAR cannot be negatively impacted by road construction and adherence to timing windows is always possible.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>We confirm the use of native species is proposed for vegetation restoration of disturbed areas and may involve the use of groundcover mixes, tree and shrub seeding mixes, and/or natural regeneration.</p> <p>The proponent will adhere to Ministry of Transportation operation and maintenance standards developed for provincial highway facilities.</p>

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20.	<p><b>Draft Executive Summary</b> Pg 75</p>	<p>To the extent possible, construction activities will be completed during daylight hours, typically between 7:00 and 19:00, where practicable.</p> <p><i>When would construction at night ever be necessary? If you are truly committed to maximizing harm to SAR during the road construction We would hope the proponents insist on no nighttime travel or construction.</i></p> <p>The determination of significant adverse effects to caribou is based on the potential for injury or death due to changes to predator-prey dynamics. Specifically, during construction and operations of the WSR ROW is expected to provide predators such as wolves increased access to the caribou, particularly where the road traverses natural movement corridors. Overall, caribou injury or death due to changes to predator-prey dynamics from the Project is considered a significant adverse effect based on current vulnerability of the population.</p> <p><i>Why are mitigation measures or compensatory measures that would increase caribou survival not being done to offset these significant negative impacts to a SAR?</i></p> <p>The determination of significant adverse effects to wolverine is based on potential for loss of habitat, and specifically one (1) denning site. Denning sites are the rarest and most sensitive habitat for wolverine and are reused between breeding years and are passed down from mothers to daughters. The one den site in the LSA is located within 400 m from preferred route for the WSR and will likely lose function as denning habitat due to the indirect effects of clearance activities and the construction of the road, of which studies have shown females are unlikely to den within several kilometres of roads. Based on just two (2) known reproductively mature wolverine females confirmed to have home ranges in the LSA the loss of functional denning habitat in the LSA is considered to be a significant adverse effect for wolverine.</p> <p><i>Similar to caribou – can improvements or provision of other denning sites reverse this negative impact of the road on this SAR?</i></p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Construction activities are intended to be conducted during daylight hours, but in some cases the proponent's contractor may need to conduct nighttime work and where applicable will implement mitigation measures to minimize impacts to wildlife, including species at risk.</p>
21.	<p><b>Draft Executive Summary</b> Pg 77</p>	<p><b>Caribou</b></p> <p>GPS collars may be deployed on female caribou to determine if seasonal movements and habitat use change during or following road construction.</p> <p>Data from GPS collars will be used to inform construction activities. Construction activities will not commence until collar data indicated the collared caribou has left the activity buffer.</p> <p><i>May be deployed? What is the plan if there are no collars deployed?</i></p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Details on further GPS collaring of caribou, as part of the monitoring program to assess changes in their movement during construction phase and post-construction (operation phase) will be determined during the future permitting phase the Project.</p>
22.	<p><b>Draft Executive Summary</b> Pg 78</p>	<p><b>Assessment of Effects on Social Environment</b></p> <p><i>Will the Nishnawbe Aski Police force be increased to reflect the increase in the local population (including the labour force) and be conducting regular visits to construction camps?</i></p> <p><i>In speaking with a few people about the road's existence changing the local social environment it was reported to me that the previous examples of similar situations where changes of a similar type have occurred resulted in positives changes in society.</i></p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The Community Readiness Plan (Appendix N of the EAR/IS) outlines a proposed Road Safety and Traffic Management Strategy, Safety and Security Strategy for Vulnerable Community Members, and a Community Emergency Response Strategy. As indicated in Appendix N, these strategies will include a review capacity, skills, policies, administrative, allocation of capital (i.e. Buildings, services) and operational budgets for emergency services provision and integration in Webequie, including Nishnawbe Aski Police Service.</p>


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23.	<b>Draft Executive Summary</b> Pg 82	<b>Assessment of Effects on Economic Environment</b> Procurement policies that favourably consider Webequie First Nation and other LSA businesses. <i>A minimum % or # of local employees should be agreed upon. Even a guaranteed payment to Webequie for services. These agreements need be transparent to benefit other First Nations that are in similar negotiations. This transparency is presently lacking from Impact Benefit Agreements locally being made.</i>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The projected levels of employment are presented in Section 15 and its anticipated that the future owner/operator will have progressive policy and/or employment targets to maximize project benefit to Indigenous community members and businesses.
24.	<b>Draft Executive Summary</b> Pg 85	<b>Assessment of Effects on Non-Traditional Land and Resource Use Provincial and Federal Parks, Ontario Areas of Natural and Scientific Interest (ANSI) and Other Protected Areas:</b> There are no designated provincial parks, federal Nation Parks, Ontario ANSI's, Migratory Bird Sanctuaries or other National Wildlife Areas directly or indirectly affected by the Project and therefore no mitigation is proposed. <i>This statement is incorrect. Winisk River Provincial Park is just 5-10 kms downstream of much of the road.</i>	1. Item will be addressed in the Final EAR/IS submission. The Non-Traditional Land and Resource Use Local Study Area is defined as 1 km from the centreline of the WSR right-of-way. However, it is acknowledged that Winisk River Provincial Park is located within the RSA of the Project, however effects from construction and operations were deemed to not affect the park, since there is no overlap with the road and the park, and change in level of access to the park would be negligible; therefore, no effects are anticipated. No changes to the EAR/IS are proposed.
25.	<b>Draft Executive Summary</b> Pg 89	<b>Assessment of Effects on Human Health Proposed Mitigation Measures During Construction</b> M: Locations of the construction camps should be chosen that minimize interactions with high traffic areas and areas that are often used for traditional activities. <i>These camps should be as self-sustaining and placed as far from Webequie as feasible.</i>	1. Item is considered already addressed in the EAR/IS. The location of construction camps are shown in Figure 1.2 and have been selected with input from Webequie First Nation with the objective to avoid and/or minimize impacts to traditional land use activities and the community.
26.	<b>Draft Executive Summary</b> Pg 90	<b>Surface water quality:</b> Change in surface water quality (e.g., habitat, chemistry, and flow rates) <b>Proposed Mitigation Measures During Construction</b> M: Reduce construction during times that would most affect fish and fish habitat (e.g., breeding seasons). <i>Do not other parts of the document specify that construction would cease at these high risk times?</i> M: A Construction Waste Management Plan will be developed to minimize the amount of waste to be generated. <i>Does this waste go to the Webequie landfill or?</i>	Restricted activity periods to avoid impacts to fish/fish habitat are presented in Section 10, and work may be suspended in times of heavy rain where there is elevated risk of harm. 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The Construction Waste Management Plan will be developed in the future detail design and permitting phase of the Project. The current proposed management of waste is described in Section 4.
27.	<b>Draft Executive Summary</b> Pg 91	<b>Project Effects and Key Mitigation Measures: Effects on Human Health VC – Mitigation (M) and Enhancement (E) Measures:</b> All workers, except individuals from Webequie First Nation, should be housed in the designated construction camps. <i>Maybe you should insert the word primarily in the former phrase. There are many suggestions in the document that indicate a very slippery factuality to this statement.</i>	1. Item will be addressed in the Final EAR/IS submission. Wording on page 91 has been reworded to: "All workers, except individuals from Webequie First Nation, should primarily be housed in the designated construction camps."

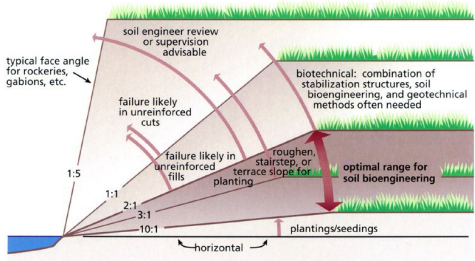
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28.	<b>Draft Executive Summary</b> Pg 92	<p>M: It is possible that construction workers who are not members of Webequie First Nation will access the traditional lands of the community to hunt for recreation and sport. This use of the land by non-members should be prohibited or strictly regulated by Webequie First Nation during the construction period to maintain self-sustaining populations of traditional food sources and therefore maintain the resulting health benefits associated with traditional food security.</p> <p>We believe that Webequie will have difficulty preventing non-members from accessing traditional areas if these areas are off-reserve and accessible by the road you are proponents of constructing.</p>	<p>1. Item will be addressed in the Final EAR/IS submission. The Community Readiness Plan (Appendix N) outlines a Stewardship and Environmental Management Plan to be developed and implemented through the Community Readiness Working Group, and along with a Monitoring and Adaptive Management Plan are to address issues related to hunting and fishing by non-local visitors.</p>
29.	<b>Draft Executive Summary</b> Pg 99	<p><b>Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights</b></p> <p>Concerned at the inconvenient truths that are not being dealt with in this section. You would agree that all life is connected. Your chosen path in developing the WSR linking Webequie to Wawangwajing has huge repercussions to the rights of 1<sup>st</sup> Nations in this region and everywhere. It cannot be denied that you are opening the door to resource extraction and your ability to control the nature of this resource extraction is uncertain (at best). The sudden appearance of Bill 5(backed up in many senses by Bill C-5) should indicate the forceful nature of the resource extraction methods the provincial and federal governments are planning to employ. You must realize that the planned designation of the Wawangwajing region as a Special Economic Zone has legal repercussions for Treaty 9 and will further curtail the incorporation of the assertions contained in the United Nations Declaration on the Rights of Indigenous Peoples. Building this road will result in extensive resource extraction and that is your undeclared choice. You will assert that these developments have yet to be decided and hence the 1<sup>st</sup> Nation Rights in UNDRIP are intact but, this is not the reality of the situation. Webequie 1<sup>st</sup> Nation needs to consider the impact this road's construction will have on the future development of projects. Projects that 1<sup>st</sup> Nation's will not be able to choose. The dams on the Albany + Attawapiskat to produce hydropower in other FN territory, the refineries built in another 1<sup>st</sup> Nation's territory etc. these projects will become mandates upon this road's construction.</p>	<p>1. Item will be addressed in the Final EAR/IS submission. The feedback provided by Mushkegowuk Council is appreciated. The comments provided by Mushkegowuk Council will be reflected in the Final EAR/IS in the assessment of effects on Indigenous Peoples and impacts on the exercise of Aboriginal and/or Treaty rights (Section 19 of the EAR/IS).</p> <p>Section 19.5.4 of the EAR/IS on Rights to Self-Determination and Self-Governance, states that "there is a critical importance for the recognition of Indigenous Peoples' inherent right to self-determination, including self-government, which pre-existed European colonial settlement. The right of self-determination, including the right to self-government, is reflected in UNDRIP and Canada's UNDA, which is now part of Canada's domestic law and is being upheld in the Supreme Court of Canada rulings." And, "Governance over environmental stewardship, such as the protection and preservation of cultural keystone species population and habitat, is crucial for the continued exercise of Aboriginal and Treaty Rights."</p> <p>Section 19.5.4 includes a description of potential impacts on rights to self-determination and self-governance of Webequie First Nation, other LSA communities (including Attawapiskat First Nation and Weenusk First Nation) and RSA communities (Fort Albany First Nation and Kashechewan First Nation). The Final EAR/IS integrates input received from First Nations in the assessment of effects on Indigenous Peoples and exercise of Aboriginal and Treaty Rights, as well as an updated cumulative effects assessment (Section 21 of the EAR/IS), which considers the development of the Wawangwajing (Ring of Fire) area.</p>
30.	<b>Draft Executive Summary</b> Pg 106	<p><b>Assessment of Effects on Cultural Heritage and Archaeological Resources</b></p> <p>There are no predicted adverse net effects identified for the Cultural Heritage and Archaeological Resources VC. Consequently, the Cultural Heritage and Archaeological Resources VC was not carried forward for assessment of cumulative effects.</p> <p>This seems inconceivable with a project of this magnitude and impact. The influx of outsiders and the impact that alone will have on the Cultural Heritage and Archaeological Resources of Webequie must be enormous.</p>	<p>No net effects are predicted for this VC based on the mitigation measures outlined in Section 20.4 of the EAR/IS, which has been updated to also include the following measures:</p> <p>"Mitigation of archaeological resources may involve avoidance and protection or excavation in accordance with MCM Standards and Guidelines for Consultant Archaeologists for Stage 4 Mitigation, as determined through Stage 2 and 3 Archaeological Assessments. The outstanding Stage 2 assessment work, and any further stages of archaeological assessment recommended by its results, will be carried</p>

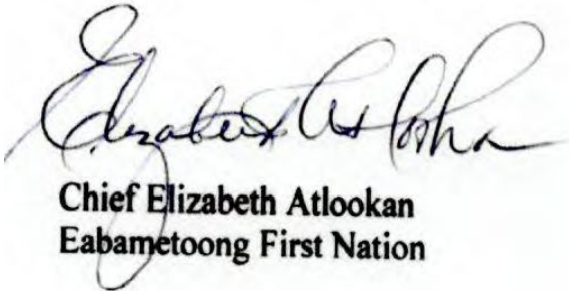

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			<p>out as early as possible during detail design and prior to any ground disturbing activities.</p> <p>Webequie First Nation Elders and Knowledge Holders will be consulted for advice on scope, methodology and approach in the development of appropriate mitigation measures.</p> <p>Ground-disturbing activities will not commence until archaeological assessment reports recommending no further assessment have been entered into the Ontario Public Register of Archaeological Reports.</p> <p>A Cultural Heritage Resources Management Plan will be developed to guide contractors in the event that a previously unidentified heritage or archaeological resources are suspected or encountered unexpectedly during construction. The plan will include the following provisions:</p> <ul style="list-style-type: none"> <li>▪ If previously unidentified archaeological resources are encountered unexpectedly during construction, the proponent or person discovering the archaeological resources shall cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the <i>Ontario Heritage Act</i>.</li> <li>▪ Any person discovering human remains shall cease all activities immediately and notify the police or coroner. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at <a href="mailto:archaeology@ontario.ca">archaeology@ontario.ca</a>) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>.”</li> </ul>
31.	<p><b>Draft Executive Summary</b></p> <p>Pg 115</p>	<p><b>Project Contributions to Sustainability</b></p> <p>“the proponent has made the commitment to achieve sustainable outcomes”</p> <p>Assessing and mitigation planning to minimize environmental impacts to air, water, land, vegetation, fish and wildlife (Sections 6 to 13);</p> <p style="color: green;">What are the actions? It seems that many of these actions are merely adherence to rules and regulations that exist for every project of this nature.</p>	<p>While the EAR/IS is required by regulations for this Project, it also serves a decision-making tool to guide sustainable project development. The EA/IA process helps identify and apply best management practices, which will be reviewed and refined through adaptive management to ensure that the proposed environmental protections are implemented for the project lifecycle.</p> <p>The environmental protection measures proposed for the Project are based on approaches that have been used effectively on similar projects within the industry. These strategies align with established best practices, supporting the mitigation of environmental effects and encouraging responsible development. Their consistent use across the sector demonstrates a broad professional agreement on effective methods to protect the environment.</p>

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			<p>Additionally, the proponent is committed to preparing a Sustainability Management Plan, which will outline the processes for monitoring and evaluating sustainability outcomes. This plan aims to provide a clear framework for measuring progress and ensuring that sustainability goals are achieved throughout all stages of the project.</p>
32.	<p><b>Draft Executive Summary</b> Pg 116</p>	<p>The design of the Project also considered the views and feedback received from other Indigenous communities, the public, government agencies, and stakeholders.</p> <p>Can you give an example of how the feedback from indigenous communities was considered?</p>	<p>The proponent conducted communication and engagement activities that included, emails, letters, poster boards, radio shows, presentations, open houses, and other in person communications to illicit feedback from Indigenous communities. The Engineering Design Team reviewed the feedback and included the following design criteria to address/accommodate the issues/request:</p> <ul style="list-style-type: none"> <li>• Floating road concept for peatlands/equalization culverts to minimize the effects of construction and operation of the road on peatlands and surface water.</li> <li>• Rest stop and turnaround areas to address safety concerns for road users and minimize potential collisions/accidents for road users and wildlife due to reduced alertness of overtired drivers.</li> <li>• Intersection added at the east extent of the Webequie community to address safety concerns for pedestrians and drivers and minimize potential for collisions/accidents as road users enter and exit the community.</li> <li>• Watercourse crossing structures, sizing, and location address concerns regarding surface water flow, maintaining watercourse navigation routes, avoiding locations with valued resources, and maintaining access and ability to continue Indigenous practice of land and water resource use.</li> <li>• Aggregate areas were selected in consideration of WFN's desire to gain access and maintain the ability to continue aggregate extraction in the long-term (during and beyond the Project life-cycle).</li> <li>• The Proponent is pursuing options to limit/restrict road use that would allow access to land and water resources that are traditionally and currently harvested by Indigenous Peoples.</li> <li>• Tables 3.4 and 3.5 in Section 3 describe the Webequie Community-Based Considerations that were included in corridor and route selection including: <ul style="list-style-type: none"> <li>○ Caribou habitat:</li> <li>○ Culturally significant features (natural or built):</li> <li>○ Traditional Use Areas</li> <li>○ Fish spawning areas</li> <li>○ Seasonal hunting areas</li> <li>○ Moose mating areas:</li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>○ Community source of spring water:</li> <li>○ Business Impacts – Licensed traplines &amp; outfitters</li> <li>○ Archaeological potential</li> <li>○ Built heritage resources</li> <li>○ Burial sites</li> <li>○ First Nation reserve land.</li> </ul>
33.	<b>Draft Executive Summary</b> Pg 117	<p>Therefore, enhanced mitigation and monitoring are proposed for these potential effects to manage and prevent significant adverse effects. In addition, the assessment concluded there are predicted significant net effects to Species at Risk and specifically changes to predator-prey dynamic for Caribou that may result in injury or death, and habitat loss for Wolverine.</p> <p>The enhanced mitigation measures are proposed for Caribou, Wolverine and other SAR?</p> <p>It is false to state that the Do Nothing option has no potential effects. Perhaps more correct would be to suggest that current effects (environmental, land resources etc...) will continue. Once again, the advantage/disadvantage columns in the chart seem quite biased by assumptions made by designers.</p>	<p>For the Do Nothing option, without consideration of the Project, it is assumed that existing trends with ongoing pressures and threats to species at risk will continue in the study area.</p>
34.	<b>Draft Executive Summary</b> Pg 118	<p><b>Advantages and Disadvantages</b></p> <p>Improved access to harvesting/hunting/fishing areas would be an advantage.</p> <p>In the chart depiction of advantages + disadvantages the advantages are depicted as certainties and the disadvantages are treated as potential – this seems like a bias</p>	<p>Thank you for your comments. No changes are proposed to the EAR/IS.</p>
35.	APPENDIX K-3: WEBEQUIE SUPPLY ROAD CONCEPTUAL UPLAND AND WETLAND RESTORATION PLANS	<p><b>Re: Planned restoration of damaged habitat to offset road construction degrading habitats equalling 380ha Wetland Removals and 160ha Upland Removals</b></p> <p>This 540ha that you plan to restore as an offset seems far less than the amount of habitat that will be unusable to many species including some species at risk. Does this area represent just the actual 35m x 117km road's 409.5ha footprint and then the estimated additional aggregate pit footprints? What about the area that noise will make wrecked for the wildlife?</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The numbers presented represent the removals required to implement the project. This includes the road footprint and ancillary facilities. Specific aerial calculations for more variable effects that do not have a visible or permanent effect on vegetation have not been calculated since they tend to be undefinable and/or limited and temporary. The effects on wildlife have been addressed in Sections 12 and 13.</p> <p>Appendix K-3 outlines the conceptual process under which the Project will address offsetting/restoration requirements of vegetation removals (i.e., direct loss or alteration). Detailed ecological restoration plans will be developed and implemented in consultation with Indigenous communities in the Project study areas, provincial and federal authorities, and stakeholders.</p>
36.	SECTION 11: ASSESSMENT OF EFFECTS ON VEGETATION AND WETLANDS	<p>All waterbody crossings will be designed with single-span elements (bridges or culverts), where possible, to limit the encroachment of structures into stream channels in order to minimize the effect on water flow and levels under variable flow conditions and thereby potential effects to riparian vegetation.</p> <p>The use of water crossings that are bridges of single-span design should be oversized to result in significant mitigation for numerous species. These areas are safe travel paths for wildlife along the banks of waterways that does not conflict with vehicles travelling the roads. The underside of these structures can also provide shaded wildlife habitat and cooler waters for fish as the future climate warms.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Although oversized bridges and culverts can enhance habitat connectivity for certain species of wildlife, they may also significantly influence riparian vegetation and associated ecosystems. For example, increased shading from large bridges has been linked to declines in submerged aquatic vegetation, while oversized culverts can modify</p>

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	Pg 193		sediment transport and reduce the retention of organic matter within stream channels. As mentioned in the EAR/IS (Section 10 and 12), waterbody crossings will be constructed in accordance with DFO's Measures to Protect Fish and Fish Habitat (2022), DFO's codes of practice, and MNR's Environmental Guidelines for Access Roads and Water Crossings (1990). To the extent practicable, crossings will be designed to integrate natural streambeds into culverts, maintain natural light and shade patterns, preserve riparian corridor connectivity and avoid bank disturbance.
37.	SECTION 11: ASSESSMENT OF EFFECTS ON VEGETATION AND WETLANDS Pg 197	All collected sewage shall be managed on-site through use of sewage treatment plant and discharged according to permit and/or authorization requirements; or shall be removed for off-site disposal at an existing, approved sewage disposal facility. <i>Sewage should be collected and trucked off-site to an established sewage treatment site. This will limit the environmental disruption resulting from building infrastructure to manage sewage locally, eliminate disposal and potential leaking of sewage lagoons and reduce the chances that worker transported diseases entering the environment through feces like Giardia lamblia, hepatitis, Cryptosporidium parvum, cholera or dysentery causing E. Coli et cetera.</i>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). All waste will be collected, stored, transported and disposed of in a safe, environmentally responsible manner that complies with federal and provincial legislation. 1. This items is addressed in the Final EAR/IS. The approach for sewage treatment has been revised for clarity as follows, "Domestic wastewater and sewage in the form of liquid effluent generated at construction camps and the Maintenance and Storage Facility may be treated on-site using a portable treatment facility (plant), a conventional septic system with a tank and leaching bed, or transported off-site by tanker truck for treatment at approved sewage disposal facilities. The appropriate approvals (e.g., environmental compliance approvals, federal approvals) will be acquired, as needed. Note that the specific sewage and wastewater treatment systems for camps and the MSF is to be determined during the detail design phase and is based on further assessment of site conditions and the selected construction contractor."
38.	Appendix E Mitigation Measures	Most of what you refer to as mitigation is that which is required by law and not any actual additional mitigation on the part of the project proponents. This anthropogenic alteration of environments has resulted in alarming decreases in biodiversity throughout the world and if the proponents are truly committed, we do hope trusted proponents plan on adhering to applicable laws, regulations and guidelines but, were particularly interested in reading additional mitigations that are seen as necessary by indigenous proponents in this unique environment.  ROM Report on Road Effects on Wil <i>This is a great resource for mitigating road impacts on wildlife. Designing a road that is more or less environmentally friendly is often not a matter of cost but, awareness. The oft repeated mantra that you will follow the Government of Ontario Guidelines is a very, very minimal attempt at caring for the</i>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Mitigation measures to minimize impacts to wildlife as documented in Sections 12 and 13 have considered guidelines and best management practices and standards in Canada and internationally, including the cited "A Guide to Road Ecology In Ontario". This guide and others will be considered in the future detail design phase of Project to ensure the most appropriate and effective mitigation measures are incorporated and implemented in the context of site sensitivities like the peatlands.

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		<p>environment and in many cases doesn't really serve as a good guide to how projects need be carried out in muskeg. Perhaps a mitigation specialist can form part of the road design/construction crew.</p>	
39.	Appendix E Mitigation Measures Pg 44	<p><b>5.5.3 Domestic Sewage</b></p> <p>Sewage should be collected and trucked off-site to an established sewage treatment site. This will limit the environmental disruption resulting from building infrastructure to manage sewage locally, eliminate disposal and potential leaking of sewage lagoons and reduce the chances that worker transported diseases entering the environment through feces like <i>Giardia lamblia</i>, hepatitis, <i>Cryptosporidium parvum</i>, cholera or dysentery causing <i>E. Coli et cetera</i>.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>All waste will be collected, stored, transported and disposed of in a safe, environmentally responsible manner that complies with federal and provincial legislation. Refer to response comment #37 where in addition to Section 11, edits to Sections 4, 7 and 8 have been made to provide further clarity of the management of domestic sewage.</p>
40.	Appendix E Mitigation Measures Pg 50	<p><b>5.11 Bridge and Culvert Installation</b></p> <p>Mitigation as prescribed in rules and regulations that will be adhered to is less than hoped for by Mushkegowuk Council. Bridge and culvert installations are mitigable environmental disruptions that are the result of specialized structures. Ongoing monitoring will also be needed to ensure that factors like changing water levels or shifting earth do not result in environments being fragmented or crossing points being unusable by species.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>
41.	Appendix E Mitigation Measures Pg 58	<p>ARA-2 and ARA-4 banks will be left sloped at a 1:1 slope to meet MNR regulations.</p> <p>A 1:1 bank sloping seems highly likely to lead to erosion</p> 	<p>1. Item will be addressed in the Final EAR/IS submission. Text has been revised that rehabilitation of pit slopes at ARA-2 and ARA-4 banks will be no steeper than 3:1, unless otherwise approved in the aggregate permit.</p>
42.	Appendix E Mitigation Measures Pg 67	<p><b>5.23 Prevention of the Transfer of Invasive Species</b></p> <p>An excellent measure to prevent the transfer of invasives would be to limit the movement of equipment into and out of the area. By the word equipment we particularly think of that overlooked. The clothing (particularly shoes or boots) and tools of the construction workers. Can this be assured through provision of mandatory lockers on site where personal equipment is stored between on/off periods when workers go home?</p>	<p>1. Item is considered addressed in the Final EAR/IS submission and no further edits are proposed.</p> <p>The potential of introducing non-native invasive plant species to the study area on clothing was identified in Section 11.3.2.3.2 and Table 11-40 of the EAR/IS. In Section 11.4.1.3.2 of the report, among the measures to mitigate against the establishment or spread of non-indigenous species, we referred to equipment and vehicles, which was intended to be inclusive of hand-held tools and clothing. The text has been updated accordingly.</p> <p>The proponent will comply with the prohibitions and restrictions of the provincial Invasive Species Act (2015) and requirements of the Canada-Ontario Invasive Species Centre. Further, any Vegetation and Invasive Species Management Plan developed for the Project would include best management practice guides and bulletins issued by the Ontario Invasive Plant Council, MNR and other recognized sources, to prevent</p>

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			<p>the introduction and spread of invasive species. However, the provision of mandatory lockers on site for the storage of personal equipment would be an action undertaken by the ultimate owner/operator and is outside of the scope of the EAR/IS.</p>
43.	APPENDIX P1.E Correspondence with Indigenous Communities and Groups Pg 79	<p><b>Comments Received from Aroland First Nation October 16, 2019</b> It is our position that presenting the Project in isolation without considering the cumulative effects of other proposed all-season road and mining projects in the region under-represents the potential impacts of the project.</p> <p><b>Comments Received from Attawapiskat First Nation</b> Animal/bird surveys unlikely to be accurate Speaks of traditional use of Dandelions and they are an invasive species.</p> <p><b>Constance Lake First Nation</b> Do not have ability to comment at this time</p> <p><b>Eabametoong 1<sup>st</sup> Nation</b></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p><b>Chief Elizabeth Atlookan</b> Eabametoong First Nation</p> </div> <div style="text-align: center;">  <p><b>Chief Wayne Moonias</b> Neskantaga First Nation</p> </div> </div> <p>regulatory process on us while we are in good faith negotiations towards a regional framework. We will also be advising Ontario that it is not appropriate to off-load the Crown's duty of consultation by reliance upon a neighbouring First Nation as proponent.</p> <p>We do not believe that Ontario can unilaterally impose its legislated Environmental Assessment process on our common family values approach, particularly given our common agreement to work together to a Regional Framework.</p> <p><b>Fort Albany First Nation</b> No comments</p> <p><b>Ginoogaming First Nation</b> GFN requires appropriate resources to be meaningfully engaged in this EA process. It is concerning that the imposed timelines have already impeded our participation in the process, and it is essential that GFN be meaningfully engaged and appropriately accommodated to do so as this project proceeds. Chief Celia Echum</p> <p><b>Kasabonika Nation</b> Q: Will there be a Webequie community representative present next time to explain this</p>	<p>Continuous consultation and engagement opportunities were provided to each First Nation via letters, online sessions, radio call-in shows, website, and similar avenues during the EA/IA. First Nations were invited to provide feedback and share information at any point in the EA/IA process to help the Project Team to develop a holistic and comprehensive impact assessment. As mentioned in Section 2.4 of the EAR/IS, numerous and continuous events and sessions were held in order to capture the thoughts of First Nations in the LSA and RSA of the Project.</p> <p>First Nations are encouraged to get in touch with the Project Team and share their thoughts and feedback.</p>

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		<p>to community members?</p> <p><b>Language</b></p> <ul style="list-style-type: none"> <li>Chief Eno Anderson (KLFN): As a Leader, I always promote our language. Ensure that all project materials are translated into the community's native language for Elders and other community members to understand the information being presented.</li> </ul> <p>255/1064</p> <p>11. Q: What about the Métis community? How were they identified to be consulted? R: <i>Metis Nation of Ontario (MNO) Region 2 was identified to be consulted with because the development within this Zone – they have the right to hunt moose and they must demonstrate how their Aboriginal rights are impacted. We gave MNO information packages and they plan to consult with their members and respond to us.</i></p> <p>12. Q: The site location is full of muskeg. I was trapping one time in the muskeg there and had to wait an hour for caribou, coming down from Churchill, to pass. Like geese, they go south and come back in the springtime. How high will the road be built to allow animals to pass in these areas? R: <i>There are challenges on that issue. The engineers are considering a floating road concept because of this issue. We are currently doing preliminary engineering designs and doing geotechnical work at the crossings, as well as where potential aggregate sources are located. The road corridor was determined based on key factors important to community members such as caribou habitat but needs to be reconciled with technical viability concerns such as road length and number/size of water crossings. Key aggregate sources have been identified near Webequie FN and near the NorOnt Esker Camp.</i></p> <p>Many of the comments above refer directly or obliquely to the lack of appropriate consultation.</p>	
44.	APPENDIX P1.E Correspondence with Indigenous Communities and Groups Pg 324/325	Why does the section for Kingfisher FN have comments from Aroland + Longlac on page 324/5?	1. Item will be addressed in the Final EAR/IS submission. Comment acknowledged and error has been corrected in Appendix P1.E.
45.	APPENDIX P1.E Correspondence with Indigenous Communities and Groups Pg 569	<p>The WSR does not facilitate mine development or mining activities in the McFaulds Lake area, and is not considered an ancillary activity to any existing or future mining development.</p> <p>The proponents continue their attempts to perpetuate this untruth. All persons connected with this project know it exists due to mining potential. The very present news reports of mining developments for critical minerals of provincial and national significance in this area. Your continued attempts to characterize it as some kind of disconnected construction does not lead anyone to trust the proponents.</p> <p>The purpose of the WSR, as stated in Section 1.4, is to connect the Webequie community with mining and mineral exploration activities in the McFaulds Lake area. In addition, the road could be used for other economic opportunities between Webequie and McFaulds Lake area. An interconnection with the provincial highway system is not necessary to facilitate the WSR.</p>	It is our opinion the project purposes of the WSR remain valid to allow for the movement of materials, supplies, and people from the Webequie First Nation to mineral exploration and proposed future mine developments in the Ring Of Fire area and by doing so the road will provide employment and economic development opportunities to Webequie First Nation. We acknowledge that Mushkegowuk Council has a different perspective on the stated purpose of the Project.

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		<p>WSR is clearly being considered for access to mines and the highway to the south. The project does not exist in isolation of the provincial/federal governments loudly voiced desires to accelerate the economy nationwide.</p>	
46.	APPENDIX P1.E Correspondence with Indigenous Communities and Groups Pg 801	<p><b>Weenusk (Peawanuck) First Nation March 15, 2019</b> QUESTIONS FROM CHIEF AND COUNCIL MEETING After the overview presentation, Chief and Council asked questions of clarification (marked "Q"). Responses from the Project Team are noted in <i>italics</i> (marked "R"), where provided.</p> <p>1. Q: Is this road only from Webequie FN to the mine site? <i>R: Yes, this project is focusing on a supply road to the proposed mine developments.</i></p>	We believe the response is generally consistent with the stated purposes of the Project in the EAR/IS (see response to comment #45).
47.	APPENDIX P1.E Correspondence with Indigenous Communities and Groups Pg 863	<p><b>Wunnumin Lake First Nation October 2, 2019</b> QUESTIONS FROM CHIEF AND COUNCIL MEETING 4. Q: Will mines be using the supply road? The supply road being utilized by other mines in the area would be a concern once mine development increases. This can be an impact to socio-economic environment. <i>R: The Supply Road is an economic development road from the Webequie airport to the mineral exploration activities and proposed mine site. Mine-related usage will largely be one way, north to south, if the mine is built.</i></p> <p>The prospective mines will follow the claims far to the west of McFauld's Lake and north of Webequie making this statement quite false. Also empty mining trucks will presumably come south to north.</p>	We believe the response is generally consistent with the stated purpose of the Project in the EAR/IS (see response to comment #45). The comment and response cited appear to confirm the assumption that haulage of ore related to mining in the Ring of Fire is likely to be transported in a north-south direction to the provincial highway network.
48.	APPENDIX P1.E Correspondence with Indigenous Communities and Groups Pg 867	<p><b>Aroland comment from of the indigenous communities correspondence</b> It is our position that presenting the Project in isolation without considering the cumulative effects of other proposed all-season road and mining projects in the region under-represents the potential impacts of the project. AFN holds the position that a regional assessment is absolutely necessary to assess the impacts of potential mineral development activity and its supporting infrastructure in the Ring of Fire. Once operating, all-season roads like this one will enable extensive mineral exploration development activities with widespread cumulative effects on our people and our inherent and established Aboriginal and Treaty rights.</p> <p>Mushkegowuk Council agrees with Aroland in that the WSR does enable extensive mineral exploration development activities with widespread cumulative effects on our people and our inherent and established Aboriginal and Treaty rights.</p>	The cumulative effects assessment (Section 21) for the Project considers other reasonable foreseeable project and activities, including mining projects. An addenda to the Final EAR/IS submission is proposed to be completed by the end of the regulatory review period and will further assess cumulative effects on established Aboriginal and Treaty rights.
49.	APPENDIX P1.E Correspondence with Indigenous Communities and Groups Pg 867	<p><b>WSR Proponent Answer to Aroland regarding WSR Rationale</b> The purpose of the WSR, as stated in Section 1.4 of the Draft ToR, is to connect the Webequie community with mining and mineral exploration activities in the McFaulds Lake Area. In addition, the road could be used for other economic opportunities between Webequie and the McFaulds Lake area. An interconnection with the provincial highway system is not necessary to facilitate the WSR and is considered beyond the scope of the WSR project.</p> <p>In other communications and public gatherings particularly you have repeatedly asserted that the WSR is an economic development road and not a mining road. We are unsure what this can possibly mean but, similarly this statement denies the connection with the provincial highway system is not necessary to facilitate the WSR. We understand that this road is possible through a large expenditure of funds by Ontario/Canada's government. This expenditure is a calculated expenditure based on likely tax revenues. The creation of infrastructure that is by necessity connected to the highway network.</p>	We believe the engagement and communication materials presented during the EA/IA process are generally consistent with the stated purposes of the Project in the EAR/IS (see response to comment #45).

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50.	Section 13: Assessment of effects on SAR Pg 36	<p>Terrestrial Species at Risk</p> <ul style="list-style-type: none"> <li>○ Caribou (Boreal Population)</li> </ul> <p>“There are two distinct populations of caribou in Ontario: the Eastern Migratory population and the Boreal population. Both populations of caribou are listed as species at risk in Ontario” taken from <a href="https://www.ontario.ca/page/species-risk-ontario">https://www.ontario.ca/page/species-risk-ontario</a></p>	We acknowledge there are two distinct populations of caribou in Ontario: the Eastern Migratory population and the Boreal population and this is reflected in the EAR/IS.
51.	Section 13: Assessment of effects on SAR Pg 42	<p>Migratory Birds &amp; SAR Bald Eagle, Common Nighthawk, Evening Grosbeak, Olive-sided Flycatcher, Lesser Yellow Legs, Rusty Blackbird, Short-eared Owl.</p> <p>Some of the bird species listed are migratory and one wonders if the migratory bird species catch-all considers species that are SAR. For example – is the Peregrine Falcon, the bank or barn swallow considered? Are the bird surveys conducted in the EA/IS process a denial of the presence of SAR that have been noted in the project area by others?</p> <p><b>Table 13-8: Project Interactions with Terrestrial Species at Risk VC and Potential Effects</b></p> <p>The table seems incorrect in many of its assertions of actions having no interaction with SAR</p>	<p>The reasons that select SAR bird species are not included in the SAR assessment, as described in Section 13.1.2.1, is unchanged and is based on the review of background records/occurrence, no suitable habitat or outside of habitat distribution range for species, and results of incidental field survey observations.</p> <p>As clarity we note that Table 13-8 shows that almost all project activities during construction and operation may result in potential interactions/effects to SAR.</p>
52.	Section 13: Assessment of effects on SAR Pg 44	<p><u>Mobilization of Equipment and Supplies: Transport of equipment, materials and supplies to the Project site area using the winter road network and airport in Webequie First Nation Reserve.</u></p> <p>You have this as having no interaction with the “Species at Risk Habitat Loss/Destruction” or “Species at Risk Habitat Alteration or Degradation” and clearly the transport/storage of these things needed will be destructive/alter habitat for SAR.</p>	We confirm our assumption that the transport of equipment and materials along the existing winter road network for limited duration during January/February of a given year is not expected to result in SAR habitat loss, destruction or alteration.
53.	Section 13: Assessment of effects on SAR Pg 45	<p>Surveying Ground surveys are conducted to stake (physically delineate) the road right-of-way (ROW) and supportive infrastructure components of the Project (i.e., construction camps, access roads, laydown/storage areas, and aggregate extraction and processing areas).</p> <p>You have this as having no interaction with the “Species at Risk Habitat Loss/Destruction,” “Species at Risk Habitat Alteration or Degradation” or “Species at Risk Injury or Death”. We think it is self-evident that surveying is an on-the-ground activity that will have an impact in all areas of SAR lives. As one example of the latter consider how you have repeatedly referred to linear features (survey lines?) favouring predators.</p>	It is our opinion that ground surveys that involve the layout and placement of wood stakes to delineate the work limits for project activities and components will not result in meaningful loss/destruction or alteration of SAR habitat and therefore not identified as a project interaction.
54.	Section 13: Assessment of effects on SAR Pg 48	<p>Completion of Project-Wide Clean-up, Site Restoration / Reclamation and Demobilization: Clean-up of excess materials, site revegetation and demobilization of equipment and materials.</p> <p>You have this as having no interaction with the “Species at Risk Injury or Death” and it baffles me to imagine how this much activity will <u>not</u> be detrimental to SAR in unintended senses.</p> <p><b>Road Use:</b> Light and heavy vehicles and maintenance equipment with average annual daily traffic volume of less than 500 vehicles.</p> <p>You have this as having no interaction with the “Species at Risk Habitat Loss/Destruction” or “Species at Risk Habitat Alteration or Degradation” and this is obviously untrue. SAR and all species (including humans) will be affected by the pollution, dust and noise and physical danger that will be the result of this road’s use.</p>	<p>Our assertion remains that clean-up, site restoration and demobilization activities are not anticipated to interact and cause potential SAR injury or death.</p> <p>The operations of the road with expected traffic volumes does not require the further removal or alteration of SAR habitat as this interaction and potential effects are primarily limited to the construction phase (e.g., clearing and grubbing, construction of road).</p>

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55.	Section 13: Assessment of effects on SAR Pg 49	<p>Operation, Maintenance and Repair of Road: Includes vegetation management control within the road ROW, repairs/resurfacing of road granular surface and shoulders, dust control, winter/seasonal maintenance (i.e., snow clearing), road drainage system cleanout/repairs to culverts, ditches and drainage outfalls, rehabilitation and repairs to structural culverts and bridges, and road patrols for inspection.</p> <p>You have this as having no interaction with the “Species at Risk Habitat Loss/Destruction” or “Species at Risk Habitat Alteration or Degradation” and this is obviously untrue. Over the lifespan of the road there will be continuing effects on SAR. An example would be barrier to animal crossings (especially when there are snowbanks), progressive alteration of habitats, vegetation control (mechanically or through application of herbicides), creeping introduction of new species, accessing of area by visitors etc.</p> <p><b>Table 13-9: Project Interactions with Fish and Fish Habitat VC and Potential Effects</b></p> <p>The table seems incorrect in many of its assertions of actions having no interaction with SAR.</p>	Refer to response to comment #54.
56.	Section 13: Assessment of effects on SAR Pg 51	<p><b>Surveying:</b> Ground surveys are conducted to stake (physically delineate) the road right-of-way (ROW) and supportive infrastructure components of the Project (i.e., construction camps, access roads, laydown/storage areas, and aggregate extraction and processing areas).</p> <p>Many of these actions will result in shading/drainage/noise that will be interactions resulting in “Destruction/Loss of Fish Habitat” or “Harmful Alteration and Disruption of Fish Habitat.” We don’t understand how they can result in “Injury or Death of Fish” without the other effects.</p>	It is our opinion that ground surveys that involve the layout and placement of wood stakes to delineate the work limits for project activities and components near water crossing will not result in meaningful loss/destruction or alteration of fish habitat and therefore not identified as a project interaction.
57.	Section 13: Assessment of effects on SAR Pg 53	<p>Decommissioning / Closure of Temporary Aggregate Extraction and Processing Areas (pits and quarries): Demobilization of extracting and processing equipment, grading and site reclamation/revegetation. This also includes formalizing / re-purposing select pits and quarries proposed as permanent Project components during operations.</p> <p>These actions will result in “Destruction/Loss of Fish Habitat” and “Harmful Alteration and Disruption of Fish Habitat” via actions involved in removal of temporary bridges, or many activities that will form part of decommissioning/closure or via the continued use of pits/quarries.</p>	Our assertion remains that clean-up, site restoration and demobilization activities are not anticipated to interact and cause potential destruction/loss or alteration to fish habitat, but would reversely restore habitat affected from construction.
58.	Section 13: Assessment of effects on SAR Pg 55	<p>Emissions, Discharges and Wastes: Noise, air emissions /greenhouse gases, water discharge, and hazardous and non-hazardous wastes.</p> <p>Why is it blank in the Destruction/Loss of Fish Habitat column? We understand that construction will cause a loss of a lot of fish habitat as is stated in other parts of your documents that refer the road traversing areas that could be seasonally occupied by fish. This to me means that the Changes in Fish Access to Habitats column is incorrectly omitted from the assessment.</p>	1. Item will be addressed in the Final EAR/IS submission. Has been added as interaction in Section 10 – Fish and Fish Habitat.
59.	Section 13: Assessment of effects on SAR Pg 56	<p>Road Use: Light and heavy vehicles and maintenance equipment with average annual daily traffic volume of less than 500 vehicles.</p> <p>These actions will result in “Destruction/Loss of Fish Habitat” and “Harmful Alteration and Disruption of Fish Habitat” via actions that are part of normal use. Vehicles make noise/vibration on crossings, shedding of pollutants from exhaust/tire rubber/fluids.</p>	The operations of the road with expected traffic volumes does not require the further removal or alteration of fish habitat as this interaction and potential effects are primarily limited to the construction phase (e.g., clearing and grubbing, construction of bridges/culverts).
60.	Section 13: Assessment of	<p>13.3.2.2 Injury or Death</p> <p>Wildlife Attractants Human-wildlife interactions may increase during the construction phase if SAR.</p>	1. Item will be addressed in the Final EAR/IS submission. Text has been revised to “will increase”.

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	effects on SAR Pg 111	As humans will be living/eating/producing waste in SAR habitat we think increased interaction is a certainty rather than “may increase”.	
61.	Section 13: Assessment of effects on SAR Pg 126	<p>Table 13-17: Summary of Threat Assessment for Potential Effects on Caribou (Boreal population)</p> <p>What about the migratory caribou? They venture into Mushkegowuk Territory and are also SAR.</p> <ol style="list-style-type: none"> <li>1. Habitat Loss – Clearance Activities Disagree that the habitat loss is slight in terms of severity and degree of effect.</li> <li>2. Habitat Alteration or Degradation – Habitat Structural Change Disagree that the habitat structural change is slight in terms of severity and degree of effect.</li> <li>3. Habitat Alteration or Degradation –Sensory Disturbances Disagree that the habitat sensory disturbances are slight in terms of severity and degree of effect.</li> <li>4. Alteration in Movement – Sensory Disturbances Disagree that alteration in movement due to sensory disturbances has a low degree of effect when you speak of caribou refusing to calve or even remain in areas that are several kilometres away from noise disturbances.</li> </ol> <p>1, 2, 3 + 4 above make the case for extreme mitigation for this SAR. Close the road during calving? Close the road to night-time driving? Create dedicated caribou crossing areas? Reduce the speed on some sections of the road for caribou by perhaps intentionally making it less easy to drive at high speeds? Install speed bumps during the calving period in some areas? Convoy vehicles to reduce disturbance frequency? Lure caribou into calving enclosures with food such that reproduction is enhanced? Actions are necessary or this population of caribou will rapidly decline as so many caribou herds have already done other parts of northern Canada.</p>	Comments on the threats assessment for caribou have been considered by the Project Team in the final EAR/IS.
62.	Section 13: Assessment of effects on SAR Pg 128	<p>13.3.4 Wolverine</p> <ul style="list-style-type: none"> <li>o Females have smaller home ranges than males and do not typically travel far from their natal home ranges, and they also prefer to den as far away from roads as possible (May et al., 2012; Sawaya et al., 2019; ECCC, 2024b).</li> <li>o In a study conducted in Idaho and Alaska, almost all reproductive dens were located many kilometres from the closest road (Magoun and Copeland, 1998) which may indicate that the construction of roads, even several kilometers from a den site, may result in functional habitat loss through indirect effects.</li> <li>o The placement of a road and its associated infrastructure would make the areas of removed habitat unusable to wolverines and have indirect effects to dens within several kilometres of the road.</li> <li>o One den site discovered during baseline studies is known to occur within 400 m of the preferred alternative and will likely lose habitat function due to the construction of the road.</li> </ul>	The reviewer comments are unclear as the cites studies on wolverine are noted under habitat loss due to clearing activities.
63.	Section 13: Assessment of effects on SAR Pg 129	<p>Road operations are unlikely to result in additional loss of wolverine habitat</p> <p>The construction of the WSR will result in the spin-off effect of the creation of several kilometres of branch roads for each kilometre of WSR. This is certain – acknowledged even. This will greatly expand the area that will be degraded habitat for the wolverine. The examples above taken from page 128 above of your document back up this statement.</p>	We are unclear and disagree with the assumption that the WSR will result kilometers of branch roads. There are no proposed branch roads off the WSR with the exception of the formal access road to aggregate source are ARA-4.
64.	Section 13: Assessment of	<p>Habitat Alteration or Degradation –Habitat Structural Change Severity Slight</p> <p>Disagree that the effect is slight</p>	We acknowledge the stated disagreement.

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	effects on SAR Pg 138	<p>Habitat Alteration or Degradation –Habitat Structural Change Degree of Effect Low</p> <p>Disagree that the effect is low. In previous paragraph it is said “Clearance activities, sensory disturbances leading to habitat alteration or degradation, and sensory disturbances altering movement, are serious as wolverines are known to be impacted by roads and human activities, including mechanical disturbances, and will likely result in wolverines being unable to use habitat in the LSA, including denning habitat, and avoiding areas entirely.”</p>	
65.	Section 13: Assessment of effects on SAR Pg 138	<p>While estimated frequency of spills is low (0.00000019 spills per mile, or 0.00000012 spills per kilometer, (Harwood and Russell, 1990), its predicted that minor spills and release are possible.</p> <p>Your data indicates that at there will be spills several times annually at this rate. How big are these spills?</p>	The cited studies of potential occurrence of spills are for roads with typically higher volumes of traffic than estimated for the WSR. It is not possible to predict volume of spills, but based of the types of vehicles and typical operation and maintenance equipment used, spills if they did occur are anticipated to be spatially limited and minor in nature.
66.	Section 13: Assessment of effects on SAR Pg 291	<p><b>13.1.2 SAR and SAR Habitat</b></p> <p>The road needs to incorporate crossing points for SAR (and other wildlife) to connect environments. The option being chosen but, not mentioned is the extirpation of species. How will environments be connected despite the existence of a road? This can be done with appropriate crossing points but this needs to be a commitment by proponents.</p>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Designated wildlife crossings and/or warning signage will be further examined by the ultimate owner/operator during the detail design and permitting phase of the Project.
67.	Section 13: Assessment of effects on SAR Pg 306	<p>Collisions with Vehicles and Equipment</p> <p>Recommend locked compounds for vehicles at night</p>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). It’s expected that vehicles at construction camps will be stored in a secured facility.
68.	Section 13: Assessment of effects on SAR Pg 307	<p>Managing roadkill by removing it from the ROW and appropriately disposed of (e.g., to brush areas adjacent to the Project Footprint) within 48 hours of detection.</p> <p>Hauling carcasses killed during construction into the adjacent bush does not seem an adequate disposal method. We would think these need go to a landfill. The roadkill should serve as data regarding crossing areas and the animals potential samples for lethal sampling not normally employed (liver samples for contaminants, presence of brain worm in ungulates etc...)</p>	3.Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The ultimate disposal measures for managing wildlife carcasses will be documented in the Construction Environmental Management Plan and Operation Environmental Management Plan.
69.	Section 13: Assessment of effects on SAR Pg 668	<p><b>13.1.1.1.3 Alteration in Movement Loss of Connectivity</b></p> <p>Areas where there is a natural depression in the road course could have supports such that road remains flat(safer) and the underneath of the road would form a crossing where fencing could guide wildlife. Many wildlife will not cross on aerial bridges but, seek more tunnel like crossings. Maybe this is why wolverines are not well known to use “bridges.” Their seldom being seen could also just be due to their incredibly low population density.</p>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Designated wildlife crossings and/or warning signage will be further examined by the ultimate owner/operator during the detail design and permitting phase of the Project.
70.	Section 13: Assessment of effects on SAR Pg 933	<p><b>Taken from <a href="https://www.ontario.ca/page/caribou-boreal-population">https://www.ontario.ca/page/caribou-boreal-population</a></b></p> <p><b>“There are two distinct populations of caribou in Ontario: the Eastern Migratory population and the Boreal population. Both populations of caribou are listed as species at risk in Ontario.”</b></p> <p>It seems an error that you repeatedly speak of the Boreal Caribou and don’t consider the migratory caribou that venture between Webequie FN Territory and the territory of Cree FNs.</p>	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period. The caribou eastern migratory population will be addressed in an EAR/IS Addenda that will be made available for review and comment.

Comment #	Page/Section # in Draft EAR/IS	<p style="text-align: center;"><b>Comment</b></p> <p style="text-align: center;">(Black font: Text from the Draft EA/IS Webeque Access Road Document Green font: Mushkegowuk Council Environmental Coordinator Review)</p>	<p style="text-align: center;"><b>Proponent Response</b></p> <p style="text-align: center;">(Refer to Proponent Response Legend)</p>
71.	Section 13: Assessment of effects on SAR Pg 991	<p><b>13.1.6 Short-eared Owl</b></p> <p>Are we correct in understanding that the Short-eared Owl population has decreased 70-80% in Canada in the last 50 years? We think this need be more clearly conveyed in this report for accurate communication.</p>	For greater clarity and as indicated in Section 13.1.2.2.10 “OBBA data indicate that Short-eared Owl possibly breeds in proximity to the Project (Birds Canada, 2024). Provincial concentrations of this species are located between the RSA and Hudson Bay and James Bay. Studies conducted for the Noront Eagle’s Nest Project EA (Noront, 2013) did not identify this species at the Mine Study Site. Since 1970, populations of Short-eared Owl in Canada have experienced a large decrease, declining by 1.59% each year and staying well below the population goal range since 1975 (Birds Canada and ECCO, 2024). In Ontario, there was an inferred decline of greater than 30% of mature individuals over three generations, between 2007 and 2019, with declines expected to continue in the future (COSSARO, 2021).”
72.	Section 13: Assessment of effects on SAR Pg 996	<p><b>13.1.7 Lake Sturgeon (Hudson Bay – James Bay population)</b></p> <p>It must be considered that this road is a frontier road. It is the first road into an area that has not had an all-weather road ever. Therefore, this road’s construction will have effects well beyond those of just “a” road. Consider that there will be 5 kms of secondary road that will result from this main frontier road.</p>	Consideration of other reasonably foreseeable projects and activities and their potential impacts on fish and fish habitat are discussed in Section 21 – Cumulative Effects Assessment.
73.	Section 13: Assessment of effects on SAR Pg 1007	<p><b>13.3.2 Wolverine</b></p> <p>Apart from construction mitigations to avoid collisions, sensory disturbances during critical windows (i.e., denning), and laws surrounding harvest of the species, there are no known effective mitigation measures for wolverine regarding permanent loss of habitat, loss of connectivity, and sensory disturbances during operations.</p> <p>Effective mitigation measures do exist other than the 3 methods listed. Those methods might seem intensive and the proponents may argue that they are not feasible but, they certainly exist. Mitigation methods like captive rearing, feeding of “wild” wolverines, wildlife crossings over/under the road or enhancement of presently unsuitable habitats cannot be dismissed out of hand. Too easily has the assumption been made that nothing else can be done.</p>	Mitigation measures identified to address potential impacts to wolverine are described in Section 13.4.4. The ultimate owner operator will consider other mitigation measures (e.g. wildlife crossings), where practicable, in the future detail design and permitting phase of the Project outside of the EAR/IS review process.
74.	Section 13: Assessment of effects on SAR Pg 1007	<p><b>13.3.11 Lake Sturgeon (Hudson Bay – James Bay population)</b></p> <p>The road construction will result in bridges over the rivers that allow sturgeon movement/mixing during the winter months. The construction of ice roads has been shown to effectively dam the river such that sturgeon populations above and below the ice bridge are separated during the winter road’s existence.</p>	The design of bridges and culverts have considered and made provisions to ensure that fish passage is maintained at water crossings. Refer to Section 10.4.1.3 for further details.
75.	Section 13: Assessment of effects on SAR Pg 1012	<p><b>13.4 Predicted Future Condition of the Environment if the Project Does Not Proceed</b></p> <p>The road construction effect on these animals is definitely negative. You are fragmenting the landscape, reducing habitat, polluting (dust/exhaust/vehicle fragments), making collisions likely and likely increasing the human use of the wildlife’s environ. We understand that the proponent’s are uncertain as to increase/decrease in species population but disagree that the road has no influence.</p>	Your comments are noted. As discussed in Section 13.9 if the WSR Project does not proceed, the future condition of wildlife and wildlife habitat in the area is likely to be relatively unchanged. The area remains difficult to access and challenging to develop projects. It is possible that additional roadways as an alternative may be constructed if the Project does not proceed. Current alternatives may consider using the existing winter road route to Webeque for an all-season road, which would have similar environmental impacts in a different location. However, none of these have received any approvals that would allow them to proceed at this time.

Comment #	Page/Section # in Draft EAR/IS	<b>Comment</b> (Black font: Text from the Draft EA/IS Webequie Access Road Document Green font: Mushkegowuk Council Environmental Coordinator Review)	<b>Proponent Response</b> (Refer to Proponent Response Legend)
			Long-term impacts due to climate change may occur regardless of the Project. It is anticipated that species shifts may occur, both floral and faunal. Forest fires are expected to become more frequent and intense due to climate change, which will impact all species. Disturbance by fire, in combination with warming due to climate change, may eventually change the composition of the Boreal forest and create more suitable habitat for some species while reducing that of others.
76.	Section 13: Assessment of effects on SAR Pg 1019	<b>SAR Birds</b> Suggest use of a phone app known as MerlinID for easy checking of bird IDs.	This will be considered by the ultimate owner/operator where future monitoring of birds is proposed prior to construction, during construction or post-construction.
77.	Section 13: Assessment of effects on SAR Pg 1019	The reference listing isn't in any order that can be perceived.	This is addressed in the final EAR/IS. References in Section 13.12 have are presented in alphabetical order by author.

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Fox', written in a cursive style.

Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
Marian Tibor-McMahon, Deputy Project Manager, Webequie Supply Road  
Sasha McLeod and Dorothy Moszynski, Special Project Officers, Ministry of the Environment,  
Conservation and Parks  
Jason Frechette, MINES  
Sita Chinnadurai, A/Project Manager, Impact Assessment Agency of Canada  
Craig Wallace, Project Manager, AtkinsRéalis Inc

# Nibinamik First Nation





January 15, 2026

**Response to Nibinamik First Nation Comments from Review of the Webequie Supply Road Draft Environmental Assessment Report / Impact Statement**

Dear Ogamaakanang Oshkineegish,

We hope that this finds you and your community well.

On behalf of Webequie First Nation and the Webequie Supply Road (WSR) Project Team, I would like to extend our sincere thanks to you and your community for taking the time to review and provide comments on the Draft Environmental Assessment Report/Impact Statement (EAR/IS) for the Webequie Supply Road Project. Please find enclosed the table that provides responses to the comments provided in your letter dated October 7, 2025.

As we move forward in the process to submit the Final EAR/IS, we remain committed to ongoing dialogue and collaboration with Indigenous communities. Our team is available to meet with your community to discuss the findings presented in the Draft EAR/IS in the proposed methods below. Please identify which of the options would be appropriate to engage with you, your team, and your community, as well as suitable dates and times to engage to discuss the WSR Project.

Method	Description
Focus Group Sessions	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS. The session will be facilitated by the Project Team to gain feedback from the

Method	Description
	perspective of diverse population groups (women, elders, youth, land users, etc.)
In-Community Sessions	Community information sessions can be conducted, whereby the Project Team will discuss the Draft EAR/IS with a question-and-answer period at the end of the presentation.
Drop-In Sessions	Community members can drop-in at a safe location to discuss the Draft EAR/IS with the Project Team.
Virtual Focus Groups	Open discussion with 4-6 participants (Council, staff, community members, or technicians) to discuss the Draft EAR/IS facilitated by the WSR Project Team using either Zoom, Microsoft Teams, Google Meet, GoToMeetings, Skype, Webex, or any other videoconferencing platforms that Indigenous leaders and staff are currently using to meet with government officials, health agencies, lawyers, advisors, board meetings, tribal council meetings, Chiefs assemblies, online conferences, etc.
Virtual Community Presentation	Using the above range of videoconferencing platforms, the Project Team will discuss the Draft EAR/IS to community members with a question-and-answer period at the end of the presentation.
One Hour Teleconference	Using a phone and fax, the Project Team will fax you the Draft EAR/IS presentation and set up a conference call to go through the presentation based on the area of interest your team wants to focus on and answer any questions
Local Radio Call In Show	Using the local community radio, the Project Team can present the Draft EAR/IS process with a local translator that the Project team will pay for to explain the Draft EAR/IS. We can also provide a translator on our end.
Online Surveys	Using online survey methods, community members can provide feedback on the Draft EAR/IS.



Should you have any questions, please do not hesitate to contact me at 807-472-6147 or at [michael.fox@supplyroad.ca](mailto:michael.fox@supplyroad.ca).

Sincerely,

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Michael Fox

c.c. Chief Cornelius Wabasse, Webequie First Nation  
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## Comment Response Table

**Project:** Webequie Supply Road Project

**Proponent:** Webequie First Nation

**Document:** Draft Environmental Assessment Report/Impact Statement (EAR/IS)

**Comments from:** Nibinamik First Nation (NIFN)

The following categorization of the proponent responses may appear in the comment response table for clarity.

### **Proponent Response Legend**

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
1.	n/a	General: Indigenous Knowledge and Land and Resource Use Program	The Project is undergoing an EA/IS process without adequate support opportunities for Nibinamik to participate in the process meaningfully. There has not been a Nibinamik-specific Traditional Knowledge and Land Use Study (TKLUS) nor a baseline study for Nibinamik existing conditions conducted in the context of the WSR. Without the information from these studies, it is impossible to adequately assess the effects of this project on Nibinamik's Aboriginal and Treaty rights and title.	The proponent must support Nibinamik in conducting a TKLUS and baseline study. The assessment of potential effects and mitigation and follow-up measures must be implemented based on the results of this study.	The Project Team offered and continues to communicate the opportunity for Indigenous communities to undertake and/or share Indigenous Knowledge and Land and Resource Use (IKLRU) information to inform the EA/IA process. The Project Team extended an invitation to all 22 Indigenous communities to participate in the Project's IKLRU Program, including supporting communities regarding the Province of Ontario offer of capacity funding for eligible Indigenous communities to participate in the IKLRU Program. At this time, Nibinamik First Nation has not identified specific sites or detailed cultural knowledge beyond what is publicly available; therefore, a site-specific or pathway-specific assessment of the Project's potential effects on Nibinamik's Aboriginal and Treaty rights and title has not been completed.
2.	n/a	General: Socio- Economic Baseline Determination and Existing Conditions	Many of the effects assessments, including cumulative effects assessment, and consequently the proposed mitigation and follow-up measures, focus largely on the impacts of the Project on Webequie First Nation. Limited data is available for Nibinamik especially with respect to the socioeconomics components such as health and economics. While this may in part be due to a lack of available information and data of surrounding First Nations in the LSA and RSA, the EA/IS cannot be considered complete without an accurate	Expanding on the previous recommendation (Comment 1), it is critical that impacts specific to Nibinamik's socio-economic baseline be established, assessed and mitigated in the EA/IS. This assessment must include information gathered during the eventual TKLUS and must be validated by Nibinamik. Nibinamik must also be included in decisions to determine the impacts, develop mitigation monitoring and adaptive management, and accommodations.	1. Item will be addressed in the Final EAR/IS submission.  We look forward to receiving the TKLUS and any other information from Nibinamik that we can consider in the EA/IA. As noted, socio-economic information from Nibinamik First Nation would also assist in identifying potential effects from the Project on socio-economic valued components. The Community Readiness Plan (Appendix N) proposes a Community Readiness Working Group that can include LSA

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
			baseline which is required to undertake an assessment of effects on surrounding communities, including Nibinamik.		communities such as Nibinamik First Nation. Participating communities can be involved in planning of mitigation and enhancement measures as well as monitoring and adaptive management plans.
3.	n/a	General: Mitigation and Monitoring Plan Development Timeline and Commitment	The Draft EA/IS defers detailed mitigation and monitoring plans to later stages and other proponents, relying on unproven assumptions—such as 100% effective invasive species management—to dismiss impacts. This lack of defined measures and contingency planning makes the assessment speculative, creates uncertainty about protections for Nibinamik’s Rights and interests, and undermines accountability and adaptive management.	Nibinamik requests meaningful involvement in drafting, reviewing, and co-developing all mitigation and monitoring plans for both construction and operations, with adequate capacity funding to support participation.  Plans must embed Nibinamik knowledge and governance from the outset, include clear adaptive management frameworks with thresholds based on IK and corrective measures. There must be collaborative decision-making beyond simply document review as part of regulatory submissions.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4.	n/a	General: Reversibility	The potential Project effects are considered to be reversible, asserting that “the net effect is reversible if the roadway was removed.” Nibinamik firmly rejects this assertion, given that (1) the scale and extent of changes due to such substantial linear infrastructure will not return to pre- impact conditions within an ecologically or culturally relevant timeframe, and (2) the fact that the road will not be removed.  Once built and functioning, the road will be used for multiple generations to come and is more likely to see upgrades than costly full-scale removal and rehabilitation.	The Draft EA/IS must recognize that, once built and functioning, the road will not be removed. The effects assessment must recognize that the only appropriate result for the Reversibility criterion is “irreversible.” Nibinamik requests that this be changed throughout all assessment tables and scoring, where reversible determinations are based on the road removal.	The description of reversibility in relation to net effects is provided in Table 5-5 in Section 5 of the EAR/IS, which is not consistent with “the net effect is reversible if the roadway was removed”. Table 5-5 defines reversibility as whether a measurable indicator or the VC can return to its existing condition after the Project <b>activity</b> (bolded for emphasis) ceases. From this definition, one can see that reversibility is not related to removal of the road (i.e., the entire Project) but is related to the condition of the indicator or VC after any Project activity ceases and is also limited to the Project Phase when the Project activity occurs. An example of a reversible activity would be domestic waste generation at the construction camps that ceases when the construction camp is removed at the end of the construction phase.

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
5.	n/a	General: Significance Determination	The Draft EA/IS applies effects classification criteria in a way that constrains significance determinations, down-weights potential impacts, and minimizes responsibility for mitigation or accommodation. The ranking criteria applied obscures the seriousness of potential outcomes. This approach, combined with minimal integration of IK/TEK, particularly weakens assessments of surface water, groundwater, wildlife, fish and fish habitat, non-traditional resources use, GHG emissions, making it difficult or impossible for effects to be deemed “significant.”	The Draft EA/IS constrains significance determinations while failing to reflect IK/TEK, undermining a core outcome of the assessment that defines when cumulative effects assessment and additional mitigation or accommodation is required. Nibinamik views this as invalidating the effects assessment and requests the assigned score are updated with clear IK/TEK integration, and a conservative ranking classification. This must be accompanied by a reassessment of significance. Where uncertainty exists, and robust monitoring programs supported by adaptive management must be established. These measures must embed IK/TEK alongside western science and include ongoing engagement with Nibinamik to ensure accountability and protection of rights.	1. Item will be addressed in the Final EAR/IS submission Comment noted. The Final EAR/IS presents a revised approach for determination of significance of predicted net effects to use a qualitative aggregation instead of a numerical score ranking. To the extent available, the EAR/IS integrates IK/TEK provided by Indigenous communities for each discipline-specific assessment of effects section. Each discipline-specific effects assessment in the EAR/IS n presents a section on the Incorporation of Indigenous Knowledge and Land and Resource Use Information that includes a summary of information gathered from Indigenous communities through IK/TEK studies and this IK/TEK was integrated into the assessment. The Final EAR/IS has considered feedback from Indigenous communities received on the Draft EAR/IS for the determination of significance, in particular in relation to the significance of predicted effects on Indigenous Peoples and the exercise of Aboriginal and Treaty Rights (Section 19 of the EAR/IS).
6.	n/a	General: Cumulative Effects and Climate Change	The Draft EA/IS, minimizes the RFDs and potential confounding effects of climate change which should be considered as part of the cumulative effects assessments. These omissions are critical because the WSR is expected to enable further industrial development, thereby amplifying climate-related risks, including wildfire frequency and air quality degradation. These vulnerabilities are especially true for remote communities such as Nibinamik that are reliant on winter roads and country foods. The current assessment is limited in its ability to evaluate and mitigate cumulative effects and, as such, rights impacts. Given Ontario’s Bill 5 reforms and federal Bill C-5’s Building Canada framework — both of which create legal pathways to accelerate and centralize project approvals — the Draft EA/IS’s current minimization of reasonably foreseeable developments and climate confounders is unacceptable. In a fast-track regulatory environment, a robust, rights-centered	Nibinamik requests a more robust and precautionary approach, one that considers the synergistic effects of development enabled by WSR and the compounding implications for Indigenous resource access, safety, and land use in the context of a changing climate. Limitation of RFDs is not evidence based nor reflect the context of Bill 5 and C-5 for development within the Ring of Fire area, and as such must be reconsidered. Cumulative effects assessment adjustment to effectively understand Aboriginal and Treaty rights impact must not only include expanded spatial and temporal boundaries (additional RFDs) but also include Indigenous-led metrics and thresholds. For example, see comment #58 below on the deficiency of the atmospheric cumulative effects assessment to consider potential effects pathways aside from GHG emissions, including acid rain from mining or the lack of geological consideration for	The Cumulative Effects Assessment (CEA) methodology in the EAR/IS followed the requirements defined in the approved TISG and ToR. Per the Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act (the Policy Framework) the CEA should consider future physical activities that are either certain or reasonably foreseeable. Without publicly available information relating to these future physical activities, the ability to predict cumulative effects will lack reliability.

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
			cumulative effects assessment is essential to protect Treaty and Aboriginal rights.	acid rock drainage from the RFDs (Section 2.2, above).	<p>If the reasonably foreseeable projects enter the impact assessment review process, affected stakeholders (including NIFN) will have the opportunity to participate in the process including the assessment of cumulative effects.</p> <p>We interpret this request from NIFN to be an appeal for a regional assessment in the Ring of Fire area to be undertaken, which is currently ongoing under the federal <i>Impact Assessment Act</i> by the Impact Assessment Agency of Canada. We encourage NIFN to participate in the regional assessment. Climate change has been considered in the cumulative effects assessment presented in Section 21 of the EAR/IS.</p> <p>At the time of writing this response, neither the WSR Project nor the reasonably foreseeable projects are included in the Schedule of Projects under Ontario's Bill 5 or federal Bill C-5's Building Canada framework.</p>
7.	SECTION 6:	Assessment of Effects on Geology, Terrain and Soils	<p>The Draft EA/IS recommends that aggregate/rock for the proposed road is sourced from a glaciofluvial, ice-contact deposit area near the south-east side of Winisk Lake (AtkinsRéal, 2025). This presents the potential for several unmitigated impacts:</p> <ul style="list-style-type: none"> <li>Eskers are important corridors which improve wildlife movement efficiency and are used by many species including Caribou. Removal of an esker linkage area may permanently alter local wildlife migration patterns (Willison et al., 2004);</li> <li>Eskers are also known to function as important denning habitat for several valued species including foxes, wolves and bears. Friable glaciofluvial deposits, combined with good drainage and, often, a favourable solar aspect, can lead to long-term occupancy of denning sites within eskers (Gallant et al., 2014).</li> </ul>	The WSR Draft EA/IS must describe the currently unmitigated impacts of quarrying esker material, which is known to function as important movement corridor and denning habitat for various valued species.	The esker features at the proposed aggregate source areas and are non-linear geological features with minimal spatial extent with the Regional Study Area and were not determined as significant features with the wildlife habitat/species suitability modelling. Therefore, a detailed assessment of functional importance of eskers was not included in the EAR/IS. However, we note that assessment of impacts to wildlife and wildlife habitat for these areas are presented in Section 12.
8.	SECTION 6:	Assessment of Effects on Geology, Terrain and Soils	The Draft EA/IS recommends aggregate/rock source location is described as an ice-contact deposit. Aggregate extraction at a known permafrost location (within a discontinuous permafrost zone), has the potential to act as a catalyst for localized ice melting and related thaw strain.	The WSR EA/IS must describe permafrost removal and thaw strain risks associated with the road, and in particular within the ice-contact glaciofluvial deposit recommended as the quarry site.	<p>The term 'ice-contact deposit' does not refer to the presence of permafrost in the aggregate extraction area but is in reference to how the sediments formed through the meltwater from glaciers.</p> <p>The EAR/IS discusses permafrost removal and thaw strain risks in Section 6.2.2.4.</p>

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
9.	SECTION 6:	Assessment of Effects on Geology, Terrain and Soils	<p>The degradation of soil structure within the project footprint will increase the risk of erosion and sedimentation into adjacent creeks and wetlands, as well as increased dust fallout in all downwind areas. The Draft EA/IS states that erosion will be largely mitigated by the highest winds occurring during the winter when the ground is frozen. However, each decade, as winter becomes shorter due to anthropogenic climate change, the erosion and sedimentation risk of this project into surrounding water bodies will increase.</p> <p>Furthermore, the dust from increasingly hotter, drier summers will negatively impact vegetation communities.</p>	More detailed maps, models and descriptions of the expected erosion, sedimentation, and dust fallout patterns from the WSR. These should also show best-available predictions of these models within the context of the warmer and drier climate projected for Ontario over the expected project lifetime of the WSR.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).
<b>SURFACE WATER</b>					
10.	Section 7.1.2 Consideration of Input from Engagement and Consultation Activities	Draft EA/IS Section 7.0 Surface Water	<p>The engagement record highlights concerns regarding the mobilization and release of mercury and methylmercury due to changes in water flow. Despite the importance of these concerns for environmental and human health, the results of mercury and methylmercury analyses are not presented in the main body of the Draft EA/IS and are instead buried within an appendix. This placement demonstrates insufficient consideration of Indigenous knowledge and community concerns, given the potential significance of these contaminants to local ecosystems and human health.</p>	<p>The Draft EA/IS should demonstrate meaningful consideration of Indigenous knowledges and concern by clearly presenting the results of the methyl mercury and mercury monitoring. Potential methylmercury release associated with changes to hydrology and hydrogeology in peatlands represents a significant risk to Nibinamik and our neighbouring communities. Given the importance of this issue, Nibinamik recommends that a dedicated follow-up mercury monitoring program is established, independent of the proposed water quality monitoring programs.</p> <p>This follow-up program should include multi-media monitoring across surface water, groundwater, wetlands, sediment, fish, and benthic communities, and ensure monitoring is conducted at ecologically and culturally relevant locations as determined by our knowledges. Addressing the very real potential harm from mercury release requires robust planning, monitoring, and management, with meaningful involvement from Nibinamik in the design and implementation of the program.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Methyl mercury and mercury sampling will be considered in future monitoring and sampling events to be undertaken by the ultimate owner/operator.</p>

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11.	Section 7.1.4 Value Components and Indicators	Draft EA/IS Section 7.0 Surface Water	The subcomponents identified for the Surface Water Resources VCs do not fully capture the concerns raised through Indigenous knowledge and consultation. Engagement results (Section 7.1.2) and the incorporation of Indigenous knowledge (Section 7.1.3) highlight community concerns for overall watershed health and the interconnectedness of water with other parts of the ecosystem. While the current subcomponents address surface water quality, quantity, and sediment quality, they do not capture broader changes to watershed health or ecological connectivity, leaving a critical gap in the assessment of potential impacts.	Nibinamik recommends the Draft EA/IS expand the surface water value components to explicitly include subcomponents of watershed health. This addition reflects the concerns raised in consultation records and align with Nibinamik's concerns for the project. The watershed health VC should emphasize the interdependence of water with surrounding ecosystems and ability to exercise traditional practices. The addition of this VC must be done in consultation with Nibinamik and our neighbouring nations to ensure concerns are adequately addressed by indicators and assessment methods.  Assessing only water quality, quantity, and sediment quality is insufficient to capture potential disruptions to hydrological linkages, habitat connectivity, and the cumulative impacts of land use change.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).  The Nibinamik request to expand the surface water value components to explicitly include subcomponents of watershed health is considered outside of the scope of the approved EA ToR and federal TISG. We note that the identified potential effects of the Project on the Current and Historical Use of Lands and Resources for Traditional Purposes are presented in Section 19.3.1, including changes to the availability, quality and quantity of traditionally harvested resources, and loss of and/or alteration of sites and areas used for traditional harvesting, in relation to surface and groundwater. The identified potential impacts on the exercise of Aboriginal and Treaty rights related to Current and Historical Use of Lands and Resources for Traditional Purposes are discussed in Section 19.5.1, including the socio-cultural and spiritual importance of waterways for Webequie First Nation and other First Nations, and concerns about regional effects on watersheds. The concerns raised by Nibinamik First Nation and IK/TEK shared on this topic have been considered in the Final EAR/IS in Section 19 and Section 21.
12.	Section 7.2.1.2 Surface Water Quantity	Draft EA/IS Section 7.0 Surface Water	Peak discharge at the proposed waterbody crossings has been estimated using a suite of methods, with results varying significantly depending on the approach (e.g., up to 40% variation). The Index Flood Method was selected to represent peak flow, as it generally fell near the middle of the range of results. Nibinamik acknowledges the rigour and rationale provided in the hydrologic analysis. However, it remains unclear whether the methods employed are appropriate for estimating conditions during spring freshet in these snowfall-driven catchments. In addition, the analysis does not address important factors such as ice-jams, potential climate change effects, or land use changes, all of which could have cumulative effects which influence peak flow and waterbody crossing performance.	Nibinamik would like ensure that the hydrologic methods applied are appropriately suited for northern Ontario hydrology. The final EA/IS should address how suitable the hydrologic analysis is for northern Ontario conditions, where catchments are marked by an abundance of lakes and wetlands, hydrologic regime driven by snow accumulation and freshet, and rivers subject to ice break-up and transport.  The assessment should also include comprehensive cumulative effects assessment which discusses how potential changes to the regional climate and catchment characteristics (e.g., land use changes, increase in percent impervious) may impact hydrology and our ability to track natural versus project-related variation.	1. Item will be addressed in the Final EAR/IS submission.  The proponent has updated the hydrologic approach to incorporate a new hydrological modeling approach that has been validated and calibrated using local data. The Project Team met with MTO Highway Standards Branch to review hydrology, hydraulics, drainage, and climate change requirements, and agreed on the project approach. The comprehensive hydrologic assessment of the study area was conducted focusing on key watershed characteristics and flow behavior under both current and future climate conditions. The method adopted for peak flow calculations varied based on their drainage areas: - the Regional Flow Frequency Analysis was used for areas greater than 100 km <sup>2</sup>

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				Furthermore, it must be demonstrated that analysis or modelling conducted to size infrastructure is grounded in culturally relevant timescales and validated by Indigenous knowledge holders. Input data must reflect a timeframe meaningful to Indigenous experience. For example, a 30-year climate record is insufficient for determining design storms, as it does not encompass a full lifetime of observations. Members of Nibinamik possess memory and knowledge of climate events and river flows that have had significant consequences, and it must be clearly demonstrated that these observations are integrated into both analysis and design to ensure infrastructure is resilient and culturally appropriate.	- the Hydrological Model was used for areas 1 km <sup>2</sup> to 100 km <sup>2</sup> - Rational Method was used for areas less than 1 km <sup>2</sup> (when catchment areas are quite small, it can be assumed that the peak runoff event would result from a summer rainstorm). The Project Team offered and continues to communicate the opportunity for Indigenous communities to undertake and/or share Indigenous Knowledge. Input from NIFN and other Indigenous Communities is welcome and will be considered.
13.	Section 7.2.1.2 Surface Water Quantity	Draft EA/IS Section 7.0 Surface Water	The Draft EA/IS notes that beaver activity occurs at some proposed waterbody crossing locations. Proposed mitigations are limited to removing dams in accordance with the Fisheries and Oceans Canada (DFO) <i>Code of Practice: Beaver Dam Breaching and Removal</i> during construction. While the DFO Code of Practice is designed to protect fish and fish habitat, it does not provide measures to protect beavers or their habitat, nor does it prevent future damming that could affect water flows. In fact, the DFO COP explicitly states that “the breaching or removal of a beaver dam may not necessarily prevent future beaver activity in the area” (Fisheries and Oceans Canada, 2025).  Given that this mitigation will not prevent subsequent damming or contribute to the active management of beavers, additional mitigations must be identified and proposed to address potential ecological and hydrological impacts.	Nibinamik requests that the Draft EA/IS is updated to identify and implement further mitigation measures to address beaver activity. These measures should be protective of beavers and beaver habitat, prevent or manage future damming that could impact water flow and include adaptive management strategies. Nibinamik requests the right of first refusal for participation and development.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Beaver dam removal is a construction and operational issue for management that will be further described in the Construction Environmental Management Plan (CEMP) and in the Operational Environmental Management Plan (OEMP).
14.	Section 7.3 Identification of Potential Effects, Pathways and Indicators	Draft EA/IS Section 7.0 Surface Water	The Draft EA/IS proposes that the floating road design will avoid potential ecological consequences of peatland drainage. While floating roads can mitigate some impacts, they cannot be considered impact-free. The feasibility and effectiveness of this design depend on site-specific conditions (e.g., peat depth, slope, in-situ strength), engineering design considerations (e.g., geotextile placement, road thickness, construction sequencing), and require	The Final EA/IS must demonstrate advanced planning and site-specific feasibility studies to demonstrate that the floating road design will be an effective mitigation measure. Additional management and contingency planning, as well as a robust follow-up monitoring program should be developed to verify the effectiveness of floating roads as a mitigation measure. Contingency measures should clearly articulate situations where	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  The floating road design has been completed to a preliminary design engineering level and will be further developed during the detail design phase for the Project to ensure that groundwater flow and displacement is taken into account. Monitoring is also proposed to be undertaken pre and post construction

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			robust monitoring to detect settlement and lateral displacement. The Draft EA/IS has not demonstrated that these factors have been fully considered, nor does it provide contingency plans in the event that site-specific conditions or design limitations reduce the effectiveness of the floating road as a mitigation measure.	site conditions or design limitations may compromise the effectiveness of floating roads and provide available adaptive management measures. Nibinamik requests right of first refusal for the development and participation of follow-up programs.	to address settling and lateral displacement of the road in the peatlands. If during detail design, locations are identified where additional measures are required to provide additional support to the road, they will be implemented.
15.	Section 7.3 Identification of Potential Effects Pathways and Indicators	Draft EA/IS Section 7.0 Surface Water	Further to Comment 14 above, if it cannot be demonstrated that floating road construction will avoid impacts to hydrology and peatland drainage, additional assessments and mitigation measures are required. In particular, enhanced wildfire monitoring, prevention, and response measures must be developed. Without these safeguards, there is a heightened risk of peatland destabilization, altered hydrology, and increased vulnerability to wildfires, which could result in long-term ecological damage, loss of wetland function, and adverse effects on culturally and ecologically important landscapes.	Nibinamik recommends that the Draft EA/IS include additional assessments to confirm that floating road construction will not adversely impact hydrology or peatland drainage. Where risks remain, robust mitigation measures must be implemented, including enhanced wildfire monitoring, prevention, and response strategies. These measures should be designed to prevent peatland destabilization, maintain natural hydrological function, and protect ecologically and culturally significant areas throughout construction and operation.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The floating road design has been completed to a preliminary design engineering level and will be further developed during the detail design phase for the Project. Monitoring is proposed to be undertaken pre and post construction to ensure that impacts to groundwater, surface and other drainage has been appropriately addressed. If additional measures are required, they will be implemented. The proponent intends to ensure that the water flow is maintained so that the peatlands are not destabilized or adversely affected.
16.	Section 7.3 Identification of Potential Effects Pathways and Indicators	Draft EA/IS Section 7.0 Surface Water	Equalization culverts are another proposed mitigation measure to maintain hydrologic connectivity. The success of these culverts in maintaining drainage and hydrologic connection depends on the spacing and orientation (SarasSaraswati, 2020).	To ensure that culverts are installed as an effective mitigation measure, it is recommended that culvert placements and design should be developed by a qualified environmental professional. Culvert designs should also include strategies to monitor success and adaptive management plans.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Qualified environmental and engineering professionals will be involved in the design of equalization culverts.
17.	Section 7.3 Identification of Potential Effects, Pathways and Indicators	Draft EA/IS Section 7.0 Surface Water	The Draft EA/IS has not adequately consider the effect pathway between vegetation clearing/grubbing and changes to surface water quality. Vegetation in wetlands and riparian areas provides critical functions for maintaining water quality. Its removal can create short-term effect pathways, as organic matter and sediments may be mobilized into surface water bodies, potentially altering water chemistry and impacting aquatic ecosystems.	Nibinamik requests that the Final EA/IS is updated to include the effect pathway between vegetation and grubbing and surface water quality changes. The assessment should also be updated with available mitigation measures and effects assessment.	1. Item will be addressed in the Final EAR/IS submission. The effect pathway has been added as suggested. Mitigation measures are discussed in Appendix E section 5.1.
18.	Section 7.4 Mitigation Measures	Draft EA/IS Section 7.0 Surface Water	The mitigation measures state that waterbody crossing structures will be designed to accommodate the 100-year peak flood event, with additional up-sizing to account for climate change. However, the Draft EA/IS later indicates that	Nibinamik would like more information to ensure that the sizing of water body crossings will mitigate impacts: <ul style="list-style-type: none"> <li>Please clarify whether the hydraulic design of the Project's bridges and culverts will be</li> </ul>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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			<p>“structures from a hydraulic perspective have been designed to pass frequent floods or precipitation events (2-year return period) with minimal effect on stream discharge” (AtkinsRéalis, 2025, pp. 7-53). Clarification is needed to confirm that both extreme flood events and routine flows are adequately addressed in the design.</p> <p>Failure to account for this full range of flows could result in insufficient conveyance during extreme events, leading to flooding, damage to infrastructure, reduced fish passage, impaired navigability, and increased erosion or scour at crossings.</p>	<p>sufficient to convey the 100-year flood. The design should demonstrate that a full range of flows, including low-flow (drought) and high-flow conditions, has been considered to prevent impacts on stream discharge, fish passage, water navigability (where applicable), and erosion/scour.</p> <ul style="list-style-type: none"> <li>Specify which design storm will be applied for scour analysis and check flow and explain how these considerations will be incorporated into the overall water crossing design.</li> </ul> <p>Describe what additional measures have been considered to convey storm events or mitigate flooding. Alternatives to up- sizing infrastructure, such as maintaining or restoring riparian areas and wetlands, or incorporating natural design features, should be thoroughly evaluated and compared to ensure the most effective and ecologically sensitive approach is implemented.</p>	
19.	Section 7.4 Mitigation Measures	Draft EA/IS Section 7.0 Surface Water	<p>A key mitigation measure to prevent changes to water quality in the LSA is the implementation of a water quality monitoring program. The Draft EA/IS proposes a Surface Water and Storm Water Management Monitoring Program for both the construction and operational phases, however, details regarding the program are vague. While Nibinamik supports the use of a monitoring program, it must be demonstrated that the program has robust capacity to detect and respond to changes in water quality. This must include the ability to comparing observed concentrations to baseline conditions at ecologically and culturally important spatial scales. The Draft EA/IS has not shown that baseline conditions have been sufficiently characterized across all potentially impacted watersheds.</p> <p>The water quality monitoring program to track and respond to temporary changes, but this measure alone may not adequately mitigate water quality impacts in the broader RSA. Alterations in hydrology, land use, and dewatering caused by road installation, particularly through peat-rich environments, may lead to regional impacts on surface and subsurface flows. These changes could</p>	<p>To provide enhanced environmental protection from roadway runoff, a robust monitoring program is recommended.</p> <p>Nibinamik requests further consultation, engagement and capacity support to be included in the development of a robust monitoring program. The monitoring program should be considerate of known roadway runoff contaminants (e.g. nutrients, oils and grease, heavy metals, fertilizers, sediments, etc.). Monitoring should also consider sediment quality and monitoring signs of runoff pathways (e.g., gullies, bank erosion, muddy water, state of swales and vegetation). To ensure the program is successful in detecting changes on ecologically and culturally relevant scales, monitoring should be conducted throughout the broader watershed area at sites selected through engagement with Nibinamik and our neighbouring First Nations. The program must include provisions to collect additional information on baseline quality at these sites, to ensure there is adequate data to draw comparisons and implement adaptive management.</p>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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			dewater peatlands or alter water chemistry, including acidity, nutrient levels, particulate matter, and organic content. Furthermore, long-term operation of the road will increase the potential for water quality degradation from roadway runoff, which contains a range of chemicals known to have unexpected impacts on aquatic ecosystems.	Members of Nibinamik request for involvement in the development and execution of these plans, including drafting the program, collecting field data, and the interpretation of results and decision making.  This program may be best support through a Watershed Stewardship Initiative, which allows for collaboration across our Nations to support Nation-to-Nation decision making on watershed-scale issues.	
20.	Section 7.4 Mitigation Measures	Draft EA/IS Section 7.0 Surface Water	Nibinamik is pleased that low-impact stormwater management infrastructure is proposed for the WSR. Low-impact infrastructure such as enhanced swales must be monitored and maintained regularly to ensure they are operating as designed. Maintenance must include the removal of sediments (as well as debris, litter, etc.) to remove accumulated pollutants from the infrastructure and prevent the recycling of pollutants to stormwater. The Draft EA/IS has not provided plans for maintenance to ensure longevity of low-impact design and efficacy of this mitigation measure.	Nibinamik requests that a stormwater maintenance and monitoring plan be developed for low-impact infrastructure. The plan should specify responsibly, procedures, maintenance schedule, and adaptive measures to address deficiencies.  Implementing this plan helps ensure stormwater infrastructure is operating properly for the life of project and continue to offer protection to water quality and aquatic habitat.  Nibinamik also recommends that WPT consider engaging in research and development initiatives for low-impact design features. Studies on the efficacy of low-impact design and treatment capacity for roadway runoff, are well suited to be conducted in the area given the remote nature, timing of the development, abundance of reference sites and growing body of knowledge demonstrating impacts to freshwater ecosystems from roadway runoff (Cojac, 2024). Nibinamik requests that community members be provided with an opportunity to engage in any research and development activities to help offset potential impacts.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
21.	Section 7.4 Mitigation Measures	Draft EA/IS Section 7.0 Surface Water	Soil compaction during construction activities can significantly affect runoff rates. Section 7.4.2 of the Draft EA/IS indicates that disturbed areas associated with temporary support infrastructure will be restored through soil decompaction and the placement of similar native soils, or more permeable soils where practical. However, mitigation measures listed in Appendix E and Table	Clarity is needed for the use of soil decompaction as a mitigation measure. Please discuss if and when soil decompaction may be needed and provide a discussion of risks and benefits of applying soil decompaction within peatlands and riparian areas. This discussion should include a wholesome consideration of peat restoration techniques available to restore hydrology and hydrogeology in wetlands.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Soil decompaction and other restoration techniques available to restore hydrology and hydrogeology of wetlands will be documented in the CEMP and its subcomponent plans (e.g., Soil Management Plan, Site Restoration and Monitoring Plan).

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			<p>714 do not explicitly include soil decompaction as a mitigation measure.</p> <p>While soil decompaction can improve permeability, it also carries risks to soil transport, soil structure, and overall soil health. These risks are particularly pronounced in muskeg environments, where mechanical disturbance can destabilize peat and alter local hydrology, potentially leading to longer-term impacts on water flow and peatland/wetland function. Disturbance of peatland soils may also release contributions of heavy metals, sediments and organics stored in peatlands to surface waters.</p>	<p>Where decompaction is proposed, a site- specific soil management plan should be developed in consultation with Indigenous knowledge holders and soil specialists to evaluate potential risks to peat stability, soil structure, and hydrological connectivity.</p> <p>Alternatives to mechanical decompaction (such as natural revegetation, low-impact surface treatments, or controlled hydrological restoration techniques) should be prioritized in peatland and muskeg areas. Monitoring of post-construction soil permeability, stability, and hydrological conditions should be included as part of the environmental monitoring plan, with adaptive management measures applied if impacts to wetland or peatland function are detected.</p>	
22.	Section 7.4 Mitigation Measures Section 4.3.3.5	Draft EA/IS Section 7.0 Surface Water	<p>The Draft EA/IS notes that winter maintenance activities may affect surface water quantity, but the proposed mitigation measures are not clearly defined. Snow removal and placement can alter the amount and distribution of snow available to recharge surface water, groundwater, and wetlands within the affected catchments. Consideration should also be given to how snowpack placement and management will influence both snowmelt dynamics and stormwater management.</p> <p>Furthermore, the project does not plan to use salt or sand for de-icing. It is not clear how road ice will be safely managed to prevent spills and accidents.</p>	<p>The Final EA/IS should provide clear and detailed mitigation plans to address the potential effects of winter maintenance. These plans must explicitly consider how snow removal and storage may alter local water balances, affect snowpack distribution and melt, and influence both surface and subsurface hydrology. Mitigation should include:</p> <ul style="list-style-type: none"> <li>• Locating designated snow storage away from sensitive features;</li> <li>• Protection of wetlands, riparian zones, and other vulnerable areas;</li> <li>• Measures to maintain natural drainage patterns and peak flows;</li> <li>• Adaptive management, including monitoring and corrective actions, to ensure the effectiveness of mitigations over time; and</li> <li>• Provide clarity on road ice management to prevent accidents and spills that may impact surface water.</li> </ul>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>This will be examined in the OEMP.</p>
23.	Section 7.4.1 Dewatering, Water Taking and Discharges	Draft EA/IS Section 7.0 Surface Water	<p>Several Project activities require water taking and discharge either temporarily (e.g., installation) or for a pro-long period (e.g., aggregate pits). The Draft EA/IS suggests that PTTW will be used as mitigation measures prevent impacts to water quantity and quality. Nibinamik is concerned that PTTW applications do not include steps for</p>	<p>Nibinamik requests the Province and the WPT conduct further consultation when applying for any water taking permits related to the project. Consultation should be initiated at the start of the technical assessment, where Nibinamik should be given the opportunity to comment on the scope of the assessment to ensure that technical</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>

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			consultation. Further, some technical assessments required for certain PTTW applications (e.g., EASR registry for a highway project) do not require that a technical assessment is physically submitted to the ministry or reviewed. The requirements of the technical assessment may also not provide robust enough assessments for the sensitive nature of the pristine environment.	assessments are robust and consider cumulative effects. Consultation should continue until permits have been issued and permit conditions (e.g., monitoring requirements) are co-developed with, and approved by, Nibinamik and other consulted Nations. To further mitigation effects from water taking and discharge, Nibinamik requests that a Discharge Management Plan is developed. This management plan should include a description of water taking and discharge locations, timing, frequency, volumes, quality as well as a discussion of discharge site conditions. Site descriptions should identify any environmentally sensitive areas which may require additional protection (e.g., spawning habitat) and identify available on-site mitigation measures.	
24.	Section 7.5 Characterization of Net Effects	Draft EA/IS Section 7.0 Surface Water	The criteria for characterizing net effects considers input from Indigenous people, but states “no input was received during engagement and consultation” (7-68). Section 7.1.2 (Consideration of Input from Engagement and Consultation Activities) and Section 7.1.3 (Incorporation of Indigenous Knowledge and Resource Use) contain ample feedback on the importance of water and concerns regarding project interactions.	Nibinamik requests further clarification on how the information provided through IKLRU studies and consultation and engagement have been considered in the characterization of net effects. Justification is needed as to why Indigenous perspectives were not incorporated into this section, despite the ample feedback provided on the water value component. Nibinamik requests the recharacterization of the net effects and significance based on meaningful consideration of concerns. This characterization must demonstrate explicit consideration of Indigenous input in the characterization and determination of significance for net effects related to water.	1. Item will be addressed in the Final EAR/IS submission. Each valued component section of the EAR/IS (Section 6 to 20) has a subsection that describes how IKLRU information shared and feedback from received from engagement and consultation was considered in the EAR/IS.
25.	Section 7.5 Characterization of Net Effects	Draft EA/IS Section 7.0 Surface Water	Table 7-15 summarizes the predicted net effects on surface water resources. Magnitude of change is described relative to existing conditions (e.g., a low magnitude indicates changes that are characteristic of current conditions). For surface water quantity, all potential effects—including water taking, discharge, land cover changes, and waterbody crossing installation—have been characterized as low magnitude. However, Section 5 of the Natural Environment Existing Conditions Report (NEEC) notes that the Project will affect 18% of the total	Further justification is needed to support the conclusion that net effects to surface water quantity are of low magnitude. This justification may be best achieved through RA, as previously recommended by Nibinamik. Given the nature of water to accumulate impacts across the watershed, and the connectivity of water to our ecosystems, potential changes to this value component must be well understood.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). A broader regional study considered outside of the scope the ToR, TISG and Study Plan for surface water developed early in the EA/IA process. The Regional Study Area for assessment of effect to surface water is large and compasses the quaternary watersheds crossed by the recommended preferred route for the WSR. Note that further hydrology/ hydraulic analysis of water crossings will be

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			<p>tertiary watershed area and that waterbody crossings may impact 5–7.3% of the mean annual flow within tertiary watersheds. The Draft EA/IS does not provide sufficient evidence to demonstrate that this level of change can reasonably be considered characteristic of with existing conditions.</p>	<p>If this conclusion is substantiated without further support from an RA, Nibinamik requests the following is provided as justification:</p> <ul style="list-style-type: none"> <li>• Clear methods for estimating mean annual flow at waterbody crossings and across tertiary watersheds.</li> <li>• An explanation of how mean annual flow estimates were validated using spatially and temporally relevant field data.</li> <li>• Data-supported justification demonstrating that predicted changes in mean annual flow are consistent with baseline conditions.</li> <li>• Evidence showing that predicted effects will remain limited to the LSA, rather than extending to hydrologically relevant boundaries (e.g., sub-catchment, RSA).</li> <li>• An assessment of how projected flow changes account for cumulative effects related to groundwater and wetlands.</li> </ul> <p>Nibinamik requests that impacts to surface water be re-characterized based on improved justification. Recharacterization should consider impacts to surface water as moderate to high in magnitude, and significant, if predicted changes cannot be shown to fall within the natural range of variation for the region.</p>	<p>undertaken by the ultimate owner/operator during the future detail design and permitting phase for the Project and can be shared with Nibinamik First Nation.</p>
26.	Section 7.5 Characterization of net effects	Draft EA/IS Section 7.0 Surface Water	<p>The Draft EA/IS suggests that the Erosion and Sediment Control Plan is sufficient to prevent net effects to surface water quality. While Nibinamik appreciates the proposed mitigations, the effectiveness of these mitigations is dependent on design and execution.</p>	<p>Nibinamik recommends that an Annual Follow-Up Monitoring Program is developed for the Erosion and Sediment Control Plan. The Follow-Up program should assess the success of mitigation measures, provide the results of any issues or malfunctions, and report on adaptive management employed. The intent of the follow-up program should be to assess the efficacy of these measures in prevent sediments from entering waterways and adapt the Sediment Control Plan as needed as the project continues.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Further details on erosion and sediment control (ESC) measures and monitoring will be detailed in the CEMP and its subcomponent (Erosion and Sediment Control Plan), developed in the detail deign drawings for the Project and in site-specific ESC plans that are anticipated to be required to secure permits/approvals.</p>

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27.	Section 7.5.2.1 Changes in Surface Water Quality	Draft EA/IS Section 7.0 Surface Water	The Draft EA/IS applies a Western-centric approach to quantifying effects on the hydrological regime. By focusing on watershed area loss relative to overall watershed size, the analysis fails to account for effects that may disproportionately impact hydrologically diverse environments (e.g., wetlands, recharge areas, discharge areas) and the aquatic and terrestrial habitats they support. It also overlooks how these impacts may be intensified by seasonal patterns or interannual climate variation. Changes to water levels, such as prolonged low water, pose direct and significant consequences for Nibinamik, restricting community access to the land and undermining the ability to meaningfully exercise constitutionally protected Rights and Interests.	Without a fulsome discussion of how hydrologic changes may affect sensitive environments, Nibinamik cannot be assured that impacts to surface water quantity are being sufficiently mitigated. The Draft EA/IS must be strengthened to clearly describe how seasonality, interannual climate variation (e.g., wet and dry years), and long-term climate change were considered in determining and characterizing potential and cumulative effects. It must also demonstrate how these factors were incorporated into mean annual flow estimates and other key metrics used to assess the extent of potential impacts.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)  Climate considerations are incorporated into the flow computations and current preliminary engineering design that supports the EA/IA and will be further developed in the future detail design phase of the Project.
28.	Section 7.1.2 Consideration of Input from Engagement and Consultation Activities Section 7.3 Identification of Potential Effects, Pathways and Indicators Section 7.5.2 Predicted Net Effects	Draft EA/IS Section 7.0 Surface Water	The Draft EA/IS states that in the event of “flows greater than the design flow, there could be reduced water crossing clearance, impounding of water upstream of the road alignment, overtopping of the roadway and water crossings, and/or damage to the road structure” (AtkinsRéalis, 2025, pp. 7-10).  While changes to surface water quantity from waterbody crossings are discussed as a predicted net effect, it is unclear how potential downstream or knock-on effects on water and sediment quality have been considered. Additionally, the overflowing of roadside ditches is not identified as an effect pathway, and waterbody crossing impacts are characterized as temporary only. Flooding and road damage have the potential to degrade the surrounding environment, disrupt access, and increase the risk of accidents, spills, or the release of substances such as sediments and road materials. These impacts could lead to changes in surface water quantity, quality, or sediment dynamics, which in turn would directly affect Nibinamik’s ability to exercise Rights and Interests.	Nibinamik appreciates that the crossings are sized with additional contingency (e.g., 1:100- year event), however, the Draft EA/IS has not described what mitigation and response measures are available in the event of water impoundment and road flooding. The Draft EA/IS should describe the mitigation and emergency response measures that will be implemented in the event that large flows impound water upstream of the roadway, overtop, or damage the roadway. These measures should ensure that environmental damage is minimized, restoration occurs in a timely manner, and that any potential impacts on access or safety are reduced.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Consideration will be made for using geoliners to reduce the effects of road overtopping and erosion due to flooding.

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29.	Section 7.7 Cumulative Effects	Draft EA/IS Section 7.0 Surface Water	<p>The proposed road laterally crosses several catchments, where swales will divert water along the roadway and culverts will help promote surface and subsurface flow.</p> <p>While it is acknowledged that these mitigations are included in the design, the effectiveness of these mitigation measures depends on site characteristics, and laterally crossing catchments may still impact surface hydrology and peatland functions by modifying natural drainage patterns. Additionally, several proposed activities will remove or relocate water from catchments in the LSA, including snow removal, dewatering, and other water taking activities. These effects may also be enhanced by the loss of vegetation and peat along the LSA leading to changes in infiltration, evaporation and transpiration. No catchment-scale water balances or cumulative effects assessments have been provided to demonstrate that cumulative effects to drainage, water taking and water relocation will not adversely impact water availability and distribution at the catchment scale.</p> <p>Without a clear, catchment-scale water balance assessment, the Draft EA/IS cannot demonstrate that Project-related water taking, discharge, and diversion will avoid adverse impacts on water quantity. Failure to account for cumulative changes at the catchment level may result in the dewatering of spawning habitats, reduced surface water availability for traditional harvesting, and altered navigability of water bodies relied upon for travel.</p> <p>Altering the catchment level water balance can lead changes in peatland hydrology, increasing risk of fire and loss of terrestrial habitat. These impacts would not only degrade ecological integrity but could also infringe upon Indigenous rights, limit access to culturally important areas, and erode community trust in the project's management of water resources.</p>	<p>Further planning and management programs are required to ensure that catchment-scale water balances are maintained. The Final EA/IS cumulative effects assessment should explicitly present catchment-level water balances that account for cumulative water taking, discharge, and diversion associated with project construction and operation. This analysis must demonstrate that project activities will not adversely impact water quantity at the catchment level. In addition, the assessment should identify and discuss sensitive areas and traditional uses within each sub-catchment (e.g., spawning habitat, traditional harvesting areas, navigable waters) to ensure these values are fully considered and protected.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Note that further hydrology/hydraulic analysis of water crossings will be undertaken by the ultimate owner/operator during the future detail design and permitting phase for the Project and can be shared with Nibinamik First Nation.</p>

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30.	Section 7.7 Cumulative Effects	Draft EA/IS Section 7.0 Surface Water	The cumulative effects assessment is insufficient to assure Nibinamik that water resources will remain protected. The proposed road crosses three secondary watersheds that feed major river systems, including the Winisk, Ekwan, and Attawapiskat Rivers. The assessment is restricted to the RSA, defined by quaternary watersheds crossed by the project. These arbitrary boundaries artificially limit the number of projects and RFDs considered in the cumulative effects analysis, overlooking the significance of these major river systems to Nibinamik and neighbouring Nations. Moreover, the assessment relies on other projects to implement site-specific mitigation measures, rather than providing a comprehensive evaluation of potential effects or coordinated strategies to minimize cumulative impacts.	The Draft EA/IS must include a comprehensive, watershed-scale cumulative effects assessment that extends beyond arbitrary quaternary watershed boundaries. This assessment should: <ul style="list-style-type: none"> <li>• Include all relevant projects and RFDs that may influence the Winisk, Ekwan, and Attawapiskat river systems.</li> <li>• Evaluate cumulative impacts on water quantity, quality, ecological integrity, and culturally important uses.</li> <li>• Identify coordinated mitigation strategies, rather than relying on other projects to implement site-specific measures, to ensure cumulative impacts are meaningfully reduced.</li> <li>• Explicitly consider the importance of these major rivers to Nibinamik and neighbouring Indigenous Nations, including ecological, cultural, and subsistence values.</li> </ul>	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).  The various projects considered extend beyond the boundary of the surface water RSA. However, we note that projected cumulative effects within the RSA were considered in the assessment.
<b>GROUNDWATER</b>					
31.	Section 8.2 Existing Conditions	Draft EA/IS Section 8.0 Groundwater	Ground elevations for well heads were determined using LiDAR imagery when available, or from the publicly accessible Canadian Digital Elevation Model (CDEM). The CDEM provides an accuracy of 0–5 m, whereas LiDAR offers a much higher resolution of 20 cm. Given that most wells are drilled to depths of less than 10 m, a 5 m elevation uncertainty could significantly affect the interpretation of water level measurements and the assessment of groundwater flow dynamics.	The use of LiDAR data is preferred to determine reliable groundwater elevation data. Groundwater elevations are used to determine groundwater-surface water interactions and potential impacts from dewatering. Using data that can have errors up to 5 m may introduce error into the Draft EA/IS and obscure potential impacts.  Nibinamik requests that groundwater elevations be improved through additional LiDAR data collection or ground validation. The Draft EA/IS should also be explicit in which groundwater elevations are determined by LiDAR versus the CDEM dataset, and the level of uncertainty tolerated by the assessment. The level of accuracy/uncertainty tolerated by the assessment must be justified with scientifically relevant documentation or guidance or improved to meet accepted standards.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Additional geophysical surveys are proposed for the Project, and the field work is in the planning phase. Once the field work is completed and the results become available, updated groundwater elevations will be used for detail design. The resolution or accuracy of the groundwater elevations will be documented by the ultimate owner/operator.

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32.	Section 8.2 Existing Conditions	Draft EA/IS Section 8.0 Groundwater	The TSIG requires that the Draft EA/IS identifies and describes the location of all springs, including their use, potential future use, and importance to Indigenous peoples. The Draft EA/IS indicates no seeps or springs were observed during field work, but “no targeted surveys for this water resource feature were conducted” (AtkinsRéalis, 2025h, p. 136). The lack of targeted fieldwork does not reflect the level of assessment needed to protect this water resource.	A target spring study should be conducted to strengthen the Draft EA/IS. The spring study program should be guided by Indigenous knowledge holders and land users, who may be aware of current or historic springs and include opportunity for participation by Nibinamik. Springs identified must be mapped, described, and assessed for potential effect pathways. Mitigation measures should be presented, including spring monitoring programs.  The Draft EA/IS should also discuss where in the study area conditions are favourable for springs (e.g., hill slopes, valley sides, soil permeability) and demonstrate how these areas were reviewed in the spring study.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Based on our groundwater field observations, review of background data sources and community engagement and consultation undertaken during the EA/IA process, no springs were identified. Further targeted or designated spring studies, field investigations, and/or consultation on this aspect will be consider by the ultimate owner/operator during the future detail design phase of the Project.
33.	Section 8.3 Identification of Potential Effects, Pathways and Indicators	Draft EA/IS Section 8.0 Groundwater	The Draft EA/IS proposes that the floating road design will avoid potential ecological consequences of peatland drainage. While floating roads can mitigate some impacts, they cannot be considered impact-free.  The feasibility and effectiveness of this design depend on site-specific conditions (e.g., peat depth, slope, in-situ strength), engineering design considerations (e.g., geotextile placement, road thickness, construction sequencing), and require robust monitoring to detect settlement and lateral displacement. The Draft EA/IS does not demonstrate that these factors have been fully considered, nor does it provide contingency plans in the event that site-specific conditions or design limitations reduce the effectiveness of the floating road as a mitigation measure.	The Draft EA/IS must demonstrate advanced planning and site-specific feasibility studies to demonstrate that the floating road design will be an effective mitigation measure.  Additional assessments should address potential changes to both groundwater quantity (i.e., road barrier effect) and groundwater quality (i.e., peat compression), Additional management and contingency planning, as well as a robust follow-up monitoring program should be developed to verify the effectiveness of floating roads as a mitigation measure. Contingency measures should clearly articulate situations where site conditions or design limitations may compromise the effectiveness of floating roads and provide available adaptive management measures. Nibinamik requests right of first refusal for the development and participation of follow-up programs.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Field investigations at peatlands are ongoing including geotechnical boreholes, Talon drill (non-powered equipment) boreholes and shallow monitoring wells and piezometers and groundwater level monitoring and quality sampling. Upon completion of the field work programs, further analysis will be undertaken to confirm predictions in the EAR/IS on the effects of the Project on peatlands/wetlands ,including follow-up monitoring and contingency plans proposed. It is expected these analysis will be completed during the future detail design phase by the ultimate owner/operator of the Project.
34.	Section 8.3 Identification of Potential Effects Pathways and Indicators	Draft EA/IS Section 8.0 Groundwater	Equalization culverts are another proposed mitigation measure to maintain hydrologic connectivity. The success of these culverts in maintaining drainage and hydrologic connection depends on the spacing and orientation (SarasSaraswati, 2020). These mitigation measures are especially important in low land areas, where no ditch drainage is proposed.	To ensure that culverts are installed as an effective mitigation measure, it is recommended that culvert placements and design should be developed by a qualified environmental professional. Culvert designs should also include strategies to monitor success and adaptive management plans.  Designs should demonstrate that stormwater and runoff will be effectively managed, peatland	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  The design of the equalization culverts will be further examined by team of structural engineers, hydrologists/hydraulic engineers, geotechnical engineers and hydrogeologists.  The effects of these culverts will be analyzed using modelling methods combined with groundwater and

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				hydrology will remain characteristic of baseline conditions, and that roadway flooding is mitigated.	surface water interactions, embankment loading, and peat settlement. The follow-up monitoring of water levels on both sides of the road will also be used as part of the monitoring plan to be further developed during the detail design phase of the Project.
35.	Section 8.3 Identification of Potential Effects Pathways and Indicators	Draft EA/IS Section 8.0 Groundwater	A preliminary water balance has been provided to satisfy the requirements of the TSIG but acknowledges that more sophisticated approaches are available. Nibinamik appreciates the preliminary estimates to support the impact assessment and supports that more detailed water balance modelling is needed to support the detailed design and impact assessment.	Nibinamik looks forward to a more sophisticated water balance to predict potential changes to groundwater quantity. As discussed in the surface water resources section, improved water balances should be conducted at the sub-catchment and watershed level to understand local and regional changes at hydrologically relevant scales. The Draft EA/IS should provide more detailed information on the proposed sophisticated water balance assessments, when this assessment will be complete, and information on how results from these detailed assessments will be used to inform the characterization of net effects, cumulative effects and mitigation measures.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further water balance analysis will be completed using more advanced modelling methods, e.g., numerical modelling at a watershed level, with additional data collected during the detail design phase.
36.	Section 8.3 Identification of Potential Effects Pathways and Indicators	Draft EA/IS Section 8.0 Groundwater	Nibinamik appreciates that monitoring will be conducted to assess settlement, serviceability and safety issues related to roads in peatlands during the operational phase.	Nibinamik requests further engagement to participate in the development and implementation of this monitoring program. Commitments for this program should be made clear in the Draft EA/IS mitigation measures. The program must also include adaptive management strategies and contingency plans. Nibinamik is very interested in the success of the floating road construction, as settlement and other issues may jeopardize the ability of the design to prevent changes to groundwater and surface water hydrology, risking the draining of peatlands.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator) A more detailed and comprehensive monitoring program will be developed during the detail design phase, where more analysis will be conducted. The results of these analyses will be used or referenced to further refine the monitoring programs.
37.	Section 8.3 Identification of Potential Effects Pathways and Indicators	Draft EA/IS Section 8.0 Groundwater	It is anticipated that 26,750 m <sup>3</sup> of sand and gravel will be required annually for roadway maintenance and repair, as well as for other project components. While it is encouraging that the Draft EA/IS considers repair quantities, it is concerning that this volume of material will ultimately be lost to the environment through erosion, ground compaction, or other pathways, not described by the Draft EA/IS. Material loss in this volume can potentially change surface water quality, alter performance of	The Draft EA/IS must address how the annual loss of 26,750 m <sup>3</sup> of sand and gravel from maintenance activities could affect groundwater and surface water resources. This evaluation should include discussions of potential effects for increased erosion and sedimentation, or compaction. Impacts to design features, like enhanced swales, should be discussed. Where risks are identified, mitigation measures, such as sediment control structures,	We consider this issue to be adequately addressed in the EAR/IS. Given the coarse nature of the repair and maintenance materials (sand and gravel), limited impacts on groundwater resources including recharge rates or volumes are expected associated with these operational activities.

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			enhanced swales and other drainage features, or clog soil pores reducing groundwater recharge.	regular monitoring, and adaptive maintenance practices, should be clearly defined by the Draft EA/IS.	
38.	Section 8.3 Identification of Potential Effects Pathways and Indicators	Draft EA/IS Section 8.0 Groundwater	Section 8.4.7 indicates that sewage effluent at construction camps and the MSF may be treated using septic tanks. However, mitigation measures in Table 8- 18 state that “no septic systems (with potential leaching chambers/beds) will be used for sewage treatment” (8-52).  Contradicting information undermines the effectiveness of mitigation measures and the assurance that groundwater quality will not be impacted. Improper septic management can cause nutrient loading, contamination, or other adverse effects on groundwater, surface water, and wetlands.	The Draft EA/IS should clearly identify and commit to a single sewage treatment approach for construction camps and the MSF. Inconsistencies between the assessment and mitigation tables must be resolved to ensure clarity and accountability. Sewage treatment methods should be supported by design details and monitoring plans that demonstrate how sewage effluent will be effectively managed.	1. Item will be addressed in the Final EAR/IS submission.  More detailed descriptions of septic tanks and leaching/tile bed options have been added to Sections 8.3.7 and 8.4.7. Note that the ultimate septic system and/or treatment facilities for domestic wastewater and sewage at construction camps and the Maintenance and Storage Facility will be determined in the detail design phase of the Project.  The mitigation measures in Table 8-18 will be updated to be consistent with the main text.
39.	Section 8.4 Mitigation Measures	Draft EA/IS Section 8.0 Groundwater	While mitigations for waste management are provided for the construction phase, there is no Waste Management Plan proposed for the operations phase. The MSF is a permanent project component where waste will be generated from sewage, greywater, and solid materials. If not managed, this waste can contaminate groundwater and surface water, posing risks to aquatic ecosystems, wetlands, and other sensitive habitats. Effective waste management is essential to protect the ecological integrity of area.  It is also noted that the effect pathway between solid waste management and surface water quality is not presented in the Surface Water VC assessment.	The Operational Environmental Management Plan must be updated with a waste management plan. The plan must demonstrate that changes to groundwater and surface water quality will be effectively mitigated. The waste management plan must consider solid waste, wastewater, grey water, and hazardous waste that could be generated at the MSF during operations. Mitigations must be robust to prevent accidental wastewater discharge or illegal dumping during operations.  The Surface Water VC Assessment must also be updated to include potential effects and mitigations for solid waste.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  The addition of a Waste Management Plan for the operations phase will be prepared by the ultimate owner/operator and presented as a subcomponent plan of the OEMP, when detail design drawings of the MSF and other facilities are available.
40.	Section 8.4 Mitigation Measures	Draft EA/IS Section 8.0 Groundwater	Water Quality Monitoring, as described in Appendix E, is identified as a proposed measure to mitigate potential changes in groundwater quality resulting from concrete foundations. However, the Water Quality Monitoring Program does not include specific commitments to monitor <i>groundwater</i> , nor does it propose monitoring for pH. This is a significant concern because changes in pH could adversely affect wetlands and other sensitive aquatic ecosystems. Additionally, concrete is known to leach toxic chromium (VI).	Nibinamik requests that the water quality monitoring program is improved to include site-specific commitments for groundwater monitoring. The water quality monitoring program must include specific provisions for groundwater monitoring, including monitoring locations and parameters.  Groundwater monitoring locations should consider groundwater-surface water connections, peatlands, and the locations of impactful structures or activities (e.g., blasting sites, concrete footings). Water quality parameters must include relevant indicators such as pH, alkalinity, ORP and	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  More detailed and comprehensive groundwater and surface water quality monitoring plans are proposed to be developed during the detail design phase. Treatment and disposal of wastewater including process water (in any) will be detailed in the waste disposal measures.

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				<p>chromium (VI). Monitoring must be conducted near concrete foundations at both surface water and groundwater sites, as well as in connected wetlands. The monitoring program should include reporting measures and communication tools to inform Nibinamik and other users of the area if changes to groundwater are detected. Adaptive management strategies should be clearly included in water quality monitoring programs, and monitoring should continue until review by a qualified environmental professional identifies risk to groundwater or surface water quality has been mitigated.</p> <p>It is also recommended that all concrete wash water is removed and treated or disposed of off-site to provide robust environmental protection. Details of concrete wash water management should be outlined as a mitigation measure in the CEMP.</p> <p>Nibinamik requests further consultation and opportunity for participation in the development and execution of water quality monitoring programs.</p>	
41.	Section 8.4 Mitigation Measures	Draft EA/IS Section 8.0 Groundwater	<p>Nibinamik finds instances where the Draft EA/IS presents mitigation measures in principle but does not translate them into concrete, actionable, or enforceable management activities. For example changes to groundwater quality are proposed to be mitigated by a program which does not monitor groundwater.</p> <p>Further, commitments have been made to Groundwater Management Plan in the consultation record, yet this plan has not been included in the mitigation measures, construction plans, or operational plans. Failure to execute mitigation measures eliminates their effectiveness in protecting groundwater and dependent ecosystems.</p>	<p>Nibinamik requests the Draft EA/IS is improved to ensure that all proposed mitigation measures and management commitments have been translated into actionable management plans, or other measures to ensure implementation. The Draft EA/IS should also ensure that consistent information is presented throughout.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>We examined and reviewed the mitigation measures and manage plans to make sure the commitments or monitoring plans are consistent throughout the EAR/IS.</p>

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42.	Section 8.4.1 Vegetation Clearing and Grubbing	Draft EA/IS Section 8.0 Groundwater	<p>The Draft EA/IS downplays the challenges associated with peatland restoration.</p> <p>Temporary supporting infrastructure is proposed to be restored to baseline conditions after construction; however, the restoration of peatlands is inherently complex. This is particularly true for groundwater-fed fens, which are known to be difficult to rehabilitate successfully (Rodney A Chimer, 2017).</p> <p>It is also concerning that the stripping and removal of peat is characterized as a net benefit to groundwater quantity. While recharge rates may increase locally, the removal of peat will cause barrier effects and potentially disrupt regional peatland complexes, presenting a negative effect.</p>	<p>Given the challenges of restoring groundwater-fed peatlands, additional information is requested to demonstrate the efficacy of reclamation plans. The Draft EA/IS should provide evidence that demonstrates reclamation feasibility and expected timeframes. Further justification should address that potential changes to groundwater quantity, surface hydrology, and peatland function can be effectively reversed as validated by monitoring data. Further mitigation planning should be conducted in consultation with Nibinamik to ensure that ecologically and culturally significant areas are identified and protected, and that the placement of temporary infrastructure avoids sensitive locations.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Temporary or permanent infrastructure locations will be refined in the detail design phase of the Project where practicable be located away from peatlands or wetlands to avoid and/or minimize the disturbance and restoration of the peatlands.</p>
43.	Section 8.4.5 Dewatering / Pumping	Draft EA/IS Section 8.0 Groundwater	<p>The information presented in the Draft EA/IS has not demonstrated that impacts from quarry and aggregate pits are fully mitigated:</p> <ul style="list-style-type: none"> <li>• Conflicting information has been presented on the presence of groundwater at ARA-4. Review of borehole logs indicate groundwater elevations at 1 to 2 mbgs at WQA-6 and WQA-7, respectively.</li> <li>• Quarry reclamation plans have not been provided to assure Nibinamik that site conditions will be restored to baseline hydrologic function.</li> </ul> <p>Quarries and pits are known to alter groundwater levels, flow pathways and increase the risk of sediment runoff, which may degrade aquatic habitat quality.</p> <p>Quarries strip natural vegetation, creating preferential flow pathways for groundwater recharge, where chemicals or fuels used in quarrying may be spread to groundwater more easily.</p>	<p>Nibinamik requests capacity support to be actively involved in the consultation and review of aggregate pit applications. Future permitting of these sites may require additional monitoring and assessment to ensure that potential impacts are fully identified and mitigated. As stewards of the land, Nibinamik's involvement in consultation and review processes is essential to ensure that assessments account for culturally and ecologically sensitive areas, and that mitigation measures are effectively implemented to protect connected water resources and dependent ecosystems.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>It is our understanding that the Ministry of Energy and Mines (MEM) has implemented a Participant Funding Initiative (PFI) which provides funding support for eligible Indigenous communities to participate in consultation engagements related to the WSR project.</p> <p>The potential impacts of construction and operation of aggregate pits will be further examined in the detail design phase to support the permit application under Aggregate Resources Act, including hydrogeological study report(s). Reclamation and monitoring plans will also be developed during the permit application process and will become part of the permit terms and conditions to be observed and implemented during construction and operations of the aggregate pits/quarries.</p>

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44.	Section 8.4.6 Road Construction	Draft EA/IS Section 8.0 Groundwater	Road construction may compress peat, reducing permeability, changing groundwater flow directions and pathways, or alter groundwater quality. Despite these effects, “no further assessment is provided here due to uncertainty” (AtkinsRéalis, 2025, pp. 8-48). While a pre- and post-construction monitoring program is proposed, this language creates concern that project effects are not fully understood. Nibinamik remains concerned that road construction will alter regional and local hydrology, and risk peatland drainage.	Nibinamik understands the challenges associated with road construction on peatland. However, Nibinamik cannot accept that changes to groundwater quantity and groundwater quality from road construction are considered not significant while impacts are uncertain or not assessed. The Draft EA/IS should propose additional contingency measures, monitoring programs, adaptive management plans, and follow-up programs to help manage the uncertainty associated with road construction. Nibinamik requests further consultation in the development and execution of such programs.	See the response to Comment #33
45.	Section 8.5 Characterization of Net Effects	Draft EA/IS Section 8.0 Groundwater	<p>Nibinamik appreciates that preliminary estimates of dewatering rates and potential drawdown have been provided at this point in the assessment, however Nibinamik requires more hydrogeologic investigation is completed to understand potential impacts to groundwater resources, and well as the how changes to groundwater will impact surface water and wetlands. Technical deficiencies in the current assessment support Nibinamik’s request:</p> <ul style="list-style-type: none"> <li>• The ZOI is described as “not anticipated to extend beyond the LSA,” “may extend slightly beyond the LSA,” or “could range from a few metres to a few hundred metres” (p. 856). Inconsistency and a high level of uncertainty suggest that potential affects to groundwater are not well understood.</li> <li>• Consideration of site-specific heterogeneity in hydraulic conductivity is not explicit.</li> <li>• The methods used to estimate the ZOI for structure foundation is not provided.</li> <li>• Groundwater drawdown is assumed at 4 m and sensitivity of this parameter on drawdown is not assessed.</li> <li>• The location and number of supply wells for construction are not known, meaning site-specific hydrogeologic characteristics are not considered in the assessment, nor the potential for overlapping drawdown.</li> <li>• The Theis method is applied to estimate</li> </ul>	<p>Nibinamik requires more robust hydrogeologic studies are conducted to support conclusions of the Draft EA/IS. These studies must be grounded in site-specific data and robust hydrogeologic modelling.</p> <p>Operational plans, such as sequenced extraction to reduce the dewatered area, must be clearly presented along with feasibility assessments or other justification.</p> <p>The Draft EA/IS must demonstrate coherence between the estimated ZOI determined through hydrogeologic modelling and monitoring. The ZOI should consider the cumulative impacts of multiple dewatering activities, site-specific heterogeneity, and sensitive receptors within the ZOI.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The dewatering assessment including groundwater drawdown, ZOI and dewatering volume will be further refined in the detail design phase of the Project. At that time, additional data will be available including geophysical surveys, geotechnical and hydrogeological investigations and detail design drawings for aggregate pits, structures, construction camps and other temporary and permanent facilities. With supplemental data and information, the dewatering assessment will be further refined to provide more and accurate estimates/results and used to secure applicable permits.</p>

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			<p>drawdown for the supply wells. The Theis method is applicable to confined aquifers, where corrections can be made for unconfined conditions (e.g., Jacobs method). Confined conditions have not been confirmed, nor has the Jacobs correction been applied, potentially underestimating the ZOI.</p> <ul style="list-style-type: none"> <li>The assessment assumes one tenth of the area will be dewatered at a time (200 m by 200 m), without justifying how this will be feasible in an open aggregate pit.</li> </ul> <p>The role of groundwater in sustaining surface water systems and peatlands is well established. For Nibinamik, it is therefore a priority that groundwater resources are carefully managed to avoid ecological disruption to the landscapes that support the community's ability to exercise traditional practices.</p>		
46.	Section 8.5 Characterization of Net Effects	Draft EA/IS Section 8.0 Groundwater	<p>Further to Comment 45 above, the effects assessment has not clearly described how dewatering activities could affect site- specific ecologically sensitive or culturally important areas. Dewatering can alter groundwater levels, reduce baseflow contributions to streams and wetlands, and disrupt hydrological connections that sustain sensitive habitats. These changes may in turn impact culturally significant landscapes.</p>	<p>It must be demonstrated that ecologically sensitive or culturally important areas will not be disrupted by dewatering. Further capacity support should be provided to Nibinamik to identify and map these areas through a TKLUS study. Site-specific maps should be developed to display the ZOI relative to ecological features (e.g., spring, wetlands, habitat, surface water). Specific mitigation measures, such as monitoring and adaptive management plans, must be developed to mitigate impacts to site-specific features within the ZOI. Assessments of the ZOI must be grounded in robust hydrogeologic modelling and consider the effects of cumulative or overlapping water taking activities.</p>	See the response to Comment #45
47.	Section 8.3 Identification of Potential Effects, Pathways and Indicators. Section 8.1.2 Spatial and Temporal Boundaries	Draft EA/IS Section 8.0 Groundwater	<p>The cumulative effects assessment should be completed at the regional scale (i.e., VC specific RSA). No RSA has been defined for groundwater resources, with the justification that "potential effects on groundwater resources are not expected to extend beyond the LSA" (EIS, p. 8-17).</p> <p>Furthermore, the LSA is limited to prescribed buffers of 1 km and 500 m from the road and support infrastructure, without regard for ecological or hydrologically relevant boundaries.</p>	<p>The cumulative effects assessment should adopt study areas that are regionally and hydrologically relevant, such as watershed or aquifer boundaries. This approach is necessary to ensure that regional-scale changes to groundwater are meaningfully identified, assessed and mitigated. By grounding the assessment in ecologically appropriate boundaries, the integrity of interconnected ecosystems can be better protected to support Nibinamik's continued stewardship of the land and ability to exercise</p>	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).

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			Without a study area that is defined on regional and hydrological terms, the cumulative effects assessment cannot meaningfully identify, assess, or mitigate impacts at the regional scale.	traditional land use and cultural practices. An enhanced cumulative effects assessment is necessary to inform an RA which should be completed prior to regulatory decisions on this Project.	
<b>ATMOSPHERIC ENVIRONMENT</b>					
48.	Section 9.1.6 Identification of Project Interaction with Atmospheric Environment and Section 9.3 Identification of Potential Effects, Pathways and Indicators	Draft EA/IS Section 09 Atmospheric Environment	In Section 9.1.6 Project components expected to have potential effect on the atmosphere are not identified, instead a catch-all project component was developed for emissions, discharges, and wastes. This is designed to replace the need for outlining if there will be potential effects from the change in air quality, GHG emissions, vibration, sound and light for individual aspects of construction and operation.  In Section 9.3 the pathway of effects identifies specific project components and the pathway for those components to create a potential effect, however, not clearly encompassing all project components.	Sections 9.1.6 and 9.3 should be aligned to provide a consistent and complete list of project components that may cause atmospheric effects. This will reduce uncertainty whether all relevant components are considered in the assessment. The lack of alignment raises concern that some sources of effect have been excluded. For example, See recommendations 49 and 50 below. The lack of congruency between these section highlights that there may be project components with potential effects that are not included in the effects assessment.	All activities listed in Table 9-11 include project components that may generate pathways for air emissions, noise, and other wastes. This is the rationale as to why they were combined within a single activity “Emissions, Discharges and Wastes (e.g., air, noise, light, solid wastes, and liquid effluents)” applicable to each project phase. It encompasses all the concerns noted by the commenter as checkmarks were added for air quality, GHG emissions, sound level, vibration levels and light levels. Based on the above no revisions to Table 9-11 are proposed.  As cited in the notes for Table 9-11, “Emissions, Discharges, and Wastes (e.g., air, noise, light, solid wastes, and liquid effluents)” are generated by many project activities. Rather than acknowledging this by placing a checkmark against each of these activities, “Emissions, Discharges, and Wastes” is included as an additional component under each project phase.
49.	Section 9.3.1 Change in Air Quality Section 4.4.2.2 Vegetation Clearing and Grubbing Section 4.3.3.6 Storage of Fuels, Explosives and Wastes Section 4.4.2.8 Potential Emissions, Discharges, and Wastes	Draft EA/IS Section 09 Atmospheric Environment	This section identifies the use of vehicles and combustion engines as the only source of potential effects on air quality. This ignores the other project components: <ul style="list-style-type: none"><li>• Non-mobile equipment will be present.</li><li>• The project description includes burning as a means to manage non- merchantable timber.</li><li>• Fuel storage is anticipated, along with waste from heavy oil which may release emissions.</li><li>• Domestic waste may be treated on site.</li><li>• Dust will be created from quarries, stockpiles, construction, and road operation.</li></ul> The air dispersion modelling completed in section 9.3.1.2 and 9.3.1.3 do include dust but not consistently; quarry operation dust is excluded from operation phase assessment. Neither the operation	It is recommended that even minimal potential contributions to effects are discussed and evaluated as part of the air quality assessment in the Final EA/IS. To assist in ensuring all potential impacts are considered, it is further recommended that the list in Section 9.1.6, identifying project component contributing to atmospheric effects, is completed in alignment with the project description (specifically Section 4.4.2.2, 4.3.3.6 and 4.4.2.8) to ensure the full spectrum of potential effects is captured for alignment throughout the Draft EA/IS. The exclusion of potential impacts from the air dispersion modelling suggests that either the mitigations should be 100% effective in eliminating the impact,( i.e., absolutely no burning should take place, and MSF power should be from renewable	As detailed in the Air Quality Impact Assessment Report (Appendix G), there are inherent uncertainties associated with meteorological datasets, assumptions on emission factors for types of vehicles and equipment, day-to-day construction activities during the construction phase and traffic volume and types of vehicles on the WSR during the operation phase. However, the overall assessment of air quality is still considered to be conservative because the emission factors used the air dispersion model represent maximum standards to achieve, meaning the modelling results are likely to be higher than those that would be measured when the project construction and operation activities take place. When the road surface will be fully surfaced with asphalt or chipseal, it will result in much lower TSP, PM10 and PM2.5

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			phase nor construction phase assessment include emission from burning. The operation phase assessment also does not include MSF emissions from power generation.	energy) or the modelling should be adjusted to accommodate all potential emission sources.	concentrations in air and dustfall on the ground in the immediate area of the road. The confidence in the effectiveness of the proposed mitigation measures to reduce air emissions is high because most of the mitigation measures are known to effectively reduce the source of air emissions (e.g., lower fuel consumption is directly proportional to lower air emissions).
50.	Section 9.1.2 Consideration of Input from Engagement and Consultation Activities and Section 9.3 Identification of Potential Effects, Pathways and Indicators	Draft EA/IS Section 09 Atmospheric Environment	Dust and Particulate matter are noted to be primary air contaminants from dispersion modelling and persist despite the mitigation which is primarily road watering. Nibinamik members have noted the reduction of water levels, and uncertainties about water associated with climate change. Furthermore, the consultation feedback provided in Section 9.1.2 calls for long-term dustfall monitoring to understand the effectiveness of mitigations and address potential rights and environmental impacts. While the project description notes that gravel sections may eventually be resurfaced with asphalt (a good dust mitigation), this is a long-term solution and does not address short-term impacts.	To improve the performance of mitigations for dust and particulate matter it is recommended that the project consider road applications with a longer-term effectiveness than water. In comparison with other road applications water has a relatively short-term ability to mitigate dust, however, this must not be interpreted that there is a preference for chloride-based products or that the effects of other chemical applications are acceptable. Impacts of dust must not be traded for the impact from other potential chemical applications; Nature-based alternative solutions should be applied to improve effectiveness of dust mitigation; and selected under the provision of Free Prior and Informed Consent. To ensure the mitigations are successful, a dustfall monitoring program should be established for construction and early operation. This should be paired with particulate monitoring at potentially affected sensitive (human occupancy) receptors. Receptors should be established through reconsideration of the spatial boundaries (see comment 51).	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The recommendations noted by the reviewer will be considered.
51.	Atmospheric Environment Section 9.1.5 Spatial and Temporal Boundaries	Draft EA/IS Section 21 Cumulative Effects Assessment and Section 09 Atmospheric Environment	The LSA for air quality is a 1km buffer from the road centreline and a 500m buffer from temporary infrastructure. The RSA adds 5km to the LSA. These boundaries delineate the reasonably foreseeable projects included in the cumulative effects assessment. This boundary of the RSA and LSA ignores literature addressing particulate and dust transport from industrial activities, indicating movement can be up to hundreds of km from the source. Fine particulate matter (PM2.5), including road dust source, have	It is recommended that the RSA be expanded to cover the potential extent of air quality impacts. There are more reasonably foreseeable projects that will interact with the RSA (especially if extended appropriately), this include local Webequie sources as well as farther afield industrial activity. It is recommended that a much more robust and reasonable cumulative effects assessment is undertaken to comprehensively address the air quality and the Project contribution to cumulative	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). The RSA for the air quality assessment was established and identified in Atmospheric Study Plan early in the EA/IA process and was also presented for feedback from Indigenous communities as part of engagement and consultation opportunities for the Project.

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			<p>demonstrably had impacts from 10-30 km from sources and up to 100 km under favourable weather conditions (Phillips-Smith, et al., 2017) (Horb, et al., 2022) (Landis, et al., 2019).</p> <p>Further the reasonably foreseeable project list does not include potential forestry or other road projects and local Webequie sources affecting air quality such as the power plant.</p> <p>The Draft EA/IA consideration of air quality does not sufficiently meet the IAAC guidelines on cumulative effects assessment, nor does it apply appropriate spatial boundaries for the assessment of effects on the air environment.</p>	<p>effects, especially considering it is the gateway to Ring of Fire development.</p> <p>Accommodation measures to support reducing air emission should be considered, such as technology upgrades to the Webequie power plant. Mitigation to further reduce Project emissions should be employed such as renewable sources of energy for the camps and MSF.</p> <p>Additionally, given that the Draft EA/IA claim local vegetation will mitigate air quality impacts there should be offsetting measures to preserve pristine land and vegetation that will “act as physical barriers” (2025, pp. 9-116) to air contaminant dispersion.</p>	
52.	<p>Draft EA/IS Section 9.3.3 Change in Sound Levels</p> <p>Section 9.5 Characterization of Effects Section 4.4.2 Construction Phase Activity</p> <p>Appendix J Section 13.2 Construction Noise - General Construction Activities</p>	<p>Draft EA/IS Section 09 Atmospheric Environment and Section 04 Project Description and Appendix J: Noise and Vibration Technical Report</p>	<p>Appendix J assumes that road construction will progress at 100m per day. With the road being 107km long this would dictate a construction timeline of 3 years. Currently the Project is predicting 5 to 6 years of construction meaning construction will progress at a rate of approximately 50m or 60m each day, doubling the noise exposure timeline.</p> <p>Additionally, with a 1.5km radius as the exposure boundary this indicates that point receptor could experience noise for approximately 1 month, not the predicted one week. This estimate is not applicable to bridge construction, which is wholly different from the basic road construction expected progress of 50-60m daily.</p> <p>Receptors at bridges will experience noise for an extended period. Additionally, the NSA's were identified based on Indigenous rights and interests including traditional land uses (for a select portion of the representative local Indigenous communities– Nibinamik excluded). As such, to conclude that no additional considerations beyond best management practices are warranted may result in rights impacts. Traditional land uses are typically seasonal in nature and the further exclusion of timing criteria from the net effects assessment ignores the values or purposes of NSAs.</p>	<p>It is recommended the net effects assessment consider the timing of effects as this is an important criterion for traditional land use and understanding noise impacts.</p> <p>For all NSAs it is recommended that a construction schedule is developed collaboratively with the land users to avoid periods of land use, as well as a notification process to advise other potential land users of the location and timing of noise activities. This includes helicopter fly paths and blasting noise with consideration for wildlife movement patterns and avoiding noise disruptions to wildlife that has the potential to affect NSA's and traditional land use in general.</p> <p>While Nibinamik agrees with the mitigation in place, the complaint and investigation process should include that the issues can be brought directly to the construction contractor or operation and maintenance contractor. This process must include accountability for communicating resolutions or changes in general noise management practices to ensure rights are appropriately addressed. This is especially important as there is no proposed mitigation beyond best practices, and it is unclear that the assessment includes all potential noise sources (see comment 53).</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>

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53.	Section 7.2.2 Assumed Noise Sources and Section 2.3 Identification of GHG emissions Sources	Appendix J Noise and Vibration Technical Report and Appendix H GHG Emissions Technical Report	Construction camps are considered as receptors but can also be sources of noise. It is not clear that the noise sources extend to camp operations. Nibinamik members have already expressed concern about helicopters scaring off moose from mining exploration. WSR construction will be using helicopters to support the movement of personnel and supplies to construction camps before road access is available. However, the use of helicopters was not considered in the noise assessment. This impacts Nibinamik's rights to hunting.	Noise from camps such as generators and helicopter transportation should be considered to ensure the assessment accurately predicts effects and impacts. Noise from helicopters should be considered and mitigated. Flight paths should avoid areas used for hunting, and account for wildlife movement and patterns/use areas, to avoid sensitive periods.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The extent of helicopter use for construction is currently unknown. Potential effects of helicopter noise on are qualitatively discussed in Section 12 of the EAR/IS.
54.	Section 9.4.3 Mitigation Measures - Noise and Vibration	Draft EA/IS Section 09 Atmospheric Environment	As discussed above, vegetation is noted as barrier to air emission dispersion—the same is true for noise. While operational noise is expected to be limited this does not detract from the potential ability to address long-term noise and air quality through the same mitigation of vegetation management, especially adjacent to gravel surfaces and quarries. Other consideration for long-term mitigations are absent. Nibinamik has already experienced disruptions to traditional land use from industrial noise. This Project would introduce additional noise, both directly and indirectly, by facilitating further industrial development in the region. To meaningfully address the long-term effects on rights, it is essential that all Projects contributing to regional development in this sensitive landscape adopt enhanced mitigation measures to limit cumulative noise impacts. Given that the Regional Impact Assessment may not be completed prior to decision making on this EA/IS, it is particularly important to identify potential long-term mitigation strategies now, or at minimum commit to implementing any additional measures that may be recommended through the Regional Assessment.	It is recommended that noise mitigations encompassed in the Draft EA/IS include design considerations, and that a component of the design consideration includes: <ul style="list-style-type: none"> <li>Trees to provide noise buffering capacity. Where there are no trees along the edge of the ROW, appropriate species should be selected and planted in sufficient density to support the establishment of long-term sound barriers for NSAs.</li> <li>Where fill placement will support buffering receptors from noise impacts, the use of engineered terrain must be considered as part of the design. It is acknowledged that the cut fill balance has not been determined, and the movement of material has additional environmental impacts, this solution must be weighed against other potential impacts and should form a component of consultation through the design phase for joint decision making.</li> </ul>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Noise mitigation measures will be further evaluated during detail design phase for the Project and will be documented in Construction Environmental Management Plan. Trees will be considered in NSAs where appropriate.
55.	Section 9.5.2.2.1 Change in GHG during construction phase, Section 9.5.2.2.3	Draft EA/IS Section 09 Atmospheric Environment	Nibinamik members raised concerns about how climate change is already impacting their lives, including increased wildfire risk, unreliable winter roads, and reduced safe access to the land. While the Draft EA/IS acknowledges global climate trends and the fact that the Projects' contribution to GHG emission is the result of creating access to the Ring	The GHG cumulative effects assessment should include emissions from foreseeable regional projects like additional roads, mining, and forestry. While climate change is global, reducing GHGs also benefits local air quality. The Draft EA/IS lacks adequate cumulative assessment and project-specific GHG mitigation,	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference and federal Tailored Impact Statement Guidelines. The Cumulative Effects Assessment (CEA) methodology in the EAR/IS followed the requirements

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	Effects of the Project on Canada's Carbon Footprint and Carbon Sinks, Section 9.7 Cumulative Effects Section 9.4.2 GHGs and Section 9.5.2.2.2 Change in GHGs During Operation Phase		<p>of Fire, it fails to assess cumulative GHG effects from foreseeable linked developments – and there will be growth-inducing effects (see Section 2.16). This gap limits understanding of how the Project may worsen climate risks and undermine First Nations land access, mobility, and cultural continuity. Furthermore, based on the inadequate cumulative effects assessment and general conclusion that GHG impacts are not significant there are no climate-specific mitigations.</p> <p>A more thorough assessment is needed to address these rights-based impacts. GHG specific mitigations are required to meaningfully address project impacts.</p> <p>This includes consideration that the MSF will be powered by a diesel generator set representing 35% of the GHG emissions during operations yet there are no mitigation measures or considerations to replace these generators for another power source.</p>	<p>which conflicts with rights-based impact considerations and IAAC guidelines. Nibinamik recommends deferring WSR decisions until:</p> <ul style="list-style-type: none"> <li>• A Cumulative Effects Assessment of GHG is complete, expanding the Project's GHG scope to include lifecycle emissions (account for camps operations and long-term aggregate operation), and</li> <li>• There are Project-specific mitigations incorporating: <ul style="list-style-type: none"> <li>○ Low-carbon procurement strategies (such as low-carbon road materials)</li> <li>○ Low-maintenance designs (durable material and design standards that reduce the need for road repair)</li> <li>○ Vegetation management to promote roadside carbon sequestration (preferencing carbon sequestering plants over riprap).</li> <li>○ Renewable energy to replace reliance on diesel generators at the MSF and quarry sites.</li> </ul> </li> </ul>	defined in the approved TISG and ToR. Per the Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act (the Policy Framework) the CEA should consider future physical activities that are either certain or reasonably foreseeable. Without publicly available information relating to these future physical activities, the ability to predict cumulative effects will lack reliability.
56.	Section 3.1.7 Biomass Clearing Section 3.1.7.1 Living Biomass	Appendix H - Assessment of GHG Emissions	<p>Living biomass (peatlands, vegetation) along the ROW, temporary workspaces and permanent maintenance areas will be removed or covered during construction, this will effectively remove carbon sinks, lowering carbon sequestration capacity for the region.</p> <p>This aspect of the project is acknowledged to be the most significant source of GHG emissions and it likely to be repeated when additional linear infrastructure (power and communications) is installed to support the mining industry and growth-effect in Webequie. An important future consideration for addressing climate change and regional GHG emissions is electrification. And another potential opportunity within the corridor is communication infrastructure.</p>	<p>Aside from properly addressing this reasonably foreseeable future impact, which is recommended in 55 above, there could be practical considerations to reduce cumulative effects. Knowing that the disruption of biomass is a significant contribution the Project should be seeking to reduce the potential future impact from other linear projects by integrating– through simultaneous operations - any other connectivity at the same time as road construction to reduce future foreseeable GHG emissions.</p> <p>A benefit of which would be the reduction of operational GHG impacts from power requirements at the MSF and quarries.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The proponent is committed to develop and implement an Energy Management Plan that will include guidance to reduce operational GHG emissions.</p>
57.	Section 9.5.2.2.3 Section 9.7 Cumulative Effects	Draft EA/IS Section 09 Assessment of Effects on the	The Draft EA/IS compared the project emissions with provincial and national emissions leading to the conclusion that the Project will not have significant	It is recommended that the significance of the project is not evaluated in such a way that it inherently results in a favourable outcome, negating a cumulative effects assessment. A	See the response to Comment #55

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		Atmospheric Environment	GHG emissions. It is a broad total which dilutes the consideration of significance and potential impacts.	<p>better comparison would be to evaluate the current project scope:</p> <ul style="list-style-type: none"> <li>• With consideration for foreseeable project including the development of the Ring of Fire (see Section 2.16).</li> <li>• Against what emissions would be if a low-carbon design and project scope was implemented (A number of best practices and lower-carbon construction and operation alternatives are presented here as examples).</li> <li>• Against IPCC Net-Zero Roadmap benchmarks for infrastructure compatibility with 1.5°C/2°C scenarios.</li> </ul>	
58.	n/a	Draft EA/IS Section 09 Assessment of Effects on the Atmospheric Environment	The Project is designed to enable mining and related development of the Ring of Fire area, and the potential atmospheric effects of this development are not fully characterized. Nibinamik highlighted that the community is already experiencing the impacts from acid rain related to regional development. Mining is a common contributor to this phenomenon and is excluded from the Draft EA/IS atmospheric impacts.	Nibinamik reiterates the above recommendation to reevaluate the significance determination and cumulative effects from this Project, which must also consider the acid rain generating capacity from the potential Ring of Fire mine developments.	See the response to Comment #55
<b>FISH AND FISH HABITAT</b>					
59.	Section 4.6 Management Plans	Draft EA/IS Section 4 Project Description	The descriptive framework for developing the CEMPs and OEMPs are conspicuously missing any mention of collaboration with First Nations communities, or inclusion of First Nations as reportees for any reporting/documentation.	Nibinamik asserts that First Nations communities must be included in development of the plans and therein must also receive any monitoring reporting to ensure adequate oversight.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
60.	Section 10.1.5.1 Spatial Boundaries	Draft EA/IS Section 10 Assessment of Effects on Fish and FishHabitat	Proponent has defined LSA as a buffer (1 km / 500 m) around the preferred. Nibinamik is concerned that this ignores how impacts are imparted in aquatic systems - water will convey impacts beyond imaginary boundaries.	Nibinamik requests that the Fish & Fish Habitat LSA should be based on downstream watershed or waterbody boundaries.	While most direct impacts are anticipated within 1 km LSA, the potential for effects beyond this boundary are addressed in the Regional Study Area (RSA). The RSA includes the LSA extending on either side of the LSA boundaries to include the area of the tertiary watersheds crossed by the recommended preferred route. The RSA covers the area of indirect and cumulative effects of the Project in a broader regional context. Both the LSA and RSA are considered by the regulators to be adequate to characterize and assess direct and indirect impacts to fish and fish habitat. The RSA boundary has been corrected on Figures 10.2 and 10.3.

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61.	Section 10.1.6 Table 10-5 Project Interactions with Fish and Fish Habitat VC and Potential Effects	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Nibinamik is extremely concerned about the implications of increased access bringing higher fishing and hunting pressure to their territory. Therefore, all project components that have the potential to facilitate access must be appropriately assessed.	Nibinamik requests that " <i>Vegetation clearing and grubbing</i> " and " <i>Construction and use of supportive infrastructure</i> " be included in the assessment for 'Change in Public Access to Fish/Fish Habitat'.	1. Item will be addressed in the Final EAR/IS submission. "Vegetation clearing and grubbing" and "Construction and use of supportive infrastructure" have now been checked off in Table 10-5. As these activities are a subset of road construction, they do not affect conclusions in the assessment.
62.	Section 10.1.6 Table 10-5 Project Interactions with Fish and Fish Habitat VC and Potential Effects	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The breadth of impacts is not fully considered within the Draft EA/IS and missing essential conditions results in both gaps in the assessment and development of mitigation.	'Emissions, Discharges and Wastes' should have a checkmark for "Alteration, Disruption and/or Destruction/Loss of instream habitat" (chemical/vibration/discharge) AND "change in access" (i.e., creates barrier to fish passage) for both the construction and operation phases. Road runoff drainage (operation discharge), especially at bridges, has the ability to impact fish and fish habitat. Appropriate mitigations to prevent road runoff from directly entering fish and fish habitat must be established.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The checkmarks have been added as requested. The appropriate mitigation measures will be addressed in the detail design phase of the Project and documented in the CEMP and OEMP.
63.	Section 10.2.1 Existing Conditions: Methods	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Nibinamik understands that field surveys specifically targeted crossings due to increased likelihood of potential effects to Fish & Fish Habitat. However, the preferred route (as shown in Figure 10.1) appears to run adjacent to a number of waterbodies. Nibinamik is concerned about the high likelihood that clearing/grubbing will impact the riparian area of these waterbodies, but they were not characterized during existing conditions studies.	Nibinamik requests that, at minimum, a few representative sites be chosen to characterize the small waterbodies that are likely to have their riparian areas impacted by vegetation grubbing/clearing. This information should then be brought forward into the effects assessment for the construction phase.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The addition of further representative sampling sites will be considered in the future detail design phase of the Project by the ultimate owner operator.
64.	Section 10.2.1.2.1 Fish Habitat and Fish Community Surveys	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent states: " <i>the assessed waterbodies are presented in Figure 10.3</i> " however it is unclear based on Figure 10.3 whether fish community was sampled in lakes adjacent to the proposed route that did not have a crossing.	Please clarify whether these adjacent lakes were samples for fish community. If not, please provide robust justification for their omission.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Fish sampling was not completed at many of the labelled stations presented in Figure 10.3 and Table 10-7 due to safety and helicopter access issues. Adjacent lakes were not sampled. Only Winisk Lake and Bender Lake were sampled directly as they were crossing sites. Additional sampling will be considered e during the detail design phase, but extrapolation is possible in many cases for fish species likely present in waterbodies.

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65.	Section 10.2.1.2.2 Spawning Surveys	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Proponent claims spring spawning surveys were conducted to determine "...the extent of spawning habitat..." yet only 3 locations were surveyed.  Walley and Lake Sturgeon are both highly valuable species to Nibinamik, and ensuring their protection is a key concern for community members.	Please complete more robust spawning surveys to ensure accuracy of the characterizations (see also Comments 69, 96, below).  Please explain how surveying 10% of the crossings is sufficient for determining the extent of spawning habitat / use in the LSA.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Spawning survey sites were limited due to safety and helicopter access issues. Three spawning locations is a minimal dataset, but any sites where there is potential for the fish species (See Table 10-7) and has suitable spawning habitat will be considered to have fall/winter and spring spawning. Visual spawning surveys were not feasible as no helicopter flights allowed after sunset.  Additional sampling, as required, will be considered during the detail design phase of the Project on a crossing-specific basis and where applicable to meet expected permitting requirements.
66.	Section 10.2.1.2.4 Environmental DNA (eDNA) Sampling	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent collected eDNA from nine locations, four of which were already sampled by other methods.  eDNA is an effective low-cost tool for evaluating fish species presence.  Nibinamik is concerned that it was under-utilized and that characterizations do not accurately represent the fish community along the Project route.	Please justify not using eDNA surveys tool to evaluate fish presence at all locations, especially given the Proponent recognized that sampling methodology was poor for Brook Trout and Lake Sturgeon.  Lake Sturgeon are a key values species for Nibinamik and it is essential that presence and distribution are accurately characterized.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  As noted previously, safety (e.g., high-water levels) and helicopter access issues prevented access at many sites.  Additional sampling, if required, will be considered during the detail design phase of the Project on a crossing-specific basis.
67.	Section 10.2.1.3 Species at Risk	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent did not encounter Lake Sturgeon during field surveys and has all but excluded them from this assessment (see Comment 98, below).  Sturgeon are seasonally migratory and difficult to capture; thus conventional sampling programs may be ineffective - as noted above by the proponent. Lake Sturgeon are a key species for Nibinamik members. Nibinamik is concerned that very little effort was taken to characterize their presence.	Recognizing the implications of impacts to SAR (and cultural importance of Lake Sturgeon), please explain why so little effort was made to characterize Lake Sturgeon presence and use.  This is especially true for known areas of sturgeon presence (e.g., Muketei River, Winisk Lake, Winiskisis Channel). Nibinamik notes that for these areas, presence must be assumed and all potential downstream effects avoided or mitigated.	1. Item will be addressed in the Final EAR/IS submission.  Table 10-7 has been updated to include Lake Sturgeon in Muketei River, Winisk Lake, and the Winiskisis Channel. It is assumed that Lake Sturgeon is present in the Winisk River (Section 13).  Efforts were expended but as noted Lake Sturgeon are seasonally migratory and difficult to sample. Again, timing issues along with safety and helicopter access impeded sampling all sites in all time periods.
68.	Section 10.2.2 Table 10-7 Waterbody Fish Presence and Restricted Activity Timing Windows	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Nibinamik notes that 16 sites were not sampled at all for fish presence.	Please justify not sampling these locations, especially with the ease and cost-effectiveness of eDNA.	As noted previously, safety and access issues prevent access at many sites.  Additional sampling, if required, will be considered during the detail design phase of the Project on a crossing-specific basis.

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69.	Section 10.2.2.1.2 Spawning Surveys	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	<p>The Proponent notes that eggs were not recovered during spawning surveys, and suggested that conditions were unsuitable, and “the populations may have declined” as explanations for this failure. Further, the statement “the populations may have declined” as explanation for not recovering Lake Sturgeon eggs is unacceptable to Nibinamik. Community members are extremely concerned about the cumulative effects of development across their territory, and a statement that suggests a population does not need to be included in the effects assessment <i>due to its existing decline</i> is completely unacceptable.</p>	<p>Please explain why suitable conditions were not sought (i.e., field survey timing and method adjustments) to ensure walleye (at minimum) spawning was sufficiently evaluated.</p> <p>Please revisit the Lake Sturgeon characterization with more robust and appropriate methods and revise the effects assessment to sufficiently recognize Lake Sturgeon and include an appropriate characterization of cumulative effects.</p>	<p>3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>As noted previously, safety (high-water levels) and access issues prevent access at many sites. As noted, species will generally be expected to be present unless additional studies are conducted. These studies may include thermal regime studies to assist in species presence determination.</p> <p>Additional spawning and thermal regime sampling, where required, will be considered during the detail design phase of the Project on a crossing-specific basis and where applicable to meet permitting requirements.</p> <p>The issue/statement on statement “populations may have declined” regarding Lake Sturgeon eggs has been removed from the EAR/IS. Section 13.4.7 Lake Sturgeon discusses in detail; key mitigation measures related to construction and operation to be implemented and monitored. Section 13.4.8 addresses changes to fish populations.</p> <p>Cumulative effects assessment for Lake Sturgeon is presented in Section 21.4.9.11.</p>

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70.	Section 10.3.1.1 Destruction / Loss of Fish Habitat	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	<p>Proponent states 9,150 m<sup>2</sup> of habitat destruction, based on crossing and road dimensions, but later reduces the estimate to &lt;10% of this value (687.5 m<sup>2</sup>), appearing to claim bridge footings represent the only possible loss of fish habitat. Later in the section, the Proponent notes an additional 750 m<sup>2</sup> of spawning habitat will be lost across 6 crossing locations.</p> <p>Then the Proponent notes that 27,640 m<sup>2</sup> of flooded riparian area will be cleared &amp; grubbed, and is suitable for northern pike spawning when wetted.</p> <p>Given that northern pike are spring spawners, the likelihood of this riparian habitat being wetted and used for spawning is extremely high and should therefore be included in the loss calculations.</p> <p>The fact that the proponent has only claimed 687.5 m<sup>2</sup> of expected aquatic habitat destruction and has not accounted for any of the other impacts (over 30,000 m<sup>2</sup>), even below in section 10.3.1.2 when discussing harmful alteration, is extremely concerning.</p> <p>A road project over 100 km long, with 30 watercourse crossings, even if all culverts were open bottom, will have a substantially greater impact on fish habitat than simply the 687.5 m<sup>2</sup> of direct loss due to bridge footings as claimed by the Proponent.</p>	Nibinamik requests a full revision of the effects assessment to appropriately recognize the potential impacts to fish habitat. At minimum this must include the 9,150 m <sup>2</sup> of combined crossing dimensions, and the 27,640 m <sup>2</sup> of potential northern pike spawning habitat that will be lost.	The calculations reflect habitat loss with other areas calculation representing harmful alteration where this habitat may be functionally degraded either temporarily or permanently with the expected duration of this effect. Note when conducting habitat loss we have used the preliminary engineering design drawings with dimensions of structures at watercourse crossings, including associated fill embankments. As noted by the reviewer we also state for clarity that there will a loss/destruction of approximately 27,640 m <sup>2</sup> of riparian/fish habitat due to its required removal to accommodate the road and cleared ROW at each water crossing. The calculation for alteration and destruction of fish habitat is proposed to remain and will be confirmed by the ultimate owner/operator in the detail design phase of the Project. Where applicable, authorization(s) under the Fisheries Act will be secured for any harmful alteration, disruption or destruction of fish habitat as result of the Project.
71.	Section 10.3.1.3 Changes in Fish Access to Habitats	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Nibinamik is concerned about potential impacts to fish due to unsuitable culverts representing barriers or unusable habitat.	<p>There is ample evidence that open-bottom culverts are the best way to reduce impacts to fish and fish habitat if culverts must be constructed.</p> <p>The use of any other type of culvert for permanent crossings is not acceptable to Nibinamik.</p>	<p>3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Currently, there are 17 open bottom steel arch crossings and 8 corrugated steel culverts crossings proposed. Six (6) bridge crossings are also proposed in the preliminary design.</p> <p>Culvert crossings will be further evaluated during the detail design phase of the Project on a crossing-specific basis to minimize impacts to fish/fish habitat, including consideration of additional open- bottom culverts.</p>
72.	Section 10.3.2.2	Draft EA/IS Section 10	The Proponent states:	Nibinamik requests that this characterization be changed to recognize that the effect <b>will</b> be	Comment is noted but it is our opinion that the effects can be successfully mitigated.

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	Changes in Public Access to Fish/ Fish Habitat	Assessment of Effects on Fish and Fish Habitat	" <i>This potential effect could be amplified where other proposed roads in the region...are constructed...</i> " Cumulative effects, especially due to increased access and traffic, are a primary concern to Nibinamik members.	amplified as other roads are constructed, and this fact must be appropriately accounted within the effects assessment.	Cumulative effects as a result of reasonably foreseeable developments are addressed in Section 21.4.5.
73.	Section 10.3.2.2 Changes in Public Access to Fish/ Fish Habitat	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent appears to ignore the impact of facilitating increased road density; rather, limiting the potential for increased harvest to the footprint and LSA.  Construction of the WSR will provide a starting point for spur roads (legal and illegal) which will push the impacts of increased harvest well beyond the footprint of the project. This increased access and harvest pressure is a primary concern to Nibinamik members.	The inevitable impact of increased harvest beyond the footprint and LSA must be appropriately recognized and accounted for in this assessment.	1. Item is addressed in the Final EAR/IS submission. Section 19.3.1.1.4 of the EAR/IS discusses potential effects related to increased access to traditional harvesting areas during the operations phase, which could result in improved accessibility for traditional land and resource use, as well as effects on traditional harvesting areas due to increased access. Mitigation and enhancement measures are outlined in Section 19.4.1.3, including a Stewardship and Environmental Management Strategy outlined in the Community Readiness Plan (Appendix N of the EAR/IS).
74.	Section 10.4 Mitigation and Enhancement Measures	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Nibinamik acknowledges that an Environment Committee has been proposed to facilitate communication and oversight during construction and operation.	Nibinamik requests that the Environment Committee include Nibinamik members.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Members of the Environmental Committee will be selected by the ultimate owner/operator in future development stages of the Project and the request for Nibinamik to be member of the committee will be considered.
75.	Section 10.4.1.1.1 General Avoidance Measures and Project Planning	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent notes that " <i>Channel realignments/infilling will only be undertaken in locations where specific conditions are met and/or where required...</i> "  Channel realignment/infilling is a significant fish habitat impact.	Channel realignments and infilling must be avoided. Given that the proponent has neglected to include potential realignments/infilling in this effects assessment (i.e., area calculations in 10.3.1.1), any realignment or infilling must be accompanied by significant offsetting (>2:1 ratio) and must involve First Nations in the decision-making process.  If the Proponent deems a realignment necessary, First Nations (including Nibinamik) must be involved in discussions and planning from the very beginning, prior to the permitting process and any mandated consultation.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Any need for channel realignment/infilling will be assessed during the detail design phase on a crossing-specific basis. Concerns can be addressed at this time.
76.	Section 10.4.1.2.1 Temporary Water course Crossings	Draft EA/IS Section 10 Assessment of	Nibinamik is concerned that MNR guidelines for water crossings are out- of-date (25 years old).	Please ensure that best management practices also align with newer guidance (e.g., Section 8 of Ministry of Natural Resources and Fisheries and	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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		Effects on Fish and Fish Habitat		Oceans Canada protocol for the review and approval of forestry water crossings, originally published in 2020 and updated in 2024). Additionally, temporary water crossing design should be done in collaboration with First Nations, to ensure that post-construction rehabilitation is aligned with and respecting Rights, Title, and interests.	Current DFO guidelines and best management practices have been considered by the Project Team in the development of mitigation in the EAR/IS, including those from the MNR. Any updated guidelines and best management practices will be reflected in the CEMP to be developed and implemented for the construction phase. Where temporary crossings require provincial or federal permits/authorizations, it is our understanding First Nations will be afforded the opportunity to provide feedback in accordance with Crown's duty to consult.
77.	Section 10.4.1.2.2 Project Planning and Design	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent states " <i>During the construction phase, Environmental Monitor(s) and/or Indigenous Monitor(s) will be on-site...</i> " Nibinamik notes that all construction monitoring <b>must</b> include First Nations participation. It is unacceptable for environmental oversight to be conducted solely by non-Indigenous Environmental Monitor(s).	Please revise this section to recognize that Indigenous Monitors must be part of the environmental monitoring crew during construction.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Note it envisioned at this time that the ultimate owner operator will have Indigenous Monitors as part of their construction team.
78.	Section 10.4.1.2.4 Storage and Handling of Material	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	While Nibinamik supports natural revegetation following grading and stabilizing activities in cleared areas, community members are concerned about (1) invasive species, and (2) facilitating increased access.	Please confirm that measures will be put in place to prevent revegetation by invasive species and prevent road users from disturbing sites or using them to access other areas.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Note that the approach for site revegetation and measures to control the introduction of invasive plant species is discussed in Section 11 Further development and details of these items will be addressed in the detail design phase and included in the CEMP and OEMP.
79.	Section 10.4.1.2.7 Dewatering Activities	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent notes that turbidity and total suspended solids will be monitored according to permit requirements. Nibinamik is concerned that permit requirements will not be sufficiently protective, especially where sensitive habitats (e.g. spawning) are potentially impacted.	Nibinamik requests turbidity and total suspended solids monitoring be developed in collaboration with First Nations to ensure better-than-best management practices are used.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Details on the proposed surface water quality monitoring are described in Section 7 and Section 8 (Groundwater) associated with construction dewatering activities. Further monitoring measures will be considered in the context of applicable permits and authorizations for the Project. Surface water quality monitoring will be further detailed in the CEMP and OEMP by the ultimate owner/operator.

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80.	Section 10.5.2.1.1 Table 10-14: Criteria Results for Destruction of Fish Habitat - Construction	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent considers magnitude to be "low", noting "...very small [area] in relation to the available fish habitat..."  However, fish habitat within the LSA is not continuous - fish populations impacted by the destruction of habitat due to the project may not be able to simply relocate to habitat available elsewhere. The impacts of this pathway will be realized on a site-by-site basis, thus should be considered on a site-by-site basis.	Nibinamik requests the magnitude be increased to high.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Comment is noted. The criterium is aerial based looking at the overall LSA. So, the magnitude is considered low.  Impacts to fish/fish habitat documented in the EAR/IS are to be confirmed by the ultimate owner operator during the future detail design and permitting phase of the Project, and on a water crossing-specific basis.
81.	Section 10.5.2.1.1 Table 10-14: Criteria Results for Destruction of Fish Habitat - Construction	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Similar to the above comment, impacts are realized on a site-by-site basis and therefore must be assessed as such.  Habitat that exists elsewhere cannot contribute to the resilience of impacted habitat at each specific site.	Please provide thorough, site-by-site, data-backed justification for judging the impacted fish habitat to be "resilient" to disturbance.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  The criterium used is based looking at whether the effect may occur on species or habitats that are common throughout the region and will not affect the broader fish populations on the whole, and by this definition the fish habitat is resilient.  Confirmation of the characterization of impacts to fish/fish habitat will be conducted during the future detail design and permitting phase for the Project on a water crossing-specific basis.
82.	Section 10.5.2.1.1 Table 10-14: Criteria Results for Destruction of Fish Habitat - Construction	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent claims that destruction of fish habitat " <i>is reversible if the roadway was removed.</i> "  Nibinamik asserts that the Proponent is well-aware the roadway will not ever be removed and instead will be used for decades into the future to facilitate resource extraction in the Ring of Fire, as well as likely other development. these impacts will affect generations of fish.	Nibinamik asserts that reversibility <b>must</b> be considered "irreversible".	Comment is noted. The road will exist for a long – indeterminant time period. However, it is the definition used in Table 10-13 that determines the classification of reversibility. Under this definition, can the system net effect be reverse after activity completion (road removal) and rehabilitation. While activity duration is in question, roads have been decommissioned, removed and rehabilitated.
83.	Section 10.5.2.1.1 Table 10-14: Criteria Results for Destruction of Fish Habitat - Operation	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	As in the above comment, the destruction is not reversible, given that the roadway will not be removed once it is built.	Nibinamik asserts that reversibility <b>must</b> be considered "irreversible".	Refer to response to comment #82.
84.	Section 10.5.2.1.2 Harmful Alteration and	Draft EA/IS Section 10 Assessment of Effects on Fish	The introduction of invasive species, both terrestrial and aquatic, is a key concern for Nibinamik members.	Nibinamik requests a much more conservative approach, recognizing that this area is pristine and at high risk of invasives. Thorough, best-in-industry	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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	Disruption of Fish Habitat	and Fish Habitat	The proponent has committed to preparing a plan for managing invasive vegetation during construction, but not aquatic invasives. Further, without a completed plan for review, Nibinamik has no way to verify its efficacy. The proponent is simply assuming that their invasive vegetation management plan will be 100% successful.	prevention measures will be more effective than any monitoring and eradication plan.	Aquatic invasive species transfer prevention is included in Mitigation Measure - Appendix E, Section 5.23.1. It has been added to the CEMP as part of the Fish and Fish Habitat Management (Appendix E, Section 2.1.9). The full aquatic invasive management plan will be included in the CEMP to be developed and implemented by the ultimate owner/operator for the Project
85.	Section 10.5.2.1.2 Harmful Alteration and Disruption of Fish Habitat	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent claims " <i>harmful alteration and disruption of fish habitat is not expected as a result of roadway operations</i> ", noting " <i>effects are likely only to occur during roadway maintenance</i> " (Table 10-17). Nibinamik asserts that roadway operation will be a constant long-term source of impacts that will result in the harmful alteration or disruption of fish habitat. For example: <ul style="list-style-type: none"> <li>Invasive species introduction, due to increased vehicle traffic and human access from other areas of Ontario and beyond.</li> <li>Increased human access will result in increased pressure on the ecosystems from recreational and guided users - which will result in harmful alteration or disruption of fish habitat.</li> </ul>	Nibinamik requests that Proponent revise this assessment to include likely impacts to fish habitat during roadway operations.	The impacts to fish/fish habitat during the operations phase are included in the EAR/IS, with the understanding of the typical operation and maintenance activities that will be conducted. During the operations phase the ultimate owner/operator will further assess potential effects to fish/fish habitat, where applicable, including on a water crossing specific basis if necessary.
86.	Section 10.5.2.1.3 Fish Access to Habitats: Operations	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Regarding clogged culverts, the Proponent notes " <i>...a monitoring and maintenance program will reduce the duration of the effect</i> ".	Nibinamik requests that opportunities be provided to Nibinamik members to participate in the monitoring and maintenance program, in the event of Project approval.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The request for Nibinamik to participate in future monitoring programs will be considered by the ultimate owner/operator.
87.	Section 10.5.2.2.1 Injury/Death of Fish	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Nibinamik is concerned that the raw number of (potential) fish injuries or mortalities is being used as a metric to help assess the magnitude of this impact, which disregards important context. Mortality of a small number culturally significant and/or SAR fish, especially for long-lived large-bodied species like Lake Sturgeon, will have much larger population-level effects than mortality of a small number of forage minnow species.	Nibinamik requests that fish injury/mortality impacts be evaluated on a species-specific and site-by-site basis, to ensure that mitigation and monitoring measures are appropriately rigorous to protect important and/or sensitive species.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Where SAR fish can be potentially captured, a SARA permit is required. The SARA permit will provide conditions that are considered necessary for protecting the species, minimizing the impact of the authorized activity on the species and / or providing for its recovery.

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			Similarly, the mortality associated with electrofishing may be " <i>minor</i> " in abundant and ubiquitous species, but sampling-based mortality and injury for culturally significant and/or SAR fish is not "minor".		SARA permits are envisioned for Lake Sturgeon in Muketei River, Winisk Lake, and the Winiskisis Channel crossing sites. Further assessment of impacts will be examined during the detail design phase, and if Lake Sturgeon is considered present at other crossings, this item will be addressed by the ultimate owner/operator on a crossing-specific basis, including assessing permitting requirements.
88.	Section 10.5.2.2.2 Changes in Public Access to Fish Habitats: Operations	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	<p>Nibinamik community members have expressed significant concerns regarding the expansion of recreational access into their territory that would be facilitated by the WSR, especially upon completion of the other Ring of Fire roads. Community members have already noticed resource use by external guiding outfits, and road access will only bring more off this pressure.</p> <p>While the immediate short-term impacts of the Project may be overall minimal and driven primarily by Webequie members and other First Nations, the fact is that this road will connect to a public road network and the long-term impacts of that will be a significant increase in fishing traffic.</p>	Please revise the assessment to recognize the significant increase in non-local, non-Indigenous fishing traffic that will accompany the Project over the long-term.	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Mitigation during construction period includes prohibition on fishing from construction workers and access restriction for the public will be implemented. Thus, net effects are expected to be low.</p> <p>During operations, the impact can be significant if monitoring and mitigation measures are not employed. The remote nature of the Project will somewhat reduce the use by the non-local population. Still there is a need to monitor and enforce the mitigation and monitoring measure aimed at minimizing harvest to fish species utilized by Indigenous communities.</p> <p>Measures could include fishing regulations that are enforced, limiting access from road to the waterbodies where possible and placing rest areas away from waterbodies.</p>
89.	Section 10.5.3 Table 10-24 Summary of Predicted Net Effects on Fish and Fish Habitat VC (and elsewhere)	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	<p>Nibinamik is concerned that the effects of invasive species during construction and operation have been downplayed and/or mischaracterized.</p> <p>The entire assessment relies on 100% successful mitigation - despite no aquatic invasive species management plan being developed.</p> <ul style="list-style-type: none"> <li>• magnitude could be high depending on species, so should be at least moderate in the assessment;</li> <li>• impacts would be long-term if invasive species get established;</li> <li>• frequency is continuous if invasive species get established;</li> </ul>	Nibinamik requests a full revision of the effects assessment.	<p>Aquatic invasive species transfer prevention is included in Mitigation Measure - Appendix E, Section 5.23.1. It will be added to the CEMP as part of the Fish and Fish Habitat Management (Appendix E, Section 2.1.9).</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The full aquatic invasive management plan will be included in the CEMP to be developed by the ultimate owner/operator during the future detail design phase of the Project.</p>

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			<ul style="list-style-type: none"> <li>invasive species are known to significantly alter ecosystems - the local pristine ecosystems will not be resilient if invasives are established; and</li> <li>even if the road is removed, once invasive species are established there is a very low likelihood their effects can be reversed.</li> </ul>		
90.	Section 10.6.1 Methodology	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	<p>Nibinamik has significant concerns regarding the methodology for determining significance. The ranking impact criteria appear to be derived from a western perspective to downplay real and potential impacts of the project, which risks mischaracterizing the Project effects and creating poorly designed monitoring and mitigation.</p> <p>Further, the additive nature of the scoring does not accurately represent the consequences of the impacts. For example, effects occurring during sensitive spawning windows are <b>not</b> only "1 point" more impactful than effects occurring outside of sensitive spawning windows.</p>	<p>Please specifically explain how Indigenous Knowledge and guidance from First Nations was used to determine the scale ranking scores.</p> <p>Nibinamik demands a full revision of this scoring system, with meaningful input from First Nations, including Nibinamik, to ensure an accurate characterization of effects and sufficiently designed monitoring and mitigation.</p>	In addition, Section 19 of the EAR/IS considers potential effects on Indigenous Peoples and the Exercise of Aboriginal and Treaty Rights. The predicted effects of the Project on biophysical components such as fish and fish habitat are also considered as part of the assessment of effects on Current and Historical Use of Lands and Resources for Traditional Purposes, as well as Cultural Continuity. These predicted effects are subsequently considered in the identification of potential impacts on Aboriginal and Treaty Rights. During this process, further input from Indigenous communities will be integrated into the final documentation.
91.	Section 10.6 Table 10-25 Scores Assigned for Key Criteria (Categories) of the Predicted Net Effects	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent's decision-making regarding scoring is unclear and likely inaccurate.	Please explain why "magnitude" has two scores of zero.	Table 10-25 has been removed, and Table 10-24 provides the summary of the Predicted Net Effects on Fish and Fish Habitat in a qualitative manner. This assessment follows the methodology recommended by The Draft Technical Guidance Determining Whether a Designated Project is Likely to Cause Significant Adverse Environmental Effects under the <i>Canadian Environmental Assessment Act</i> (CEA Agency, 2018) and relevant to the <i>Impact Assessment Act</i> (2019).
92.	Section 10.6.1 Determination of Significance: Methodology	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	<p>Nibinamik notes that the highest possible score, based on the Proponents rankings and additive calculation method, is 15.</p> <p>Thus, the most significant impact possible to fish and fish habitat from the project (i.e., scoring the maximum value for every criterion) would only receive a significance of "moderate" - which the Proponent has also classified as "not significant".</p>	<p>This alone should fully invalidate the effects assessment.</p> <p>Nibinamik demands a fulsome revision of the entire assessment, including revised, more accurate rankings (see comment 90, above), and a more conservative approach to classification of significance.</p>	<p>1. Item is addressed in the Final EA/IS.</p> <p>Table 10-24 provides the summary of Predicted Net Effects on Fish and Fish Habitat in a qualitative manner. This assessment follows the methodology recommended by The Draft Technical Guidance Determining Whether a Designated Project is Likely to Cause Significant Adverse Environmental Effects under the <i>Canadian Environmental Assessment Act</i> (CEA Agency, 2018) and relevant to the <i>Impact Assessment Act</i> (2019).</p>

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					In addition, Section 19 of the EAR/IS considers potential effects on Indigenous Peoples and the Exercise of Aboriginal and Treaty Rights. (See the response to Comment 90).
93.	Section 10.7 Cumulative Effects	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent limits the cumulative effects assessment to only "probable/certain" and "moderate/high". This allows them to minimize the number of impacts brought forward into the cumulative effects assessment.  The proponent states " <i>Net effects with this characterization are most likely to interact with other RFD] and activities</i> ". This creates substantial risks of mischaracterizing cumulative effects by ignoring contributing impacts that may be characterized as "low" magnitude in isolation but result in a disproportionately high impact (especially to sensitive species or SAR) in combination with other stressors.	As above, Nibinamik demands a full revision of the effects assessment—which includes a more adequate cumulative effects assessment.  This revised cumulative effects assessment must include all Project effects that are considered "possible" or above, and a magnitude of "low" or greater.	The cumulative effects assessment follows the methodology within the Interim Cumulative Effects Assessment Guidance Document under the <i>Canadian Environmental Assessment Act</i> (CEA Agency, 2012).  Section 19 of the EAR/IS considers potential effects on Indigenous Peoples and the Exercise of Aboriginal and Treaty Rights. (See the response to Comment 90).
94.	Section 10.10 Follow-up and Monitoring	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	Nibinamik acknowledges the invitation for development and implementation of monitoring programs.	Please elaborate how the road operator will ensure further mitigation measures are enacted if unacceptable effects are observed.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
95.	Section 10.10 Follow-up and Monitoring	Draft EA/IS Section 10 Assessment of Effects on Fish and Fish Habitat	The Proponent notes monitoring of potential impacts to fish and fish habitat will be limited to in-stream construction or active water taking/discharge.  Nibinamik is concerned that this plan ignores the potential effects from activities adjacent to water.	Nibinamik asserts that monitoring for effects to fish and fish habitat must occur for any activities adjacent to watercourses and water bodies, rather than only in-stream work.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Any activities and/or areas where potential concerns are noted (e.g., vegetation clearing) may form part of the ultimate monitoring program to be further developed in the detail design phase on a crossing-specific basis, if required. The appropriate monitoring measures will be documented in the CEMP and OEMP, as necessary.
96.	Section 13.2.1.3.4	Draft EA/IS Section 13 Assessment of	Nibinamik is concerned that the timing of Proponent surveys was not effective for characterizing Lake	Nibinamik requests new spawning surveys be conducted at appropriate times (i.e., throughout May) at all sites to ensure the effects	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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		Effects on Species at Risk	<p>Sturgeon (or Walleye) spawning in the LSA, which creates substantial risk to this SAR.</p> <p>According to the Natural Environment Existing Conditions (Appendix F, 8.2.2.3.3), spawning surveys were conducted in June.</p> <p>Nibinamik recognizes that sturgeon spawning habitat is rare in the LSA. However, the appropriate timing for Lake Sturgeon spawning surveys would be during the month of May, rather than June. Similarly, Walleye spawning is likely to occur earlier in spring compared to the survey timing.</p>	characterization is accurate.	<p>As noted previously, safety and access issues prevent access at many sites. As noted, species will generally be expected to be present unless additional studies are conducted. These studies may include thermal regime studies to assist in species presence determination.</p> <p>Additional spawning sampling, where required, will be considered during the detailed design phase of the Project on a crossing-specific basis and to meet requirements for such studies to secure applicable permits/approvals.</p>
97.	Section 13.2.1.3.5	Draft EA/IS Section 13 Assessment of Effects on Species at Risk	<p>Nibinamik is concerned that eDNA sampling timing (Aug 17-20) and effort (9 sites) was not nearly rigorous enough to sufficiently evaluate Lake Sturgeon presence or use in the LSA.</p> <p>Lake sturgeon are highly migratory, especially during spawning period when they move up smaller tributaries. eDNA sampling at the majority of crossings during May would produce much more reliable results for Lake Sturgeon presence/use, as they are migrating/spawning during this time.</p>	Nibinamik requests that new eDNA surveys at all watercourse crossings be conducted during the updated spawning surveys (see comment 96, above) throughout May.	<p>3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>As noted previously, safety and access issues prevent access at many sites. As noted, species will generally be expected to be present unless additional studies are conducted. These studies may include thermal regime studies to assist in species presence determination (See comment 69, above).</p> <p>Additional eDNA sampling, where required, will be occur during the detail design phase of the Project on a crossing-specific basis.</p>
98.	Section 13.3.12.1	Draft EA/IS Section 13 Assessment of Effects on Species at Risk	<p>The Proponent states "<i>Only a portion of these watercourses and waterbodies have the potential to support Lake Sturgeon based on their habitat characteristics</i>"</p> <p>Nibinamik is concerned that this ignores potential use by Lake Sturgeon as migratory corridors for spawning. This compounds, the already poor fish presence and spawning evaluations that the Proponent had conducted.</p> <p>Nibinamik asserts all of the crossings in the LSA must be considered potentially impacting Lake Sturgeon.</p>	Given that Lake Sturgeon may utilize LSA watercourses for migration, potential impacted habitat must equal that of all crossings, at minimum, rather than simply bridge footings. Please also refer to comment 70, above.	<p>3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Where SAR fish can be potentially captured, a SARA permit is required. The SARA permit is anticipated to provide conditions that are considered necessary for protecting the species, minimizing the impact of the authorized activity on the species and / or providing for its recovery.</p> <p>SARA permits are anticipated to be required for Lake Sturgeon in Muketei River, Winisk Lake, and the Winiskisis Channel crossing sites.</p> <p>In the detail design phase, if Lake Sturgeon is considered present at other crossings, then this will be addressed as required on a crossing-specific basis.</p>

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99.	Section 13.3.12.1.3	Draft EA/IS Section 13 Assessment of Effects on Species at Risk	The Proponent states " <i>Since bridges are planned at all watercourses and waterbodies where Lake Sturgeon are expected to be present, there are no expected operational effects on Lake Sturgeon passage</i> " Nibinamik reiterates concerns that culverts may impact Lake Sturgeon migration. Nibinamik also re-asserts that the Proponent has not sufficiently characterized Lake Sturgeon presence or use within the LSA, and had utilized baseline studies that were not relevant to determining Lake Sturgeon use or presence. Thus, Nibinamik is also concerned that the Proponent's understanding of Lake Sturgeon ecology is insufficient to make predictions regarding which watercourses and waterbodies are "expected" to have Lake Sturgeon present.	Please either: (1) assume that any watercourse or waterbody connected to known Lake Sturgeon habitat contains Lake Sturgeon for the purposes of this assessment, Or (2) complete revised eDNA sampling at all crossings during multiple seasons to confirm Lake Sturgeon presence/absence.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). As noted previously, safety and access issues prevent access at many sites. As noted, species will generally be expected to be present unless additional studies are conducted. Further assessment of impacts will be examined during the detail design phase, and if Lake Sturgeon is considered present at other crossings, this item will be addressed by the ultimate owner/operator on a crossing-specific basis, including assessing permitting requirements.
100.	Appendix E Section 2	Draft EA/IS Appendix E– Mitigation Measures	The Proponent states " <i>Webequie First Nation, or the proponent for construction and operations for the project, will develop a Sustainability Plan which will be an integral part of the CEMP and OEMP...</i> " Nibinamik is extremely concerned that Webequie First Nation may only be the Project proponent for this initial regulatory phase, and that the critical environmental management plans will be developed by an entirely different entity, with little or no integration of Indigenous voices.	Please confirm: <ul style="list-style-type: none"> <li>How Webequie First Nation will be involved in determining the criteria, metrics, and thresholds for the CEMP and OEMP to ensure that Indigenous values are truly embedded within the project, and involvement is not superficial or tokenistic.</li> <li>How decision making by other First Nations, including Nibinamik, will be integrated into the development of the Sustainability Plan, CEMPs, and OEMPs (to the same effect as inquired above).</li> </ul>	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). It is envisioned the ultimate owner/operator will likely provide opportunities for interested First Nations to provide feedback on the developed of the CEMP and OEMP for implementation.
101.	Appendix E Section 5.6	Draft EA/IS Appendix E– Mitigation Measures	In item 2, the Proponent states that " <i>Whenever possible, in-water works shall be scheduled...when [watercourses are] seasonally dry or frozen to the bottom.</i> " Nibinamik is concerned that limited seasonal visits during existing conditions data collection have created uncertainty regarding the wetted or frozen status of watercourses in the LSA.	Please describe the contingency mitigations planned in the event that a watercourse is not dry or frozen, as predicted, during the work window.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further details on contingency mitigation will be considered in the CEMP and OWMP by the ultimate owner operator of the Project.
102.	Appendix E Section 5.6	Draft EA/IS Appendix E– Mitigation Measures	In item 3, the Proponent notes the <i>Ontario Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat</i> will be used to establish times when no instream works are allowed.	Given that fish will use habitats for both spawning and migration to spawning grounds, Nibinamik requests that the most conservative window possible that encompasses Walleye and Lake Sturgeon (both very important species) be used to ensure critical migration periods are protected. Based on the "spring" table in <i>Ontario Restricted Activity Timing Windows for the Protection of Fish and</i>	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The restricted activity periods to protect fish and fish habitat during spawning, rearing and migration will be reevaluated with consideration of Nibinamik's comment and in consultation with the Ministry of Natural Resources and Fisheries and Oceans Canada (DFO)

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				<i>Fish Habitat</i> , this conservative window is April 1 to July 15.	during the future detail design and permitting phase of the Project and on water crossing specific basis.
103.	Appendix E Section 5.7	Draft EA/IS Appendix E– Mitigation Measures	Nibinamik is concerned about potential bed instability and habitat impacts from Temporary watercourse crossings.	Nibinamik requests that fords not be permitted, and that all temporary crossings be in the form of temporary spans to avoid infilling, grading, or excavation.	3. The item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Nibinamik requests to not use fords as a temporary crossing method will be considered by the ultimate owner/operator during the future detail design and permitting phase of the Project and on water crossing specific basis. We note that use of fords is permitted by DFO and can avoid harmful impacts to fish/fish habitat with application of mitigation measures and conditions in the DFO Code of Practice – Temporary Ford: Crossing.
104.	Appendix E Section 5.8	Draft EA/IS Appendix E– Mitigation Measures	Nibinamik is concerned about the planned rigour of downstream monitoring during watercourse diversions.	Nibinamik requests that all temporary watercourse diversions include rigorous downstream turbidity monitoring to ensure cofferdams and other sediment control measures are functioning as expected. Nibinamik also requests that opportunity (including training) be provided for Nibinamik community members to participate in this monitoring.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Further details on monitoring will be included in the CEMP and the ultimate owner/operator will consider the request of Nibinami for turbidity monitoring at water crossings.
105.	Appendix E Section 5.22	Draft EA/IS Appendix E– Mitigation Measures	The Proponent has stated water quality monitoring will occur when working in or near fish-bearing watercourses, or when required by permit. However, this appears to ignore the potential downstream transmission of impacts from "non-fish-bearing" watercourses. Nibinamik is also concerned that watercourses may be judged non-fish-bearing based on inadequate data (see comments above).	Nibinamik requests that water quality monitoring occur when working in or near all watercourses.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Refer to response to comment #104.
106.	Appendix E Section 5.22	Draft EA/IS Appendix E– Mitigation Measures	Nibinamik is concerned that impacts to fish due to changes in water quality may be missed if monitoring is not sufficiently rigorous. This area is pristine, and water quality is a key concern for Nibinamik members.	Nibinamik requests explicit minimum water quality monitoring regularity to include: <ul style="list-style-type: none"> <li>• continuous temperature, pH, conductivity, dissolved oxygen monitoring downstream and upstream using dataloggers or similar;</li> <li>• hourly spot measurements during in-water work for turbidity, pH, temperature, conductivity, dissolved oxygen to ensure quick action if necessary as well as calibrate and</li> </ul>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Refer to response to comment #104.

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				<p>verify continuous logger data; and</p> <ul style="list-style-type: none"> <li>at least four (4) daily spot measurements during work near water.</li> </ul>	
107.	Appendix E Section 5.22	Draft EA/IS Appendix E– Mitigation Measures	Nibinamik is concerned that First Nations are not included in the water quality monitoring or planning process.	<p>Nibinamik requests the following adjustments: The Contractor shall be responsible for:</p> <ul style="list-style-type: none"> <li>Preparing a Water Quality Management Plan for work requiring, or that may require water quality monitoring and submitting the Plan to Nibinamik and other First Nations for review prior to MECP and/or MNR prior to the start of the contract. The Plan shall include a description of the works and measures proposed to mitigate adverse changes to water quality developed in collaboration with local First Nations.</li> <li>Contracting with a qualified professional to conduct water quality monitoring activities unless otherwise directed by MECP in writing. And Enabling Nibinamik to either participate in the monitoring as assistants or training Nibinamik members to act as a QP.</li> <li>Conducting water quality monitoring prior to, during, and after construction activities.</li> <li>Reporting exceedances immediately to MECP and local First Nations.</li> <li>Ceasing work if exceedances occur and employing corrective actions to mitigate exceedances prior to restarting work.</li> <li>Notifying MECP and local First Nations immediately when the water quality monitoring plan is not being adhered to.</li> <li>Submitting water quality monitoring reports prepared by a qualified professional to MECP and local First Nations.</li> </ul>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Refer to response to comment #104.</p>
108.	Appendix F Section 8.2.2.2	Draft EA/IS Appendix F– Natural Environment Existing Conditions	Nibinamik is concerned that the Proponent has used outdated and/or inaccurate data to characterize thermal regimes, which risks mischaracterizing the potential impacts of the Project and/or climate change on aquatic species through temperature changes.	<p>Please explain why outdated information was used for thermal regimes.</p> <p>Nibinamik requests sites be re-classified with relevant guidance from Ontario. We suggest [Jones, N. and B. Schmidt. 2019. <i>Thermal habitat: Understanding stream temperature and thermal classifications</i>. Ontario Ministry of Natural Resources and Forestry, Science and</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Thermal regimes at water crossings were based on review of existing data sources and field measurement. Thermal regimes may be reevaluated during the detail design and permitting phase in</p>

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				<p><i>Research Branch, Peterborough, ON. Science and Research Information Report IR-18. 13 p.]:</i></p> <ul style="list-style-type: none"> <li>• Cold water &lt;17.5 °C, cold transition 17.5–19.5 °C, warm transition 19.5–21.0 °C, and warm &gt;21.0 °C</li> <li>• These should be based on average July temperature data.</li> </ul>	consultation with MNR by the ultimate owner/operator.
109.	Appendix F Section 8.2.2.2	Draft EA/IS Appendix F– Natural Environment Existing Conditions	Assume that "Cold" designated waterbodies should read <19°C rather than <9°C.	Please revise.	1. Item will be addressed in the Final EAR/IS submission. This has been revised as suggested.
<b>VEGETATION AND WETLANDS</b>					
110.	Section 9.2.2.1 Baseline Characterization	Draft EA/IS Appendix F: Natural Environment Existing Conditions	<p>Appendix F indicates that the Ontario Parks Inventory and Monitoring Program Guidelines (OPIAM) (Draft, Ver. 1.4, 2012) were used to collect data at wetland and vegetation survey locations. However, the methodology lacks transparency, as it does not specify what measurements or assessments were actually completed to evaluate wetland hydrology and hydrogeology within the LSA or RSA. Section 9.2.6 <i>Wetland Function Assessment</i> Further notes that geophysical functional indices were derived primarily from published studies and spatial analyses, with only limited field data collected for groundwater recharge and discharge. These data do not extend across the Wetland RSA and do not account for all wetland types identified, leaving significant gaps in representation.</p> <p>Groundwater recharge and discharge are inherently site-specific processes. Hansen (2005) highlights that groundwater recharge is “variable and difficult to quantify, depending on basin shape, location within the watershed, substrate, local groundwater gradients, etc.” Assigning values to wetland recharge and discharge without site-specific investigation is therefore scientifically unsound and risks misrepresenting actual wetland function within the assessment area.</p>	The Wetland Function Assessment should include site-specific hydrogeologic investigations across all wetland types within the RSA to accurately characterize recharge and discharge functions. At minimum, a transparent description of field methods, data coverage, and limitations must be provided to support the validity of the functional ratings.	<p>4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR). The OPIAM guidelines are used to collect information for substrates (soils) and vegetation. Field teams used large-scale plots and small-scale quadrats to collect data about species presence and abundance in upland, wetland and riparian environments. Additional details about the survey methodologies employed by the Project team are contained in Sections 9.2.4.1 through 9.2.4.5 of the Natural Environment Existing Conditions report, with Section 9.2.4.2 specifically describing surveys of wetland ecosystems. Data collection forms are included as Appendix 9.1 of the NEEC report.</p> <p>Sections 7 and 8 of the EAR/IS discuss hydrological and hydrogeological assessments that were undertaken in the Project’s study areas. These included the installation of monitoring wells and piezometers, tests of hydraulic conductivity, and groundwater sampling. It would not have been feasible to conduct site-specific hydrogeologic investigations throughout the RSA.</p> <p>The Wetland Function Assessment was conducted at a landscape (Tier 1) scale by modelling probability of use, data from the vegetation and wildlife field programs, and qualitative relative geophysical functional values based on published reports. In</p>

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					<p>addition to the qualitative descriptions of relative geophysical functional values, a semi-quantitative assessment (i.e., based on ordinal values) of each geophysical value was modelled using logistic regression in R to assess specific wetland geophysical functions in terms of probability that specific mapped wetlands (ELC polygons) provide that functional value. The relative probability values used were based on a review of published literature and other environmental assessments, and were assigned to wetland types, ranging from 0 to 1. This approach is considered adequate for this stage in the study since it would not have been feasible to conduct site-specific geophysical wetland function investigations throughout the RSA prior to the identification of the preferred route during the Existing Conditions study field programs.</p> <p>As a result, a commitment has been made to conduct a more detailed Tier 3 wetland functions assessment in the future (outside EA/IA process) as part of the development of the Wetlands Function Monitoring program discussed in Section 11.4.2 and outlined in Appendix K4. The monitoring program will be based on an initial detailed baseline functional assessment of each wetland type potentially impacted by the roadway installation. For each wetland type two (2) reference sites will be selected, subject to the same assessment process which will include site specific collection of geophysical function data (e.g., Hydrology, Hydrogeology, etc) to provide benchmarks for the assessment of functional change during construction and operations.</p>
111.	Section 9.4.2 Wetland Function Assessment	Draft EA/IS Appendix F: Natural Environment Existing Conditions	The Appendix F applies Tier 1 Landscape- Level Assessments. Hansen (2005) describes these as tools that “consider the broader landscape (e.g., sub-shed, watershed, country or province) [to] help identify the <i>relative</i> importance of wetland function within the landscape.” However, the scope of this assessment is constrained to the RSA, which does not align with ecologically meaningful landscape boundaries or a broader landscape (e.g., sub-shed or watershed).	A landscape-level assessment should be conducted using ecologically relevant boundaries, such as sub-watersheds or entire watersheds. This would allow wetland functions to be assessed within the full hydrologic and ecological systems that they are a part of. The Draft EA/IS should provide clear justification for limiting the assessment to the RSA and explain how this method reliably characterizes wetland function and net effects.	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The Tier 1 wetlands Functional assessment was limited to the RSA due to the availability of detailed vegetation and wildlife field data which was used as inputs to the probability of use and occurrence models. A discussion of regional hydrologic function in relation to the broader landscape (e.g., watersheds, physiographic regions) is contained in Section 9.4.1 of the Natural Environment Existing Conditions Report</p>

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			<p>Instead, it is restricted to a 5-km or 500-m buffer. The RSA is defined as the “geographical extent to which potential effects from the Project may be expected.” This means the assessment is estimating the relative importance of wetland functions only within an area already assumed to experience effects, rather than in the context of the broader watershed. As such, there is risk of underestimating effects, since wetlands are being evaluated only against other potentially impacted wetlands, rather than against their functional role within the broader watershed.</p>	<p>The potential impact to wetland function within the broader context of watershed function further supports the need for a watershed health value component and the need for more coordinated watershed monitoring and stewardship initiatives, as discussed in the surface water section.</p>	<p>(Appendix F of the EAR/IS). VC specific follow-up and compliance monitoring programs, including a dedicated wetlands function monitoring program, will be developed as part of future detail design phase of the Project in consultation with Indigenous communities, federal and provincial agencies, and stakeholders.</p> <p>Although the proponent acknowledges that the regional functional wetland assessment methodology was adequate for determining an initial assessment of wetland function, follow-up monitoring programs would be site specific. An approach to monitoring localized effects is included in Appendix K-4.</p>
112.	Section 9.4.2 Wetland Function Assessment	Draft EA/IS Appendix F: Natural Environment Existing Conditions	<p>The Draft EA/IS applies a semi-quantitative assessment (e.g., ordinal values) to estimate the probability that a given wetland type provides specific geophysical functions. It is stated that this method is considered adequate to determine the general function of wetlands for the purpose of conducting the alternatives analysis and developing a determination of the net effects of the preferred route. However, no justification is provided from literature, regional assessments, or guidance to support this claim. Nibinamik is concerned that this approach lacks the rigour needed to identify impacts to sensitive local wetlands or broader regional wetland/peatland complexes.</p> <p>While the Proponent acknowledges that a comprehensive hydrologic, groundwater, nutrient cycling, and carbon monitoring program will be needed after construction, post-construction monitoring cannot substitute for a robust assessment of net effects at this stage.</p>	<p>The Draft EA/IS should provide greater justification to support that the applied approach is adequate to determine net effects on wetland function (e.g., published studies, past assessments, guidance, etc.). Justification should demonstrate that this high-level assessment has been successful in determining net effects and implementing mitigations. Nibinamik prefers that a full assessment of wetland function is completed, where effects to wetland function are assessed at the site-specific and watershed level. Nibinamik requests that impacts to wetland function are considered highly uncertain at this time and require a more robust assessment to demonstrate the scope and significance of net effects.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>Section 9.2.6 of the Natural Environment Existing Conditions Report includes a list of approaches that can be used to assess wetland function(s) on the landscape. It also provides the Project team’s rationale for selecting a modified landscape-level assessment method (rather than rapid or detailed) for this proposal.</p> <p>There have been few long-term studies of wetland function(s) in boreal ecosystems; however, some semi-quantitative wetland functional assessments that have been used to characterize existing conditions or monitor the effectiveness of mitigation or restoration measures include:</p> <ul style="list-style-type: none"> <li>• Hydrogeomorphic (HGM) approach models;</li> <li>• Remote-sensing-based conditions assessments (Chasmer et al., 2020);</li> <li>• Wetland Ecosystem Services Protocol for Atlantic Canada (Adamus, 2018).</li> </ul>
113.	Section 9.4.11 Calculation of Accumulated Functional Values	Draft EA/IS Appendix F: Natural Environment Existing Conditions	<p>There are concerns that the approach to the functional wetland assessment may underestimate impacts. Aggregating functional values across different wetland function groups (e.g., hydrologic, vegetation, wildlife) may dilute or obscure critical signals for specific functions, potentially limiting the ability to identify and mitigate significant impacts.</p>	<p>The Draft EA/IS should provide a transparent methodology that evaluates each wetland function individually and clearly demonstrates how post-construction changes were estimated. This would improve confidence in identifying impacts and designing effective mitigation measures.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>The methodology and results presented in Appendix F relate to the characterization of existing conditions in the study areas. The effects assessment begins in</p>

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			Furthermore, the assessment does not explain how changes to wetland function post-construction were determined, creating uncertainty around potential effects and the adequacy of proposed mitigation measures.		<p>Section 11.3 of the EAR/IS, with potential effects to wetland function being described in Section 11.3.3 and Table 11-40, mitigation measures in Section 11.4.2 and Table 11-41, and predicted net effects in Section 11.7.2 and Section 11.8.</p> <p>The TISG require that the Wetlands Function Evaluation approach be developed using the approaches provided in the Wetland Ecological Functions Assessment: An Overview of Approaches (Hanson et. al., 2008) (WEFA). The approaches found therein, as well as a review of other approaches not listed, all aim to provide a single functional value for a particular wetland which is based on numerous factors.</p> <p>It is understood that the single aggregated value may be misleading, but the methodology chosen allows for the examination of each factor individually (if required) since the 50 biotic and abiotic geophysical, biophysical, and socio-economic functions of wetlands incorporated into the model were developed, considered, and described independently prior to aggregation.</p>
114.	Section 11.3.2.1.3 Vegetation Community Fragmentation	SECTION 11: Assessment of Effects on Vegetation and Wetland	<p>The reported 0.8% direct and indirect loss of vegetation and wetlands within the RSA (AtkinsRéalis, 2025) does not account for the true impact to vegetation from this road. This novel linear feature, especially in conjunction with the Northern Road Link and nearby mining operations (AtkinsRéalis, 2025), will create emergent cumulative effects that will impact local ecological communities to an unknown, but likely significant, extent. The mechanisms for these vegetation and wetland impacts are as follows:</p> <ul style="list-style-type: none"> <li>• invasive species;</li> <li>• edge effects;</li> <li>• increased dust (described in Geology, Terrain &amp; Soils Section); and</li> <li>• increased anthropogenic access.</li> </ul>	Nibinamik recommends an expanded description of “Moderate” and “High” vegetation and wetland impacts to encompass at least a 150 m buffer around the entire project footprint.	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>The purpose of Section 11.3 is to identify potential effects pathways, with Section 11.3.2.1.3 focused on potential effects of vegetation community fragmentation. The mechanisms identified by Nibinamik First Nation (invasive species, edge effects, increased dust and increased anthropogenic access) are considered under indirect effect pathways (Section 11.3.2.3) with potential effects zones of up to 250 m incorporated into the analysis (refer to Tables 11-30 and 11-31).</p>

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115.	n/a	SECTION 11: Assessment of Effects on Vegetation and Wetland	Invasive species exert a cost of between \$13-\$34 billion dollars per year on Canadian industries. And, this is, by definition, an underestimate as no dollar-value is assigned for subsistence harvesting, culturally significant plants and animals, or ecosystem services. Roads are known vectors for their proliferation, therefore, the proposed WSR comes with a major risk of spreading invasive species.	Nibinamik requests to be involved in the development and implementation of a comprehensive and adaptive Invasive Species Mitigation Plan. Invasive species management must not involve the use of herbicides or other chemical treatments with the potential to have knock-on adverse environmental impacts.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Follow-up and compliance monitoring programs, including a Vegetation and Invasive Species Management Plan, and a long-term restoration and monitoring program will be developed during the future detail design phase. Community members will be provided the opportunity to provide feedback on monitoring programs and participate in the implementation of these programs. Additional details can be found in Section 22 of the EAR/IS.
116.	Section 11.9 Determination of Significance	SECTION 11: Assessment of Effects on Vegetation and Wetland	Disturbance tolerant and invasive plant species are known to thrive along roads and other anthropogenic linear features, and in some cases, this impact has been observed extending as far as 150 m away from the road edge. Therefore, a 150 m wide corridor extending beyond the edge of the road may experience (moderate to high) impacts from shifts in vegetation community composition and diversity	There must be an acknowledgement in the Vegetation & Wetland assessment of significance section: shifts in vegetation and wetland communities should be assessed as "Significant", due to the extensive edge effects and invasive species proliferation expected and described above.	1. Item will be addressed in the Final EAR/IS submission. Section 11.9 has undergone substantial revision, with a qualitative aggregation method now being used to determine significance.
117.	n/a	SECTION 11: Assessment of Effects on Vegetation and Wetlands	Because plant medicines are not assigned economic value, they are not taken into account when examining the impact of invasive species. Habitat fragmentation would alter vegetation communities along the WSR, with ecological effects to extensive adjacent areas (such as changes in plant species composition, road avoidance by large wildlife, pollinator & seed disperser impacts etc.). The ecological changes to road-adjacent areas may impact distribution and abundance of plant medicines in currently unforeseen ways.	Nibinamik requests consultation, oversight, participation in decision making and involvement in monitoring of vegetation communities and wetlands during all project phases.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
118.	Section 11.3.6 Effects Summary Table 11-40: Potential Effects, Pathways, and Indicators for the Vegetation and Wetlands VC and Section 21.4.6.5	Section 11: Assessment of Effects on Vegetation and Wetlands And Section 21 Cumulative Effects Assessment	Airborne dust and runoff contaminants such as silts, sands and salt, will have a direct negative impact on plant medicine quality near the WSR. RFDs will also have an impact on vegetation health through the use of herbicides, pesticides, or other chemical treatments. Impacts to the health of vegetation, especially country foods, may affect Nibinamik members' health.	Nibinamik requests consultation, oversight, participation in decision making and involvement in monitoring of vegetation communities and wetlands during all project phases. A country food monitoring program to verify the presence and absence of contamination must be developed and implemented in collaboration with Nibinamik.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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	Assessment of Significance				
<b>WILDLIFE AND WILDLIFE HABITAT</b>					
119.	n/a	Section 12: Assessment of Effects on Wildlife and Wildlife Habitat	The health of wildlife may be impacted through direct contact and/or through their food by products used in the Project (e.g., dust and herbicides). The Project also enables RFDs which will have an influence on wildlife health through the use of herbicides, pesticides, and other chemical treatments.	Nibinamik not only requests that this Project refrain from the application of chemicals that may affect wildlife health, but it is essential that the health of wildlife is monitored. Nibinamik reiterates the request that a country foods monitoring program is established to verify the health of wildlife and potential risks to Nibinamik members from the consumption of country foods.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
120.	Section 12.2.1 Existing Conditions: Methods	Section 12: Assessment of Effects on Wildlife and Wildlife Habitat	For the majority of potential SWH types along the proposed WSR, no field investigations were completed. The risk of losing discrete and significant features such as mineral licks, perennial den sites, or hibernacula remains an unknown and unmitigated impact. SWH was developed based on guidance documents.	Additional ground truthing for potential high-valued SWH sites (including caribou nursery sites, hibernacula, mineral licks, den sites etc.) should be completed. Also, the Draft EA/IS should specify that these impacts are unknown and pose a high risk for various VCs within the LSA/RSA. Furthermore, well-considered adaptive management and mitigation plans should be created in order to reduce impacts to SWH features, should they be discovered.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
121.	Section 12.3 Identification of Potential Effects, Pathways and Indicators	Section 12: Assessment of Effects on Wildlife and Wildlife Habitat	Section 12.3.2.1 on Habitat Alteration or Degradation should address other influential effects pathways including fragmentation, which may differentially impact species in distinct ways – this is noted throughout the remainder of Section 12.3. Roads are known to create substantial habitat fragmentation effects within wilderness areas. The proposed physical roadway, its traffic, and alterations to vegetation communities would all serve as barriers to wildlife movement. While a road may not entirely prevent wildlife from crossing, fragmentation increases the cost of movement and disrupts wildlife through a combination of mechanisms.	The Proponent must establish a long-term monitoring and adaptive management plan that includes: <ul style="list-style-type: none"> <li>measurable mitigation targets;</li> <li>mechanisms to limit harvesting and access along the road;</li> <li>ongoing monitoring;</li> <li>seasonal shut-downs to facilitate wildlife movement;</li> <li>invasive species monitoring and management.</li> </ul> Further, the Proponent must ensure that wildlife corridors and passages are included in the design of the road. Nibinamik requests to be engaged on these.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). A monitoring plan will be developed during the future detail design phase, including consideration of eco-passages for wildlife and Nibinamik will be engaged during its development. It is not practicable to shut down the road due to community safety reasons but appropriate safety and wildlife measures will be developed to minimize impacts to wildlife in addition to those specified in the EAR/IS.
122.	Section 10.3.1.7.4 Bat Maternity Roost Habitat	Appendix F: Natural Environment Exiting	Information presented in the Draft EA/IS is lacking with respect to bat habitat use within the LSA/RSA, which creates a risk that impacts to bats would be higher than those acknowledged. Incidental surveys for bat hibernacula (aerial surveys at 100 km/h at	Ground truthing of the highest likelihood potential hibernacula sites should be conducted during a seasonally appropriate timeframe (swarming/pre-overwintering) including the use of active and passive ultrasound acoustic detectors.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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		Conditions Report	100 m altitude) are not sufficient to comment on the presence/absence of these features: as acknowledged in the Draft EA/IS.		Further field investigation related to hibernacula sites will be consider by the ultimate owner/operator during the detail design and permitting phase of the Project.
123.	Section 10.3.1.7.4 Bat Maternity Roost Habitat	Appendix F: Natural Environment Exiting Conditions Report	The Draft EA/IS currently states that no bat maternity roosts were confirmed during field surveys—however no suitable surveys were conducted to examine for bat maternity roost sites. Impacts to bat maternity roosts are unknown and are an unmitigated risk of the proposed WSR.	Please revise 10.3.1.7.4 to state that “no bat maternity roost field surveys were completed.”	1. Item will be addressed in the Final EAR/IS submission. Edit has been made as requested.
124.	Section 12.8.1 Table 12-244 Key Criteria and Scores for Determining the Significance of the Predicted Net Adverse Effects on Moose	Section 12: Assessment of Effects on Wildlife and Wildlife Habitat	The assessment that, net adverse effects on the Moose is considered not significant, is not substantiated. Especially within the RSA, the cumulative effects of multiple novel roads and mines will certainly cause increased moose mortality due to interactions with hunters, vehicles, and predators.	In light of the myriad impacts to this complex, and culturally important species, we assert that the proposed impacts to moose in the LSA and RSA should be determined as “High” magnitude and the cumulative effects as “Significant.”	Your comments on characterization of the effects to moose and determination of significance has been considered in the Final EAR/IS.
125.	Section 13.3.3 Identification of Potential Effects, Pathways and Indicators; Caribou and Section 13.5 Characterization of Net Effects	Section 13: Assessment of Effects on Species at Risk	The proposed WSR would create a large, novel, ongoing habitat fragmentation impact within the Missisa herd range, a partial fragmentation of the Ozhiski herd and would also exert an impact on eastern migratory caribou of the Southern Hudson Bay herd. Furthermore, it would set the stage for major future cumulative effects to these herds from developments associated with the road (including forestry and mining impacts). Data collection suggests the Project will intersect to highly suitable habitat for calving and winter areas.	Nibinamik requests the following: <ul style="list-style-type: none"> <li>consultation, oversight, decision making and involvement in the development and implementation of caribou impact mitigation planning;</li> <li>provision of a memorandum report on the caribou that was killed during the collaring program; and</li> <li>road mitigation planning to include seasonal shut-downs when caribou migration or calving is present near the proposed road.</li> </ul>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
126.	n/a	Section 12: Assessment of Effects on Wildlife and Wildlife Habitat And Section 13 Assessment of	New roads create major opportunities to access natural resources and thus pose the risk of increased harvesting and hunting pressure in the region. The completion of the WSR would immediately expose timber, wildlife, plants, fungi, and minerals to increased harvesting levels and greatly enhance the risk of over- exploitation. Public access is only restricted during construction.	Nibinamik requests the following: <ul style="list-style-type: none"> <li>consultation, oversight, decision making and involvement in new commercial hunting and fishing operations in the region;</li> <li>consultation, oversight, decision making and involvement in access permissions along the proposed road; and</li> <li>consultation, oversight, decision making and involvement in permitting forestry and mining</li> </ul>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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		Effects on Species at Risk		<p>operations and developments.</p> <ul style="list-style-type: none"> <li>• Consultation, oversight, decision making and involvement in the development of detailed Monitoring Plans for the road's construction and operation including records and analysis of hunting and harvesting in the region.</li> </ul>	
127.	Section 12.3.8 Identification of Potential Effects, Pathways and Indicators: Waterfowl and Section 12.7.8 Predicted Net Effects: Waterfowl	Section 12: Assessment of Effects on Wildlife and Wildlife Habitat	The Draft EA/IS states that cumulative effects to forest and wetland birds will be moderate but "Not Significant." However, there is potential for substantial and unmitigated impacts to these VCs. The boreal forest currently serves as a critical nursery ground for over 300 species and produces billions of juvenile birds every year.	All novel road proponents in this region, including the WSR, should collaborate on a boreal bird conservation plan. This plan should incorporate known best practices such as refugia, stepping stones and corridors, as well as supporting research into region specific best practices for conserving this major population of North American breeding birds.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).
<b>SOCIAL ENVIRONMENT</b>					
128.	Section 1.0 Scope of the Assessment	SECTION 14: Assessment of Effects on Social Environment	The baseline and assessment of effects on the Social Environment is based on First Nations in the LSA available CCPs, Community-Based Land Use Plan (CBLUP) and IKLRU studies. However, only Webequie and two other First Nations have these documents and studies available, meaning the data to determine baseline and effects on Social Environment is incomplete. Completing CCPs, CBLUP and IKLRU takes time, capacity and funding.	Nibinamik requests that the proponent provides capacity and funding to support a Nibinamik - specific IKLRU study. The results of the IKLRU and assessment based on the results must be completed prior to any decision is made on the WSR project.	Refer to the response to Comment #1.
129.	Section 7.1.1.1 Childcare and Youth Services Drop-In Centre	Appendix N: Community Readiness Plan	The CRP proposed childcare centres in Webequie to support Webequie community members who will participate in training or employment opportunities related to the project. Though this initiative is positive, there must also be an option for childcare for community members from outside Indigenous communities to benefit from to ensure equal access to employment across genders and communities.	To ensure equal opportunities to training and employment, there must be childcare and youth services available to members of other Indigenous communities who will follow training programs or will work on the WSR.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>It is acknowledged that childcare in Nibinamik First Nation is an issue of concern to the community. Section 15.2.2.1.1 presents possible barriers to employment faced by fly-in First Nation communities such as Nibinamik First Nation. Section 15.3.1.2 and Section 15.4.1 present the predicted positive effects of increased jobs that will be available to LSA communities, including Nibinamik First Nation, as well as mitigation and enhancement measures to address barriers to employment. The Community Readiness Plan (Appendix N) proposes a Community Readiness Working Group that can include LSA communities such as Nibinamik First Nation. Participating</p>

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					communities can be involved in planning of mitigation and enhancement measures as well as monitoring and adaptive management plans.
130.	Table 14-4: Social Environment VCs –Indicators and Rationale	SECTION 14: Assessment of Effects on Social Environment	One of the VCs identified is Community Well-Being (CWB). One of the indicators that is of concern to Nibinamik related to CWB is the potential increased access to and consumption of drugs and alcohol, which is not mentioned as an indicator here.	As drug and alcohol consumption is a concern for many communities, and the Project, by increasing accessibility to the area, has the potential to increase the access to these substances. Therefore, we request that increased access to these substances be listed as an indicator and be part of the assessment of effects on Social Environment.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Changes to community well-being and safety are assessed in Section 14.3.7 and describes potential pathways of effects that could exacerbate existing substance use concerns in LSA communities, such as Nibinamik First Nation. However, changes to existing conditions with respect to substance use in Nibinamik First Nation due to increased employment and non-local population increase is not anticipated to be measurable.</p> <p>Substance use, including drugs and alcohol, is addressed in Section 17 of the Environmental Assessment Report/Impact Statement (EAR/IS) as a health determinant. This section considers potential effects related to substance use within the context of health and social well-being.</p>
131.	Table 14-5: Project Interactions with Social Environment VCs and Potential Effects	SECTION 14: Assessment of Effects on Social Environment	<p>Only 9 of the 19 Project activities during the construction and operation phases are listed as interacting with the Community Well-Being Valued Component. However, all of the activities listed will have impacts on community well-being and safety, as CWB is intrinsically linked to the environment and to the ability to practice traditional land use and harvesting activities, as well as the exercise of rights.</p> <p>Therefore, vegetation clearing, construction of culverts and bridges, etc. will have impacts on wildlife and wildlife/fish habitat, and therefore on CWB. Mobilization of equipment will also impact community safety and well-being, since any increase of people from elsewhere jeopardizes their security/puts them at greater risks.</p>	All of the listed activities must be indicated as having interactions with community well-being and safety.	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>The effects assessment was revised to reflect the input provided by Nibinamik First Nation, with the consideration of additional construction phase activities (Mobilization of Equipment and Supplies, Surveying and Vegetation Clearing and Grubbing. It should also be noted that indirect effects from changes to wildlife and wildlife habitat, as well as fish and fish habitat, on current and historical use of lands and resources for traditional purposes, including loss and/or alteration of lands and resources for traditional harvesting and loss of and/or alteration of sites and areas used for traditional harvesting has been assessed in Section 19.</p> <p>Changes to community well-being have been considered using indicators under Community Well-being and Safety in Section 14 of the EAR/IS (Social cohesion and culture; Participation in social and/or cultural events; Safety; and Nuisance effects indicators), Cultural Continuity in Section 19 of the EAR/IS (Quantity and/or quality of culturally and</p>

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					spiritually important sites and areas; Distance to culturally and spiritually important sites and areas; Sufficiency of lands and resources for cultural practices; and Cultural traditions or practices indicators). Social and cultural well-being are also considered as a social determinant of health in the health impact assessment, presented in Section 17 of the EAR/IS.
132.	Section 14.2.1.2 Collection and Analysis of Baseline Information	SECTION 14: Assessment of Effects on Social Environment	Census data was used as one of the sources for data collection and analysis of baseline conditions for Social Environment.  However, Census data is rarely accurate when it comes to First Nations data collection, for many reasons including aggregation of small communities into larger district, inconsistent participation of community members, lack of meaningful engagement with communities, and lack of cultural relevancy of the surveys (Leach, 2025).	Census data must be used cautiously, and must be complimented/supplemented with Indigenous/Community-led socio-economic studies. Again, capacity and funding must be available to support communities in completing these.	1. Item will be addressed in the Final EAR/IS submission.  Comment is acknowledged. The limitations of using census data are noted. If more information is supplied by any communities within the LSA or RSA that supplements census data, it will be integrated into Project planning, including in community readiness plans such as monitoring and adaptive management plans.
133.	Section 14.2.1.2 Collection and Analysis of Baseline Information	SECTION 14: Assessment of Effects on Social Environment	Only Webequie First Nation participated in the Focus Group and Knowledge Holder interviews, and only members from Webequie, Weenusk and Marten Falls First Nations participated in the community surveys (though all 22 Indigenous communities were invited to participate). This indicates a potential lack of engagement from leadership-leadership or nation-nation, which is often more meaningful than engagement from a project team or consultant.	Moving forward, creating opportunities for leadership-to-leadership discussions and engagement is important to ensure meaningful and proper engagement of affected First Nations.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
134.	Section 14.2.2 Results	SECTION 14: Assessment of Effects on Social Environment	The results of the social baseline study indicate that English is the primary language spoken in 74% of households in Indigenous communities in the LSA. This number is likely inaccurate for many communities.	Socio-economic data must be updated based on community-led studies and information for accuracy.	1. Item will be addressed in the Final EAR/IS submission.  The limitations of using census data are noted. If more information is supplied by any communities within the LSA or RSA that supplements census data, it will be used in the further Project planning, including in community readiness plans such as monitoring and adaptive management plans.
135.	Section 14.3.4 Change to Education, Training, and	SECTION 14: Assessment of Effects on Social Environment	It is mentioned that the Project may have positive effects on employment, training and business contracting opportunities.	We agree with this statement, however the training and employment opportunities must be specific to each community's needs and realities, and must extend to Nibinamik, as a signatory of Treaty 9.	1. Item will be addressed in the Final EAR/IS submission.  Comment is acknowledged. The Community Readiness Plan has been modified as needed to clarify that LSA and RSA communities may identify

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	Traditional Learning				education and training initiatives needed for the community such as those described in Section 7.2.1 through the Community Readiness Working Group.
136.	Section 14.3.4 Change to Education, Training, and Traditional Learning	SECTION 14: Assessment of Effects on Social Environment	Due to lack of availability of education and training programming and facility space in communities, it is likely community members will have to leave their community to get training and employment related to the WSR. This is understandable, however the impacts that this could have on social cohesion and practice of traditional activities as well as the passing down of culture, knowledge and language must be assessed here.	Ensure there is an assessment of the impacts of community members leaving their community for education and training related to the WSR on social cohesion and community well-being.	1. Item will be addressed in the Final EAR/IS submission. Comment is acknowledged. Change to education, training and traditional learning in LSA communities is considered in Section 14.3.4.2 of the EAR/IS, as well as mitigation and enhancement measures in Section 14.4.4 and included in the Community Readiness Plan. The Community Readiness Plan has been modified as needed to clarify that LSA and RSA communities may identify education and training initiatives needed for the community such as those described in Section 7.2.1 through the Community Readiness Working Group.
137.	Section 14.3.4 Change to Education, Training, and Traditional Learning	SECTION 14: Assessment of Effects on Social Environment	The statement that “The Project will not have a direct impact on the community well-being and safety within the other LSA communities” and that this effect is negligible is not accurate.	This Project inserts itself in the cumulative development in Northern Ontario around the Ring of Fire - Nibinamik is concerned about the cumulative impacts of this development specifically on CWB (community safety and health - drug use and drug and alcohol consumption in the community) and believes there will be direct impacts of the WSR on Community Well-Being. This must be reflected and assessed accurately in the Final EA/IS.	1. Item will be addressed in the Final EAR/IS submission. Mitigation and enhancement measures described in Section 14.4.7 for Community Well-being and Safety include participating LSA communities. Substance use, including drugs and alcohol, is addressed in Section 17 of the Environmental Assessment Report/Impact Statement (EAR/IS) as a health determinant. This section considers potential effects related to substance use within the context of health and social well-being.
138.	Section 14.4.1 Change to Population and Demographics	SECTION 14: Assessment of Effects on Social Environment	The WSR Working Group will only be composed of Webequie First Nation Chief and Council, Elders and representatives., meaning that the Community Readiness Plan will mostly focus on mitigating effects and maximizing benefits for Webequie First Nation. There will be impacts and benefits for First Nations in the LSA, and therefore, they should be represented on the Working Group to ensure their voices are heard and they have a say in decision making.	Representatives of other FN in the LSA should be invited to participate in the Working Group.	1. Item will be addressed in the Final EAR/IS submission. Members of LSA communities may be represented on the working group for the Community Readiness Plan.
139.	Section 14.4 Mitigation and Enhancement Measures	SECTION 14: Assessment of Effects on Social	Many of the mitigation and enhancement measures are focused or intended only for Webequie First Nation. As Nibinamik and other First Nations in the	Nibinamik-specific mitigation and enhancement measures must be developed with Nibinamik First Nation, based on the results of community	1. Item will be addressed in the Final EAR/IS submission. Mitigation measures are found throughout the EAR/IS and Environmental Mitigation measures are

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		Environment	LSA will also be directly impacted by the WSR, they should not be excluded of these measures.	engagement and IKLRU studies, as well as community concerns.	summarized in Appendix E while measures discussed in Chapters 14-20 are summarized in the Community Readiness Plan (Appendix N). The measures apply to all areas that will be impacted in both the LSA and RSA. No changes required.
140.	Section 14.7 Cumulative Effects	SECTION 14: Assessment of Effects on Social Environment	Cumulative effects assessment for the Social Environment VCs are focused on Webequie First Nation. There is no assessment for the cumulative effects of the WSR Project on other First Nations in the LSA.	The cumulative effects assessment needs to integrate other communities in the LSA, including Nibinamik, as the entire region will be subjected to the cumulative effects of road development and mining/other development in the foreseeable future. Roads could facilitate other development or activities such as tourism, outfitting, forestry, hydro, etc., all of which could have negative impacts on Nibinamik CWB and their Treaty and Aboriginal rights.	1. Item will be addressed in the Final EAR/IS submission. None of the residual effects identified in Section 14 for other communities in the LSA were predicted to be of moderate significance and therefore were not carried forward in the cumulative effects assessment, as per the methodology laid out in Section 14.7.
141.	Section 21.4.9.3 Social Environment: Mitigation for Cumulative Effects	SECTION 21: Cumulative Effects Assessment	Since the Cumulative Effects Assessment (CEA) focuses on the cumulative effects of RDFs on Webequie First Nation, the mitigation measures are geared toward minimizing impacts and enhancing benefits to Webequie First Nation. There are no mitigation measures specific to the social impacts of the WSR on Nibinamik First Nation.	As previously mentioned, a CEA for impacts on the Social Environment is necessary for not only WFN, but all other surrounding FN, including Nibinamik. Mitigation and enhancement measures for cumulative effects on Nibinamik will need to be developed and implemented based on the result of this study.	1. Item will be addressed in the Final EAR/IS submission. Mitigation measures are found throughout the EAR/IS and Environmental Mitigation measures are summarized in Appendix E while measures discussed in Chapters 14-20 are summarized in the Community Readiness Plan (Appendix N). The measures apply to all areas that will be impacted in both the LSA and RSA. No changes required. The proponent proposes to meet with Nibinamik First Nation to discuss further coordination of ongoing planning processes related to the all-season road projects and the Ring of Fire mineral development area, including identifying effects, mitigation and enhancement measures and monitoring. The proponent encourages Nibinamik First Nation to bring forward proposed mitigation and enhancement measures that could contribute to community readiness of Nibinamik First Nation related to all-season road projects and the Ring of Fire mineral development area; however, currently the EAR/IS for WSR has not defined these specific measures, but provides a path to discuss further via the proposed Community Readiness Working Group, as described in Section 5 of the Community Readiness Plan (Appendix N).

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142.	Section 6.0 Plan Inputs	Appendix N: Community Readiness Plan	The CRP focuses on the priorities identified in Webequie First Nation's CCP. Therefore, priorities of other First Nations impacted by the WSR Project do not seem to be reflected in the CRP.	The CRP should extend to the priorities of surrounding First Nations, including Nibinamik. Funding should be provided by the Proponent for Nibinamik to develop its own CRP and participate in the development of an Emergency Response Plan for the WSR Project.	1. Item will be addressed in the Final EAR/IS submission. The CRP is intended on being iterative and will include representatives from other LSA communities. One of the intents (Section 2 of the CRP) is to transfer the EAR/IS results and commitments into a format for facilitating dialogue with Webequie First Nation and other LSA and RSA communities.
143.	Section 7.2.1 Education, Training and Employment Readiness Strategy	Appendix N: Community Readiness Plan	The Training and Employment Strategy seems to be geared toward the needs of Webequie First Nation, while all surrounding First Nations, including Nibinamik, should be considered in this strategy.	Ensure equal access for Nibinamik community members to training and employment opportunities. This includes a Training and Employment Plan that considers the cultural and social reality and specificities of Nibinamik.	1. Item will be addressed in the Final EAR/IS submission. See the response to Comment #142.
<b>ECONOMIC ENVIRONMENT</b>					
144.	Table 15-2 Regional and Local Economy VC–Summary of Input Received During Engagement and Consultation And Section 15.4.4 Mitigation and Enhancement Measures–Public and Indigenous Finances	Draft EA/IS Section 15 Economic Environment	<p>The Project is intended to be an economic driver, both for the regional mineral development and community of Webequie. As an economic engine for the Treaty Territory, and Nibinamik as a signatory of the Treaty, it is imperative that the economic benefits extend to Nibinamik (in response to Treaty Rights for economic benefit from development within the Treaty territory).</p> <p>Mitigations and accommodation specific to the economic environment rights are missing from the results and deficient in the Aboriginal and Treaty Rights assessment section (see Section 2.14).</p> <p>This Project is designed to align with Webequie First Nation self-determined goals and community priorities, but this is not clear for Nibinamik.</p> <p>Because this project is a cost to the province there are no mitigations or enhancements proposed in relation to Indigenous finances. Previous discussions throughout the Draft EA/IS highlight the economic and socio-economic challenges experienced with the LSA.</p> <p>Significant investment into the Webequie community (\$60 million) is brought forward as a suggestion to enabling the Nation fully capture the economic benefits of the WSR.</p>	<p>The economic environment assessment address generic benefits and impacts and is recommended to better encompass Rights consideration as this forms part of the legal and constitutional context. Beyond a separate ARTI Section, a discussion of how the Project will fulfill the constitutional and Treaty economic obligations is warranted as part of the Economic Environment. This should include revenue sharing to ensure that Nations benefit economically for development of the Treaty and can better enable their ability to capture the benefit of development (WSR and regional).</p> <p>An improved engagement process is required to understand how this Project, and its objective for Ring of Fire development, relate to Nibinamik's self-determination goals, traditional economies, and community priorities. Additional Community plans and inputs are necessary for Nibinamik rights to be considered, and this may include an assessment of the Nations Readiness to participate in the WSR and other regional development.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Section 19 of the Environmental Assessment Report/Impact Statement (EAR/IS) assesses potential effects on Indigenous peoples, including impacts to the exercise of Aboriginal and/or Treaty rights. This section considers how the Project may influence rights, traditional practices, and community priorities, and incorporates input received through engagement with Indigenous communities.</p> <p>Economic considerations related to Indigenous participation and benefits are addressed through ongoing engagement and collaboration with communities. These discussions aim to understand community priorities, self-determination goals, and readiness for participation in regional development initiatives. Feedback received will continue to inform the assessment and support opportunities for Indigenous communities to benefit from the Project.</p> <p>Please note that matters such as revenue sharing and fulfillment of constitutional and Treaty economic obligations fall outside the scope of the EAR/IS. However, these topics are recognized as important and will be considered through separate processes and continued engagement with Indigenous communities and relevant authorities.</p>

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			<p>The same work to understand investment needs for other LSA First Nations has not been completed, including Nibinamik.</p> <p>There is also a lack of Project recommendations in how government profits and benefits should remain within the LSA.</p>		<p>The proponent commits to meeting with Nibinamik First Nation in the future to discuss further coordination of ongoing planning processes related to the all-season road projects and the Ring of Fire mineral development area, including identifying effects, mitigation and enhancement measures and monitoring. The proponent encourages Nibinamik First Nation to bring forward proposed mitigation and enhancement measures that could contribute to community readiness of Nibinamik First Nation related to all-season road projects and the Ring of Fire mineral development area; however, currently the EAR/IS for WSR has not defined these specific measures, but provides a path to discuss further via the proposed Community Readiness Working Group, as described in Section 5 of the Community Readiness Plan (Appendix N).</p>
145.	<p>Section 15.2.2.1 Labour Force Employment and Income</p> <p>Section 15.2.1.5 Summary of Data Sources</p> <p>Section 15.3.1 and 15.3.2</p>	Draft EA/IS Section 15 Economic Environment	<p>The assessment acknowledges that reliance on census data as the primary input does not adequately capture the traditional economy and may either under- or over-represent existing conditions, thereby limiting the accuracy of projected economic impacts.</p> <p>Socio-economic conditions within the LSA are identified as key factors influencing employment barriers and labour force participation, with a significant disparity in income and employment already present across communities.</p> <p>The assessment forecasts that the majority of employment opportunities will be directed to members of Webequie First Nation, with a smaller proportion available to other LSA communities, including Nibinamik First Nation. As noted, “due to the limited presence of supply chain industries in the LSA, relatively few indirect effects will be captured by the other LSA communities” (AtkinsRéalis, 2025, pp. 15-114).</p> <p>Given that Webequie First Nation is the Project proponent, it is expected that the Nation will hold a direct role and accountability in achieving project outcomes.</p> <p>Importantly, the assessment does not propose mitigation measures to address existing challenges</p>	<p>These knowledge gaps, wage and employment disparities can be address by community-specific studies and planning to ensure the LSA to prepared to participate in the Project as well as the regional development that may come from the Ring of fire Access. Nibinamik recommends capacity to undertake economic development planning for the community. Including Nibinamik-specific outcomes in project planning is essential to address the limited supply chain. This must be paired with direct engagement:</p> <ul style="list-style-type: none"> <li>• Between Nibinamik and Webequie leadership to address employment and labour force participation as part of this Project as well as adaptive management for follow-up accountability.</li> <li>• Between Nibinamik and the WPT along with commitments for future relationship building with the construction contractor and adaptive management for follow-up accountability.</li> <li>• Between Nibinamik and the Ontario and Federal government to ensure the appropriate support systems are in place to improve Nibinamik members capacity to capture future employment opportunities. Training and career development must be beyond</li> </ul>	<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>As more information becomes available, the Project team will incorporate it into the Environmental Assessment Statement/Impact Report (EAS/IR). Commitments made in the Community Readiness Plan will be monitored and evaluated for their effectiveness in supporting employment, training, and economic participation.</p> <p>The Project Team recognizes the importance of direct engagement and adaptive management to address employment objectives and community priorities. Feedback received through ongoing engagement will continue to inform planning and mitigation measures, including those related to workforce readiness, cultural considerations, and workplace policies.</p>

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			<p>in local employment and income conditions but instead frames these measures as “Project enhancements.” Without binding commitments, the socio-economic issues documented in the existing conditions baseline can reasonably be expected to persist or worsen as a result of the Project. The characterization of these measures as enhancements does not provide the level of certainty required; they must be framed and implemented as formal mitigations to ensure adverse impacts are addressed.</p>	<p>Project-specific opportunities but is necessary now to prepare for the long-term regional development.</p> <p>Project-specific mitigations to improve employment and income outcomes must include:</p> <ul style="list-style-type: none"> <li>• seasonal and flexible work opportunities to accommodate cultural practices (traditional land use and ceremony);</li> <li>• wage equity between employees from the LSA, RSA and beyond;</li> <li>• mitigative training and strict workplace policies against discrimination and harassment;</li> <li>• zero tolerance policy for drugs and alcohol at all work and camp sites;</li> <li>• inclusion of ceremonial or cultural practices in construction plans monitoring programs with specific targets and metrics on employment and income within the LSA; and</li> <li>• commitments for adaptive management and contingency measures if employment objectives are not met.</li> </ul>	

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146.	Section 15.5.1 Potential Effect Pathways Not Carried Through for Further Assessment and Section 15.2 Existing Conditions	Draft EA/IS Section 15 Economic Environment	<p>Traditional economies are considered within the Draft EA/IS, however little data was available or provided. It is recognized that the traditional Indigenous economy is a component of Aboriginal and Treaty Rights. Many traditional economies are considered to be directly related to other disciplines of assessment (fish, wildlife, vegetation) all of which are included herein and highlight potential long-term impacts affecting Nibinamik rights.</p> <p>This Project is designed to facilitate further long-term regional impacts as well as economic benefit and employment, for this reason, consideration of the cumulative effects on Rights impacts and traditional economies is warranted.</p> <p>The majority of data assessed is based on census, which admittedly excludes traditional economies. Employment rates are notably lower in the LSA than the rest of Ontario, the importance of traditional economies may be entirely underrepresented and in the absence of a cumulative effects assessment, the impacts (short and long-term) overlooked.</p>	<p>Short-term impacts may be centralized around the lack of individual opportunities to participate in traditional economies (as a result of employment), and therefore cultural transmission. However, the impacts become cumulative with long-term potential for degradation of cultural preservation/transmission and the environmental conditions necessary for traditional economies.</p> <p>Mining and resource extraction have a tendency to operate on a boom-and-bust cycle, which poses intermittent positive and negative economic impacts within the LSA and RSA. This cycle emphasizes the importance of the traditional economy.</p> <p>Further data on traditional economy participation and the conditions to sustain this Aboriginal Rights is required to develop effective mitigations. This is recommended to form part of the future cumulative effects assessment on the Rights of Indigenous Peoples (AtkinsRéalais, 2025, p. 21.4.12). As noted in Section 2.1, this assessment should be validated by Nibinamik.</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>We look forward to Nibinamik's validation of our assessment.</p>
147.	Section 15.4.3 Mitigation and Enhancement Measures – Business Environment	Draft EA/IS Section 15 Economic Environment	<p>The assessment does not propose mitigation measures to address existing challenges in the business environment, but instead frames these measures as “Project enhancements” and include:</p> <ul style="list-style-type: none"> <li>• robust procurement policies to involve Indigenous-owned businesses and strategies to support Indigenous hiring;</li> <li>• set-asides for Indigenous business are noted as tentative due to the limited capacity of Webequie and uncertainty of capacity within the LSA; and</li> <li>• scalable contracts and training to promotes skill development and sustainable business growth.</li> </ul> <p>Without binding commitments, the issues documented in the existing conditions baseline of the Draft EA/IS can reasonably be expected to persist or worsen as a result of the Project.</p>	<p>The characterization of these measures as enhancements does not provide the level of certainty required; they must be framed and implemented as formal mitigations to ensure potential adverse impacts are addressed. Mitigation as noted under Comment 145 above are applicable here as well. Additional measures should include:</p> <ul style="list-style-type: none"> <li>• Indigenous-prioritized bidding processes;</li> <li>• simplified and streamlined procurement processes for Indigenous business with procurement support processes (such as guidance to navigate the procurement process);</li> <li>• nation-direct engagement with Nibinamik to discuss opportunities and maintenance of the business relationship; and</li> <li>• track, measure and report economic outcomes; require institutional commitment from senior project leadership to ensure</li> </ul>	<p>1. Item will be addressed in the Final EAR/IS submission.</p> <p>Section 7.2.4 of the Community Readiness Plan (Appendix N) of the EAR/IS covers the Procurement Enhancement Strategy which includes procurement for Indigenous businesses. Monitoring, Review and adaptation of the Community Readiness Plan is commitment of the proponent and is described in Section 8 of the Community Readiness Plan.</p> <p>The proponent commits to meeting with Nibinamik First Nation to discuss further coordination of ongoing planning processes related to the all-season road projects and the Ring of Fire mineral development area, including identifying effects, mitigation and enhancement measures and monitoring. The proponent encourages Nibinamik First Nation to bring forward proposed mitigation and enhancement measures that could contribute to community readiness of Nibinamik First Nation related to all-season road projects and the Ring of Fire mineral</p>

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				economic goals are prioritized and achieved in collaboration with Webequie First Nation.	development area; however, currently the EAR/IS for WSR has not defined these specific measures, but provides a path to discuss further via the proposed Community Readiness Working Group, as described in Section 5 of the Community Readiness Plan (Appendix N).
<b>NON-TRADITIONAL LAND AND RESOURCE USE</b>					
148.	Table 16-5: Project Interactions with Land and Resource Use (non-Indigenous) VCs and Potential Effects	SECTION 16: Assessment of Effects on Non-Traditional Land and Resource Use	The Project interactions table does not identify 'Change to Land Use Compatibility and Stewardship' as a potential effect of the construction of structures at waterbody crossings.	The construction of waterbody crossings will change the land and the way waterbodies and the land are used, and therefore it will have impacts on Land Stewardship, and should be assessed as such.	1. Item will be addressed in the Final EAR/IS submission. Changes to waterbodies associated with waterbody crossings are discussed as a pathway related to changes in recreation and tourism (Section 16.3.3) rather than under Changes to Land Use Compatibility and Stewardship (Section 16.3.1). Considerations related to land and water use are addressed through this pathway, ensuring potential effects on how the land and waterbodies are used are captured within the assessment framework.
149.	Section 16.2.2.1.7 Federal Regional Assessment in the Ring of Fire Area	SECTION 16: Assessment of Effects on Non-Traditional Land and Resource Use	The RA of the Ring of Fire is necessary to assess the cumulative impacts of development in the area, however, as previously stated, no decision about the Project should be made until the RA is complete.	Ensure the RA is complete before making any decision about the WSR Project.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comments to the Ontario and Canada governments so the Crown can respond directly to you on this matter.
150.	Section 16.2.2.2 Land Use Planning and Stewardship	SECTION 16: Assessment of Effects on Non-Traditional Land and Resource Use	This section highlights Nibinamik (and other First Nations) land use planning and background information. As previously stated, Nibinamik does not yet have a CBLUP, and the information cited is likely outdated as it cites a 2014 study.	Nibinamik would like the opportunity to review the information provided, as well as opportunity to provide community-led information and land use planning for consideration in the assessment.	1. Item will be addressed in the Final EAR/IS submission. The Project welcomes any input that Nibinamik may provide with respect to Community Planning. No changes are proposed to the EAR/IS at this time.
151.	Section 16.2.2.3.2 Regional Study Area - Trapping	SECTION 16: Assessment of Effects on Non-Traditional Land and Resource Use	Again, the trapping data is based on Statistics Canada Census data and is likely an underrepresentation of trapping in First Nations in the RSA. The Draft EA/IS reports that there are 0 people whose occupation is trapper or hunter.	Nibinamik requests that this data is updated based on Community-led data gathering.	1. Item will be addressed in the Final EAR/IS submission. The Project welcomes any input that Nibinamik may provide with respect to Trapping for consideration.

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152.	Section 16.3.3.1.8 Road Use (Operations Phase) - Change in Access to Traditional Territory - Potential Increase in Number of Tourism Activities or Users	SECTION 16: Assessment of Effects on Non-Traditional Land and Resource Use	The effect of the operations of the WSR Project (road use) is considered to be negligible on the potential increase of tourism activities or users in the region. Rather, increase in tourism and users (outfitters, hunting, trapping, fishing, gathering, etc.) is a significant concern for Nibinamik, and increased access to the region will likely increase these activities, and thus the effect should not be considered negligible.	The effect of the operations of the WSR Project (road use) on the potential increase of tourism activities or users in the region should be considered as moderate or high, and should be carried forward for further assessment and cumulative effects assessment, and mitigation measures should be implemented to minimize these impacts.	1. Item will be addressed in the Final EAR/IS submission. The Project does not create new attractions, and any incidental increase in access is expected to be minimal compared to existing regional tourism drivers, therefore any potential increase in tourism activities or users due to WSR Project road operations would not be considered moderate or high. The road primarily serves operational needs, with controlled and limited traffic, and does not significantly alter regional tourism patterns or contribute meaningfully to cumulative effects. Therefore, this interaction in our opinion does not warrant further assessment.
153.	Section 16.3.3.1.9 and Section 16.3.3.2.3 Road Use (Operations Phase) - Change in Access to Traditional Territory - Potential Increase in Number of Tourism Activities or Users - Potential Decrease in Availability of Wildlife Resources and Fish Resources	SECTION 16: Assessment of Effects on Non-Traditional Land and Resource Us	Similarly, the road use is likely to decrease availability of wildlife and fish resources as it will increase access to hunting and other harvesting activities in the area. Though WSR road use does not provide a transportation connection to hunting or fishing sites (as stated in the Draft EA/IS), it does provide easier access to these areas that are currently difficult to access. This is especially true during the winter months when the winter roads are open, as there is a winter road that connects Webequie to Nibinamik. This effect is therefore not negligible and must not be assessed as such.	The effect of the operations of the Project (road use) on the potential decrease in the availability of wildlife and fish resources should be considered as moderate or high, and should be carried forward for further assessment and cumulative effects assessment, and mitigation measures should be implemented to minimize these impacts.	1. Item will be addressed in the Final EAR/IS submission. The Project does not create new attractions, and any incidental increase in access is expected to be minimal compared to existing regional tourism drivers, therefore any potential increase in tourism activities or users due to WSR Project road operations would not be considered moderate or high. The road primarily serves operational needs, with controlled and limited traffic, and does not significantly alter regional tourism patterns or contribute meaningfully to cumulative effects. Therefore, this interaction in our opinion does not warrant further assessment.
154.	Table 16-47: Summary of Potential Effects, Mitigation Measures and Predicted Net Effects for Non-Traditional Land and Resource Use VCs	SECTION 16: Assessment of Effects on Non-Traditional Land and Resource Us	To mitigate and minimize the potential increase in mining claims, the Draft EA/IS proposed to use provisions from the <i>Mining Act</i> . With the implementation of this mitigation, the Draft EA/IS predicts there will be no net effect on commercial and industrial use in the area. However, it is important to consider other legislation that may have an impact on the potential increase in mining activity and claims in the region of the Ring of Fire, particularly the newly passed Bill C5 at the federal level, and Bill 5 at the provincial level.	Though we understand Bill 5 and Bill C5 were not passed at the time of the release of the Draft EA/IS, they must be considered in the Final EA/IS. The Draft EA/IS must take into consideration these new pieces of legislation, and the impacts they will have on development in the region.	1. Item will be addressed in the Final EAR/IS submission. Table 16-47 of the Draft EAR/IS already identifies a potential increase in mining claims as a potential effect. The mitigation measures described, which include provisions under the Mining Act, would still apply in the context of Bill 5 and Bill C5. These legislative changes will be considered in the Final EAR/IS to ensure that the assessment reflects the current regulatory environment.

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<b>HUMAN HEALTH</b>					
155.	Table 17-3: Human Health VC—Determinants of Health, Indicators, and Rationale	Section 17: Assessment of Effects on Human Health	The indicator for the Determinant called “Colonialism and trauma of residential schools” indicates the temporary disruption in traditional practices on the land. Though this determinant and indicator is critical to the effects assessment, the disruption of traditional practices of Indigenous Peoples in Canada was not temporary and isolated in time, but rather ongoing and a consequence of many colonial practices and laws, including the <i>Indian Act</i> .	Temporary should be replaced with ongoing disruption of traditional practices, to accurately reflect the ongoing challenges that many First Nations, including Nibinamik, still face related to practicing traditional activities such as harvesting.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).
156.	Table 17-4: Human Health VC—Project Interactions with Determinants of Health	Section 17: Assessment of Effects on Human Health	“Racism and social exclusion” is only determined to interact with human health during the construction phase, and not during the operation phase. Though the external workers will no longer be on site, the WSR will increase access of external people to the region, whether for recreational or tourism activities, or mining activities in the Ring of Fire. It is therefore safe to assume that there is potential for an increase in racism and social exclusion during the operation phase of the project.	The impacts of racism and social exclusion must be assessed not only during the construction phase, but also during the operation phase.	It is not known how many outsiders would have access to Webequie First Nation during the operations phase, and as such it cannot be anticipated what, if any, impacts there would be during the operations phase. Based on these uncertainties, the assessment was based on the assumption that road restrictions are effective to prevent public access by outsiders or trespassers.
157.	Section 17.2 Existing Conditions—Baseline Community Health Profile	Section 17: Assessment of Effects on Human Health	The baseline community health profile is only established for Webequie First Nation (other than certain generalizations that are made from existing literature), despite the fact that surrounding First Nations, including Nibinamik, are within the LSA and there will be direct impacts on their health and well-being. Without a baseline for health and well-being of Nibinamik, it is not possible to adequately assess the effects of the WSR on the community.	A Nibinamik-specific baseline study must be conducted for health and well-being to establish the existing conditions and identify, assess and mitigate the impacts of the WSR on Nibinamik. This Proponent must provide capacity and funding for this study.	See the response to Comment #1.
158.	Section 17.3 Identification of Potential Effects, Pathways and Indicators	Section 17: Assessment of Effects on Human Health	Similarly, the identification of potential effects of the WSR on Human Health is primarily focused on the potential impacts on Webequie First Nation and does not provide an assessment for the surrounding First Nation.	The identification of potential effects of the WSR must be done for Nibinamik specifically, based on the results of the baseline study.	See the response to Comment #1.
159.	Section 17.4 Mitigation and Enhancement Measures	Section 17: Assessment of Effects on Human Health	The Community Readiness Plan and Community Readiness Working Group will be implemented to ensure that community recommendations and enhancement measures are considered. However, this Working Group must reflect the input of all First	The Proponent must ensure equal representation of all First Nations in the LSA on the Community Readiness Working Group.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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			Nations in the LSA, including Nibinamik, and ensure equal representation from all communities.		
160.	Table 17-6: Summary of Potential Effects, Mitigation Measures and Predicted Net Effects for Human Health VC	Section 17: Assessment of Effects on Human Health	Mitigation measures for the “food security” determinant of health and the potential loss of access to traditional foods caused by the project is to identify traditional hunting areas and to minimize disturbance in these areas. While this measure will likely minimize the impacts on access to traditional foods and harvesting areas, the information is solely based on First Nations who have TKLUS or Community-based Land Use Plans. Therefore, at the moment, though we know that Nibinamik members travel to Webequie to practice traditional activities and to visit family members, there is no information on specific Nibinamik land use areas in the disturbance area of the Project.	A TKLUS must be conducted for Nibinamik, so mitigation measures can be applied to culturally important sites for Nibinamik First Nation.	See the response to Comment #1.
161.	Table 17-6: Summary of Potential Effects, Mitigation Measures and Predicted Net Effects for Human Health VC	Section 17: Assessment of Effects on Human Health	Another mitigation measure for loss of access to traditional foods is to ensure Webequie First Nation is involved in all land use planning activities. Having only WFN involved is not representative of all First Nations in the LSA and does not allow other impacted First Nations to be involved appropriately in the project.	First Nations in the LSA should be included in land use planning activities, and all other relevant monitoring or planning activities, including the Community Readiness Plan, the Community Liaison Committee, cultural sensitivity training, Community Health and Well-being survey, etc.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
162.	Section 17.5.1 Potential Effect Pathways Not Carried Through for Further Assessment	Section 17: Assessment of Effects on Human Health	It is determined that the Project will have adverse effects on food security during the construction phase and positive effects on food security during the operations phase. Though the road will in fact increase access to the traditional territory for harvesting and subsistence hunting, fishing, trapping and gathering for community members, it will also increase access to these resources and areas for other people external to communities. This will have adverse effects on food security.	The adverse effects on food security (impacts on wildlife populations and health caused by increase in noise, dust, etc., increased access for people external to communities, etc.) during the construction phase must be assessed and mitigated and carried forward to the cumulative effects assessment.	Food security is carried forwarded in the cumulative effects assessment for human health as presented in Section 21.4.11.
163.	Section 17.10 Follow-up and Monitoring	Section 17: Assessment of Effects on Human Health	The Draft EA/IS invites First Nations to develop and implement monitoring programs, which will be helpful in ensuring that impacts are minimized and benefits are maximized on the surrounding First Nations. However, without adequate capacity and funding, it may be difficult for certain First Nations to develop and implement these monitoring programs.	The WPT must provide funding to Nibinamik to develop and implement a monitoring program to monitor the effects of the project on their rights and interests.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

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164.	Section 17.10 Follow-up and Monitoring	Section 17: Assessment of Effects on Human Health	Further, the follow-up and monitoring proposed is solely based on minimizing impacts and maximizing benefits (such as economic development and empowerment) on Webequie First Nation. This does not reflect the impacts that the Project will have on surrounding First Nations, including Nibinamik.	The WPT must provide funding and ensure that monitoring and follow-up programs are geared to impacts on not only WFN, but also surrounding FN, including Nibinamik.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
165.	Table 21-91: Net Effects for each Determinant of Health	SECTION 21: Cumulative Effects Assessment	Air quality, water quality and surface water quality have all been assessed to have impacts on Health, however the Draft EA/IS decided not to carry the assessment forward for these indicators in the cumulative effects assessment. No rationale is provided for this decision.	Nibinamik asks that the Draft EA/IS either provide rationale for why these determinants of health were not retained for a CEA or include them in the CEA.	1. Item will be addressed in the Final EAR/IS submission. For clarification, a table note has been added to Table 21-91 indicating that cumulative effects of air quality are discussed in Section 21.4.4. As the net effects on water quality are predicted to be of low magnitude, water quality is not carried forwarded in the cumulative effects assessment based on the criteria described in Section 21.3.2.
<b>ABORIGINAL AND TREATY RIGHTS AND INTERESTS</b>					
166.	Section 19.1.5.1 Spatial Boundaries	Section 19: Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Right	The spatial boundaries as described in section 19.1.5.1 describe the Project Footprint (disturbance area) as “35-metre wide right-of-way” and the LSA as encompassing surrounding First Nations, including Nibinamik. However, the map in Figure 19.3 shows the LSA as being a buffer around the preferred route and the RSA as a small region around the WSR, which does not encompass any other First Nations. These spatial boundaries do not align, and this information should be rectified.	For the purpose of the Indigenous Peoples and Aboriginal and Treaty Rights (IPATR), we believe the Project Footprint, LSA and RSA should be as qualitatively described in section 19.1.5.1, and not as shown on the map. The Proponent must also clearly indicate the spatial boundaries, both written and portrayed on a map.	1. Item will be addressed in the Final EAR/IS submission. Commented acknowledged. For clarification, please refer to Section 19.1.5.1 (Spatial Boundaries) of the EAR/IS, which includes the following description of the LSA with respect to Nibinamik First Nation: Local Study Area (LSA) – the area where direct and indirect effects of the Project on Indigenous Peoples and Aboriginal and Treaty Rights are likely to occur. The LSA extends 1 km from the centreline of the preliminary recommended preferred route and 500 m from temporary or permanent support infrastructure (Figure 19.3). The LSA also encompasses the following communities which may be beyond the 500 m delineation of the preferred route and permanent support infrastructure: - Nibinamik First Nation...

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167.	Section 19.2.2.2.6 Nibinamik First Nation	Section 19: Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Right	We appreciate that the Draft EA/IS mentions the limited available information on Nibinamik's cultural and traditional existing conditions and that the information will be incorporated into the next revision.	The WPT must ensure that sufficient time and funding is available for Nibinamik to complete these studies. The results of these studies must be used to identify culturally sensitive and significant areas, and to develop measures to avoid or minimize impacts in these areas.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). Refer to response to Comment # 43 on funding to participate in future phases of the Project.
168.	Section 19.4.1.1.2 Timing / Seasonality for Harvested Preferred Species	Section 19: Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Right	A suggested mitigation measure for overharvesting is to prohibit fishing for construction workers. However, there is no mention of restricting or prohibiting other harvesting practices (gathering, hunting and trapping) for construction workers.	We ask the WPT to indicate whether measures to restrict and/or prohibit all harvesting activities for construction workers will be implement, and if so, how they will be decided.	1. Item will be addressed in the Final EAR/IS submission. Section 7.5.2 of the Community Readiness Plan describes the Stewardship and Environmental Management Strategy, which will be developed by the Community Readiness Working Group (CRWG). Measures to restrict and/or prohibit harvesting activities for construction workers, including fishing, hunting, trapping, and gathering, will be considered by the CRWG as part of this strategy within the Community Readiness Plan.
169.	Section 19.4.1.4 Exercise of Aboriginal and Treaty Rights with Current and Historical Use of Lands and Resources for Traditional Purposes	Section 19: Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Right	This section mentions the implementation of a Stewardship and Environmental Management Strategy (The Strategy).	Further information on the Strategy would be appreciated. Nibinamik would like to be involved in the development of this Strategy.	1. Item will be addressed in the Final EAR/IS submission. More details can be found in Appendix N- Community Readiness Plan. Other members of the LSA, including Nibinamik will be invited to participate in this Strategy.
<b>CULTURAL HERITAGE AND ARCHAEOLOGICAL RESOURCES</b>					
170.	Section 2.3 Alternative Strategies for Special Survey Conditions: Test Pit Survey in Northern Ontario and on Canadian Shield Terrain and	Draft EA/IS Appendix T: Stage 1 Archaeological Assessment Report	A buffer of 50 m extending inland from known modern watercourses, waterbodies, and wetland areas demonstrates there are areas of high archaeological potential with the Study Area. The buffer for water as a feature of potential should be revised in line with best practices.	It is recommended that the potential model is revised to increase the buffer attributed to modern waterways to a minimum of 150 m.	The report has been submitted to the MCM and cannot be revised unless requested the proponent's subcontractor to pull the report from the MCM review queue. As per the Standards and Guidelines (S&Gs) lands beyond 50m from water do not retain potential unless other criteria such as well draining soils or features of interest are identified.

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
	Section 3.0 Recommendations				
171.	Section 2.3, Section 2.4 Conclusions and Section 3.0 Recommendations	Draft EA/IS Appendix T: Stage 1 Archaeological Assessment Report	The attribution of low potential for the balance of the LSA due to presumed condition of vast wetlands does not align with the background research and past land use.	It is recommended that the balance of the LSA that was considered to have low archaeological potential is reevaluated.	Until a visual inspection is conducted to confirm ground conditions, no areas are cleared of archaeological potential. This was an exercise in archaeological modeling to comply with the S&Gs. Background research and land use features available at the time of writing informed the determination of potential.  Please see the proposed mitigation measures described in the response to Comment #172 for the potential discovery of previously unidentified archaeological resources.
172.	Section 2.1 Alternatives for Potential Evaluation in Special Conditions: Remote Areas and Section 3.0 Recommendations	Draft EA/IS Appendix T: Stage 1 Archaeological Assessment Report	According to S & G Section 1.3.4, Stage 2 survey may be reduced in these areas due to the logistics of accessing these remote locations, and their inherent low potential for archaeological materials. The use of an exemption that will eliminate any assessment without visual survey could put unknown archaeological resources at risk of destruction.	It is recommended that the use of the exemption from S&Gs 1.3.4 is reconsidered. Site visits and the Stage 2 assessment can be completed in phases, aligned with the construction of road segments, to improve access to previously remote areas.	1. Item will be addressed in the Final EAR/IS submission. Once areas have existing transportation infrastructure, they are not considered remote and this standard would not apply in those locations.  To address potential discovery of previously unidentified archaeological resources, Section 20 of the EAR/IS has been updated to include the following mitigation measures:  "A Cultural Heritage Resources Management Plan will be developed to guide contractors in the event that a previously unidentified heritage or archaeological resources are suspected or encountered unexpectedly during construction. The plan will include the following provisions:  <ul style="list-style-type: none"> <li>▪ If previously unidentified archaeological resources are encountered unexpectedly during construction, the proponent or person discovering the archaeological resources shall cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the <i>Ontario Heritage Act</i>.</li> <li>▪ Any person discovering human remains shall cease all activities immediately and notify the police or coroner. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at <a href="mailto:archaeology@ontario.ca">archaeology@ontario.ca</a>) to ensure that the</li> </ul>

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
					archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act.</i> "
<b>EFFECTS OF THE ENVIRONMENT ON THE PROJECT</b>					
173.	Draft EA/IS Section 24.2 Average Climate Trends and Appendix Section 5.2 Risk Level Assessment Section 5.3- Special Cases- Wildfires	Draft EA/IS Section Effects of Environment on Project and Appendix I: Climate Change Resilience Review Report	<p>Nibinamik members highlighted ongoing impacts of climate change including the change of fish species present or absent, (potentially related to hydrological change) and wildfire risk (to which the Project area is susceptible). The Draft EA/IS appropriately considers climate change impacts on Project infrastructure and proposes design measures to enhance resiliency. However, these considerations must also address community safety and ensure the road does not worsen environmental conditions—such as increasing wildfire risk—that would in turn heighten the very climate vulnerabilities the design seeks to mitigate. That said, the following concerns could be addressed as part of the design:</p> <ul style="list-style-type: none"> <li>Wildfire is one of the potential hazard, the road serves to address by way of: <ul style="list-style-type: none"> <li>providing access to fight wildfire; and</li> <li>preventing wildfire movement by serving as a fire break.</li> </ul> </li> </ul> <p>However, this must not overshadow the fact that road often act as a fire source (Bowring, Li, Mouillot, Rosan, &amp; Ciais, 2024). The function of a firebreak also causes the conditions that can lead to the road acting as a source of wildfire. Draft EA/IS modelling demonstrated increase of heat and drier conditions which results in a medium uncertainty of wildfire risk but a probable increase of wildfire frequency. It is important that the Project does not contribute to these drier conditions (mainly to the hydrological condition of the surrounding areas) and potentially exacerbating the wildfire conditions.</p>	<p>Access to address wildfire:</p> <ul style="list-style-type: none"> <li>The road itself will have the potential to act as a firebreak and emergency access for firefighters. Strategic location for turnouts and rest stops can improve potential connectivity to water sources for firefighters or act as safe haven for firefighting personnel. Importantly, the ROW may serve as a future corridor for communication infrastructure which can support emergency management and enhance human safety, all of which can be considered with the design.</li> </ul> <p>Fire break:</p> <ul style="list-style-type: none"> <li>Effective firebreak design should be considered, impacts weighted, and discussed with the goal of achieving FPIC in the Project design.</li> </ul> <p>Fire source:</p> <ul style="list-style-type: none"> <li>Roads provide access for people (a primary contribution to wildfire), fires are more likely to start near roads (the result of drying, and ignition sources). Appropriately sized culverts must be positioned to ensure flow across the ROW to maintain hydrological connectivity and prevent drying effects which exacerbate wildfire potential. Please also refer to Section 2.3 for wetland and hydrological concerns and recommendations. Additionally, signage highlighting wildfire risk should be installed to encourage behaviour that will reduce the human potential to serve as ignition sources.</li> </ul>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
174.	Section 3.1 Average Climate Trends and Section 4.1 Future Climate	Appendix I - Climate Change Resilience Review	<p>Climate conditions and future predictions were based on a 30-year period (1981– 2010) that excludes the most recent years of weather data. Nibinamik is concerned that the baseline dataset used does not represent the most extreme weather events, in particular rainfall or snowfall intensity and duration. This may result in the modelling outputs not</p>	A robust set of data is needed to make predictions on local climate trends and potential. Extremes from recent years and earlier is necessary to properly calculate the potential climate events and ensure the design is robust enough to withstand those events.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). The Project Team view that the analysis presented in Appendix I has met the requirements of the ToR and the TISG. At this time, Nibinamik First Nation has not

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
			<p>predicting the potential severity of weather that the WSR may experience. The operational lifespan of the road is expected to be at least 75-years, so it is reasonable to rely on a more substantive weather dataset to capture extreme events between 2010 and 2025, as well as pre-1981. This would support engineering and design consideration to ensure:</p> <ul style="list-style-type: none"> <li>the road is equipped to manage the potential snow and rain volumes; and</li> <li>bridges are designed to accommodate the maximum potential debris flows.</li> </ul>	<p>This should consider Indigenous Knowledge and experiences of weather events.</p> <p>The project and operator should consider triggers for road and bridge upgrades if expected weather events (such as rain) are exceeded.</p> <p>Please also refer to comments relating to precipitation management in the groundwater and surface water section above.</p>	<p>identified specific Indigenous Knowledge beyond what is publicly available.</p>
175.	Section 4.1 Future Climate and Section 4.2 Extreme Precipitations	Appendix I - Climate Change Resilience Review	<p>It is noted that the application of the most conservative emissions scenario is the best approach to predicting and addressing plausible effects of the environment on the Project. Historical data suggests the 1:100 year event would see a maximum of 113mm of precipitation. The IDF data predictions note that in an SPP-5 (highest emissions) scenario the 100-year rain event would produce 180mm of precipitation.</p> <p>Mitigations include mention of applying the 1:100-year design criteria for culverts and bridges (plus 30 to 40% increase of IDFs). 40% of 113m does not achieve the 180mm capacity as the SPP-5 scenario suggests is prudent and the design mitigation does not state which IDF criteria is applied.</p>	<p>Mitigation should specifically apply the SPP-5 predictions to the design criteria.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>The Project Team view that the analysis presented in Appendix I has met the requirements of the ToR and the TISG.</p>
<b>ENVIRONMENTAL OBLIGATIONS AND CLIMATE CHANGE</b>					
176.	Draft EA/IS Section 3.2.5.6 Review Results and Select Preferred Route and Section 25.3 Assessment of the Project's Effects	Draft EA/IS Section 03 Evaluation of Project Alternatives and Section 25 Project Effects on Canada's Ability to Meeting its Environmental Obligation and its Climate	<p>The most preferable route from a biological and physical perspective is not the most preferred option. The assessment of the project effects (or benefits) on Canada's commitments to biodiversity conservation, caribou, wetlands, and migratory birds characterizes that there are no net effects. This is inconsistent with the concerns identified throughout this technical review, inconsistent with western science evidence on the effects of development and observed impacts in the minable oil sands region which serves as an analog.</p> <p>Nibinamik (among other Indigenous communities) is presenting concerns with respect to the ability maintain traditional land use and appropriately implementing Indigenous Knowledge, the assumption that the Project supports Targets 12 and</p>	<p>The ongoing Regional Impact Assessment for the Ring of Fire provides an important opportunity to address regional impacts and ensure biodiversity, caribou, wetlands, and migratory birds are conserved. This Project should fully uphold all commitments, accommodations, and mitigations identified through that assessment. In addition, it should proactively offset its impacts through wetland replacement, reforestation, land set-asides, or Indigenous-led conservation projects—especially in areas identified by Nibinamik as critical for caribou, migratory birds, or wetlands. Effective mitigation must include long-term monitoring, adaptive management incorporating Indigenous Knowledge, and incentives for electrification and renewable energy to support</p>	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>As required by the TISG and ToR Notice of Approval requirement (amendment #1.3) for the WSR Project, and the IA Act, relevant information from the regional assessment, if available, will be used to inform the Project effects assessment. This may, for example, include informing the baseline studies, effects prediction, cumulative effects assessment, mitigation and enhancement measures, and follow-up programs, as applicable. At this time there are no deliverable outputs available from the Regional Assessment to consider.</p>

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
		Change Commitments	15 from Canadas Biodiversity Goals and Targets is not wholly accurate. There is risk that the Project becomes an enabling mechanism for unsustainable regional development, repeating past Canadian examples.	emission reductions. These measures would directly contribute to Canada's biodiversity goals, including Target #3 to conserve 30% of land and water by 2030. Importantly to mitigate the risk of repeating past Canadian examples of unsustainable regional development the regional strategic assessment (RA) must guide Project planning and related development.	
177.	n/a	Section 25 Project Effects on Canada's Ability to Meeting its Environmental Obligation and its Climate Change Commitments	Cumulative impacts from roads are well documented, yet the Draft EA/IS dismisses them as negligible. Evidence from the Alberta Oil Sands Region exemplifies how small road footprints facilitated massive regional disturbance. The Draft EA/IS ignores foreseeable mining as a gateway to the Ring of Fire. Without mining impacts (proven and observed across Canada), cumulative effects are understated.	The Provincial and Federal Government should consider requirement for a case- comparison analyses (e.g., comparison with Highway 63 and the expansion of mining) to inform cumulative effects projections. Cumulative effects scenario modeling should incorporate foreseeable mining and industrial activity enabled by the Project. This should explicitly assess cumulative effects of foreseeable mining operations, including acid-generating potential, tailings management, water contamination risks, and Scope 3 emissions in climate analysis.	This comment is outside the scope of what Webequie First Nation is responsible for responding to as the proponent for the WSR EA/IA. We have referred your comment to the Ontario and Canada governments so the Crown can respond directly to you on this matter.
178.	Section 25.1 Federal Environmental Obligations	Section 25 Project Effects on Canada's Ability to Meeting its Environmental Obligation and its Climate Change Commitments	This Project is more likely to undermine, than support, Canada's biodiversity commitments (CBD 2030 Targets) through habitat loss, fragmentation, increased predation risk, aquatic impacts, spreading invasive species, and causing hydrological disruption. Additionally the construction of the Project contradicts federal caribou recovery strategy by fragmenting critical habitat, increasing predation risk, and lacking long-term wildlife monitoring. Migratory birds face foreseeable impacts: habitat fragmentation, reduced breeding success, increased collision risk, forestry- induced loss of habitat, and tailings pond mortality.	In alignment with the comment above the Proponent should implement a biodiversity offsetting plan tied to CBD 2030 Targets, identify conservation or land set-asides equivalent to lost habitat and create the conditions necessary to demonstrate there will be no-net-loss or net-gain for biodiversity. Nibinamik further recommends a caribou-specific mitigation and monitoring plan developed with Indigenous partners. This must include Indigenous established thresholds for disturbance, predator control if necessary, and enforceable triggers for adaptive management if population declines are observed. The cumulative effect on migratory birds must consider industrial and forestry development to accurately predict the pending contravention of the Convention for the Protection of Migratory Birds through incidental mortality.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).
179.	Section 25.1	Section 25 Project Effects on Canada's	Canada's wetland commitments are inadequately addressed: scope limited to Ramsar sites, no	The Project should expand wetland analysis to include all wetlands in the RSA. In order to effectively protect wetlands within the LSA and	3. Item will be addressed outside of the EAR/IS review process.

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
	Federal Environmental Obligations	Ability to Meeting its Environmental Obligation and its Climate Change Commitments	offsetting for wetland loss, no long-term monitoring of fragmentation impacts.	RSA the regulator must mandate wetland offsets/replacement within the local watershed and require hydrological/hydrogeological monitoring over the project lifecycle.	<p>We are of the opinion that the Canadian wetland commitments have been met. The vegetation and wetlands evaluations along with the Wetlands Functional Assessment encompass the entire RSA. The Ramsar site identified is the only globally significant wetland identified in the area, and no Provincial or Federally designated wetlands occur within close proximity to the study area.</p> <p>Habitat off-setting is discussed in Section 11.4.5 of the EAR/IS, with Appendix K-3 describing a conceptual off-setting and restoration approach for wetland and upland sites. Detailed restoration activities will be documented in the Site Restoration and Monitoring Plan to be developed and implemented as part of the Construction Environmental Monitoring Plan. The offsetting/restoration approach also describes a consultation process that would include relevant agencies and local community input in the development of the final compensation and restoration plans.</p> <p>A Wetlands Function Monitoring program, discussed in Section 11.4.2 and outlined in Appendix K4 (which includes hydrological and hydrogeological monitoring) is also proposed to ensure that losses of wetland function are both identified and addressed during the construction and operation of the roadway. Information about follow-up monitoring programs for wetlands can also be found in Section 11.13 and Section 22 of the EAR/IS.</p>
180.	Section 25.2 Commitments in Respect of Climate Change	Section 25 Project Effects on Canada's Ability to Meeting its Environmental Obligation and its Climate Change Commitments	This Draft EA/IS assessment of air impacts are identified in Section 2.5 above. In addition to deficiencies and concerns note above the Project does not include a net-zero 2050 commitment or consider Scope 3 emissions (especially linked to mining or forestry): only Scope 1 and 2 emissions considered. In addition, there is no plan for electrification or renewable integration into this Project.	The GHG analysis should be expanded and include Scope 3 emissions to understand the Project impacts on Canada's Net-Zero commitments. This Project must also consider decarbonization and incentives for electrification integration.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).
181.	Section 25.1 Federal Environmental Obligations	Section 25 Project Effects on Canada's Ability to Meeting its Environmental	The Project is premature to suggest Project supports Biodiversity Targets 12 & 15 (supporting traditional land use, respecting IK) without demonstrated incorporation of Indigenous input. A lack of explicit safeguards, binding mitigation, transparent monitoring, and Indigenous inclusion as	The Project must mandate Indigenous co-governance in monitoring and adaptive management to ensure Nibnamik, among other affects nations, are included in the governance decisions affecting their Traditional Territory.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).

Comment #	Page/Section # in Draft EAR/IS	Document Name / Topic	Issue	Question/Recommendation	Proponent Response (Refer to Proponent Response Legend)
		Obligation and its Climate Change Commitments	noted throughout this Technical Review, undermines credibility of this claim.	This should also include publicly available monitoring reports and enforceable project conditions tied to compliance with environmental and climate commitments.	
<b>PROJECT CONTRIBUTIONS TO SUSTAINABILITY</b>					
182.	Section 26.1 Assessment Considerations and Section 26.3 Engagement and Consultation	Draft EA/IS Section 26 Project Contributions to Sustainability	Sustainability is defined by Webequie and government standards. The engagement and consultation section highlights issues of importance and the essential value that bringing in key issues and Indigenous Knowledge from local communities such as Nibinamik. Key issues of importance that are address by the project align with the SDG, which is an admirable comparison standard. However, in absence of the Free Prior and Informed Consent (FPIC) from Nibinamik through Nation-specific engagement process the project falls short of meeting another important United Nations principle, and one which the Government of Canada has ratified through adopting the UNDRIP.	Robust contribution from all affected First Nations, including Nibinamik has not been embedded into this project. Nibinamik- specific process for consultation have not been implemented and so it has not yet been possible for Nibinamik to consider how this project can be provided with Free Prior and Informed Consent from Nibinamik. This project should strive not only to meet the mentioned SDG but also the UNDRIP and FPIC. It is recommended that the Project engage with Nibinamik to fully understand what capacity funding and additional project contributions are required from Nibinamik to obtain their FPIC.	See the response to Comment #1. As part of Project implementation, the proponent will adopt a Sustainability Management Plan, providing a framework for evaluating and monitoring sustainability throughout construction, operation, and maintenance.
183.	Section 26.5 Planning and Design Section 26.7.4 Principle 4: Precautionary Principle and consideration of Uncertainty and Risk of Irreversible Harm	Draft EA/IS Section 26 Project Contributions to Sustainability	Long-term planning and design is noted to have resulted in a project that can only be described a sustainable and the various assessment studies contained with the Draft EA/IS are meant to prove this Project will have a sustainable outcome. As demonstrated in Figure 26-1 the ecological condition influences all other aspects of well-being including Aboriginal and Treaty Rights. With the bulk of potential deficiencies in the Draft EA/IS it is unclear that this project will not result in impacts to Nibinamik rights. By its very nature the Draft EA/IS addresses many uncertainties and point out as much. While the Project states to have applied a robust mitigation hierarchy, this review offers some opportunity for improvement, these may also address uncertainties.	The content herein highlights challenges with the Draft EA/IS content and its predicted results. It is not clear that the assertion of Project sustainability is certain. To improve this potential it is recommended that the Regional Assessment is completed first. The completion and integration of the Regional Assessment and ongoing involvement with Nibinamik (among other first Nations) may serve to reduce uncertainties and reduce the risk of irreversible harm by way of improving the identification of relevant mitigations.	4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG). The Regional Assessment is being co-developed and co-led with Indigenous communities from Matawa and Mushkegowuk Territories. This process is independent of the EAR/IS for the Webequie Supply Road but, as required by the <i>Impact Assessment Act</i> and the Tailored Impact Statement Guidelines, relevant information from the Regional Assessment will be used to inform the effects assessment for the Project should this be provided during the EA/IA process for the Project. At this time there is no information available from the Ring of Fire Regional Assessment to consider in the EA/IA for the Project.

# APPENDIX P2.M.2

## Comment Response Tables for Draft EAR/IS

- Comment Response Tables from Government Review Team Review



# MECP: Thunder Bay District



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Rachel Hepburn, Environmental Compliance Officer

**Ministry and Branch:** MECP, Northern Region, Thunder Bay

Comment #	Page/Section #	Comments & Rationale	GRT Comments		Proponent Response	GRT Follow Up
			Proposed Action/Solution	Type of Comment:		
1.	1-22/Table 1-3  3-68/Section 3.4.3 Construction Camps	<b>Site Notes:</b> Temporary construction camps (Camp 1A, Camp 2A, Camp 3A and Camp 4B). Average workforce accommodation – 100 workers, Accommodations (bunkhouse) for workers; includes permanent and temporary infrastructure, Construction office(s); Kitchen and dining hall; First aid station, communications system, wastewater treatment system, groundwater water supply well, waste handling and storage facility area; electricity supply from diesel generators, above ground fuel storage tanks (ASTs) and refueling area; and laydown/storage areas for equipment and materials.	N/A		N/A	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b>  <b>B. Satisfied for now but will need to see final EA</b>  <b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
				<b>Type of Comment:</b> <b>A. Required for EA (per ministry mandate/policy/legislation)</b> <b>B. Recommended for EA</b> <b>C. Editorial</b> <b>D. Permitting Related, Not Required for EA</b>	1. Item will be addressed in the Final EAR/IS submission 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator) 4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)	<b>Categorize Proponent's response as follows:</b> <b>A. Satisfied with response</b> <b>B. Satisfied for now but will need to see final EA</b> <b>C. Not satisfied – would like to discuss comment/ response with proponent</b>
2.	6.53/6.4.1 Management Plans	Various Management Plans	Included in the CEMP and OEMP Frameworks  The District is requesting copies of the Plans (CEMP and OEMP) be submitted to the District for review and awareness. The District will be notified of any changes to the Plans. This condition should be included as a reporting requirements within the Plans.	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
3.	4-48/4.4.2.7  8-48/8.4.7	Discusses Modular sewage treatment plants and Pre-engineered double-wall fuels dispensing and storage systems.  Domestic wastewater and sewage in the form of liquid effluent generated from portable sewage treatment facilities at construction camps and the MSF may be treated on site using portable facilities (e.g., septic tank) or transported offsite by tanker truck for treatment at approved disposal facilities, depending on available facilities.	<u>Sewage</u> MECP ECA required for sewage works with a design capacity in excess of 10,000 litres per day (OWRA).  Sewage disposal evaluation is required prior to construction activities.  Any transported wastewater and sewage will require a WMS approval to haul such waste. All waste must be sent to an approved facility to accept such waste. Volume capacity may not be available under existing ECAs for municipal/private sites.  Grease trap for kitchen wastewater should be considered.  <u>Portable Sewage Treatment Facilities</u> These systems are engineered to meet effluent discharge standards and are often used where permanent infrastructure is not feasible. Must meet MECP effluent criteria, typically requiring secondary treatment or equivalent as the minimum standards. ECA required.	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	1. Item will be addressed in the Final EAR/IS submission 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator) 4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)	<b>Categorize Proponent's response as follows:</b>  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
4.	4-36/4.3.3.5	Where landfill capacity concerns are expressed for receiving project generated domestic waste in Webequie, the Proponent may	<u>Domestic Non-Hazardous Wastes</u> Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT	D  Review during the planning stage and made available for	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate	

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
				<p><b>Type of Comment:</b></p> <p>A. Required for EA (per ministry mandate/policy/legislation)  B. Recommended for EA  C. Editorial  D. Permitting Related, Not Required for EA</p>	<p>1. Item will be addressed in the Final EAR/IS submission  2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period  3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)  4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p>A. Satisfied with response  B. Satisfied for now but will need to see final EA  C. Not satisfied – would like to discuss comment/ response with proponent</p>
	11-123/11.4.1.3.3	<p>consider the use of on-site waste incinerators at construction camps and MSF. Where waste incinerations are proposed, appropriate approvals will be obtained, including a provincial Environmental Compliance Approval, prior to the use of any waste incinerators.</p> <p>All hazardous materials products will be transported in accordance with the federal Transportation of Dangerous Goods Act, Ontario Dangerous Goods Transportation Act and Ontario Gasoline Handling Act and will include tanker trucks, in drums, or other approved container.</p> <p>General – Spill events</p>	<p>The Waste Management Plan discussed should include a section on how construction and domestic waste shall be handled. A description of waste generated, timing of removal, and destination of final waste needs to be discussed. Volume capacity may not be available under existing ECAs for municipal/private waste disposal sites. Site evaluations and determination is required prior to construction activities.</p> <p>Waste generated and stored on site will require to be stored in an approved manner to limit waste causing adverse effect to the natural environment (ex. Closed leak proof containers).</p> <p><u>Wastes</u>  General Registration under Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT with respect to hazardous waste and liquid waste management with Resource Productivity &amp; Recovery Authority (RPRA).</p> <p>List of types of wastes generated during the project (including drilling waste water, domestic, Dangerous Goods, waste oils, etc.), planned disposal framework, and transportation to the approved waste facility should be established prior to construction activities.</p>	<p>permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>	owner/operator).	

Comment #	Page/ Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
			<p>If storage of waste is greater than 90 days, a notice of Storage will be required. If waste is stored for longer than 24 months approval for a waste site maybe required.</p> <p>An ECA or an EASR (under O. Reg. 351/12) is required for the transportation of solid non-hazardous wastes to a licensed facility.</p> <p><u>Spill Events and Response Protocol</u> All spills must be reported immediately to the MECP Spills Action Centre (SAC) and remediated forthwith, in accordance with Sections 92 and 93 of the Environmental Protection Act (EPA). In cases of uncertainty regarding what constitutes a reportable spill, Best Management Practice (BMP) is to document and report all spills and associated remedial actions to MECP SAC. Refer to Part X of the EPA for detailed regulatory requirements.</p> <p><u>Contingency Planning</u> A Contingency Plan must be developed prior to the commencement of construction to address potential spill scenarios along the corridor during and after</p>	<p><b>Type of Comment:</b></p> <p>A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA</p>	<p>1. Item will be addressed in the Final EAR/IS submission 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator) 4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p>A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent</p>

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			<p>construction activities. This plan should include, but not limited to:</p> <ul style="list-style-type: none"> <li>• Spill Response Strategies: <ul style="list-style-type: none"> <li>• Emergency procedures tailored to specific matrices (e.g., soil, water).</li> <li>• Availability of appropriate spill response equipment and matrix-specific spill kits.</li> <li>• Identification of contractors authorized (e.g., via Waste Management System ECA or EASR) to manage spill response and waste removal.</li> </ul> </li> <li>• Roles and Responsibilities: <ul style="list-style-type: none"> <li>• Clearly defined responsibilities for the corridor Owner, Project Managers/Supervisors, contractors, on-site emergency responders, and the Qualified Person (QP).</li> </ul> </li> <li>• Communication and Notification Protocol: <ul style="list-style-type: none"> <li>• Procedures for notifying local communities and regulatory agencies, including MECP SAC, MNR, ECCC, DFO, and ISC.</li> <li>• Defined timing and methods of communication</li> <li>• Contractors and stakeholders.</li> </ul> </li> <li>• Recovery and Remediation Procedures:</li> </ul>	<p><b>Type of Comment:</b></p> <p><b>A. Required for EA (per ministry mandate/policy/legislation)</b>  <b>B. Recommended for EA</b>  <b>C. Editorial</b>  <b>D. Permitting Related, Not Required for EA</b></p>	<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b>  <b>B. Satisfied for now but will need to see final EA</b>  <b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>

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			<ul style="list-style-type: none"> <li>Assessment, delineation, and remediation led by a QP.</li> <li>Transportation of impacted materials by licensed haulers to approved disposal facilities.</li> <li>Submission of a remediation report prepared by a QP.</li> <li>Testing Protocols: <ul style="list-style-type: none"> <li>Identification of contaminants of concern by a QP.</li> <li>Use of certified laboratories for analysis, including Toxicity Characteristic Leachate Procedure (TCLP) testing to determine disposal criteria and options.</li> </ul> </li> </ul> <p>Conduct a review of current ECAs within the local and surrounding communities to identify:</p> <ul style="list-style-type: none"> <li>Waste disposal sites authorized to accept non-hazardous solid waste.</li> <li>Bioremediation facilities approved to process petroleum hydrocarbon-impacted soils.</li> <li>Types and quantities of materials permitted for disposal or treatment.</li> </ul> <p>WDS Owners and/or Operators retain the right to refuse waste at any time. WDS are capped at a maximum</p>	<p><b>Type of Comment:</b></p> <p><b>A. Required for EA (per ministry mandate/policy/legislation)</b>  <b>B. Recommended for EA</b>  <b>C. Editorial</b>  <b>D. Permitting Related, Not Required for EA</b></p>	<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b>  <b>B. Satisfied for now but will need to see final EA</b>  <b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>

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			<p>volume over its operational lifespan. Each ECA includes conditions specifying that waste must originate from a defined geographic area to be accepted.</p> <p>ECA Amendments (administrative or site-specific) require both the consent of the ECA Owner and endorsement from MECP.</p> <p>The Spills and Emergency Preparedness Plan must include criteria for what constitutes a reportable spill under Ontario Regulation 675/98. These thresholds do not exempt the responsible party from immediate cleanup and documentation of the spill and remedial actions and reporting.</p> <p>An ECA or EASR (under O. Reg. 351/12) is required for the transportation of solid non-hazardous waste (including contaminated soil, subject to testing) to a licensed facility. It is recommended to secure this approval proactively for emergency spill scenarios.</p> <p>Hazardous wastes are regulated under the EPA and must be handled in accordance with strict standards for handling, transportation, treatment, disposal, and testing.</p>		<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b></p> <p><b>B. Satisfied for now but will need to see final EA</b></p> <p><b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>
5.	6-56/Table 6-12	Sensitive receptor study	Evaluations of the proposed camp facilities setbacks to sensitive receivers (water, wetlands, groundwater). This	D	3. Item will be addressed outside of the EAR/IS	

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			evaluation should be completed prior to construction activities and applications for MECP approvals (i.e. PTTW, EASR for groundwater takings, stormwater management, ECA for discharges, air and noise).	Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	review process (i.e., taken on by the ultimate owner/operator).	<b>Categorize Proponent's response as follows:</b>  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
6.	1.23/1.4.5	An ECA will be required for isolated power generation at construction camps and/or permanent maintenance facility where a connection to grid service is not available.  Noise/emissions from generators	An ECA or an EASR (under Ontario Regulation 245/11) may be required for the use if the diesel generators.  Review of Environmental Noise Guideline – Stationary and Transportation Sources (NPC-300) and Ontario Regulation 419/05 (Local Air Quality).	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	
7.	8.7/Table 8-1	Water Takings	Depending on the water taking activity a PTTW and/or EASR is required. Review of Ontario Regulation 63/16 and 387/04.  Dewatering of an area (including groundwater) for	D  Review during the planning stage and made available for permitting stage and	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).	

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					<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b></p> <p><b>B. Satisfied for now but will need to see final EA</b></p> <p><b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>
			construction purposes is subject to eligibility criteria included in the water taking EASR regulation (Ontario Regulation 245/11).	<p>applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>		
8.	4-35/4.3.3.6	<p>All ASTs will be registered under, and in compliance with applicable federal and provincial legislation.</p> <p>Aboveground storage tanks will meet the Canadian Council of Ministers of the Environment (CCME) <i>Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products</i> (CCME, 1994). The transportation, storage and handling of fuels will be in compliance with the Ontario <i>Technical Standards and Safety Act</i> and Canada's <i>Transportation of Dangerous Goods Act</i>. The transport vehicles will be licensed and maintained according to safety</p>	<p>Registrations with Technical Standards and Safety Authority (TSSA) maybe required.</p> <p>BMPs should be implemented for the storage of large volumes of fuel and other fuel-based liquids (secured compounds, secondary containment).</p> <p>Ensure appropriate amount of spills kits are always available.</p> <p>All spills are to be reported to MECP Spills Action Centre (SAC) and remediated forthwith (EPA, Section 92 and 93). Ontario Regulation 675/98 speaks to spill exemptions. The Spills and Emergency Preparedness Plan discuss what classifies as a reportable spill. These exemptions do not exempt the spiller from clean up of the spill forthwith and submit a report completed by a QP of the cleanup.</p>	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>	

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		requirements. The details of how fuel is stored and eventually distributed along the road ROW to support construction and operation activities will be an important planning and allocation exercise. An overall fuel-consumption and storage plan will be developed in the future planning and development stages of the Project.				
9.	8-42/ ES8.1.3	Effects of Geology of Geochemistry discusses blasting.	Noise and Vibration, Blasting, and <u>Communication Management Plans</u> are required.  Review of Environmental Noise Guideline – Stationary and Transportation Sources (NPC-300)  Reference should be made to MECP Publications NPC-115 and NPC-118 for source-based noise limits, to	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).	

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					<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b></p> <p><b>B. Satisfied for now but will need to see final EA</b></p> <p><b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>
			<p>NPC-119 and NPC-207 for receptor-based limits due to impulsive vibration from construction activities such as blasting and pile driving, and to MECP Publications NPC-300 for stationary and transportation sources.</p> <p>Considerations should be considered for Human Health associated with frequent vibrations and blasting.</p>	<p>of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>		
10.	8-42/ ES8.1.3	Effects of Geology of Geochemistry discusses soil salvage and management	<p>The Excess Soil Regulation (Ontario Regulation 406/19) may apply if the contractor is planning on removing greater than 100 m<sup>3</sup> of soil from a project area and transporting off-site. So, while 100 m<sup>3</sup> is a notable threshold for exemption from certain requirements (especially when soil is going to a landfill or transfer facility), Regulation 406/19 may still apply based on: destination of the soil, project location and type, potential for contamination, total volume being excavated. The BMP and Soil Management Plan must discuss whether areas of the project fall under the Excess Soil Regulation.</p> <p>This should also include how the contractor will manage, store, handle, transport and details on the final disposal location(s) and quantities.</p>	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	
11.	8-42/ ES8.1.3 and ES8.4.3/8-51	Effects of Geology of Geochemistry discusses Dust Control measures including dust suppression.	<p>Opacity discharge into the air (Ontario Reg 419) may apply and the requirement for a BMP Plan for the duration of project. Include complaint procedures and mitigation measures.</p>	<p>D</p> <p>Review during the planning stage and made available for</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate</p>	

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			<p>Included in CEMP; require Air Quality and Dust Control Management Plan.</p> <p>Off site impacts may be occurring, if people and the natural environment are adversely affected.</p>	<p>permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>	<p>owner/operator).</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b>  <b>B. Satisfied for now but will need to see final EA</b>  <b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>
12.	8-43/ES8.1.3	Maintaining drainage in the work area to minimize ponding or channelization of surface flow.	An ECA or an EASR (under Ontario Regulation 137/05) may be required for SWM.	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>	
13.	8-42/ES8.1.3	The following management plans will be developed and implemented for the Project: Construction Waste Management Plan; and Spill Prevention and Emergency Response Management Plan. This plan will lay out the requirements for	General Registration under Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT with respect to hazardous waste and liquid waste management with Resource Productivity & Recovery Authority (RPRA). List of types of wastes generated during the project, planned disposal framework, and transportation to the approved waste facility.	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>	

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		<p>training and procedures for the storage, handling, and transportation of potential contaminants, as well as equipment operation and maintenance intended to prevent spills from occurring.</p>	<p>ECAs and/or EASRs will be required for transportation and disposal activities.</p> <p>The spill contingency plan and emergency response plan was mentioned. This should also include how the contractor will manage, store and handle fuel, with a description of how and where wastes from spills will be transported and disposed of. Review O. Reg 224/07: Spill Prevention and Contingency Plan.</p> <p>Review the Guidelines for environmental protection measures at chemical and waste storage facilities for storage guidance and BMP.</p> <p>Include information on servicing options and disposal, as capacity may not be available under existing ECAs for to accept these wastes.</p> <p>Review of the Waste Diversion Act, 2022.</p> <p>Review of Hazardous waste management: business and industry.</p> <p>The District is requesting copies of these plans be submitted for review and awareness.</p>	<p><b>A. Required for EA (per ministry mandate/policy/legislation)</b>  <b>B. Recommended for EA</b>  <b>C. Editorial</b>  <b>D. Permitting Related, Not Required for EA</b></p>	<p>1. Item will be addressed in the Final EAR/IS submission  2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period  3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)  4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b>  <b>B. Satisfied for now but will need to see final EA</b>  <b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>

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14.	8-43/ ES8.1.3	Erosion and Sediment Control Plan will be developed and implemented during construction.	<p>Sediment erosion control would be required during vegetation clearing, at water crossings, and/or when working near water. Refer to comments provided by the surface water technical staff.</p> <p>Review of B-6 Guidelines for Evaluating Construction Activities Impacting on Water Resources</p> <p>Completion of a Receiving Water Assessments/Impact Assessments.</p> <p>Contact MNR to determine permits/approvals.</p>	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b></p> <p><b>B. Satisfied for now but will need to see final EA</b></p> <p><b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>
15.	8-42/ ES8.1.3	Potential for ARD	<p>Metal-Leaching and Acid Rock Drainage Management Plan is required.</p> <p>The District is requesting a copy of this plan be submitted for review and awareness.</p>	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p>	
16.	4-63/ 4.4.2.8	Waste oil from heavy equipment. Maintenance of heavy equipment would occur at specific temporary	An ECA is required for on-site waste oil incinerator(s) (EPA Section 9 and 27)	D  Review during the planning	<p>3. Item will be addressed outside of the EAR/IS review process (i.e.,</p>	

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		and secure locations prior to management or disposal at a licensed facility and/or through on-site incineration facility.		stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	taken on by the ultimate owner/operator).	<b>Categorize Proponent's response as follows:</b>  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
17.	4-64- 4.4.2.8	Slash and root waste from clearing and grubbing operations will be managed using best management practices, including but not limited to: chipping, leaving in place, small wood scattering, and burning.	Slash pile burning may be required during the construction phase. Notification to the local fire department is recommended prior to burning. Emergency fire suppression should be considered and planned.  Contact MNR to determine permits/approvals.	D  Review during the planning stage and made available for permitting stage and applications.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).	
18.	4-35/4.3.3.6	Storage of Fuels, Explosives and Wastes  Discusses the use of waste incinerators	Incinerator ash is classified as a special waste and must be disposed of at designated, approved landfill facilities. This material must be handled with precautions (this includes covered metal containers during transport). Incinerator ash is not permitted in standard waste streams; instead, it must be managed and transported in full compliance with regulatory requirements to ensure environmental and public health protection.  This issue should be addressed at both the EA phase and permitting phase. The EA should include	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).	

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			<p>information on servicing options for ash disposal associated with the temporary construction camps, as capacity may not be available under existing ECAs for municipal disposal sites. Additional testing may be required for ash disposal.</p> <p>Considerations and explore beneficial uses for incinerator ash.</p> <p>Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT and Guideline A-7: Air Pollution Control, Design and Operation Guidelines for Municipal Waste Thermal. Guideline A-7 outlines air pollution control and operational standards for incinerators</p>	comment.	<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p><b>A. Satisfied with response</b></p> <p><b>B. Satisfied for now but will need to see final EA</b></p> <p><b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>
19.	Table 8-1/8-6	The minimum clearance from the bottom of the aggregate pits to the groundwater table is one of the criteria to determine the category of the aggregate permit. The operation of the aggregate pits (e.g., dewatering and discharge) may affect groundwater and surface water systems near the pits.	<p>If aggregate extraction is below the water table and water is to be removed (pumped) PTTW may be required.</p> <p>If water is contaminated (sediment), an Industrial sewage ECA may also be required for discharge of a contaminant other than water.</p> <p>In addition, environmental conditions are also found in the ARA License for the site.</p>	D  Review during the planning stage and made available for permitting stage and applications.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).	
20.	12-223 and 23-20/23.5.1 Accidental	Reporting any major spill of petroleum or other hazardous material to the MECP Spill Action	All spills are to be reported to MECP SAC and remediated forthwith (EPA, Section 92 and 93). Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE	D  Review during the planning	3. Item will be addressed outside of the EAR/IS review process (i.e.,	

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	Spills of Hazardous material	Centre, immediately after occurrence of the environmental accident (as per Ontario Regulation 675/98).	<p>MANAGEMENT and Ontario Regulation 675/98, OWRA, EPA, and Fisheries Act (Canada).</p> <p>Spills to water require special considerations due to the potential for widespread environmental harm, impacts on aquatic ecosystems, DW Sources, and challenges in containment and remediation.</p> <p>Ontario Regulation 675/98 speaks to spill exemptions. The Spills and Emergency Preparedness Plan should discuss what classifies as a reportable spill. <u>Note</u>, that although spills less than 100 L in restricted areas from public access, and spills less than 25 L in areas with public access are not required to be reported, this <u>does not exempt</u> the spiller from clean up of the spill <u>forthwith</u> and file an internal record of the cleanup. If there is confusion on what to report to MECP SAC, BMP would be to record and report all spills and remedial activity to SAC and follow up with district office.</p> <p>Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT with respect to waste characterization. Submission of a worst case soil sample for Toxicity Characterization Leaching Procedure (TCLP) analysis of Contaminates of Concern (COC) is required prior to remedial activities. TCLP sample from the spill site is to be completed prior to remedial activities to determine</p>	<p>A. Required for EA (per ministry mandate/policy/legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>	<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>

Comment #	GRT Comments				Proponent Response	GRT Follow Up
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			<p>suitable disposal facilities (hazardous vs non-hazardous).</p> <p>Spill Prevention and Emergency Response Management Plan to be completed. The District is requesting copies of these plans be submitted for review and awareness.</p>	<p><b>Type of Comment:</b></p> <p>A. Required for EA (per ministry mandate/policy/legislation)            B. Recommended for EA            C. Editorial            D. Permitting Related, Not Required for EA</p>	<p>1. Item will be addressed in the Final EAR/IS submission            2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period            3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)            4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p><b>Categorize Proponent's response as follows:</b></p> <p>A. Satisfied with response            B. Satisfied for now but will need to see final EA            C. Not satisfied – would like to discuss comment/ response with proponent</p>

# MECP: Northern Region Thunder Bay



**Comments Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Rachel Hepburn, Environmental Compliance Officer

**Ministry and Branch:** MECP, Northern Region, Thunder Bay

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied
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1.	1-22/Table 1-3  3-68/Section 3.4.3 Construction Camps	<b>Site Notes:</b> Temporary construction camps (Camp 1A, Camp 2A, Camp 3A and Camp 4B). Average workforce accommodation – 100 workers, Accommodations (bunkhouse) for workers; includes permanent and temporary infrastructure, Construction office(s); Kitchen and dining hall; First aid station, communications system, wastewater treatment system, groundwater water supply well, waste handling and storage facility area; electricity supply from diesel generators, above ground fuel storage tanks (ASTs) and refueling area; and laydown/storage areas for equipment and materials.	N/A	N/A		
2.	6.53/6.4.1 Management Plans	Various Management Plans	Included in the CEMP and OEMP Frameworks  The District is requesting copies of the Plans (CEMP and OEMP) be submitted to the District for review and awareness. The District will be notified of any changes to the Plans. This condition should be included as a reporting requirements within the Plans.	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		

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3.	4-48/4.4.2.7  8-48/8.4.7	Discusses Modular sewage treatment plants and Pre-engineered double-wall fuels dispensing and storage systems.  Domestic wastewater and sewage in the form of liquid effluent generated from portable sewage treatment facilities at construction camps and the MSF may be treated on site using portable facilities (e.g., septic tank) or transported offsite by tanker truck for treatment at approved disposal facilities, depending on available facilities.	<u>Sewage</u> MECP ECA required for sewage works with a design capacity in excess of 10,000 litres per day (OWRA).  Sewage disposal evaluation is required prior to construction activities.  Any transported wastewater and sewage will require a WMS approval to haul such waste. All waste must be sent to an approved facility to accept such waste. Volume capacity may not be available under existing ECAs for municipal/private sites.  Grease trap for kitchen wastewater should be considered.  <u>Portable Sewage Treatment Facilities</u> These systems are engineered to meet effluent discharge standards and are often used where permanent infrastructure is not feasible. Must meet MECP effluent criteria, typically requiring secondary treatment or equivalent as the minimum standards. ECA required.	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		
4.	4-36/4.3.3.5  11-123/11.4.1.3.3	Where landfill capacity concerns are expressed for receiving project generated domestic waste in Webequie, the Proponent may consider the use of on-site waste incinerators at construction camps and MSF. Where waste incinerations are proposed, appropriate approvals will be obtained, including a provincial Environmental Compliance Approval, prior to the use of any waste incinerators.  All hazardous materials products will be transported in accordance with the federal Transportation of Dangerous Goods Act, Ontario Dangerous Goods Transportation Act and Ontario Gasoline Handling Act and will include tanker trucks, in drums, or other approved container.  General – Spill events	<u>Domestic Non-Hazardous Wastes</u> Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT  The Waste Management Plan discussed should include a section on how construction and domestic waste shall be handled. A description of waste generated, timing of removal, and destination of final waste needs to be discussed. Volume capacity may not be available under existing ECAs for municipal/private waste disposal sites. Site evaluations and determination is required prior to construction activities.  Waste generated and stored on site will require to be stored in an approved manner to limit waste causing adverse effect to the natural environment (ex. Closed leak	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		

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			<p>proof containers).</p> <p><u>Wastes</u> General Registration under Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT with respect to hazardous waste and liquid waste management with Resource Productivity &amp; Recovery Authority (RPRA).</p> <p>List of types of wastes generated during the project (including drilling waste water, domestic, Dangerous Goods, waste oils, etc.), planned disposal framework, and transportation to the approved waste facility should be established prior to construction activities.</p> <p>If storage of waste is greater than 90 days, a notice of Storage will be required. If waste is stored for longer than 24 months approval for a waste site maybe required.</p> <p>An ECA or an EASR (under O. Reg. 351/12) is required for the transportation of solid non-hazardous wastes to a licensed facility.</p> <p><u>Spill Events and Response Protocol</u> All spills must be reported immediately to the MECP Spills Action Centre (SAC) and remediated forthwith, in accordance with Sections 92 and 93 of the Environmental Protection Act (EPA). In cases of uncertainty regarding what constitutes a reportable spill, Best Management Practice (BMP) is to document and report all spills and associated remedial actions to MECP SAC. Refer to Part X of the EPA for detailed regulatory requirements.</p> <p><u>Contingency Planning</u> A Contingency Plan must be developed prior to the commencement of construction to address potential spill</p>			

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			<p>scenarios along the corridor during and after construction activities. This plan should include, but not limited to:</p> <ul style="list-style-type: none"> <li>• Spill Response Strategies: <ul style="list-style-type: none"> <li>• Emergency procedures tailored to specific matrices (e.g., soil, water).</li> <li>• Availability of appropriate spill response equipment and matrix-specific spill kits.</li> <li>• Identification of contractors authorized (e.g., via Waste Management System ECA or EASR) to manage spill response and waste removal.</li> </ul> </li> <li>• Roles and Responsibilities: <ul style="list-style-type: none"> <li>• Clearly defined responsibilities for the corridor Owner, Project Managers/Supervisors, contractors, on-site emergency responders, and the Qualified Person (QP).</li> </ul> </li> <li>• Communication and Notification Protocol: <ul style="list-style-type: none"> <li>• Procedures for notifying local communities and regulatory agencies, including MECP SAC, MNR, ECCC, DFO, and ISC.</li> <li>• Defined timing and methods of communication</li> <li>• Contractors and stakeholders.</li> </ul> </li> <li>• Recovery and Remediation Procedures: <ul style="list-style-type: none"> <li>• Assessment, delineation, and remediation led by a QP.</li> <li>• Transportation of impacted materials by licensed haulers to approved disposal facilities.</li> <li>• Submission of a remediation report prepared by a QP.</li> </ul> </li> <li>• Testing Protocols: <ul style="list-style-type: none"> <li>• Identification of contaminants of concern by a QP.</li> </ul> </li> </ul>			

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			<ul style="list-style-type: none"> <li>Use of certified laboratories for analysis, including Toxicity Characteristic Leachate Procedure (TCLP) testing to determine disposal criteria and options.</li> </ul> <p>Conduct a review of current ECAs within the local and surrounding communities to identify:</p> <ul style="list-style-type: none"> <li>Waste disposal sites authorized to accept non-hazardous solid waste.</li> <li>Bioremediation facilities approved to process petroleum hydrocarbon-impacted soils.</li> <li>Types and quantities of materials permitted for disposal or treatment.</li> </ul> <p>WDS Owners and/or Operators retain the right to refuse waste at any time. WDS are capped at a maximum volume over its operational lifespan. Each ECA includes conditions specifying that waste must originate from a defined geographic area to be accepted.</p> <p>ECA Amendments (administrative or site-specific) require both the consent of the ECA Owner and endorsement from MECP.</p> <p>The Spills and Emergency Preparedness Plan must include criteria for what constitutes a reportable spill under Ontario Regulation 675/98. These thresholds do not exempt the responsible party from immediate cleanup and documentation of the spill and remedial actions and reporting.</p> <p>An ECA or EASR (under O. Reg. 351/12) is required for the transportation of solid non-hazardous waste (including contaminated soil, subject to testing) to a licensed facility. It is recommended to secure this approval proactively for emergency spill scenarios.</p>			

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			Hazardous wastes are regulated under the EPA and must be handled in accordance with strict standards for handling, transportation, treatment, disposal, and testing.			
5.	6-56/Table 6-12	Sensitive receptor study	Evaluations of the proposed camp facilities setbacks to sensitive receivers (water, wetlands, groundwater). This evaluation should be completed prior to construction activities and applications for MECP approvals (i.e. PTTW, EASR for groundwater takings, stormwater management, ECA for discharges, air and noise).	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		
6.	1.23/1.4.5	An ECA will be required for isolated power generation at construction camps and/or permanent maintenance facility where a connection to grid service is not available.  Noise/emissions from generators	An ECA or an EASR (under Ontario Regulation 245/11) may be required for the use if the diesel generators.  Review of Environmental Noise Guideline – Stationary and Transportation Sources (NPC-300) and Ontario Regulation 419/05 (Local Air Quality).	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		
7.	8.7/Table 8-1	Water Takings	Depending on the water taking activity a PTTW and/or EASR is required. Review of Ontario Regulation 63/16 and 387/04.  Dewatering of an area (including groundwater) for construction purposes is subject to eligibility criteria included in the water taking EASR regulation (Ontario Regulation 245/11).	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		

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8.	4-35/4.3.3.6	<p>All ASTs will be registered under, and in compliance with applicable federal and provincial legislation.</p> <p>Aboveground storage tanks will meet the Canadian Council of Ministers of the Environment (CCME) <i>Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products</i> (CCME, 1994). The transportation, storage and handling of fuels will be in compliance with the Ontario <i>Technical Standards and Safety Act</i> and Canada's <i>Transportation of Dangerous Goods Act</i>. The transport vehicles will be licensed and maintained according to safety requirements. The details of how fuel is stored and eventually distributed along the road ROW to support construction and operation activities will be an important planning and allocation exercise. An overall fuel-consumption and storage plan will be developed in the future planning and development stages of the Project.</p>	<p>Registrations with Technical Standards and Safety Authority (TSSA) maybe required.</p> <p>BMPs should be implemented for the storage of large volumes of fuel and other fuel-based liquids (secured compounds, secondary containment).</p> <p>Ensure appropriate amount of spills kits are always available.</p> <p>All spills are to be reported to MECP Spills Action Centre (SAC) and remediated forthwith (EPA, Section 92 and 93). Ontario Regulation 675/98 speaks to spill exemptions. The Spills and Emergency Preparedness Plan discuss what classifies as a reportable spill. These exemptions do not exempt the spiller from clean up of the spill forthwith and submit a report completed by a QP of the cleanup.</p>	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>		
9.	8-42/ ES8.1.3	Effects of Geology of Geochemistry discusses blasting.	<p>Noise and Vibration, Blasting, and <u>Communication Management Plans</u> are required.</p> <p>Review of Environmental Noise Guideline – Stationary and Transportation Sources (NPC-300)</p> <p>Reference should be made to MECP Publications NPC-115 and NPC-118 for source-based noise limits, to NPC-119 and NPC-207 for receptor-based limits due to impulsive vibration from construction activities such as blasting and pile driving, and to MECP Publications NPC-300 for stationary and transportation sources.</p> <p>Considerations should be considered for Human Health associated with frequent vibrations and blasting.</p>	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>		
10.	8-42/ ES8.1.3	Effects of Geology of Geochemistry discusses soil salvage and management	The Excess Soil Regulation (Ontario Regulation 406/19) may apply if the contractor is planning on removing greater than 100 m3 of soil from a project area and transporting	<p>D</p> <p>Review during the planning stage</p>		

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			<p>off-site. So, while 100 m<sup>3</sup> is a notable threshold for exemption from certain requirements (especially when soil is going to a landfill or transfer facility), Regulation 406/19 may still apply based on: destination of the soil, project location and type, potential for contamination, total volume being excavated. The BMP and Soil Management Plan must discuss whether areas of the project fall under the Excess Soil Regulation.</p> <p>This should also include how the contractor will manage, store, handle, transport and details on the final disposal location(s) and quantities.</p>	<p>and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>		
11.	8-42/ES8.1.3 and ES8.4.3/8-51	Effects of Geology of Geochemistry discusses Dust Control measures including dust suppression.	<p>Opacity discharge into the air (Ontario Reg 419) may apply and the requirement for a BMP Plan for the duration of project. Include complaint procedures and mitigation measures.</p> <p>Included in CEMP; require Air Quality and Dust Control Management Plan.</p> <p>Off site impacts may be occurring, if people and the natural environment are adversely affected.</p>	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>		
12.	8-43/ES8.1.3	Maintaining drainage in the work area to minimize ponding or channelization of surface flow.	An ECA or an EASR (under Ontario Regulation 137/05) may be required for SWM.	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.</p>		
13.	8-42/ES8.1.3	The following management plans will be developed and implemented for the Project: Construction Waste Management Plan; and Spill Prevention and Emergency Response Management Plan. This plan will lay out the requirements for training and procedures for the storage,	General Registration under Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT with respect to hazardous waste and liquid waste management with Resource Productivity & Recovery Authority (RPRA). List of types of wastes generated during the project, planned	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p>		

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		handling, and transportation of potential contaminants, as well as equipment operation and maintenance intended to prevent spills from occurring.	<p>disposal framework, and transportation to the approved waste facility.</p> <p>ECAs and/or EASRs will be required for transportation and disposal activities.</p> <p>The spill contingency plan and emergency response plan was mentioned. This should also include how the contractor will manage, store and handle fuel, with a description of how and where wastes from spills will be transported and disposed of. Review O. Reg 224/07: Spill Prevention and Contingency Plan.</p> <p>Review the Guidelines for environmental protection measures at chemical and waste storage facilities for storage guidance and BMP.</p> <p>Include information on servicing options and disposal, as capacity may not be available under existing ECAs for to accept these wastes.</p> <p>Review of the Waste Diversion Act, 2022.</p> <p>Review of Hazardous waste management: business and industry.</p> <p>The District is requesting copies of these plans be submitted for review and awareness.</p>	The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		
14.	8-43/ ES8.1.3	Erosion and Sediment Control Plan will be developed and implemented during construction.	<p>Sediment erosion control would be required during vegetation clearing, at water crossings, and/or when working near water. Refer to comments provided by the surface water technical staff.</p> <p>Review of B-6 Guidelines for Evaluating Construction Activities Impacting on Water Resources</p>	<p>D</p> <p>Review during the planning stage and made available for permitting stage and applications.</p> <p>The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the</p>		

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			Completion of a Receiving Water Assessments/Impact Assessments.  Contact MNR to determine permits/approvals.		District for review and comment.	
15.	8-42/ ES8.1.3	Potential for ARD	Metal-Leaching and Acid Rock Drainage Management Plan is required.  The District is requesting a copy of this plan be submitted for review and awareness.	D	Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	
16.	4-63/ 4.4.2.8	Waste oil from heavy equipment. Maintenance of heavy equipment would occur at specific temporary and secure locations prior to management or disposal at a licensed facility and/or through on-site incineration facility.	An ECA is required for on-site waste oil incinerator(s) (EPA Section 9 and 27)	D	Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.	
17.	4-64- 4.4.2.8	Slash and root waste from clearing and grubbing operations will be managed using best management practices, including but not limited to: chipping, leaving in place, small wood scattering, and burning.	Slash pile burning may be required during the construction phase. Notification to the local fire department is recommended prior to burning. Emergency fire suppression should be considered and planned.  Contact MNR to determine permits/approvals.	D	Review during the planning stage and made available for permitting stage and applications.	
18.	4-35/4.3.3.6	Storage of Fuels, Explosives and Wastes  Discusses the use of waste incinerators	Incinerator ash is classified as a special waste and must be disposed of at designated, approved landfill facilities. This material must be handled with precautions (this includes covered metal containers during transport). Incinerator ash is not permitted in standard waste streams; instead, it must be managed and transported in full	D	Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies	

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			<p>compliance with regulatory requirements to ensure environmental and public health protection.</p> <p>This issue should be addressed at both the EA phase and permitting phase. The EA should include information on servicing options for ash disposal associated with the temporary construction camps, as capacity may not be available under existing ECAs for municipal disposal sites. Additional testing may be required for ash disposal.</p> <p>Considerations and explore beneficial uses for incinerator ash.</p> <p>Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT and Guideline A-7: Air Pollution Control, Design and Operation Guidelines for Municipal Waste Thermal. Guideline A-7 outlines air pollution control and operational standards for incinerators</p>	of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		
19.	Table 8-1/8-6	The minimum clearance from the bottom of the aggregate pits to the groundwater table is one of the criteria to determine the category of the aggregate permit. The operation of the aggregate pits (e.g., dewatering and discharge) may affect groundwater and surface water systems near the pits.	<p>If aggregate extraction is below the water table and water is to be removed (pumped) PTTW may be required.</p> <p>If water is contaminated (sediment), an Industrial sewage ECA may also be required for discharge of a contaminant other than water.</p> <p>In addition, environmental conditions are also found in the ARA License for the site.</p>	D  Review during the planning stage and made available for permitting stage and applications.		
20.	12-223 and 23-20/23.5.1 Accidental Spills of Hazardous material	Reporting any major spill of petroleum or other hazardous material to the MECP Spill Action Centre, immediately after occurrence of the environmental accident (as per Ontario Regulation 675/98).	<p>All spills are to be reported to MECP SAC and remediated forthwith (EPA, Section 92 and 93). Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT and Ontario Regulation 675/98, OWRA, EPA, and Fisheries Act (Canada).</p> <p>Spills to water require special considerations due to the potential for widespread environmental harm, impacts on aquatic ecosystems, DW Sources, and challenges in containment and remediation.</p>	D  Review during the planning stage and made available for permitting stage and applications.  The District is requesting copies of the Plans (CEMP and OEMP Frameworks) be submitted to the District for review and comment.		

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			<p>Ontario Regulation 675/98 speaks to spill exemptions. The Spills and Emergency Preparedness Plan should discuss what classifies as a reportable spill. <u>Note</u>, that although spills less than 100 L in restricted areas from public access, and spills less than 25 L in areas with public access are not required to be reported, this <u>does not exempt</u> the spiller from clean up of the spill <u>forthwith</u> and file an internal record of the cleanup. If there is confusion on what to report to MECP SAC, BMP would be to record and report all spills and remedial activity to SAC and follow up with district office.</p> <p>Review of R.R.O. 1990, Reg. 347: GENERAL - WASTE MANAGEMENT with respect to waste characterization. Submission of a worst case soil sample for Toxicity Characterization Leaching Procedure (TCLP) analysis of Contaminates of Concern (COC) is required prior to remedial activities. TCLP sample from the spill site is to be completed prior to remedial activities to determine suitable disposal facilities (hazardous vs non-hazardous).</p> <p>Spill Prevention and Emergency Response Management Plan to be completed. The District is requesting copies of these plans be submitted for review and awareness.</p>			

**MECP:**

**Human Toxicology  
and Air Standards  
Section**



## Comments Table

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Ganesharam Balagopal, Senior Regulatory Toxicologist, and Deep Patel, Human Toxicologist

**Ministry and Branch:** Human Toxicology and Air Standards Section,  
Technical Assessment and Standards Development Branch  
Ministry of the Environment, Conservation and Parks

**Comments Summary:** Following is a summary of the general comments on the HHRA report, intended to highlight key areas requiring clarification and additional justification. The individual section-specific comments from the HHRA report are provided in the table below.

1. **Problem Formulation & Conceptual Site Model (CSM):**

To strengthen the HHRA, we recommend considering revising the CSM to address several critical gaps. The report should clearly state the objectives of the assessment and define acute, subchronic, and chronic exposure durations with appropriate averaging times. The CSM should also identify all receptors (including sensitive subpopulations such as children, elders, and individuals with pre-existing conditions), address seasonal variation, and provide additional rationale for any pathway exclusions.

Additionally, the CSM should incorporate potential sources of contaminants such as gravel materials, or activities that may result in exposure such as the peat road design and blasting activities, as these may influence soil, water, and air quality. These enhancements will improve transparency, ensure completeness, and support a scientifically robust risk characterization.

Comments in the table below related to this subject are: 1-3, 5, 7, 8, 26-29

2. **COPC Selection & TRV Justification:**

The proponent should provide a clear and transparent screening process and rationale for selecting chemicals of potential concern (COPCs) and toxicity reference values (TRVs). For example, where ingestion pathways cannot be ruled out, oral TRVs should also be included. The current document does not explain why certain COPCs were included or excluded, nor does it justify the choice of TRVs or benchmarks, which may lead to uncertainty in risk estimates.

Further, ensure that benchmarks reflect appropriate exposure durations (acute, subchronic, chronic) and that any assumptions about additivity for common toxicological endpoints are clearly explained, to improve transparency and consistency of the HHRA.

Comments in the table below related to this subject are: 17, 19, 30, 36, 46–50

3. **Air Quality Assessment & Modelling:**

It is apparent that the current modelling of emissions from vehicle omits important COPCs such as SO<sub>2</sub>, CO, and additional VOCs (including diesel exhaust components), which may cause the HHRA to underestimate potential risks. We recommend including all relevant COPCs in the dispersion modelling and clearly identifying the model used, meteorological data inputs, and key assumptions.

It is recommended to properly define points of impingement (POIs) and justify receptor distances, ensuring that both temporary and permanent receptors are adequately represented. Further, the report should present modelling results both with and without mitigation measures, to demonstrate the effectiveness of risk management strategies.

Comments in the table below related to this subject are: 18, 20, 21, 32, 33, 35, 41

4. **Exposure Pathways & Sensitive Populations:**

To ensure the HHRA reflects all relevant exposure scenarios, consider expanding the assessment beyond inhalation-only pathways. Limiting the analysis to air exposure overlooks potential ingestion and dermal contact routes, which may occur through dust deposition impacting soil, water, and vegetation. These pathways can be particularly relevant for traditional land users and sensitive populations such as children, elders, and individuals with pre-existing health conditions.

The details on the characterization of gravel and construction materials used for the project should be provided. These materials may introduce metals, polycyclic aromatic hydrocarbons (PAHs), and other contaminants that could affect soil, groundwater, surface water, and air quality. We recommend conducting chemical characterization and, where appropriate, leach testing of gravel to identify any COPCs in this

material and incorporate appropriate COPCs and exposure pathways into the CSM while analyzing pathways of exposure in CSM

We recommend incorporating a multi-pathway exposure assessment or, at minimum, providing a clear quantitative discussion of these additional routes and their potential contribution to overall risk. Including this analysis will improve completeness and demonstrate that all plausible exposure scenarios have been considered.

Comments in the table below related to this subject are: 6, 9–16, 22–24, 26–29, 39, 40, 43, 44

5. **Risk Management Measures (RMM):**

To provide a transparent analysis of potential risks, the report should present risk estimates both with and without applying risk management measures (RMMs). The current document includes risk calculations only with mitigation measures in place which limits the ability to evaluate the true effectiveness of controls.

We recommend moving the discussion of RMM to the appropriate section after uncertainty analysis and clearly distinguishing between active and passive mitigation. This allows risk calculation to be done with and without active mitigation (RMM). This approach will improve clarity and support informed decision-making.

Comments in the table below related to this subject are: 34, 38

6. **Risk Characterization & Uncertainty Analysis:**

Risk characterization and uncertainty analysis should consider and discuss the points raised above with respect to exposure scenarios and duration of exposures, and pathways of exposure including multi-pathway, (Points # 1,2, 3 and 4 above); further review of risk characterization cannot be completed until exposure pathways and other elements are incorporated. We also recommend addressing the uncertainty about chromium speciation (proportion of hexavalent chromium) through sampling and analysis.

Comments in the table below related to this subject are: 51–58

7. **References and Consistency Issues:**

The current version cites the 2017 Health Canada guidance series for air quality, water quality, and country foods. These have since been superseded by the 2023 updates, which should be considered.

In addition, please review terminology and consistency issues throughout the HHRA and verify that all cross-references and numerical values (e.g., table notes, exceedance statements) are accurate and consistent across the document.

Comments in the table below related to this subject are: 4, 37, 42, 48

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
<b>Executive Summary and Introduction</b> Pages 6-8						
1.	Page 7	Define acute and chronic exposure in the executive summary.	Please provide a brief definition and averaging time for acute and chronic exposure up front in the summary for better understanding to the reader.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
2	Page 8	Further clarity is required in the introduction.	The introduction should clearly state the objectives of the HHRA (e.g., to evaluate potential health risks from predicted exposure to project-related contaminants).  The introduction should also briefly mention who is being assessed (e.g., local residents, Indigenous land users, sensitive subpopulations) and how (e.g., inhalation, ingestion).	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
3	Page 8	It is stated that 17 km of the WSR is within the First Nations reserve land. However, it is not apparent if the study area includes the assessment of these residential exposures. Does the WSR stretch pass through any residential area or human dwelling?	Additional clarity is needed, please provide additional rationale of how the residential locations will be assessed.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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4	Page 9 Section 2.1	The HHRA cites old federal guidance documents from 2017 for air quality, water quality, and country foods. These references should be updated to the latest Health Canada guidance published in 2023 to ensure alignment with current best practices. Please review and replace the following references: 1. <i>Evaluating Human Health Impacts in Environmental Assessments: Air Quality</i> (2017) 2. <i>Evaluating Human Health Impacts in Environmental Assessments: Country Foods</i> (2017) 3. <i>Evaluating Human Health Impacts in Environmental Assessments: Water Quality</i> (2017)	The latest reference on this topic was published in 2023 and the link is provided below.  1. <a href="https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-1-2023-eng.pdf">https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-1-2023-eng.pdf</a> 2. <a href="https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-5-2023-eng.pdf">https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-5-2023-eng.pdf</a> 3. <a href="https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-2-2023-eng.pdf">https://publications.gc.ca/collections/collection_2024/sc-hc/H129-54-2-2023-eng.pdf</a> .	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
<b>Problem Formulation</b> Pages 11 - 41						
5.	Page 12 & 13 Section 3.1	It is not apparent the project timelines for the different phases of the undertaking, (i.e. WSR construction and operation) as well as impact of seasonal considerations.	A clear understanding of the timelines of the phases of the undertaking is required, a schematic representation of timeline in the project could be beneficial.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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		Temporal boundaries (construction: 5–6 years; operation: 75 years) are mentioned later in Section 3.5 Study Area, but not in Section 3.1 where readers expect project context. Further, seasonal considerations (e.g., winter road, dust control during dry months) are scattered but not consolidated.				
6.	Page 12 Section 3.1	In paragraph 3, procuring the gravels from pits and quarries require further details. Additional detail and composition of the gravel being used are required to ensure that COPCs are captured and that these COPCs may require additional modelling for exposure considerations. It is also not apparent if operations involving gravel are being considered as part of this undertaking.	Additional consideration of both the processing and future source of COPCs from gravel are required. This includes an analysis of the composition of the gravel to ensure that no COPCs are missed. Depending on this information, additional direct and indirect exposure routes may need to be addressed. This information is critical for assessing indirect exposure pathways and should be linked to soil and groundwater quality discussions in Section 3.3. Additional consideration of the gravel operations may need to be incorporated.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
7.	Page 12 Section 3.1	It is not apparent how the floating road on top of peat is being considered for potential impacts on water quality and human exposure.	Additional consideration and rationale is required to assess this potential exposure pathway.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	

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					the twenty-three-week review period	
8.	Page 17 Section 3.3.1	The section does not specify what types of contaminants (e.g., hydrocarbons, metals, particulates) might be introduced to soil or how they could lead to potential exposures.	It is expected that contaminant within the LSA and the gravel procured for road construction use should also be considered.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
9.	Page 17 section 3.3.1	"The magnitude of effect on soil is considered moderate due to project activities". However, the gravel for road construction as a potential source of contaminants has not been included in the discussion.	A discussion on gravel for road construction should be included in this section.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
10.	Page 18 Section 3.3.1. First paragraph	"The duration of most effects from changes to soil quality is considered short-term..." The changes to the soil quality that is based on crushed gravels may also have a long-term impact on the LSA.	A discussion on the potential long-term effect from the contents of the crushed gravels on the ecosystem and soil, ground water that could impact human health requires additional elaboration.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
11.	Page 18 Section 3.3.1, 2 <sup>nd</sup> paragraph	It is stated that the dust generated and deposited would not affect the soil quality beyond the LSA. However, there is insufficient data to support this claim, if crushed gravels are used from another area for road construction.	Crushed gravels should be analyzed for its contents and the contaminants be included in formulation.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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		Dust will often be carried beyond the area it is generated.				
12.	Page 18 Section 3.3.2, 4th paragraph	The text refers to "chemical constituents" and "potential contaminants" but does not specify which substances are of concern (e.g., nitrates, heavy metals, hydrocarbons).	Both the terms (chemical constituents and potential contaminants) should be defined, and chemicals categorized with sufficient justification.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
13.	Page 18 Section 3.3.2, 5th paragraph	There's no mention of baseline conditions or whether existing water quality data were used to contextualize predicted changes and its impact on human health.	More details during problem formulation are required on the use of baseline data and future prediction due to road construction activity including construction materials exposure to the LSA.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
14.	Page 18 Section 3.3.2, 5th paragraph	Settling of particles from air emissions and re-entrainment of dust into water bodies and its potential impact to human health was not considered. Additional rationale is required to assess whether these pathways should be assessed.	Emissions from project activity including the gravels used for road construction should be considered and discussed as an exposure pathway for potential human impact.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
15.	Page 18 Section 3.3.2, 5th paragraph	As a conclusion to Section 3.3.2, it is stated that "significant effects to water quality were not predicted...", however, it is not apparent how this was determined.	A detailed consideration of the construction material that would be released to air and enters the water bodies has to be given and discussed.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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16.	Page 19 Section 3.3.3, 1 <sup>st</sup> paragraph	<p>This section discusses rock blasting as a potential source of groundwater contamination, but this consideration is not applied consistently throughout the HHRA.</p> <p>Additionally, the magnitude of effect due to blasting is considered low to moderate for groundwater quality and is stated to be within the range of seasonal variation. However, such an inference cannot be drawn unless the gravel procured from local quarries or pits is chemically characterized.</p>	Rock blasting as a potential source of contamination should be consistently considered throughout the HHRA. Further, chemical characterization of the gravels is required to support the comments on the effects of blasting on groundwater quality.	A	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	
17.	Page 19 Section 3.3.4, 1 <sup>st</sup> paragraph	It is not apparent how air contaminants which are considered to have potential impact on human health were screened.	A brief rationale for the selection of these contaminants should be provided in this document.	A	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	
18.	Page 19 Section 3.3.4, 2 <sup>nd</sup> paragraph	It is stated that "Atmospheric dispersion modelling was carried out for both construction and operation phase". Please provide a plain language summary of the assumptions and	This paragraph should also include brief details on model used, meteorological data & modelling assumptions.	B	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	

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		modelling used to assess exposure point concentrations.				
19.	Page 19 Section 3.3.4, 3 <sup>rd</sup> paragraph	<i>Air benchmarks were referred from Ontario's AAQC list and CAAQS. Additionally, the Ontario Air Contaminant Benchmark (ACB) list should also be considered, as it provides health-based screening levels for contaminants not fully addressed by AAQC or CAAQS. Other relevant toxicity reference sources could also be reviewed to ensure comprehensive coverage.</i>	<i>Additionally, Ontario Air Contaminant Benchmark (ACB) list can also be considered.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
20.	Page 20 Section 3.3.4.	<i>The phrases "exceedance at one or more location" and "point of impingement" have been used inconsistently in this section. Further, the clarity in defining POI is missing.</i>	<i>The distinction between exceedances "at one or more location" and "at points of impingement of interest" needs clarification. Moreover, the POI should be defined including the distance of the receptor from the point of release of the COPC.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
21.	Page 20 Section 3.3.4.	<i>It is stated that "based on the potential for changes to air quality, quantitative evaluation of potential exposures and risks of humans to contaminants in air will be conducted in the HHRA." It is not clear when will be the risk calculation of the HHRA conducted.</i>	<i>If it is done further down in the document or in the future, it should be referenced in this section.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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22.	Page 21 Section 3.3.5.1	<i>It is stated that contaminant uptake by plants is not anticipated by project activity. However, sufficient rationale has not been provided to support this assertion. For example, has leach testing been done on the crushed gravels which may contain potential metals as COPC (if otherwise proved not to have any COPC with chemical characterization) could be a source for plant uptake through fall outs in soil or water media.</i>	<i>A discussion and supporting data of gravel chemical characteristic is needed.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
23.	Page 21 Section 3.3.5.1. 4 <sup>th</sup> Paragraph	<i>This paragraph claims operational dust “is not anticipated to differ in composition from baseline dust.” This assumes the disturbed soil is uncontaminated and the procured gravel is also without any COPCs—but if baseline soils contain metals or other pollutants along with any COPC in the procured gravel (e.g., legacy contamination), this could underestimate exposure.</i>	<i>As above baseline chemical characterization data is required and included while discussion. As mentioned in comment #22.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
24.	Page 22 Section	<i>It is stated that country food tissue data is available, and project related contaminant</i>	<i>A clear consideration of sources of COPCs including crushed gravels may require additional consideration.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	

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	3.3.5.4. 1 <sup>st</sup> Paragraph	increase in country food is not expected. Additional justification is required.			the twenty-three-week review period	
25.	Page 22 Section 3.3.5.4. 2 <sup>nd</sup> Paragraph	It is stated monitoring of contaminants will continue during the construction and operation phase. However, it is not apparent which contaminants will be measured in baseline samples and monitoring in the operation phase.	A list of contaminants measured in baseline samples and monitored in the operation phase should be provided in this section.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
26.	Page 24 Section 3.4	The scope of the HHRA assumes that inhalation of air contaminants is the only exposure pathway considered; however, this assumption is not clearly explained or supported. Redistribution of particulate matter as COPCs to other media (e.g., soil, groundwater, plants) is not addressed, which could influence indirect exposure pathways and should be discussed in the CSM. Additionally, while the section states that acute and chronic air quality will be assessed, subchronic exposures are also relevant for the project phase. Proper benchmarks to protect against acute, subchronic, and chronic toxicities should be defined, with a clear rationale for TRV selection.	<ol style="list-style-type: none"> <li>1. Provide a clear justification for limiting the HHRA to inhalation exposure or include a discussion on the potential redistribution of particulate matter to other media and its implications for human health.</li> <li>2. Expand the scope to include subchronic exposure benchmarks and provide a rationale for the selection of TRVs for all exposure durations (acute, subchronic, chronic).</li> <li>3. Revise the study area description to clearly identify receptor locations and differentiate between temporary and permanent receptors,</li> </ol>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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		<i>Finally, the description of receptors within the LSA lacks clarity. Different receptor types, such as temporary receptors (construction camps, seasonal cabins) and permanent receptors (future residents along the road), should be explicitly identified and considered in the assessment.</i>	<i>ensuring these are reflected in the CSM and subsequent risk characterization.</i>			
27.	Page 25 Section 3.4 2 <sup>nd</sup> paragraph	<i>It is stated that "As presented in Section 3.2, no significant project related effects have been predicted for other media". Requires further consideration.</i>	<i>Such discussions have not been done in Section 3.2 and therefore such statements should be clarified or discussed further. Or additional justification is required to support this statement.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
28.	Page 29 Section 3.7 1 <sup>st</sup> paragraph	<i>It is stated that "As described in Section 3.3, no significant effects, including increasing concentrations of Project-related contaminants, were predicted for soil, groundwater." Requires further consideration.</i>	<i>Such discussions have not been done in Section 3.3 and therefore such statements should be clarified or discussed further. Or additional justification is required to support this statement.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
29.	Page 29 Section 3.7 2 <sup>nd</sup> paragraph	<i>It is stated that "Air quality is the only VC linked to human health effects". Such claims have to be backed with data and a fully rationalized CSM model.</i>	<i>Detailed explanation and rationale for this assumption is lacking anywhere in the document. A summary explaining why soil, groundwater, surface water, and country foods were excluded should be included. Include a Conceptual Site</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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			<i>Model diagram showing: Sources (construction activities, vehicle emissions, dust), pathways (airborne transport), receptors (Webequie FN residents, seasonal users), exposure route(s). This will provide transparency and help understand the basis for HHRA scoping decisions.</i>			
30.	Page 30 Table 3.1	<i>Table 3.1 lists number of contaminants as indicators of air quality VC without justification for their selection.</i>	<i>Rationale for the selection of the contaminants should be provided.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
31	Page 30 Section 3.7.1. 1st Paragraph	<i>It is stated that "WSR will not be fully surfaced with asphalt or chip seal from the start." As per the approved terms of reference dated August 2020, the road is only a gravel road which indicates asphalt may not be used. Further clarification is required, and appropriate COPC (e.g. PAHs) should be considered.</i>	<i>If at all it is surfaced with asphalt, will it be done within the project period? A plan of timeline should be stated. A clear explanation should be provided.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
32.	Page 30 Section 3.7.1. 3rd Paragraph	<i>"The modelling considered receptors, or points of impingement, for potential contaminant concentrations in ambient air, at 50 m and 150 m distance from the road centreline (RCL).....".</i>	<i>Real ground distance of all the receptors should be cited in the document and a rationale for selecting the assumed distance i.e. 50 m, 150 m etc. should be provided.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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		<i>Additionally, it is also specified many receptors that may be potential near the project site or could get exposed to project activities.</i>				
33.	Page 31 Section 3.7.1.1. Table 3.2	<i>The table provides the results of dispersion modelling during the construction phase. The table is missing in many COPCs.</i>	<i>COPCs like sulphur dioxide, carbon monoxide and other VOCs like ethylbenzene, xylene and contents of diesel exhausts are missing that has been mentioned in previous sections. These COPCs should be modelled and included in the table. If these COPCs were not modelled, provide a clear rationale.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
34.	Section 3.7.1.1. Table 3.2 (page 31); Table 3.3 (page 34); Table 3.5 (page 37)	<i>Dispersion modelling results were presented with mitigation in place assumed. It is not apparent that what kind of risk mitigations are in place. If it is an active risk management measure, please provide the calculation with and without mitigation as well.</i>	<i>The table should also present modelling results of the COPC emissions both with and without mitigation measure.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
35.	Page 32 Section 3.7.1.1. 1 <sup>st</sup> paragraph	<i>Benzeno(a)pyrene is modelled, and exceedance has been reported. If this is to represent whole PAHs, further consideration is required. BaP is a surrogate representing industrial emissions to</i>	<i>It is recommended that TEF should be considered while measuring PAHs and a discuss is required if otherwise.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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		<i>air. However, if BaP is from any other operation especially involving soil or gravel, Toxic Equivalence Factor (TEF) should be considered.</i>				
36.	Page 33 Section 3.7.7.1 1 <sup>st</sup> bullet point	<i>It is stated "The potential exceedances only concern short-term AAQC (24-hours...)". Note: 24-hr AAQCs are not short-term benchmark, it only represents a concentration that is equivalent to the annual average with short-term exposure duration (24-hr).</i>	<i>If the exposure is only of short-term duration, appropriate benchmarks should be used (e.g. acute or subchronic benchmarks). Provide a rationale for benchmark selection in Section 5 and cross-reference it here.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
37.	Page 33 Section 3.7.7.1 2 <sup>nd</sup> bullet point	<i>It is stated "Dust deposition on the ground and on vegetation above the threshold would be limited to the road....". Note: Thresholds are not benchmarks. This statement requires further clarification.</i>	<i>Provide rationale and justification to support either qualitative or quantitative assessment.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
38.	Page 33 Section 3.7.7.1 5 <sup>th</sup> bullet point	<i>This bullet discusses in detail about the Risk Management Measures (RMM). However, the RMM should be discussed after the risk calculation and discussion on uncertainties.</i>	<i>The RMM should be included in the appropriate section at the end.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
39.	Page 34	<i>"estimate Project scenario concentrations of metals in dust (i.e., TSP) generated from soils in the study area, soil data collected as part of the</i>	<i>The HHRA should include the characterization of gravel and evaluation of the potential for gravel to contribute to dust exposure.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

Comment #	Page/Section #	Comments & Rationale	GRT Comments		Proponent Response	GRT Follow Categorize Proponent's response as follows:
			Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
	Section 3.7.7.1 1 <sup>st</sup> paragraph	<i>Eagle's Nest Multi-metal Mine Environmental Assessment, located in the Ring of Fire, has been used"</i> <i>It is not apparent how gravel used in road construction would contribute to dust exposure</i>				
40.	Page 35. Table 3.4	<i>The metals concentrations in airborne particulates are estimated using soil metal concentrations multiplied by TSP concentration.</i>  <i>This assumes all particulate matter is soil-derived, which may not be entirely accurate (other sources could contribute metals i.e. project activity and gravels).</i>	<i>Additional explanation of this assumption's validity, or whether emissions inventories support it, would improve clarity.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
41.	Page 36. Section 3.7.1.2. 1 <sup>st</sup> paragraph	<i>Vehicle emissions including SO<sub>2</sub> concentrations or modeling results during the operation phase were not mentioned.</i>	<i>Given that operational emissions could include vehicle exhaust or other combustion sources, SO<sub>2</sub> should typically be considered and modeled alongside NO<sub>2</sub> and VOCs.</i>  <i>If SO<sub>2</sub> was modeled, add results to Table 3-5 and discuss whether concentrations were below AAQC. If not modeled, provide a rationale as to why (e.g., emission estimates indicate negligible</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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			Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
			contribution). Ensure consistency between COPC screening (Section 3.3.4) and modeling results (Section 3.7.1.2).			
42.	Page 37, 3 <sup>rd</sup> paragraph and page 39, notes section.	The maximum predicted TSP concentration at a sensitive receptor is stated as 97 µg/m <sup>3</sup> in the text but 489 µg/m <sup>3</sup> in the notes under Table 3-6 (there seems to be a discrepancy).	Clarify whether the 97 or 489 µg/m <sup>3</sup> is correct for the TSP concentration used to calculate metals concentrations.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
43.	Page 40. Section 3.8. 5 <sup>th</sup> paragraph.	As COPCs were only identified in air, the primary exposure pathway by which Webequie First Nation community members and other populations in the LSA have the potential to be exposed to Project related COPCs is via inhalation. This assertion has not been fully justified. The potential for dust to contributed to other routes of exposure have not been well characterized.  Some indirect exposure pathways (e.g., dermal contact with settled dust, ingestion of contaminated surface water or soil) do not	Given the potential redistribution of particles from air to different media, a detailed discussion (including quantitative assessment) is needed to assess other routes of exposure.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
		<i>appear as they have been assessed fully. See comments in above sections.</i>				
44.	Page 41. Section 3.9 and table 3.8	<i>Lack of consideration of sensitive subpopulations.  Vulnerable subpopulations (e.g., elders, pregnant women, people with pre-existing respiratory conditions) may have greater sensitivity to air pollutants, especially PM<sub>10</sub> and metals like Cr(VI).</i>	<i>A qualitative discussion would add to the transparency and completeness of the HHRA.</i>	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
<b>Exposure Assessment</b> Pages 42 - 44						
45.	Page 42. Section 4.1, Table 4.1	<i>Data on SO2 and CO2 are missing in the table.  In the operations phase, PM2.5 and TSP are also missing.</i>	<i>Clarification is required.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
<b>Toxicity Assessment</b> Pages 45 - 47						
46.	Page 45. Section 5	<i>"Acute TRV: the air concentration of a chemical that can be tolerated without appreciable health</i>	<i>Clarification is required on the limits used to assess short-term risks.</i>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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		<p>effects on a short-term basis (e.g. 1-hour, 24-hours)".</p> <p>24-hour AAQCs are not acute TRVs. These benchmarks are short-term representation of a chronic benchmarks.</p>				
47.	Pages 45-46 Section 5	<p>"The TRVs provided by the above listed agencies are protective of critical sub-groups ....for example, the elderly or persons suffering from existing medical conditions)."</p> <p>While TRVs may consider vulnerable sub-population, it never covers people with existing medical conditions.</p>	Additional context or clarification to this statement is needed.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
48.	Page 46. Section 5	<p>"a range of the available acute and chronic air quality guidelines available from Ontario MECP, the CCME and the WHO were used."</p> <p>This statement requires further clarification.</p>	Further clarification is required when using acute or chronic benchmarks.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
49.	Page 46. Table 5.1	<p>PM<sub>10</sub> 24-hr benchmark is noted as 50 ug/m<sup>3</sup>. However, it is not an acute number. It is extrapolation from a chronic effect.</p>	Clarification is required in use of this benchmark.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	

Comment #	Page/Section #	Comments & Rationale	GRT Comments		Proponent Response	GRT Follow Categorize Proponent's response as follows:
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					the twenty-three-week review period	
50.	Page 47. Table 5.2	Oral TRV was provided only for iron and is considered as a basis for calculating inhalation risk based on route extrapolation.  As discussed, earlier ingestion pathway cannot be ruled out and oral TRVs are needed for COPC.	Oral TRVs of COPCs should be provided with rationale. The TRVs can represent acute, subchronic and chronic as needed.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
<b>Risk Characterization</b> Pages 48 - 51						
51.	Page 49. Table 6.1	This table presents acute risk estimates. However acute risk has not been properly characterized in this document.	A clear definition of short-term (acute) exposure and its benchmark should be included. Use of 24-hr averaging period as equivalent to short-term (acute) exposure may be reasonable but would require additional justification and clarification as an initial screening step.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
52.	Page 50 Section 6.1	An expanded Section 6.1 may be needed to address dust re-entrainment and deposition, including scenarios with and without risk management measures.	Additional rationale and considerations are required.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

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53.	Page 50. Last para	<p><i>It is stated that there is no baseline chromium speciation data so only the total chromium baseline concentration was used and with the assumption 1/7<sup>th</sup> is the hexavalent chromium as recommended by Health Canada.</i></p> <p><i>The document concludes this approach is over estimation of risk. However, the gravels used in road construction should also be taken into account for potential Chromium and speciation content before any risk calculations or conclusions are drawn.</i></p>	<p><i>Potential chromium content with speciation from the gravels used in road construction should be considered and assessed if applicable.</i></p>	A	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
54.	Page 51, 2 <sup>nd</sup> para	<p><i>It is stated in the document, "The predicted PM10 concentration did not account for the eventual asphalt or chip-seal surfacing and the AQIA indicated that the PM10 concentration will decrease by approximately 50% once the surfacing is in place."</i></p> <p><i>However, addition of asphalt may result in potential PAHs to the environment and eventually could lead to human exposure.</i></p>	<p><i>A discussion potential asphalt exposure to human which may include PAHS among other contaminants should be considered and discussed.</i></p>	A	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	

Comment #	Page/Section #	Comments & Rationale	GRT Comments		Proponent Response	GRT Follow Categorize Proponent's response as follows:
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55.	Page 51, 3 <sup>rd</sup> para	<p>States that it is an over estimation of risk during construction phase, since the chromium speciated concentration for hexavalent is considered 1/7<sup>th</sup>.</p> <p>However, in the same page (page 51, 1<sup>st</sup> para), it is stated that it is recommended to collect soil sample for baseline speciation of chromium and there could be a potential from the crushed gravels to release any contaminant including chromium.</p>	Clarification in the course of action is required, for sample collection to characterize chromium speciation and recalculation of risk using characterized chromium data.	A	<p>1. Item will be addressed in the Final EAR/IS submission</p> <p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)</p>	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/response with proponent</p>
<b>Uncertainty Analysis</b>						
Pages 52 - 54						
56.	Section 7. Page 52	<p>In uncertainty analysis, it is stated that conservative approach was adopted due to potential over estimation of risk from air.</p> <p>However, the assessment included only the inhalation exposure in the exposure pathways, whereas redistribution of suspended particles to soil or water bodies and the associated exposure pathways should also be considered.</p>	Additional, quantitative considerations on other pathways or routes of exposure need to be addressed.	B	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	

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57.	Page 53 to 54 Table 7.1	Table summarizes different parts of the HHRA. However, based on this review this table will need to be revisited.	Table 7.1 should be reconsidered once the comments on the problem formulation step are addressed.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
<b>Conclusion and Risk based Recommendations</b> Pages 55 - 57						
58.	Pages 55 - 57	Similar to the above comments Conclusion and Recommendations should follow updated modifications to the HHRA.	As above # 55.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	

# MECP: Environmental Assessment Branch



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment  
**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Sasha McLeod and Dorothy Moszynski, Special Project Officers  
**Ministry and Branch:** Ministry of the Environment, Conservation and Parks, Environmental Assessment Branch

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation ) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent’s response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
<b>Comments on Main Report</b>						
1.	General	<p>The draft EA does not include any flexibility provisions (e.g. amendment procedure/change process) that would set out a process to follow if changes are required to implement the project post-EA, should the project receive EAA approval.</p> <p>The EA Code of Practice states: “Including an amendment procedure in the environmental assessment may allow a proponent to make minor modifications to the approved undertaking without having to fulfil the requirements of the <i>Environmental Assessment Act</i> all over again. Before developing an amendment procedure, the proponent should discuss its merits and requirements with the Project Officer” (section 4.2.5 of Code).</p>	<p>The proponent should prepare a process to be followed in respect of any changes to the project, and any changes to how the project is to be carried out that the proponent may wish to make after the EA, should the project receive EAA approval.</p> <p>The proponent is requested to share a draft version of the amendment procedure/change process with MECP EAB for EAB’s review and comment prior to inclusion in the final EA.</p>	A. Required for EA as per EA Code of Practice	<p>Flexibility provisions that outline a process to follow if changes are required to implement the project after the EA, should the project receive approval, are presented in Section 27 – Conclusions.</p> <p>As requested, a draft version of the amendment procedure/change process will be provided to the MECP EAB for review and comment prior to inclusion in the final EAR/IS.</p>	B. As discussed with proponent on December 9, 2025, MECP looks forward to reviewing the amendment procedure when available.

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation ) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
2.	General – Significance Scoring	<p>The scoring for the determination of significance of the various environmental components is inconsistent and unclear. For example:</p> <ul style="list-style-type: none"> <li>- The scoring method for significance of effects to geology/terrain/soils (Table 6-16) defines “high (significant)” as 16 or greater, however the highest score possible for the criteria is only 14, meaning a score of 16 or greater is impossible. For groundwater the max. score possible is 13. For fish/fish habitat the max. score possible is 15.</li> <li>- Different methods were used to determine significance for the various valued components, with some using qualitative descriptions only (e.g. surface water, air quality) and some using quantitative scoring (e.g. geology/terrain/soils, groundwater).</li> <li>- The quantitative scoring, when used, was not consistent – e.g. for groundwater, the maximum score for magnitude is 2 (i.e. high</li> </ul>	<p>Please revisit the methodology for assessing significance of effects for the environmental components in sections 6 to 20 of the EA.</p> <p>Please provide rationale for the differences in determining significance of net effects between the valued components, e.g. quantitative vs. qualitative, differences in what is a moderate effect.</p> <p>Please explain why significance was assessed in a different manner for Surface Water.</p>	A. Required for EA per EA Code of Practice	The methodology for assessing significance has been modified and described in Section 5 – EA/IA Approach and Methods (refer to Section 5.2.6). The approach for determination of significance has been standardized for the environmental, cultural and social valued components (VCs) presented in Sections 6 to 20 to provide clear and transparent documentation on the determination of significance. The revised approach has removed the scoring method for the determination of significance and all components will now apply one qualitative method for consistency and clarity. The overarching approach for determination of significance is described in Section 5.2.6. Based on the application of significance criteria, a significance conclusion is made for each VC. A description of how significance was determined for each VC is now summarized in Section 5.2.6. Further details on characterizing net effects and determining significance for VCs and VC-specific definitions of significance are also provided in Sections 6 to	B.

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		<p>magnitude) whereas for vegetation the max. score for magnitude is 3 and for wildlife it is 4.</p> <ul style="list-style-type: none"> <li>- Moderate effects are significant for some valued components and not significant for others. For example the Social Environment section says: “A predicted net effect is considered <b>significant</b> if the effect is <b>Moderate</b> (value of 9 or 12) or high (value of 13 to 16).” However, for other valued components a moderate effect is not significant – e.g. sections 10-13 for Fish, Vegetation, Wildlife and SAR indicate: “<b>Moderate (not significant): 11 to 15.</b>”</li> </ul> <p>The MECP Code of Practice for Preparing and Reviewing EAs in Ontario (2023) includes principles for clear and transparent documentation that allows the reader to understand the decision-making process with explanations of the rationale for making certain choices. Means of achieving transparency include using appropriate, well-established and easily understood</p>			20.	

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		evaluation methods, and making the process clear, rational and logical (sections 3.1.5 and 3.2.3 of Code).				
3.	Page 1-8 Executive Summary 1.0 Introduction	<p><i>“An <b>environmental assessment</b> is a process used to evaluate the potential effects of a proposed project or action on the natural environment. The Ontario EA Act considers the natural, social, economic, cultural and built environment. The goal is to identify any negative effects and find ways to either reduce or avoid them before the project begins.”</i></p> <p>Please note that the Ontario EA Act requires the examination of alternatives and consideration of both advantages and disadvantages of the project (s. 17.6 of EAA). Also, MECP's Code of Practice for EAs in Ontario states that information about both positive and negative effects should be included in the EA.</p>	Consider revising statement to add that the goal is to identify both positive and negative effects and find ways to either reduce or avoid (for negative) or enhance (for positive) effects.	C. Editorial	The statement has been revised based on the proposed action/solution.	A.
4.	Page 1-18 S. 1.4.2 Regional Assessment	<p><i>“As required by the TISG for the WSR Project, and the IA Act, relevant information from the regional assessment, if available, will be used to inform the Project effects assessment.”</i></p> <p>This should also reference the ToR Notice of Approval requirement in</p>	Please add reference to the ToR Notice of Approval requirement – amendment 1.3. This should be added to both pages 1-18 and 16-40.	B. Recommended for EA	Reference to the ToR Notice of Approval requirement – amendment # 1.3 has been added to both pages 1-18 and 16-40.	A.

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation ) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
		<p>amendment #1.3 to consider where appropriate any ongoing or completed Regional Assessment for the Ring of Fire area.</p> <p>It is noted that page 3-5 states that the Regional Assessment for the Ring of Fire is in the ToR phase and has not formally started.</p>				
5.	Page 1-13	<p>When describing the mineral deposits in the area, the statement is made that their potential is well-documented and they have: "...the potential to positively impact the nation's economy and global mining industry." As this is a rather broad statement, a source would be useful.</p>	<p>Please add at least one source for this paragraph.</p>	C. Editorial	<p>A reference has been added to support the statement.</p>	A.
6.	Page 1-19	<p>This section states "The amendments in the ToR Notice of Approval contained additional requirements for consultation with Indigenous communities with respect to the cumulative effects assessment as part of the EA."</p> <p>The amendments include various requirements about cumulative effects including consultation, consideration of other cumulative effects, consideration of the regional assessment and production of a cumulative effects consultation report.</p>	<p>It is recommended that this statement is revised to either be more general ex "ToR Notice of Approval contained additional requirements for cumulative effects assessment as part of the EA." Or more detailed, ex: "ToR Notice of Approval contained additional requirements for consultation with Indigenous communities, consideration of other studies and the regional assessment, and reporting with respect to the cumulative effects assessment as part of the EA."</p>	B. Recommended for EA	<p>The statement has been revised to be more general as suggested by the reviewer.</p>	A.

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation ) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
7.	5-17 and others	ENDM- the Ministry of Energy, Northern Development and Mines is referred to in the draft EA. The ministry name has changed.	Please update reference and acronym to the ministry to Ministry of Energy and Mines – MEM, for the final EA.	C. Editorial	Reference and acronym to MEM have been updated for the final EA.	A.
8.	Page 5-18 ES 5.2.1 Indigenous Communities and Groups	The paragraph above the table should indicate that the provincial Crown's list of Indigenous communities to be consulted on a rights or interest basis is in the Feb 7, 2020 MOU.  The table is missing what the asterisk means and it uses the character "ü" – assume this should be a checkmark or some symbol?	Please add that the provincial Crown's list is in the MOU.  Please add what the asterisk in the table means. If it means communities that were identified for consultation on a rights-basis, Wapekeka should have an asterisk.  Same comments for pages 2-8 to 2-9, section 2.3.1 of the main EA report.	C. Editorial	Text has been revised to include statement that The Ontario Crown list of Indigenous communities to be consulted for the Project is contained in the MOU of February 7, 2020 between MECP, ENDM (now MEM) and Webequie First Nation. We have added what the asterisk means in the table. It means - those whose Aboriginal and Treaty Rights may be affected by the Project, as identified by the Crown, including an asterisk for Wapekeka First Nation. Changes were also made in the main sections of the EAR/IS.	A.
9.	Page 5-19 ES 5.2.3 Ontario GRT	The list of Ontario Government Review Team ministries should include a few more ministries.	Please add: - Ministry of Northern Economic Development and Growth - Ministry of Tourism, Culture and Gaming  MECP does not have the following ministries on its GRT list, so	C. Editorial	Additional GRT ministries have been added and those not on the MECP GRT list are now removed based on the Project Team's review. Changes have also been applied to Section 2 of the EAR/IS.	A.

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			consider if these are still relevant to include: - Ministry of Education - Ministry of Community Safety and Correctional Services - Ministry of Municipal Affairs and Housing  Same comment for page 2-10, section 2.3.2.1.			
10.	Page 8-46	In the table, under the project effects for surface water VC, it is stated that "Cross-culverts will be installed at regular intervals along the road (non-waterbody areas) within the lowlands/peatlands to convey surface drainage and movement subsurface groundwater flow through the road." This sentence reads strangely, is a word missing or should 'movement' read move"?	Please check sentence for accuracy.	B. Recommended for EA	Revised to add "movement of" for clarity and accuracy.	A.
11.	Page 8-46 Page 6-59	Under effects to surface water quality, no application of sand or salt is proposed for de-icing of the WSR during the winter season. For curiosity, how will the safety of ice formation on the road be addressed?	Please indicate how the road will be de-iced if necessary	B. Recommended for EA	As noted in Section 4 of the EAR/IS, under winter maintenance, no application of sand or salt is currently proposed for de-icing of the WSR during the winter season based on MTO specifications for similar types of roads in northwest Ontario that are considered Class 4 provincial highways. The following wording	A.

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					has been added to Section 4.4.3 of the EAR/IS: "Where safety concerns are identified by operation and maintenance crews, the road operator may consider applying sand in strategic locations to improve traction on slippery surfaces, especially in very cold temperatures within the study area where salt is not effective."	
12.	Page 8-45 onwards	Please see potential effects and mitigation measures tables in executive summary section 8 for spelling and editorial errors as several were found.	Please look over the tables for editorial errors.	C. Editorial	Tables have been reviewed and spelling and editorial errors corrected, where applicable.	A.
13.	List of Acronyms and Abbreviations	Please check current ministry names for the final EA.	Please check current ministry names for the final EA.	C. Editorial	Ministry names have been checked and corrected where applicable.	A.
14.	Page 1-11	The section states: "In 2013, Noront Resources prepared a draft federal/provincial Environmental Impact Statement/Environmental Assessment Report (EIS/EAR) for their proposed Eagle's Nest mine in the McFaulds Lake area, including an examination of alternative road routes and types (e.g., winter, all-season and combined winter/all-season) that would connect the mine to the provincial highway system. The Noront draft EIS/EAR process was not completed."	This statement should be deleted and revised. For example, consult Ontario's webpage for the project: "A comprehensive environmental assessment is no longer required for the project. The voluntary agreement has been terminated and the Terms of Reference approval revoked by the <i>Protect Ontario by Unleashing our Economy Act, 2025</i> , effective June 5, 2025. The decision reflects significant changes to the project scope since the Terms of Reference was approved in 2015. The voluntary	B. Recommended for EA	The statement regarding the 2013 Noront Resources draft federal/provincial Environmental Impact Statement/Environmental Assessment Report is proposed to remain with additional text for context. This includes suggested MECP statement regarding the ToR, that the draft EIS/EAR had no status or recognition under the EA Act and also updated project information on Ontario's webpage.	A.

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		The statement is incorrect- in 2013 a ToR was submitted and in 2015 it was approved with amendments.	agreement and Terms of Reference no longer reflect the current proposal. The proposed mine will continue to be subject to environmental oversight, including public consultation requirements and obligations to consult with potentially affected Indigenous communities.”			
15.	Page 1-14	This statement sounds like an industry/commercial sales pitch and would benefit from a source: “Discovered in the early 21st century, the Ring of Fire is considered one of the most significant mineral deposits in Canada, with the potential to positively impact the nation's economy and global mining industry.”	Please consider adding a source to this statement.	B. Recommended for EA	A reference has been added for this statement.	A.
16.	Page 2-40 onwards	In the tables documenting concerns raised by Indigenous communities, in the “overview of issues and/or concern” several of the columns make statements such as “concern that Indigenous rights be examined prior to any vegetation removal” or “concern about who is responsible for post construction spills.” Consider whether these could be labelled as “comments” or questions” as opposed to being prefaced as “concerns” in the column, since some are more neutral statements as opposed to concerns/issues.	Consider whether it may be useful to revise several of the sentences in the “Overview of issues and/or concern” table to indicate that some of the statements made are more comments or questions for example, “comment that Indigenous rights be examined prior to any vegetation removal” or “question about who is responsible for post construction spills.”	C. Editorial	The text in tables has been revised to reflect statements that are considered to be either comments or questions rather than prefaced as a concern. A footnote has also been added to explain that key comments and questions are also captured in column.	A.

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17.	Page 2-45 Table 2-7 Key Issues- Indigenous Communities	One of the rows on page 2-45 is missing text in the last 3 columns.	Fill in the row as needed.	C. Editorial	Formatting oversight has been corrected to address the comment.	A.
18.	Page 2-53 S. 2.5 Public Engagement Methods	<p><i>“These methods of engagement have considered the activities and public participation approach for the Agency-led consultation during the impact statement phase of the IA as contained the Agency’s Public Participation Plan for the Project.”</i></p> <p>This paragraph should also acknowledge the ToR requirements, including the consultation plan and the ToR approval.</p>	<p>Please add whether the methods of engagement also considered the approved ToR, including the consultation plan and commitments made in the ToR, and the ToR Notice of Approval requirements.</p> <p>Also clarify if this sentence should say public/government agencies/stakeholders instead of Indigenous communities: <i>“Engagement methods undertaken with <b>Indigenous communities</b>, including supplemental methods and tools to those listed in <b>Table 2-8</b> are described in <b>Section 2.4.3.</b>”</i></p>	B. Recommended for EA	<p>Added that methods of engagement also considered the approved ToR, including the consultation plan and commitments made in the ToR, and the ToR Notice of Approval requirements.</p> <p>Reference to “Engagement methods undertaken with Indigenous communities, including supplemental methods and tools to those listed in Table 2-8 are described in Section 2.4.3” has been deleted.</p>	B.
19.	Page 3-15	Please review and update text regarding Noront and the Eagle’s Nest proposal.	Please review and update text regarding Noront and the Eagle’s Nest proposal.	B. Recommended for EA.	Text regarding Noront has been updated to be consistent with that proposed in the Introduction - Section 1 (refer to response to Comment #14).	A.
20.	Page 3-70 S. 3.4.3 Construction Camps	Section 3.4.3 and Figure 3.18 would benefit from a brief narrative explanation of why the Camp 1A, 2A, 3A and 4B were preferred over the other locations. Figure 3.18 is a bar graph showing the comparative results but there is no	Please consider providing a brief narrative explanation for the selections of the four preferred camp locations.	B. Recommended for EA	A brief narrative has been added after Figure 3.18 in section to describe the results of the comparative analysis of the camps from the multi-criteria scoring.	B.

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		explanatory text to help the reader understand the camp selections.				
21.	Page 4-43 S. 4.4.2.4 Construction of Proposed Road	<p><i>"The road at the east terminus near McFaulds Lake may connect to an access road within the existing mineral exploration camp for the Eagle's Nest Mine Project and/or connect to the proposed Northern Road Link. Linked roadways will meet provincial intersection design standards and may require separate approvals by appropriate regulatory authorities."</i></p> <p>It would be helpful to clarify what these separate approvals may include, particularly any additional Class EA requirements, to understand if any additional EA Act requirements could apply following the comprehensive EA process.</p>	Please clarify if these separate approvals may include any additional EA/Class EA requirements, and if so which one(s).	B. Recommended for EA	We have added the following text to address the reviewers comment: "Following the current EA/IA process, other approvals for any future road intersections with the WSR may include meeting the requirements of the Class Environmental Assessment for Resource Stewardship and Facility Development Projects (amended, 2024) and/or the Class Environmental Assessment for Provincial Transportation Facilities and Municipal Expressways (2024)".	B.
22.	Page 4-64	The summary if potential emissions, discharges and wastes states: "Aggregate or quarry materials testing for acid rock drainage/metal leaching potential prior to use in construction. At this time based on the preliminary analysis of rock and soil samples there are no identified concerns with potential acid rock drainage or metal leaching" Just to confirm for the reader- this will be tested prior to use?	Please confirm whether rock will be sampled prior to use in construction- or change the summary to better reflect S. 6.2.2.3. i.e. mention there is a low potential and further testing is planned.	B. Recommended for EA	Text has been revised where reference is made to "Aggregate or quarry materials testing for acid rock drainage/metal leaching potential" in Section 4.4.2.8 to clarify that further material testing will be undertaken in the detail phase of the Project, prior to its use during construction, to confirm the preliminary findings. Additionally, the words "if required" on page 4-69 has been removed to	B.

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		<p>Page 4-69 states that at the operation stage activities will include: "Geochemical testing, if required, to assess the potential for metal leaching and acid generation from aggregate and quarried rock;" Section 6.2.2.3 however seems to say that there are already plans for further sampling in detail design.</p> <p>Section 6.2.2.3 says that testing so far revealed a low potential for ARD however during detail design or construction certain geochemical considerations will be addressed: "Geochemical characterization has revealed that three out of four bedrock samples have a sulphide content ranging between 0.01% and 0.02%, with only one sample exhibiting a higher sulphide content of 0.16%. This particular bedrock sample's lack of neutralization-potential indicates a possible ARD risk, prompting plans for additional sampling in the detail design phase to ascertain the sulphur content distribution more accurately. Preliminary ARD evaluations will focus on total sulphur and inorganic carbon content, with further tests planned if higher sulphide contents are found to assess the acid generation potential effectively."</p>			clarify that further testing will be conducted during the operations phase of the project.	

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23.	Page 4-70	What is the timeframe for applying water for dust management? Will this be done often, or only in times of severe dryness? Are the details of this found in any management plan?	Please provide some more detail on this mitigation measure.	B. Recommended for EA.	Text has been added that mitigation and monitoring related to dust control are described in Section 5.18 of Appendix E and Section 9, and will be further detailed in the Air Quality and Dust Management Control Plan to be developed and implemented for the construction and operation phases of the Project. Monitoring is envisioned to include frequent visual daily monitoring during the summer dry periods and/or in high winds to assess the need to apply water-spraying on the road surface for dust suppression.	B.
24.	Page 4-73 S. 4.4.3.3 Environmental Monitoring	<i>"The purpose of the follow-up monitoring will be to assess the effectiveness of mitigation and predicted effects in the EAR/IS and to document compliance with commitments and obligations in the approved provincial ToR and federal TISG."</i>  This should say that the monitoring will document compliance with the EA approval (if received), not the ToR.	Please revise statement to say "...commitments and obligations in the <b>EA approval (if received)</b> approved provincial ToR, and the federal TISG."	C. Editorial	Text has been revised as recommended by the reviewer.	A.
25.	Page 5-4 S. 5 EA Approach and Methods	The bulleted list should mention the provincial Ministry Review as another future opportunity for the public, agencies and Indigenous communities to provide comments during the EA	Please add " <b>Ministry Review to be prepared by the Ministry of the Environment, Conservation and Parks.</b> "	B. Recommended for EA	We have added Ministry Review to be prepared by the Ministry of the Environment, Conservation and Parks to the list as opportunity for the public, agencies and	A.

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		process. The federal draft IA Report from IAAC is noted, so the MECP Ministry Review should also be mentioned (note that one Ministry Review is published; there is no draft version).			Indigenous communities.	
26.	Page 5-7	The Code of Practice for Preparing and Reviewing EAs is not identified as one of the documents used for guidance for VCs. The Code is referenced elsewhere such as Section 5.4.	It is recommended that the proponent use this code for guidance on VCs and effects assessment for the final EA.	B. Recommended for EA.	The Code of Practice for Preparing and Reviewing EAs has been added.	A.
27.	Page 6-14 table 6-3	In this table the second column is labelled "Key information and Concerns." The only 'concern' listed is "Concern that Indigenous Knowledge and other information shared to characterize the existing physical environment be integrated in and inform the EA/IA." Is this a concern or a comment made by the community? Does this column need to be labelled 'concerns raised' if only one comment is described and no concerns are described in the other themes?	Consider whether the title of the second column accurately describes the information/comments provided.	C. Editorial	The statement that Indigenous Knowledge and other information shared to characterize the existing physical environment be integrated in and inform the EA/IA is interpreted to be a concern and no editorial change is proposed. Adding "concerns raised" is considered redundant. If it appears in the table it is identified as a concern.	A.
28.	Page 8-21	The section on documents reviewed during the desktop study include: "Eagles Nest Mine Project – Draft Federal/Provincial Environmental Impact Statement/Environmental Assessment Report, Noront Resources Ltd., Knight Piesold Consulting. December 2013" Is	Please state the correct reference as there was no draft EA issued for the project.	C. Editorial	See the response for Comment #14 to status of Draft Eagles Nest Mine Project – Draft Federal/Provincial Environmental Impact Statement/Environmental Assessment Report. No editorial change is proposed.	A.

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		this referring to the Terms of Reference?				
29.	Page 10-7 Table 10-1	This table provides a description of the provincial Endangered Species Act, 2007. This table should be checked to ensure it reflects recent amendments to the ESA following the passing of Bill 5 (June 5, 2025)	Please review the “project relevance” column under this Act for current status.	B. Recommended for EA.	Text has been added to explain the key amendments to the ESA and interim framework until the <i>Species Conservation Act</i> is proclaimed, including the project relevance.	B.
30.	Pages 11-70, 12-77, 13-92 and others S. 11, 12 and 13 Threat Assessment Approach (Vegetation, Wildlife, SAR)	It is unclear why sections 11, 12 and 13 (Vegetation/Wetlands, Wildlife, SAR) use a “Threat Assessment Approach” methodology to identifying and assessing potential effects, whereas the other valued component sections do not and section 5 (EA methodology) does not mention a threat assessment method (e.g. Figure 5.1).  The MECP EA Code of Practice includes principles for clear and transparent documentation that allows the reader to understand the decision-making process with explanations of the rationale for making certain choices (s. 3.1.5 and 3.2.3 of Code).	Please clarify whether a different effects assessment methodology was used for sections 11-13 compared to the EA methodology described in section 5 and used for the other valued components.  If the federal TISG required different approaches for these specific valued components, please provide additional explanation of that in the EA, and confirm whether the methodology in section 5 was still used as well. For example, the following sentence on page 11-70 of the draft EA could use another sentence or two to further explain if the TISG required a threat assessment specifically for certain valued components but not others:  <i>“The criteria proposed in the TISG for the initial Threat Assessment, as outlined below,</i>	B. Recommended for EA	The Threat Assessment Approach for Sections 11,12 and 13 is a requirement of the federal TISG. This includes use of specific criteria defined in the TISG along with rating scales for: Scope, Severity, Irreversibility (Permanence), Magnitude (determined by Scope and Severity), and Degree of Effect (determined by Magnitude and Irreversibility). Scope, Severity and Irreversibility.  In each Threat Assessment Approach subsection of Sections 11, 12 and 13 there is explanation as to why this approach is required and general methodology. Below is excerpt from Section 12 and bolded area represents additional text, which we feel is adequate to explain the threats assessment step.	B. <i>Internal note: review section 5.2 for new wording on methodology</i>

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			<i>focus specifically on biological effects."</i>		<p>“As required in the TISG (Section 13) the methodology for the effects assessment for wildlife and wildlife habitat is a staged approach involving an initial assessment of the effects of the Project or “Threat Assessment” <b>(without consideration of mitigation)</b>, followed by an assessment of the predicted net effects with application of mitigative measures as presented in Section 12.5. These two assessments differ in that the Threat Assessment is limited to the physical direct removals or alteration of wildlife habitat, while the predicted net effects assessment <b>incorporates a qualitative and quantitative description of the effects using criteria to assess adverse effects, taking into account any important contextual factors and mitigation.</b></p> <p>For clarity to the reader we have also added the following text to Section 5.2 after the bullets on steps in the assessment.</p> <p>“Note for the specific valued components of vegetation and</p>	

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					wetlands (Section 11), wildlife and wildlife habitat (Section 12); and species at risk (Section 13) there is a requirement in the federal TISG to apply a "Threat Assessment Approach". The Threat Assessment Approach is a staged assessment approach involving an initial assessment of the effects of the Project or "Threat Assessment" without consideration of mitigation, followed by an assessment of the predicted net effects with consideration of mitigative measures. In the steps above the Threat Assessment occurs following the identification of potential effects, effect Pathways and indicators and prior to identification of mitigation. Further details on the Threat Assessment Approach are described in Sections 11, 12 and 13.	
31.	Page 12-79 S. 12.3.2.1 Habitat Alteration (Wildlife)	In terms of potential effects to wildlife, page 12-79 says: <i>"Additionally, dust depositions during the operations phase will only be present for the first three years as the road is forecasted to be paved at that point."</i>  The EA earlier indicates that the gravel surface <b>may</b> be replaced with chip seal	Please consider if the statement on dust depositions should be revised to indicate some uncertainty with whether the gravel portion of the road will be replaced with paved treatment.  Comment applies to the same statement made on page 13-94	B. Recommended for EA	The statement has been revised to replace "will" with "may only be present for 3-5 years as the road is forecasted to be paved at that point."  Statement in Section 4 (page 4-10 is to remain.	A.

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		or asphalt in a 3-5 year timeframe (page 4-10), so should this statement say “may” instead of “will”?	(SAR) and elsewhere.			
32.	Pages 13-209 & 210 S. 13.4.2.1.1 Mitigation for SAR	Pages 13-209 and 13-210 say one mitigation measure for SAR is <i>“Using herbicides only when other control methods have proven ineffective in weed management: (Should herbicide application be selected as a method of invasive plant control, all herbicides must be applied by a licensed applicator in accordance with Ontario regulations).”</i>  However, page 11-13 states, <i>“Herbicides will not be used for vegetation management”</i> and page 12-221 says a mitigation measure will be <i>“Avoiding the use of herbicides during the construction phase and avoiding the use of road salt or sand on the road for de-icing.”</i>  The EA is elsewhere inconsistent in a number of places about whether herbicides will be used or not.	Please clarify whether herbicides may be used and revise statements throughout the EA to be consistent.	B. Recommended for EA	The statements on herbicides in Section 13.4.2.1.1. has been revised to read” Herbicides are not proposed for use to control weeds. However, if mechanical control methods prove ineffective in weed management, and represent a concern with respect to the spread to abutting natural areas, then the use of herbicides may be considered by the Proponent. Should herbicides be used as a method of invasive plant control, all herbicides will be applied by a licensed applicator in accordance with Ontario regulations.”	B.
33.	Various pages starting 13-201	Various pages include the text <i>“Section Error! Reference source not found.”</i>	Please fix the section references.	C. Editorial	Section error reference has been corrected for the final EA.	A.
34.	Page 13-216 S. 13.4.2.3.2 Mitigation for SAR	This sentence is incomplete: <i>“Where practicable, incorporating measures that reduce the effectiveness</i>	Please fill in missing text as needed.	C. Editorial	Text has been revised to form a complete sentence.	A.

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		<i>of predators during detailed design. These measures may include”</i>				
35.	Page 15-138 Table 15-69 Federal Tax Revenue	Table 15-69 2 <sup>nd</sup> column is mislabeled as “Provincial Tax Revenue” when it should be Federal Tax Revenue.	Correct column heading.	C. Editorial	The heading of the 2 <sup>nd</sup> column of Table 15-69 has been fixed as “Federal Tax Revenue”	A.
36.	Table 16-3 starting on page 16-18	Key information and Concerns Shared: As in an earlier comment, some of these ‘concerns’ are more comments than concerns. Perhaps see which need to be reclassified as information shared’ or perhaps reclassify as “comment received” or just label the whole column “key information shared”	Consider revising column and contents description.	C. Editorial	See the response for Comment #27.	A.
37.	Page 16-40 S. 16.2.2.1.7 Regional Assessment	The end of the Regional Assessment section should acknowledge the provincial ToR requirements regarding the RA, not just the federal TISG requirements: <i>“As required by the TISG for the Project, and the IA Act, relevant information from the Regional Assessment, if available, will be used to inform the effects assessment for the Project.”</i>	Please revise statement as follows:  <i>As required by the TISG for the Project, the IA Act, and the Notice of Approval for the WSR Terms of Reference, relevant information from the Regional Assessment, if available, will be used to inform the effects assessment for the Project.</i>	B. Recommended for EA	The statement noted in the comment has been revised as suggested by the reviewer.	A.
38.	Page 16-84 Table 16-18 Status of Energy Resources in the RSA	Table 16-18 says Eabametoong is connected to the Ontario power grid through the Wataynikaneyap Power Transmission project. This is not accurate and should be checked/revised. The Wataynikaneyap website does not list Eabametoong:	Please confirm/correct the table.	C. Editorial	Table 16-18 has been revised to state the following: "Eabametoong First Nation operates as an Independent Power Authority community. It is responsible for both the generation and local distribution of electricity within the community. Although	A.

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		<a href="https://www.wataypower.ca/project/community-connection-schedule">https://www.wataypower.ca/project/community-connection-schedule</a>			Eabametoong First Nation is not part of the Wataynikaneyap Power transmission project, the community is being considered under a new initiative announced in April 2024 to connect five additional Matawa First Nations (Eabametoong, Marten Falls, Webequie, Neskantaga, and Nibinamik) to the grid. This project is still in the consultation and planning stage, with no confirmed timeline or cost yet."	
39.	Page 16-119 to 16-120	This section states that trapping was a commercial activity and now remains as a cultural activity. The section also states: "the location, number or types of commercial trapping are unknown..." why are these unknown? Is this information protected? Do they not need to be registered somewhere?	Please provide some more information on commercial trap lines if possible.	B. Recommended for EA.	As mentioned in the section, commercial trapping was active until 1970 and significantly declined since then. As of now it remains as a cultural practice only. Any information regarding commercial trapping within First Nations, if present, was not included in the Indigenous Knowledge (IK) studies provided for WSR and is not publicly accessible.	B.
40.	Page 17-25, and Appendix Q	Regarding employment, this section states "Webequie has lower rates of participation, employment and unemployment" compared to Ontario. What does lower rates of unemployment mean? Does it mean that they are not in the labour force to begin with?	Please provide some more clarity for the reader	C. Editorial	For clarity, details (rates as % of population) have been added to the sentence noted in the comments as follows: <i>"When compared to Ontario, Webequie has lower rates of participation (Ontario: 62.8%</i>	A.

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					<i>versus Webequie: 37.9%), employment (Ontario: 55.1% versus Webequie: 36.8%), and unemployment (Ontario: 12.2% versus Webequie: 5.6%), based on Statistics Canada 2021 Census (Statistics Canada, 2021). The participation rate indicates the share of the working-age population that is working or looking for work.”</i> These details are presented in Table 5-7 in Appendix Q.	
41.	Page 17-39	In the table, in the housing section, in the operations phase it is mentioned that the Northern Road Link and Marten Falls CAR are also going through federal IA process, but does not state that they are also going through the provincial EA process.	Please note that EA processes are ongoing for both of these proposed projects	C. Editorial	The phrase noted in the comment has been revised as follows: “...both of which are also going through a coordinated federal-provincial EA/IA process.	A.
42.	Page 17-40	In the food security section of the table, it states: “Similarly, community members are concerned that construction noise will scare away animals, impacting their ability to hunt and rely on traditional food sources. However, the noise-effect due to road construction is expected to be locally isolated to the road construction area, and reversible. Therefore, the impact to health is expected to be minimal.” It is expected that construction noise would also be present at	Consider adding “noise effect due to road <b>and ancillary infrastructure</b> ” to this statement.	B. Recommended for EA.	We have added “and supportive infrastructure” to the statement noted in the comment.	A.

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation ) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
		associated infrastructure sites such as aggregate pits.				
43.	Page 17-89	Under “colonialism and residential schools” under operations, it is stated that “The availability of jobs and economic opportunities may improve access to mental health services in the community and net positive effects to mental health and wellness and go some way to address intergenerational trauma from residential schools.” However, it is understood from the draft EA that there are very few job opportunities remaining for the operations phase. So, is this statement accurate?	Please provide more information about this conclusion.	B. Recommended for EA.	The statement noted in the comment is a prediction of potential indirect effects of the Project’s operations phase and has been revised as follows for clarity: <i>“The Project may provide a link to employment opportunities in the Ring of Fire area resulting in economic opportunities that may improve access to mental health services in the community and net positive effects to mental health and wellness and go some way to address intergenerational trauma from residential schools.”</i>  As noted in Section 17.3.2.1, the Project may provide a link to employment opportunities in the Ring of Fire area and promote positive economic growth and development due to the number of	A.

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					employment opportunities available. The Project itself is only projected to provide four jobs during the operations phase. Should there be increased jobs due to the link with the Ring of Fire area, it will improve the physical and mental wellbeing of Webequie First Nation by enhancing the community's right to self-determination and self-governance (i.e., determine its own path by overcoming systemic marginalization due to pre-existing colonial policies), economic growth and access to services, including mental health services to address the intergenerational trauma in the community. During interviews and focus group discussions, community members indicated that they believed the WSR would help address the impacts of colonization and the intergenerational trauma in the community.	
44.	Page 19-56 and other pages, sections	Under Attawapiskat First Nation, and several other First Nations, this section states "Information regarding Attawapiskat First Nation's cultural and traditional existing conditions is limited. Information has been requested from	Consider revising the wording in this section to reflect the fact that further information may not be provided by the communities for the final EA.	B. Recommended for EA.	Wording has been revised to state "when and/or if information is obtained."	A.

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		the community, and when made available it will be incorporated into the next revision of the EAR/IS". Would it be more accurate to state that <i>when and/or if information is obtained</i> , in the case that more information is not provided by the community for final EA drafting?				
45.	Page 19-59 and other pages	Please be advised that Weenusk is misspelled on this map and several others in this section.	Please correct spelling to "Weenusk First Nation."	C. Editorial	Spelling on Figure 19-4 has been revised to "Weenusk".	A.
46.	Page 19-149 S. 19.3.1.1.3 Impacts to loss or alteration of lands for traditional harvesting	Page 19-149 indicates, " <i>A detailed review of the camp sites located within the Project Footprint is required to determine options to prevent or minimize direct adverse effects of construction.</i> "  It is not clear whether this specific potential impact or the need to conduct a detailed review as noted above should be reflected in the mitigation measures in section 19.4. It did not seem to be specifically mentioned in section 19.4 or Table 19-15, so unclear if it may already be captured elsewhere.	Please consider if mitigation measures listed in section 19.4 should specifically mention completing "a detailed review of the camp sites located within the Project Footprint" as mentioned in section 19.3, or if this is covered elsewhere.	B. Recommended for EA	Additions were made to the Mitigations listed in Section 19.4.1.3.1 to include: Vegetation Management Plan in CEMP to take into consideration location of camp sites.	A.
47.	Page 19-210 S. 19.6 Approach for Severity of Impacts on ATRI	The results are missing from section 19.6. The section outlines the approach to determine severity of impacts on the rights of Indigenous people, and defines what is considered low, medium and high severity, but then just goes to the	Please add the results for the severity of impacts on Aboriginal and treaty rights to section 19.	B. Recommended for EA	Thank you for your comment. This section will be completed for the final EAR/IS.	B.

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		References. Will this be completed for the final EA?				
48.	Page 20-24	Section 20.2.2.3.2 states “No archaeological features or sites were identified during the limited Stage 2 Archaeological Assessment conducted to date that is intended to support the Project’s Geotechnical Investigations in 2024. As noted in <b>Section 20.2.1.2.2</b> , further work for Stage 2 Archaeological Assessment for the Project is planned in late spring 2025 and in future development phases of the Project and will adhere to Standards and Guidelines for Consulting Archaeologists (MTC, 2011a), and applicable site-specific approaches approved by MCM.”  Will the findings from the work planned for late spring be included in the Final EA?	Since the Stage 2 AA work has been described as limited to date, it would be beneficial to include a summary of any results from further work in the Final EA to understand potential impacts.	B. Recommended for EA.	Section 20 of the EAR/IS will be updated to reflect the current status of the Stage 2 Archaeological Assessment.	B.

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49.	Page 20-28	Under the construction phase it is written: "Sites identified during the Stage 2 archaeological assessment should be subject to Stage 3 investigation according to MCM Standards and Guidelines in order to determine further cultural heritage value (CHV). Archaeological sites identified to have further CHV during Stage 3 assessment must be subject to Stage 4 archaeological mitigation that will determine whether the site will be subject to salvage excavation or protection prior to construction."  Why does this say "should" in the first sentence and "must" in the second? Is the requirement to conduct a stage 3 assessment not as strong as stage 4?	Please consider whether a wording change is warranted here.	C. Editorial	For clarity, the first sentence in the comment has been revised as follows, to align with the wording of the MCM's Standards And Guidelines For Consultant Archaeologists (2011): <i>"Sites <u>with cultural heritage value or interest</u> identified during the Stage 2 archaeological assessment <u>are</u> subject to Stage 3 investigation according to MCM Standards and Guidelines in order to determine further cultural heritage value (CHV)."</i>	A.
50.	Page 21-8 S. 21.1 Cumulative Effects Regulatory Requirements	<i>"The cumulative effects assessment was conducted in accordance with the... provincial regulatory requirements, pursuant to the EA Act, and as set out in Section 8.1 of the provincial Webequie Supply Road Terms of Reference (ToR)."</i>  The ToR Notice of Approval requirements should also be included here – amendments 1.1 to 1.5. The EA must indicate how the requirements have been fulfilled. If any of the	Please include the ToR Notice of Approval requirements regarding the cumulative effects assessment. Please indicate how these were fulfilled in the EA, or provide rationale if any of the requirements could not be fulfilled.  Ensure the information matches Appendix A-2 pages 37-38.	A. Required for EA per ToR Notice of Approval	Reference to the ToR Notice of Approval requirements regarding the cumulative effects assessment has been added. In regards to the Notice of Approval it is noted that the Proponent completed the following key task and/or activities: offered targeted consultation opportunities to each Indigenous community on cumulative effects; considered other cumulative effect assessments (e.g., Marten Falls Community Access Road;	B. As discussed with proponent on December 9, 2025, MECP expects the final EA to demonstrate consideration of the MFCAR EA's cumulative effects assessment, e.g. if conclusions were different or aligned with the WSR CE assessment, if methodologies were generally the same or different, etc. This is required to address the ToR Notice of Approval requirement and does not need to be overly detailed. MECP looks forward to reviewing this in the final EA.

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		requirements could not be fulfilled at the time of EA preparation, the EA should indicate this with rationale – e.g. availability of the MFCAR and NRL cumulative effects assessments for their EAs, or the federal Regional Assessment for the Ring of Fire area.			considered information generated from the federal Regional Assessment in the Ring of Fire area, where publicly available; and prepared a Cumulative Effects Consultation Report (refer to Record of Engagement and Consultation). For greater clarity on consideration of other cumulative effects assessments the Project Team has considered the analysis and findings (e.g. species at risk - caribou) in the cumulative effects assessment for the Marten Falls Community Access Road Project as contained in Section 10 of the Draft Environmental Assessment / Impact Statement, dated February 2025. We note at this time the cumulative effects assessment for the NRL and findings from federal Regional Assessment are not available.	
51.	Page 21-15 Table 21-2	Greenstone Gold Mine is listed as item 3 in this table. In the status/timing column, it says "opening 2024". This should be updated to current events.	Please update this section	C. Editorial	The following update has been added to the description for item #3 in Table 21-2: <i>"As of October 2025, the Greenstone Project had reached commercial production (Greenstone Gold Mine, 2025)."</i>	A.

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52.	Page 21-40 Table 21-13 Cumulative Effects – Groundwater	The NRL row, 4 <sup>th</sup> column says “The development and construction of the mine site...”  This text appears in the row above for the Eagle’s Nest mine project. Is it also meant to be in the NRL row?	Please check if reference to the mine site should be in the row about the NRL interaction with WSR.	C. Editorial	The text noted in the comment was an error which has been fixed as follows: “The <u>road</u> development.”	A.
53.	Table 21-28 and other places	This section discusses how roadway operations make moose predation by wolves more frequent. Please explain how moose injury or death can be considered reversible if predation may be more frequent and assumed to be ongoing during operations.	Please describe why injury or death of animals was considered reversible in this table and other areas (ex. Table 21-31).	B. Recommended for EA.	As stated in Section 21.4.7.1.4 and summarized in our response is the effects of injury and death from changes to predator-prey dynamics will be long-term as any anthropogenic features constructed for Reasonable Foreseeable Developments (RFDs) will be used by predators beyond operational lifetimes. However, this effect is considered reversible in the long term once anthropogenic features have naturally regenerated following closure and rehabilitation of any RFDs.	A.
54.	Page 21-90	Table 21-34 “Characterization of Predicted Cumulative Effects” on forest songbirds contains scores used in determining significance. For some of the VCs described earlier ex. furbearer, moose) no scores were provided in the table but were summarized in the text.	Describe why scores were not uniformly provided for each VC in these tables or consider whether it would benefit the reader to uniformly apply the scores in the tables.	B. Recommended for EA.	Refer to response to Comment #2. The approach for characterization and determination of significance in Sections 6 to 20 has also been applied to the cumulative effects assessment to provide a standardized, clear and transparent documentation on the determination of significance of	B.

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					cumulative effects.	
55.	Page 21-127 and 21-128	The Herptiles VC section seems to be lacking an overall statement on the assessment of significance.	Please include a statement about the overall significance of predicted cumulative effects on this VC.	B. Recommended for EA.	Overall statement on significance of predicted cumulative effects on this Herptiles VC has been added.	B.
56.	Page 21-137	Item 28- Neskantaga forest management units, has no information (blank columns) for potential habitat loss and percentage of RSA.	Please clarify why this information was not included	B. Recommended for EA.	There is no information available on the duration that the proposed the biomass energy facility will be operational. However, Neskantaga First Nation and its partner Mitigokaa Development Corporation estimate that 100 hectares per year of forest from public land near the community will be needed. Based on information available its assumed that the life span of the biomass energy facility will be 15 years and we have inserted 1,500 ha as habitat loss in the table, under Item 28.	A.
57.	Page 21-229 Table 21-91 Cumulative Effects – Human Health	In Table 21-91, it is unclear why “Air Quality” for construction and operation was not carried forward into the cumulative effects assessment, when the likelihood and magnitude of this possible effect are stated to be “certain” and “moderate to high.”  Other possible effects in this table that were deemed to be lower likelihood and magnitude were brought forward into the assessment (e.g. probable and moderate), but Air Quality was not.	Please provide rationale for why “Air Quality” was not brought forward into the cumulative effects assessment for Human Health, given the ratings for likelihood and magnitude.	B. Recommended for EA	For clarification, a table note has been added to Table 21-91 indicating that cumulative effects of air quality and noise levels are discussed in Section 21.4.4.	B.

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58.	Page 21-231	For racism and social exclusion- construction phase the report states: "It is assumed that the construction of the Webequie Supply Road, Marten Falls Community Access Road, and the Northern Road Link will occur simultaneously and require large mobilization efforts of equipment, personnel, and supplies to staging areas and worker accommodations camps."  What is this assumption based on? MECP understands that the construction of NRL likely starts later than the MFCAR and WSR projects.	Please consider the validity of this statement	B. Recommended for EA.	The statement noted in the comment has been revised to read as follows: "It is assumed that the construction <u>schedules</u> of the Webequie Supply Road <u>and the</u> Marten Falls Community Access Road-will <u>overlap</u> and the construction will require large mobilization efforts of equipment, personnel, and supplies to staging areas and worker accommodations camps."	A.
59.	Page 21-239	This section states that "The assessment of cumulative effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty Rights is to be determined. An evaluation of cumulative effects will be undertaken once the severity of potential adverse effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and Treaty rights has been completed."	This information should be available early enough to inform the final EA.	B. Recommended for EA.	This section will be completed for the final EAR/IS.	B.
60.	Page 22-3 to 22-17 S. 22 Follow Up Programs	Section 22.1 mentions monitoring for compliance with any conditions of approval for the EA, but not with <u>commitments made in the EA</u> . It is noted that section 27.4 in the conclusions makes reference to commitments, and section 22 should as well.	Please clarify in section 22 how compliance monitoring will assess whether the project has been constructed, implemented and/or operated in accordance with commitments made during the EA process, and how and when all	A. Required for EA per approved ToR and EA Code of Practice	For greater clarity Section 22 has been renamed to Follow-up and <b>Compliance</b> Monitoring Programs"  The introductory sentence under Section 22.1 has been revised to read "The purpose of the follow-up	A.

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		<p>As required by the approved ToR, page 133 of the approved ToR states:</p> <ul style="list-style-type: none"> <li>▪ “Compliance monitoring is the assessment and evaluation of whether an undertaking has been constructed, implemented and/or operated in accordance with <b>commitments made during the EA process</b>, and any conditions of the EA approval and other approvals required to implement the Project.”</li> <li>▪ “WFN will also develop a monitoring strategy <b>that sets out how and when all commitments made in the EAR/IS will be fulfilled</b> and how they will report to the Ministry of the Environment, Conservation and Parks about compliance.”</li> <li>▪ The compliance monitoring program will be further described in the EAR/IS, including the preparation of supportive plans, such as an Environmental Management Plan and discipline-specific management plans, <b>to ensure compliance with all commitments identified during the EA process.</b>”</li> </ul>	<p>commitments made in the EA will be fulfilled (in addition to any conditions of the EA approval should approval be received).</p> <p>Please clarify in section 22.8 (e.g. in the bulleted list page 22-17) if the reporting framework will include reporting on the fulfillment of commitments made in the EA and conditions of any EAA approval.</p>		<p>and compliance monitoring programs are to assess the effectiveness of mitigation, verify predicted effects in the EAR/IS, and to document compliance with commitments and obligations made during the Environmental Assessment / Impact Assessment (EA/IA) process, including any conditions of approvals if granted under the Environmental Assessment Act (EA Act) and federal Impact Assessment Act (IA Act)”</p> <p>In Section 22.1 the last bullet point has been revised with respect to the statement “monitoring activities have been designed to:</p> <ul style="list-style-type: none"> <li>• Document compliance with commitments made during the EA//IA process and conditions in positive decisions under the EA Act and IA Act), and as stipulated in others regulator permits and authorizations.</li> </ul> <p>As well text has been added to Section 22.8 to indicate that reporting structure will include</p>	

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		Similarly, the Commitments and Monitoring section (4.3.5) of the MECP EA Code of Practice states: “compliance monitoring is an assessment of whether an undertaking has been constructed, implemented and/or operated in accordance with the commitments made in the environmental assessment and the conditions of the <i>Environmental Assessment Act</i> approval.”			preparation of Annual Follow-up and Compliance Monitoring Reporting, and that this will document the proponent's fulfilment of commitments made during the EA/IA process, and conditions of approvals (if granted) under the EA Act and IA Act.	
61.	Page 23-17 and others	Under management planning and mitigation, the report states: “An Environment Committee will be established to facilitate communication and engagement during construction and operations of the Project. Committee members will include Webequie First Nation Elders and Knowledge Holders, other Indigenous Nations, and appropriate project representatives, to: facilitate communication and engagement during construction and operations of the Project; facilitate use of Indigenous Knowledge in project activities; facilitate evaluation of land use information; and facilitate development of appropriate monitoring programs, protocols and management plans for potential Project related accidents and malfunctions.”	Please consider whether to qualify somehow that committee membership would depend on whether other Indigenous Nations are willing to participate.	B. Recommended in EA.	Other Indigenous Nations has been replaced with “other First Nations with interest in participating”	A.

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		It may benefit the EA report to qualify that this would depend on if other First Nations agree to join the committee.				
62.	Page 27-5 S. 27.2 Conclusions- Effects Assessment And S. 27.3 Advantages and Disadvantages	Section 27.2 states: <i>“However, there are some potential effects where the risk of occurrence <u>may have significant consequences based on the unique challenges and vulnerabilities faced by Indigenous communities that are more susceptible to certain negative social effects due to historical and systemic inequalities...</u>”</i> <i>“In addition the assessment concluded <u>there are predicted significant net effects to Species at Risk...</u>”</i>	Please review and correct the statements as required for consistency.	C. Editorial	This erroneous statement <i>“Consequently, no significant adverse effects are predicted as result of the Project.”</i> has been removed. The sentence preceding the removed one has been revised as follows: <i>“Based on the Project Description (Section 4) prepared at the time of submission of this EAR/IS, the existing environment and considering the implementation of</i>	B.

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		<p>However, section 27.3 states:  <i>“Consequently, <u>no significant adverse effects</u> are predicted as result of the Project.”</i></p> <p>These statements appear contradictory regarding whether the EA predicts potential significant adverse effects from the project.</p>			<p>the mitigation <u>and</u> <u>enhancement</u> measures described in Sections 6 to 20, Appendix E, <u>and</u> Appendix N, the net <u>adverse</u> effects associated with the Project can be effectively mitigated <u>and</u> <u>managed</u>.”</p>	
<b>Comments on Appendices</b>						
63.	Appendix A-2 Concordance Table ToR Page 4	<p><i><u>Commitment made in the ToR: Section 6.1(3) of the EA Act:</u></i>  <i>6.1(3) The approved terms of reference may provide that the environmental assessment consists of information other than that required by subsection (2). 1996, c. 27, s. 3.</i>  <u>EA section where commitment is addressed: Section 5.3</u></p> <p>Section 5.3 is not the correct section where this commitment is addressed as 5.3 includes accidents/malfunctions, effects of the environment on the project, and contributions to Canada's obligations and sustainability.</p> <p>For the WSR EA, the EA Act section 6.1(3) reference refers primarily to the alternatives sections, where the ToR indicates that the EA will focus the assessment of 'alternatives to' on the</p>	Please correct the EA section where this ToR commitment is fulfilled.	C. Editorial	“Section 5.3” in the last column has been replaced with “Section 3.1 and Section 3.2”.	A.

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		project (all season road) and the do nothing alternative, and not do a detailed assessment of other 'alternatives to' such as railway, hovercraft, traffic demand management, etc. Therefore it appears the commitment is fulfilled in sections 3.1 and 3.2.				
64.	Appendix A-2 Concordance Table ToR Page 13	<i>Commitment made in the ToR: In addition, as indicated in Section 5.1.1.6, the Do Nothing option will also be carried forward as a comparator in the EA study for the purposes of assessing the overall advantages and disadvantages of proceeding with the preferred method of implementing the Project.</i> <u>EA section where commitment is addressed: Section 3.1.2</u>  Section 27.3 also fulfills the ToR commitment to assess the Do Nothing alternative.	Please add reference to section 27.3 of the EA as well.	C. Editorial	"Section 27.3" has been added to the last column.	A.
65.	Appendix A-2 Concordance Table ToR Page 21	The last column is blank - missing where the commitment was addressed in the EA. Or there is an erroneous page break between pages 21 and 22.	Please fill in the last column.	C. Editorial	That was an erroneous page break which has been fixed and the last column on page 21 now shows where the commitment was addressed in the EA.	A.
66.	Appendix A-2 Concordance Table ToR Page 37	Section 21.3.4 does not fulfill the ToR Notice of Approval requirement to consider any cumulative effects assessment developed as part of any	In both the EA main report (e.g. cumulative effects section) and in Appendix A-2, please update and clarify where the ToR Notice of	A. Required for EA per ToR Notice of Approval	Appendix A-2 has been updated to reflect the proposed changes to the text in Section 21 (refer to response to Comment # 50). Our	B. See #50

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		EA in respect of the proposed MFCAR and NRL. This section lists reasonably foreseeable projects that were considered in the WSR cumulative effects assessment, but does not speak to the cumulative effects assessments that are being/will be completed for the MFCAR and NRL EAs.  If the cumulative effects assessments for the MFCAR and NRL EAs were not available at the time of drafting the WSR EA, that should be clearly stated in both the EA main report and in Appendix A-2, to help fulfill the ToR Notice of Approval requirement in amendment #1.2.	Approval requirement in amendment 1.2 is fulfilled.		revised statements confirm that the proponent has fulfilled the Notice of Approval requirements in amendment 1.2. As noted in our response to comment # 50, the Project Team has considered the results of the cumulative effects assessment for the Marten Falls Community Access Road Project contained in Section 10 of the Draft Environmental Assessment / Impact Statement, dated February 2025.	
67.	Appendix A-2 Concordance Table ToR Page 38	The last column for item 1.3 "Consideration of Regional Assessment" is blank - missing where the commitment was addressed in the EA.	Please fill in where this commitment has been fulfilled in the EA.	C. Editorial	We have put "Pending" in the last column for item 1.3 at this time. When the EA is being finalized, we will update the last column to indicate whether information from the Regional Assessment for the Ring of Fire area is publicly available for the final EA.	B.
68.	Appendix A-2 Concordance Table ToR Page 41	<i>"In accordance with Section 5.2.8 of the MECP Code of Practice, the EA will include a comprehensive list of commitments made by Webequie First Nation during the course of the ToR and the EA processes, and how they will be addressed."</i> These include mitigation measures and monitoring.	Please further describe whether a single comprehensive consolidation of commitments and mitigation measures will be developed in the EA. If not, please explain how the various commitments, mitigations and monitoring described throughout the EA will be brought forward into	B. Recommended for EA	The final EA will include a comprehensive consolidated list of commitments and mitigations made during the ToR and EA processes in an appendix to the EAR/IS.	B.

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		Nine different sections and appendices of the EA are stated as fulfilling the above requirement to “include a comprehensive list of commitments.” It is not clear whether the intention is to develop a consolidated list of commitments out of these nine or so sections and throughout the EA.	the project implementation phase in a clear and traceable way.			
69.	Appendices C-2 and C-3 Alternatives Criteria Indicators and Multiple Accounts Assessment Datasets	The main EA report, page 3-43 (section 3.2.5.3), states that <i>“The scores that were assigned to indicators are presented in Appendix C-2.”</i>  Appendix C-2 does not have any scores (unclear if these would be the same scores in Tables 3-8 and 3-9 of the main report?). Also, it seems Appendices C-2 and C-3 could be combined to remove some repetition, and a narrative could be added at the top of the appendix to explain what the appendix is showing.	Please add the scores to Appendix C-2. Consider combining C-2 and C-3 to reduce repetition and add a brief narrative explanation at the top to explain what the appendix is showing.	B. Recommended for EA	Appendix C-2 has been updated to show the scores in the column at the far right of the table. Appendices C2 and C3 will not be combined.	B.
70.	Appendix E Mitigation Measures Page 1	<i>“The proposed mitigation measures presented in this document are not intended to be an exhaustive list and will be updated to reflect permit requirements and conditions.”</i>  Appendix A-2 page 41 says that the ToR requires that “the EA will include a comprehensive list of commitments made by WFN during the course of	Please clarify if Appendix E comprises a comprehensive list of the commitments and mitigations made during the EA process, or where this will be provided.  Also please clarify whether Appendix E will be updated for the final EA based on comments received on the draft EA.	B. Recommended for EA	Appendix E provides key mitigation measures to address potential environmental effects of the Project and does not comprise a comprehensive list of the commitments and mitigations made during the EA process.  The final EA will include a comprehensive consolidated list of	B.

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		<p>the... EA processes, and how they will be addressed.” But it says this is fulfilled across several different sections and appendices throughout the EA.</p> <p>It is unclear if Appendix E comprises the comprehensive list of the commitments and mitigations made during the EA process. For instance, will the plans mentioned in Appendix E carry forward the mitigation measures and commitments described in sections 6-21 of the EA? Also, it is unclear whether Appendix E will be updated for the final EA based on comments received on the draft EA.</p>			<p>commitments and mitigations made during the ToR and EA process in an appendix to the EAR/IS.</p> <p>Appendix E will be updated for the final EA based on comments received on the draft EA.</p>	
71.	Appendix E Mitigation Measures Page 8 S. 2.1.4 Construction Traffic Management	<p><i>“The Construction Traffic Management Plan will provide guidance on how Project related traffic is managed in and around the Project site, including use of the winter during construction of the Project.”</i></p> <p>Is the word “road” missing above?</p>	Add the word “road” as appropriate.	C. Editorial	The word “road” has been added to the sentence noted in the comment.	A.
72.	Appendix K-3 Veg Conceptual Restoration Plan Page 13	<p>It is unclear what ‘Long Lake at the Delta area’ refers to on page 13 of Appendix K-3: <i>“Development of features to integrate the restoration into the shoreline of Long Lake at the Delta area;”</i></p>	Please clarify.	C. Editorial	Thank you for the comment. The sentence noted in the comment was included in Appendix K-3 by error and has been removed for the final EA.	A.

# MECP: Environmental Monitoring and Reporting Branch



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Yushan Su, Senior Scientific Advisor, and Peter Rehbein, Lead Engineer, Air Emissions Modelling (A)

**Ministry and Branch:** Ministry of the Environment, Conservation and Parks, Environmental Monitoring and Reporting Branch

Comment #	Page/ Section #	Comments & Rationale	GRT Comments		Proponent Response	GRT Follow Up
			Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent’s response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
<b>Comments from Yushan Su, Senior Scientific Advisor</b>						
1.	<b>WEBEQUIE SUPPLY ROAD ENVIRONMENTAL ASSESSMENT REPORT / IMPACT STATEMENT</b>  ES 8.4.2 Existing Conditions Summary	typos	Suggested edits: <ul style="list-style-type: none"><li>Local air quality data are not available with the exception of limited data collected from a station operated by the MECP (2019) as part of Ontario’s Ring of Fire Baseline Monitoring Program (2015-2017) providing data on <u>fine particulate matter (PM2.5)</u> and metals which are excluded from this assessment.</li></ul>	C	Edits have been made in the sentence to correct the typos noted in the comment and include the duration from 2015 to 2018 for available measurements.	A
2.	<b>APPENDIX G: AIR QUALITY IMPACT ASSESSMENT</b>  Table 2-3: Summary of	Quotation: <i>“Inhalable fraction of particulate matter (PM10), background concentrations 20mg/m<sup>3</sup>, Maximum PM2.5 24-hour concentration from 2015-2017 based on measurements at the Ring of Fire (ON) station (1)”</i>	Proposed actions: <ul style="list-style-type: none"><li>Suggest explaining how the maximum PM10 concentration was calculated from PM<sub>2.5</sub> measurements at the Ring of Fire station;</li></ul>	B and C	Item 1: The Ring of Fire station did not measure PM <sub>10</sub> . So, a new background concentration will be developed based on monitoring data from a remote non-urban station (Fort Smith in NWT) that measures PM <sub>10</sub> concentrations.	B

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	Background Concentrations for Studied Contaminants	<p>Comments:</p> <ul style="list-style-type: none"> <li>PM<sub>2.5</sub> (instead of PM<sub>10</sub>) was monitored at the Ring of Fire station. It is unclear how the maximum PM<sub>10</sub> concentration was derived from the PM<sub>2.5</sub> measurements.</li> <li>The unit of PM<sub>2.5</sub> concentrations is µg/m<sup>3</sup>, instead of mg/m<sup>3</sup>. The unit of µg/m<sup>3</sup> should also be applied to many other air pollutants in the Table 2-3.</li> </ul> <p>Quotation: <i>“Benzo(a)pyrene, background concentrations 1.0 x 10<sup>-5</sup> mg/m<sup>3</sup>, Representative concentration for the study area”</i></p> <p>Comments:</p> <ul style="list-style-type: none"> <li>It is unclear where and when benzo(a)pyrene data were collected.</li> </ul>	<ul style="list-style-type: none"> <li>Suggest revising the unit “mg/m<sup>3</sup>” in Table 2-3; and</li> <li>Suggest adding information on benzo(a)pyrene measurement (e.g., station and years).</li> </ul>		<p>Item 2: The background concentration will be presented in microgram per m<sup>3</sup> for all contaminants.</p> <p>Item 3: A new background concentration will be derived for benzo(a)pyrene using monitoring data from a non-urban station (Simcoe in Ontario) that measures BaP concentrations. The average of results from integrated air samples between 2017 and 2019 will be reported.</p>	
<b>Comments from Peter Rehbein, Lead Engineer, Air Emissions Modelling (A)</b>						
<b>Comments pertain to Appendix G – Air Quality Impacts Assessment</b>						
<b>General</b>						
3.	General	When evaluating roadway EAs in Ontario, for roads greater than approximately 25 kilometers (km) in length, Ontario MECP expects that the entire roadway is	Proposed actions are discussed in subsequent comments.	B	Noted	A

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		<p>assessed in some manner. This is because potential differences in road configuration, land cover, terrain, and meteorological conditions, which are expected along a 107 km roadway, can result in vastly different concentrations or air pollutants. These assessments could include modelling the entire roadway in sections using different meteorological data sets that specifically represent the meteorological parameters and surface characteristics of each section. Alternately, each section could be screened (based on traffic volumes, surface characteristics, etc.) in attempt to determine the potential worst-case sections or segments for modelling.</p> <p>This was not done for WSR and the selection of the 40.6 km section that was modelled appears to have been based only on the proximity to sensitive receptors. Considering the length of the road and the potential sensitivity of the general ecology to emissions from the project (in addition to the sensitive</p>				


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		receptors), this was a cause for potential concern by the MECP. In order to determine the extent of further actions/modelling that may be necessary, MECP divided the WSR roadway into several sections and developed different meteorological data sets for each. Modelling was then completed using the input data provided by the WSR consultants to determine whether the modelling completed by the WSR consultant sufficiently captured the worst case. This included a number of sensitivity analyses. The results indicate that, coincidentally, because of the land characteristics within the modelled area and their impact on meteorology, the smaller section of roadway modelled in the AQIA appears to be generally sufficient in covering the worst-case section of roadway, but only if more appropriate meteorology is used in the modelling (see further details in subsequent comments).				
4.	Section 1.2, Table 1-1	Dustfall was also included in the assessment however is not listed as an indicator in Table 1-1.	Add dustfall to Table 1-1 as an indicator.	C	Dustfall as an indicator will be added to Table 1-1 in the revised AQIA report.	B
<b>General Modelling Methodology</b>						

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5.	Section 2.1, Table 2-1	<p>The notes on deposition and depletion in Table 2-1 are inconsistent with the options used in the modelling.</p> <p>Table 2-1 reports that both wet and dry deposition were modelled, however the meteorological data used did not contain precipitation and as such only dry deposition was modelled (precipitation is needed in the meteorological file for wet deposition). Since wet deposition is important in the calculation of total dustfall, the meteorological data used by the model should include precipitation. MECP's Environmental monitoring and Reporting Branch (EMRB) can provide the meteorological data that should be used.</p> <p>The Table 2-1 also reports that wet depletion was not included. Since the meteorological data did not include precipitation, this is currently true (coincidentally), however the model files that were provided did not include the "NOWETDPLT" option. When the meteorological file includes precipitation, unless the "NOWETDPLT" option is used,</p>	<p>Dustfall modelling should include both wet and dry deposition. EMRB can provide the meteorological data that should be used, which will include precipitation as required for the modelling of wet deposition.</p> <p>Once updated meteorology with precipitation is used, either the "NOWETDPLT" option should be used in the model, or Table 2-1 should be updated to state that both dry and wet depletion are enabled.</p>	B	<p>Item 1: Dustfall modelling in the revised AQIA will include both wet and dry deposition using the meteorological data (WSR1_22112) provided by EMRB to Craig Wallace (AtkinsRéalis) on October 2, 2025. This dataset includes precipitation data required for wet deposition calculations.</p> <p>Item 2: We acknowledge the issue identified. While wet depletion can influence annual TSP concentrations, it does not significantly affect maximum daily TSP or PM<sub>10</sub> concentrations compared to the dry depletion method. Therefore, wet depletion will not be applied for daily TSP and PM<sub>10</sub> concentration calculations in the revised study. Wet depletion will be applied only for total dustfall modeling, where its impact is more relevant.</p>	B

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		wet depletion is enabled by default whenever particle parameters are defined within the model. As such, when updated meteorology with precipitation is used as per the comment above, either the "NOWETDPLT" option should be used in the model, or Table 2-1 should be updated to state that both dry and wet depletion are enabled.				
6.	Section 2.2	The dispersion modelling for this study used a generic regional meteorological dataset for Northern Ontario forest areas, which utilizes meteorology from International Falls, Minnesota, located approximately 600 km to the southwest of the Project. In addition, a review of the land surface characteristics along the roadway path within approximately 3 km from the right-of-way also indicates that the "forest" land characteristics in the generic regional meteorological dataset are not representative as the forested areas in the vicinity of the roadway are more sparse and interspersed with low lying vegetation, wetlands, and open water which leads to a lower	The modelling should be updated to use site-specific meteorology that incorporates the local land characteristics representative of the area. EMRB can provide the meteorological data that should be used.	B	The meteorological dataset (WSR1_22112) that was provided by EMRB to Craig Wallace (AtkinsRéalis) on October 2, 2025 will replace the International Falls dataset from the original study. As noted in the comment, this change is expected to result in a non-negligible increase in predicted ambient concentrations because of differences in key meteorological parameters including surface roughness. The updated dataset reflects conditions dominated by open terrain and lakes, which contrasts with the mixed landscape along the 100 km roadway that includes low-lying areas, wetlands, and patches of forest. It is inherently challenging to	B To ensure we are clear on the proponent's response, it is understood that: 1. The proponent will remodel and update the results based on the meteorological data provided by EMRB. 2. The proponent will include a discussion of the uncertainty associated with the choice of meteorological data.  As long as the proponent remodels and updates the results based on the meteorological data provided by EMRB, then this comment has been satisfied for now, but EMRB will

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		<p>surface roughness length which typically results in higher concentrations.</p> <p>The modelling should be updated to use site-specific meteorology that incorporates the local land characteristics representative of the area. EMRB can provide the meteorological data that should be used.</p>			<p>select a single meteorological dataset that accurately represents all terrain and land-cover conditions along the entire proposed road right-of-way. Predicted concentrations are highly sensitive to meteorological inputs, and this variability introduces uncertainty into the modelling results.</p> <p>As such, the revised AQIA will include a discussion of the uncertainty associated with the choice of meteorological data and its potential influence on predicted concentrations. This will provide context for interpreting the results and ensure transparency in the assessment.</p>	need to review the final EA.
7.	Section 2.3	<p>The modelling included receptors at 50 m and 150 m distances on either side of the roadway. For pollutants/scenarios where exceedances are predicted at the 150 m distances, additional receptors at further distances should also be included in order to predict the full potential extent of any impacts (i.e., how far from the roadway any exceedances are predicted).</p>	<p>Receptors at additional setback distances from the roadway should be added to the model as required, in order to predict the full potential extent of any impacts (i.e., to determine how far from the roadway exceedances are predicted).</p> <p>For the construction modelling, additional receptors at varying setback distances from the sources at the quarry should also be added.</p>	B	<p>Adding multiple additional receptor lines along the entire proposed road right-of-way would significantly increase computational time given the large number of sources and receptors already included in the model. To address the comment while maintaining efficiency, we propose adding one additional line of receptors on both sides of the road right-of-way at 300 m from the centerline, as</p>	<p>B</p> <p>The main concern raised by the original comment was that receptor distances of 150 m were insufficient to capture the full distance from the roadway where exceedances may be predicted. While the addition of receptors at 300 m is helpful, it is suspected that this distance may also be insufficient in capturing the full exceedance setback distance.</p>

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		In addition, for the construction modelling, there should also be some additional receptors at varying setback distances from the sources at the quarry. The quarry sources appear to be approximately 300 m away from the roadway and as such the impacts from these sources are not well represented from the receptors surrounding the roadway.			<p>concentrations are expected to increase with the updated meteorological dataset.</p> <p>The initial receptor spacing was determined based on a sensitivity analysis. This analysis included a road cross-section study, which showed that beyond 150 m from the road, the relative change in predicted concentrations became negligible. Based on these findings, this type of analysis supports that a 300 m receptor distance should be sufficient in the updated model.</p> <p>For the construction phase, additional receptors will also be placed at 50 m, 150 m and 300 m from the periphery of the largest volume source at the aggregate pits/quarries to better characterize impacts from these sources.</p> <p>The original AQIA included isocontour figures illustrating the extent of exceedances beyond the proposed road right-of-way (see example below). These were generated by re-running the model on a smaller portion of the curving road using a standard cartesian grid to generate representative dispersion patterns</p>	<p>However, from the proponent's response, the isocontour plots used a more generic receptor grid, and these should cover the area of exceedances. As long as these are also considered when assessing the results and exceedance setback distances, then the response satisfies the main concern in the comment.</p> <p>This comment has been satisfied for now but EMRB will need to review the final EA.</p>

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					<p>under varying wind directions. We will also include in the results section an approximate exceedance setback from the road centerline based on the new receptor distances (50, 150 m and 300 m) and the isocontour plots.</p> 	
8.	Section 2.3 and modelling files	The source of the terrain data used for the modelling is unclear and in some cases appears to differ between models. As an example, the base elevations for the roadway volume sources in the OSEG_IF model are different than for the OSD_IF_PMT_DP model, even though the coordinates for the sources are the same. Similar discrepancies exist amongst some of the other modelling files, including for the construction phase. The reason for these discrepancies should be	The source of the terrain data used for the modelling should be clarified and discrepancies in the base elevations between model files should be explained or corrected as necessary. Unless site-specific terrain data is available from another source, it is recommended that the terrain data available from the MECP should be used: <a href="https://www.ontario.ca/page/map-regional-meteorological-and-terrain-data-air-dispersion-modelling">https://www.ontario.ca/page/map-regional-meteorological-and-terrain-data-air-dispersion-modelling</a>	B	The reasons behind the discrepancies observed on receptor or sources elevation are unknown. The revised AQIA study will make sure to use the same terrain dataset from the MECP.	B

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		explained or corrected as necessary. Unless site-specific terrain data is available from another source, it is recommended that the terrain data available from the MECP should be used: <a href="https://www.ontario.ca/page/map-regional-meteorological-and-terrain-data-air-dispersion-modelling">https://www.ontario.ca/page/map-regional-meteorological-and-terrain-data-air-dispersion-modelling</a>				
9.	Section 2.4	Only the 30-day averaging period for dustfall is included in the assessment. Dustfall also has an annual threshold and so annual dustfall should also be assessed.	Annual dustfall should also be included in the assessment.	B	Annual dustfall will be added to the revised AQIA study.	B
10.	Section 2.6	The following concerns have been identified with respect to the ozone limiting method: <ul style="list-style-type: none"> <li>The ozone limiting method was used to determine the conversion of NO to NO<sub>2</sub> for 1-hour concentrations but was not applied for 24-hour or annual concentrations which assume complete conversion. While assuming complete conversion is conservative, it is generally preferable to use a consistent methodology for all averaging periods. In</li> </ul>	It would be preferred to use a consistent NO to NO <sub>2</sub> conversion methodology for all averaging periods, however it is acknowledged that the use of complete conversion is conservative. A rationale for the assumption that 10% of NO <sub>x</sub> is released as NO <sub>2</sub> should be provided in the report or the model should be updated accordingly if another value is found to be more appropriate. The ozone concentration used by the ozone limiting method in the model should be updated to be	B	Item 1: NO <sub>2</sub> concentrations will be calculated using the OLM method for all averaging periods in the revised AQIA study. Item 2: Rationale and reference will be provided for the in-stack NO <sub>2</sub> /NO <sub>x</sub> ratio in the revised report. Based on new information, this value will slightly change from 10%. Item 3: A constant hourly O <sub>3</sub> concentration of 41 ppb will be used in the revised study for all averaging periods. This value represents the 90 <sup>th</sup> percentile of	B

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		<p>particular, for the construction scenario, the modelled 24-hour NO<sub>2</sub> concentrations are higher than the 1-hour concentrations, which is not possible in reality.</p> <ul style="list-style-type: none"> <li>When applying the ozone limiting method, it was assumed that 10% of the NO<sub>x</sub> is released as NO<sub>2</sub>, but no justification for this selection was provided. Please provide a rationale for this value.</li> <li>When applying the ozone limiting method a constant concentration of 28 ppb ozone was assumed. This appears to be based on an average background concentration, however a 90<sup>th</sup> percentile background concentration would be more appropriate to be more conservative. If hourly ozone data is available, it is also preferred to use hourly 90<sup>th</sup> percentile ozone concentrations in the model for more representative results.</li> </ul>	<p>based on a 90<sup>th</sup> percentile concentration rather than an average. If hourly ozone data is available, the model should use hourly 90<sup>th</sup> percentile ozone concentrations rather than a constant value.</p>		<p>hourly O<sub>3</sub> measurements at the Senneterre, QC station (selected as most representative vs. project site) from 2017-2019. Hourly ozone data are not available for the project site, and using hourly data from another location would introduce additional uncertainty. Applying a fixed 90<sup>th</sup> percentile value provides a conservative and more reliable approach for this assessment.</p>	

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<b>Construction Phase Modelling and Results</b>						
11.	Section 3.3.2	Vehicle exhaust emissions are reported to have been developed based on US average MOVES emission factors and speciation data rather than running the MOVES model for each pollutant based on project-specific inputs. It is unclear how representative these US average emission factors and speciation data would be of a project in Northern Ontario where climate, vehicle fleet, speeds, etc. are expected to be quite different. The MOVES model should be run with project-specific inputs in order to either assess the emissions that were used, or to update them accordingly.	The MOVES model should be run with project-specific inputs in order to either assess the emissions that were used, or to update them accordingly.	B	While MECP's comment is valid, applying the MOVES model would require extensive parametrization using fleet input data that are unknown and largely hypothetical. Given the uncertainty in the fleet composition (expected to consist primarily of light and heavy-duty trucks) and the lack of project-specific operational details, running MOVES may not yield results that are meaningfully more accurate than using established emission factors. Additionally, implementing MOVES would require significant time and resources without clear benefit under these conditions.  The only project-specific variable we can confidently account for is climate, which strongly influences emissions. To address this, we propose the following approach to account for temperature variations in Northern Ontario:  1. Apply the <b>Base Emission Factors</b> from the most recent US BTS assessment representing averaging conditions at 75 deg F (emissions factors used in original study).	B  The methodology used / proposed to be used to estimate vehicle tailpipe emissions is unusual and will lead to additional uncertainty compared to running the MOVES model with project-specific inputs, as recommended in the original comment. However, in general the impact from the tailpipe emissions of the general vehicular traffic is quite low and therefore these uncertainties may be unlikely to impact the conclusions of the study.  This comment has been satisfied for now but EMRB will need to review the final EA.

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					<p>2. Develop <b>Temperature Adjustment Factors</b> (to be implemented in AERMOD per month in Variable Emissions) based on data from the figures in a white paper (link below) provided by the US EPA describing the emissions sensitivity with regard to temperature. These factors would differ depending on contaminants and exposure period.</p> <p>3. Use <b>Monthly Temperature Inputs</b> with the coldest temperature from the EMRB meteorological dataset for each month to set up the variable emission factors for exposure period of 24 hours or less. For annual exposures, the average monthly temperatures would be used instead.</p> <p><a href="https://gaftp.epa.gov/air/nei/ei_conference/EI19/session6/choi.pdf">https://gaftp.epa.gov/air/nei/ei_conference/EI19/session6/choi.pdf</a></p>	
12.	Section 3.3.3	Unpaved road dust emission calculations appear to have been based on the equations for publicly accessible roads which are meant for roads that are dominated by light duty vehicles,	The road dust emission calculations should be updated to use the equations for unpaved surfaces at industrial sites.	B	We acknowledge MECP's comment and agree that the industrial road equation is more appropriate for the construction phase, given the predominance of heavy-duty vehicles. This	B

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		which is not the case here. For the construction phase in particular, because the majority of the vehicles are anticipated to be heavy duty vehicles, the equations for unpaved surfaces at industrial sites (which account for the heavier vehicle weights) would be more appropriate.			adjustment will be implemented. However, once the WSR becomes operational and maintained according to standard practices, it will function as a publicly accessible road for light-duty vehicles even though heavy trucks may also use it. We understand that the “public roads” model from the US EPA was not developed for heavy vehicles and the uncertainty in emissions for this category is high. While the WSR vehicle fleet composition and usage patterns are unknown, it is hypothesized that half of the maximum 500 vehicle passages per day would be from heavy-duty trucks while the other half would be composed of lighter-duty vehicles having a weight of less than 3 tonnes.  To address this uncertainty and ensure a balanced representation of both vehicle types, we propose the following: <b>Construction Phase:</b> Use the industrial road empirical equation from U.S. EPA for heavy-duty truck traffic. <b>Operational Phase:</b> Calculate an average emission factor derived	

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					from both the "industrial site" and "public roads" models to reflect the mixed fleet scenario. This approach provides a practical compromise that accounts for both vehicle categories while acknowledging the limitations of available models and the uncertainty in fleet composition.	
13.	Section 3.3.3	The number of days with precipitation used to determine the monthly and annual road dust control factors are based on climate data from Pickle Lake, which is located approximately 250 km from the site. A new site-specific meteorological dataset will be provided by MECP EMRB for this project which will include precipitation data. The precipitation data from Pickle Lake should be compared against the precipitation data in the new site-specific meteorological dataset to ensure that the number of precipitation days are comparable. If they are not, the control factors should be updated accordingly.	The precipitation data from Pickle Lake should be compared against the precipitation data in the new site-specific meteorological dataset provided by MECP EMRB to ensure that the number of precipitation days are comparable. If they are not, the control factors should be updated accordingly.	B	Analysis of precipitation data from the EMRB dataset indicates a lower average frequency of days with precipitation greater than 0.2 mm (31% of the year vs. 47% for the Pickle Lake climate normals). A review of older climate normals (1970-2000), for Big Trout and Lansdowne House stations, which are geographically closer to Webequie compared to Pickle Lake, suggests a ratio of about 45%.  For consistency, the revised AQIA study will use the EMRB dataset to calculate dust control ratios based on precipitation.	B

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14.	Section 3.3.7	The blasting operations appear to only account for the emissions of particulate matter (TSP, PM <sub>10</sub> , and PM <sub>2.5</sub> ), however blasting can also be a significant source of by-products of combustion, such as NO <sub>x</sub> , CO, SO <sub>2</sub> and/or others depending on the explosive used. By-products of combustion from blasting should also be included in the assessment.	By-products of combustion from blasting should also be included in the assessment.	B	The combustion emissions from ANFO explosive (hypothesis) will be added to the model for the construction phase in the revised AQIA study.	B
15.	Section 3.4 and modelling files	The parameters for the line of volume sources differed slightly from those which are recommended by the U.S. EPA ( <a href="https://www.epa.gov/sites/default/files/2020-10/documents/haul_road_workgroup-final_report_package-20120302.pdf">https://www.epa.gov/sites/default/files/2020-10/documents/haul_road_workgroup-final_report_package-20120302.pdf</a> ). Most notably: <ul style="list-style-type: none"> <li>The release height was modelled at 0 m rather than at half the plume height.</li> <li>The plume heights used for exhaust gas and fugitive dust emission sources differ and it is unclear on what they are based.</li> </ul> This should be clarified or corrected.	The methodology used to determine the modelled parameters for the line of volume sources for the exhaust gas and fugitive dust sources should be clarified or corrected.	B	The emission parameters will be reviewed to respect the recommendations of the US EPA on haul roads emissions.	B

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16.	Section 3.6 and modelling files	When comparing annual modelled concentration against an annual AAQC, the maximum annual modelled concentration from any of the five modelled years should be used. From the model files, it appears that the annual concentration averaged over the five years was used instead. This should be corrected.	The annual concentration results should be updated to report the maximum annual modelled concentration from any of the five modelled years (rather than the annual concentration averaged over the five years).	B	The annual concentration results will be updated in the revised AQIA report to present the maximum annual modelled concentration from any of the five modelled years.	B
17.	Section 3.6 and modelling files	The 24-hour PM <sub>2.5</sub> concentration (with control) appears to erroneously be reporting the 8 <sup>th</sup> highest concentration as a representation of the 98 <sup>th</sup> percentile. This should be corrected to use the 7 <sup>th</sup> highest concentration.	Correct the 24-hour PM <sub>2.5</sub> results to report the 7 <sup>th</sup> highest concentration (for the 98 <sup>th</sup> percentile).	C	The 24-hour PM <sub>2.5</sub> results will be corrected in the revised AQIA report to present the 7 <sup>th</sup> highest concentration (for the 98 <sup>th</sup> percentile).	B
18.	Section 3.6	Where significant exceedances are predicted (e.g., 24-hour TSP), a review of the frequency of exceedances would also help to characterize the potential risk associated with the elevated concentrations.  This comment also applies to the operation phase although the concentrations are currently not predicted to be as elevated.	Where significant exceedances are predicted, consider including a review of the frequency of exceedances.  This comment also applies to the operation phase although the concentrations are currently not predicted to be as elevated.	B	The revised AQIA will include tables in the results section showing the maximum predicted concentrations and number of exceedances at 50 m, 150 m, and 300 m, and at sensible receptors, where applicable.  In addition, where significant exceedances are predicted (e.g., 24-hour TSP), we will provide a review of the frequency of exceedances to better characterize the potential risk	B

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					associated with elevated concentrations.	
<b>Operation Phase Modelling and Results</b>						
19.	Section 4.2.1	Similar to the comment above regarding Section 3.3.2 for the construction phase, for the operation phase, vehicle exhaust emissions are similarly reported to have been developed based on US average MOVES emission factors and speciation data rather than running the MOVES model for each pollutant based on project-specific inputs. It is unclear how representative these US average emission factors and speciation data would be of a project in Northern Ontario where climate, vehicle fleet, speeds, etc. are expected to be quite different. The MOVES model should be run with project-specific inputs in order to either assess the emissions that were used, or to update them accordingly.	The MOVES model should be run with project-specific inputs in order to either assess the emissions that were used, or to update them accordingly.	B	Refer to the response for comment #11. For the operation phase, the variable emissions factors will also consider the following hypotheses with regard to vehicle type distribution: 50% heavy-duty trucks; 25% light-duty trucks (diesel); 25% light-duty trucks (gasoline).	B
20.	Section 4.2.2	For both fugitive dust modelling scenarios (with control and without control), a 70% reduction factor was applied to the 24-hour December-April emissions to account for the presence of snow	Further information should be provided to justify the use of the 70% reduction factor or this factor should be modified accordingly.	B	Further justifications for the use of the 70% reduction factor will be provided in the revised AQIA report.	B

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		and frost which “naturally mitigates dust emissions during dry days”. While some information was provided related to this reduction factor, the approach was not referenced and it is unclear as to whether or not this reduction is representative.				
21.	Section 4.2.2	Similar to the comment above regarding Section 3.3.3 for the construction phase, for the operation phase, the number of days with precipitation used to determine the monthly and annual road dust control factors are also based on climate data from Pickle Lake, which is located approximately 250 km from the site. A new site-specific meteorological dataset will be provided for this project which will include precipitation data. The precipitation data from Pickle Lake should be compared against the precipitation data in the new site-specific meteorological dataset to ensure that the number of precipitation days are comparable. If they are not, the control factors should be updated accordingly.	The precipitation data from Pickle Lake should be compared against the precipitation data in the new site-specific meteorological dataset to ensure that the number of precipitation days are comparable. If they are not, the control factors should be updated accordingly.	B	Refer to the response for comment #13.	B

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22.	Section 4.2.2, Appendix A, and modelling files	<p>The modelling methodology uses the MHRDOW keyword to apply monthly scaling factors to reduce the road dust emissions for the months of December through April, compared to those from May through November. Based on Section 4.2.2 of the report and the road dust calculations in Appendix A, these scaling factors should differ for 24-hour, monthly, and annual averaging periods because the monthly and annual scaling factors also account for the number of days with precipitation, whereas the 24-hour scaling factors do not. Despite these differences, the 24-hour, monthly, and annual concentrations all utilize the same model run with the same monthly scaling factors.</p> <p>In this case, it does appear that the modelling used the worst-case winter/summer emission ratio as the scaling factor, which is acceptable as it is conservative, but in general it is preferred to use separate model runs for these averaging periods to more appropriately account for the</p>	For any re-modelling, it is recommended to use separate model runs for 24-hour, monthly, and annual averaging periods to more appropriately account for the emissions and scaling factors that vary by season.	B	We will consider this recommendation in the revised study.	B

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		emissions and scaling factors that vary by season.				
23.	Section 4.3 and modelling files	Similar to the comment above regarding Section 3.4 for the construction phase, for the operation phase, the parameters for the line of volume sources also differed slightly from those which are recommended by the U.S. EPA ( <a href="https://www.epa.gov/sites/default/files/2020-10/documents/haul_road_workgroup-final_report_package-20120302.pdf">https://www.epa.gov/sites/default/files/2020-10/documents/haul_road_workgroup-final_report_package-20120302.pdf</a> ). Most notably: <ul style="list-style-type: none"> <li>The release height was modelled at 0 m rather than at half the plume height.</li> <li>The plume heights used for exhaust gas and fugitive dust emission sources differ and it is unclear on what they are based.</li> </ul> This should be clarified or corrected.	The methodology used to determine the modelled parameters for the line of volume sources for the exhaust gas and fugitive dust sources should be clarified or corrected.	B	Refer to the response for comment #15.	B
24.	Section 4.5, results spreadsheets, Appendix B and modelling files	Several inconsistencies were identified in comparing the model output to the results spreadsheets, Appendix B, and the tables presented in Section 4.5. Specifically:	All model results spreadsheets and summaries should be thoroughly reviewed to ensure that they are consistent with the model output. The tables and report should be updated accordingly.	B	Noted	B  As the modelling/results will be updated this comment may no longer be relevant, however it is

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		<ul style="list-style-type: none"> <li>In general, the maximum concentration for particulate compounds appears to be based on the sum of the maximum concentration from the fugitive dust model and the maximum concentration from the exhaust model. It should be noted that the maximum concentration for these two models may not necessarily occur at the same time/location and as such, using a single model that accounts for the total emissions from both the fugitive dust and the exhaust would be preferable. However, the approach that was utilized may be acceptable as it should be conservative. This same comment applies to the construction phase modelling.</li> <li>The 24-hour and annual TSP/PM10 exhaust concentrations in the results spreadsheet (Oper_RawResults_NoControls tab, columns E and G, and Oper_RawResults_withControls tab, columns E and G) do not</li> </ul>				<p>assumed that any errors in post-processing and results tables that may still exist will be closely reviewed and corrected, and new results be reviewed thoroughly for accuracy.</p> <p>This comment has been satisfied for now but EMRB will need to review the final EA.</p>

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		<p>appear to match the concentrations in their respective modelled .plt files. For the annual concentration, it is also unclear why this is said to be based on the PM2.5 concentration rather than PM10. This should be clarified or corrected as necessary.</p> <ul style="list-style-type: none"> <li>The annual TSP fugitive concentrations in the results spreadsheet (Oper_RawResults_NoControls tab, column F, and Oper_RawResults_withControls tab, column F) do not appear to match the concentrations in their respective modelled .plt files, even after accounting for the emissions scaling. Note that the results with controls appear to match the .plt file for receptors at 150m distance, but not for the receptors at 50m distance, and for some of the sensitive receptors. This should be clarified or corrected as necessary.</li> <li>For the OSEG_IF model, the total source emission rates shown at the bottom of the scaled .plt files do not appear</li> </ul>				

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		to match the reported emission rates for the relevant pollutants and averaging periods. This should be clarified or corrected as necessary.				
25.	Section 4.5 and modelling files	Similar to the comment above regarding Section 3.6 for the construction phase, for the operation phase, when comparing annual modelled concentration against an annual AAQC, the maximum annual modelled concentration from any of the five modelled years should be used. From the model files, it appears that the annual concentration averaged over the five years was used instead. This should be corrected.	The annual concentration results should be updated to report the maximum annual modelled concentration from any of the five modelled years (rather than the annual concentration averaged over the five years).	B	The annual concentration results will be updated in the revised AQIA report to present the maximum annual modelled concentration from any of the five modelled years.	B

# MECP: Species at Risk Branch



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment  
**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Kevin Green, Northern Species at Risk Specialist  
**Ministry and Branch:** Ministry of the Environment, Conservation and Parks, Species at Risk Branch

**Proponent Response Legend**

- 1. Item will be addressed in the Final EAR/IS submission
- 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period
- 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
- 4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)

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<b>Draft Environmental Assessment / Impact Assessment Report</b>						
1.	General	<p>For awareness, on June 5, 2025 the Province of Ontario passed <a href="#">Bill 5: Protecting Ontario by Unleashing our Economy Act, 2025</a> which included amendments to the <i>Endangered Species Act, 2007</i> that are now in force, and the creation of the <i>Species Conservation Act, 2025</i> which is not yet in effect. These changes are intended to streamline permit applications and approvals and help projects proceed faster while continuing to provide important protection for species at risk and their habitats.</p> <p>Below we have provided some highlights of the recent amendments to the <i>Endangered Species Act, 2007</i>, for you to consider in relation to your project activities, along with guidance to help you determine next steps in the authorization process.</p> <p><b>Changes to protections under the amended <i>Endangered Species Act, 2007</i></b></p> <p><i>Species protection</i></p> <p>Undertaking an activity that results in harassment of a species is no longer prohibited under the amended <i>Endangered Species Act, 2007</i>, and therefore does not require you to seek a permit or make use of an exemption.</p>	For awareness - no action required	D – Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response

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		<p>The <a href="#">Policy Guidance on Harm and Harass under the Endangered Species Act</a> can support you in determining whether an activity may result in only harassment, or whether it may result in harm or killing. Please note that this policy guidance was developed prior to the June 5, 2025, amendments, and some are no longer relevant.</p> <p><i>Habitat protection</i></p> <p>Under the amended <i>Endangered Species Act, 2007</i>, the definition of habitat has been changed and is now:</p> <ul style="list-style-type: none"> <li>o for animals, the dwelling place and immediate surrounding area</li> <li>o for plants, the critical root zone</li> <li>o for all other species (for example, lichens), an area on which any member of the species directly depends to carry out its life processes</li> </ul> <p>Habitat for animals does not include areas used exclusively for foraging or travelling between dwelling places. Existing habitat guidance materials available on the <a href="#">ministry's webpage</a> – such as recovery strategies, general habitat descriptions, and habitat protection summaries will continue to provide valuable information to support you in identifying habitat as it is defined under the amended legislation, though may contain outdated references to concepts from the previous legislation.</p> <p><i>Determining whether species' habitat is present</i></p> <p>To determine whether a species' habitat exists in an area expected to be affected by an activity, it will often be necessary to both:</p> <ul style="list-style-type: none"> <li>a) conduct a desktop analysis to assess the likelihood of species presence in the area based on: <ul style="list-style-type: none"> <li>o existing species observation records (e.g., available through the <a href="#">Natural Heritage Information Centre</a> or other sources)</li> <li>o species distribution maps or habitat suitability modelling</li> <li>o existing information on ecological site condition (e.g., Ecological Land Classification, satellite imagery, etc.)</li> </ul> </li> <li>b) where species are known or likely to be present, conduct appropriate site assessments and field surveys, as necessary, to determine whether areas that meet the definition of habitat are present.</li> </ul>				

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		<p>Alternatively, where the species is known or likely to be present in the general area, you may assume that suitable areas are habitat and take appropriate action in advance of your project (e.g., register or seek a permit). This approach may result in cost and time savings in circumstances where precise habitat locations or boundaries are unknown and would require significant survey effort (e.g., multiple years) or research to determine.</p> <p><i>Determining whether an activity is likely to damage or destroy habitat</i></p> <p>Not every activity that occurs within or near habitat will damage or destroy it. Activities that take place in a habitat but do not result in damage or destruction can proceed without the need for a permit or exemption. Conversely, you should also keep in mind that in some cases, activities that take place outside of habitat can result in impacts to habitat, such as introducing pollution to a waterway that results in habitat impacts further downstream.</p> <p>To support you in determining whether an activity is likely to result in the damage or destruction of habitat, it is recommended that you refer to the definitions of these terms in the <a href="#">Categorizing and Protecting Habitat under the Endangered Species Act</a>. Please note that this policy guidance was developed prior to the June 5, 2025 legislative amendments, and therefore some aspects are no longer relevant.</p> <p><b>Final note – the Species Conservation Act, 2025</b></p> <p>In time, once new supporting regulations are created, the <i>Endangered Species Act, 2007</i>, will be replaced by the new <i>Species Conservation Act, 2025</i> which will enable a new Species Conservation Registry to allow for faster, online registration of eligible activities impacting protected species. Additionally, under the <i>Species Conservation Act, 2025</i>, provincial authorization for migratory birds and aquatic species (fish and mussels) listed on Schedule 1 of the federal <i>Species at Risk Act</i> would not be required.</p> <p>While it is anticipated that these changes may occur in 2026, the ministry is not able to provide precise timing on the changes. Until the <i>Species Conservation Act, 2025</i> is enacted, the amended <i>Endangered Species Act, 2007</i> continues to apply and any applications and information shared with the ministry at this time will be assessed under the current legislation.</p>				
2.	General	MECP SARB should be engaged in the preparation of the following documents as they relate to species at risk:	Please updated the Final EAR/IS Report, and all other relevant locations within the	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<ul style="list-style-type: none"> <li>- <b>Construction Environmental Management Plan</b> and relevant component management plans, including: <ul style="list-style-type: none"> <li>o Construction Blasting Management Plan</li> <li>o Construction Traffic Management Plan</li> <li>o Construction Waste Management Plan (including Hazardous, Contaminated and Controlled Materials)</li> <li>o Environmental and Cultural Awareness and Education Plan</li> <li>o Noise and Vibration Management Plan</li> <li>o Site Restoration and Monitoring Plan</li> <li>o Wildlife Management Plan (includes species at risk)</li> </ul> </li> <li>- <b>Operation Environmental Management Plan</b> and relevant component management plans</li> </ul>	Report and associated Appendices, as appropriate, to include a commitment that the Project Team will engage the Ministry of the Environment, Conservation and Parks Species at Risk Branch in the development of the Construction Environmental Management Plan and Operation Environmental Management Plan and all relevant component management plans.			
3.	General	<p>For awareness, since development of the ToR and Draft EAR/IS Report, the following three migratory bat species have been listed as Endangered:</p> <ul style="list-style-type: none"> <li>• Hoary Bat</li> <li>• Silver-haired Bat</li> <li>• Eastern Red Bat</li> </ul> <p>Golden Eagle and Red Knot (<i>rufus</i> subspecies) are currently listed as Endangered and Hudsonian Godwit is currently listed as Threatened on the SARO list. Golden Eagle, Red Knot, Hudsonian Godwit, Hoary Bat, Silver-haired Bat, and Eastern Red Bat are not included as Valued Components subcomponents in the Draft EAR/IS Report.</p> <p>Once new supporting regulations are created and the <i>Species Conservation Act, 2025</i> (SCA) replaces the ESA, a new Protected Species in Ontario list will replace the SARO list. Additionally, under the SCA, provincial authorization for migratory birds and aquatic species (fish and mussels) listed on Schedule 1 of the federal <i>Species at Risk Act</i> would not be required.</p> <p>For awareness, the assessment of potential impacts of the proposed Webequie Supply Road will need to consider potential impacts to Hoary Bat, Silver-haired Bat, and Eastern Red Bat, and their habitat, propose appropriate mitigation measures, and actions to mitigation the lasting impacts during the authorization process, should an authorization under the ESA or SCA be required.</p>	For awareness, any activities associated with the Webequie Supply Road should consider potential adverse impacts to protected species and their habitat, implement mitigation and avoidance measures appropriate for these species, and seek project authorization under the amended ESA or SCA or register activities under the SCA as required. The Little Brown Myotis and Northern Myotis maternity roost habitat suitability mapping and effects assessment presented in the Draft EAR/IS Report does not capture all of the suitable Eastern Red Bat, Hoary Bat, and Silver-haired Bat maternity roost habitat types, and as such the route evaluation, assessment of residual effects of the Community Access Road, and proposed mitigation for Little Brown Myotis and Northern Myotis is not directly applicable to the migratory bat species.	D – Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
4.	Pg. 3-6 / 3.1.1 / Table 3-1	The Draft EAR/IS Report states, " <i>At this level of screening, impacts were considered to fall into one of two categories. The categories were the potential for general impacts to (1) the aquatic environment resulting from construction /</i>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	B. Satisfied for now but will need to see final EA

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		<p><i>maintenance at waterbody crossings and (2) the terrestrial environment, primarily from vegetation clearing during construction.</i>" [emphasis added]</p> <p>It is unclear why impacts to the terrestrial environment were limited to vegetation clearing. As it relates to species at risk, it is reasonable to expect that other impacts may occur during the other components of construction and operation of the Project. Additional rationale and justification is required to support the decision to scope the assessment of terrestrial impacts to vegetation clearing, or clarify what consideration was given in the assessment to other Project activities.</p>	<p>associated Appendices, as appropriate, to revise the statement as follows:</p> <p><i>"At this level of screening, impacts were considered to fall into one of two categories. The categories were the potential for general impacts to (1) the aquatic environment resulting from construction / maintenance at waterbody crossings and (2) the terrestrial environment, <del>primarily from vegetation clearing during construction.</del>"</i></p> <p>Alternatively, please provide additional rationale and justification required to support the decision to scope the assessment of terrestrial impacts to vegetation clearing, or clarify what consideration was given in the assessment to other Project activities.</p>		the twenty-three-week review period	
5.	Pg. 3-13 / 3.1.3	<p>The Draft EAR/IS Report states, "<i>Environmental effects of either type of road can be <b>avoided</b> through proper routing/alignment selection and/or can be sufficiently managed with mitigation to <b>avoid</b> significant effects.</i>" [emphasis added]</p> <p>As assessed and discussed in Section 13 of the Draft EAR/IS Report, the proposed Project will not avoid impacts to species at risk despite proposed mitigation.</p>	<p>Please consider updating the referenced statement in the Final EAR/IS Report to reflect the following changes in <b>bold</b>:</p> <p><i>"Environmental effects of either type of road can be <b>avoided or minimized</b> through proper routing/alignment selection and/or can be sufficiently managed with mitigation to <b>avoid or minimize</b> significant effects."</i></p>	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
6.	Pg. 3-42 / 3.2.5.1	<p>The Draft EAR/IS Report states, "<i>All data were pre-processed prior to inclusion in the model, including removal of any topological errors, clipped to <b>an area buffered by 5 km</b> from the centerlines of the combined alternative routes under consideration.</i>" [emphasis added]</p> <p>It is unclear why 5 km was selected as the maximum spatial extent in which to consider Factors, Disciplines, Criteria and Indicators. Additional rationale and justification are required to support the Project Teams decision to limit the are of assessment to 5 km.</p>	<p>Please update the Final EAR/IS Report to provide additional rational and justification to support the Project Teams decision to limit the area of assessment to 5 km.</p>	B – Recommended for EA	<p>4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)</p> <p>The 5 km area of assessment was strictly applied to the comparison of potential routes and selection of the preferred route. The potential routes that were being compared against</p>	A. Satisfied with response

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		Landscape species at risk, such as Boreal Caribou, use landscapes at broad geographic scales much larger than 5 km. Existing evidence indicates anthropogenic activities may result in sensory disturbances to Boreal Caribou during sensitive times of the year up to 10 km or more.			each other in the alternatives assessment were so tightly spaced (geographically), that extending the area of assessment beyond 5 km would not have resulted in a difference between them.  This was not carried forward into the assessment of effects on Boreal Caribou where the LSA consisted of an 11 km (2,513 km <sup>2</sup> ) offset from the centreline of the preferred route, and from supportive infrastructure and the RSA consisted of the Missisa and Ozhiski Caribou Ranges (108,600 km <sup>2</sup> ).	
7.	Pg. 3-43 / 3.2.5.3	The Draft EAR/IS Report states, " <i>The scores that were assigned to indicators are presented in Appendix C-2.</i> "  The scores do not appear to have been included in Appendix C-2.	Please update Appendix C-2 to include the scores.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.  Noted – the scores have been added to Appendix C2.	A. Satisfied with response
8.	Pgs. 4-46 and 4.47 / 4.4.2.6	The Draft EAR/IS Report states, " <i>Temporary supportive facilities and work areas that will not be required for operations of the Project will be decommissioned upon completion of construction. This will include decommissioning and rehabilitation of temporary construction camps, temporary access roads and waterbody crossings, the aggregate pit/quarry at site ARA-2 and construction staging areas within the road ROW.</i> " and " <i>The pit and quarry at site ARA-2 will be progressively rehabilitated, and also be decommissioned for a final rehabilitated state as part of the completion of the construction phase.</i> " [emphasis added]  These two statements contradict each other and earlier statements in Section 4 which indicated temporary infrastructure (e.g., construction camps, temporary access roads) will be progressively rehabilitated. MECP SARB encourages the Project Team to consider progressive rehabilitation to minimize the potential effects on species at risk.	Please update the Final EAR/IS Report to include a clear commitment to progressively rehabilitate and restore all temporary infrastructure.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
9.	Pg. 4-46 / 4.4.2.6	The Draft EAR/IS Report states, " <i>As required, disturbed areas will be stabilized using an appropriate native groundcover seed mix in accordance with Ontario Provincial Standard Specification (OPSS) 803 – Construction Specifications for Vegetative Cover.</i> "	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		MECP SARB encourages the Project Team to refer to, and implement, recommended best management practices for the restoration of disturbed areas consistent with Boreal Caribou habitat. Specifically, please see <a href="#">Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario</a> .	include a commitment to incorporate the best management practices for the restoration of disturbed areas consistent with Boreal Caribou habitat in the detailed design stage. Specifically, please see <a href="#">Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario</a> .			
10.	Pg. 4-48 / 4.4.2.7	Please consider appropriate mitigation measures for species at risk in the development of the "Traffic Management Plan" to minimize potential impacts to SAR associated with material and equipment delivery along the winter road that begins off Highway 808 (NORT road).	Please considering incorporating appropriate mitigation measures in the development of the Traffic Management Plan that will minimize potential impacts to species at risk.	D – Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
11.	Pgs. 4-49 – 4-63 / 4.4.2.7 / Table 4-8	Please clarify if Table 4-8 specifically lists appropriate noise attenuation equipment associated with specific equipment (e.g., generators, crushers and other equipment associated with aggregate production, etc.) necessary to minimize sensory disturbances to species at risk.  If this type of noise attenuation equipment is not specifically identified in Table 4-8, please consider including.	Please clarify if noise attenuation equipment is specifically identified in Table 4-8 and, if not, please consider updating the Final EAR/IS Report to include a commitment to assess and incorporate all necessary noise attenuation equipment in the detailed design stage of the Project. This may be grouped by categories of equipment such as passenger vehicles, construction vehicles, power generation, aggregate extraction and processing, storage facilities, work camps, etc.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
12.	Pg. 4-63 / 4.4.2.8	The Draft EAR/IS Report does not appear to include specific equipment and/or has not specified reasonable mitigation measures to minimize noise emissions. Where possible/necessary, MECP SARB encourages the Project Team to consider implementing the use of a mix of engineered structures, natural features, and operation practices to reduce sound, including: - Berms; - Vegetative buffers, where possible; - Acoustic fences/noise walls (e.g., wood, concrete, steel, or composite panels) - Portable/temporary barriers (e.g., moveable acoustic panels or curtains); and/or - On-site equipment controls (e.g., enclosing crushers, screens, conveyors; locating equipment in natural depressions or behind	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include a commitment to assess and incorporate all necessary noise attenuation equipment in the detailed design stage that would minimize noise emissions around equipment, where reasonable.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		stockpiles; scheduling loud operations for mid-day when ambient noise is higher)				
13.	Pgs. 4-74 – 4-82 / 4.5.1 / Table 4-10	Table 4-10 does not include Environmental Managers as position/skill requirement.  Section 4.4.3.3 of the Draft EAR/IS Report states, “ <i>The delegated Environmental Manager for the road operator will have the right to stop operations activities in the case of non-compliance or failure to implement corrective actions and remediation measures.</i> ”	Please update Table 4-10 of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include Environmental Manager as a required position/skill.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
14.	Pgs. 13-18 to 13-91 / 13.1 and 13.2	Broadly, the description of existing conditions appears to be split across two sections, Section 13.1 (Scope of the Assessment) and Section 13.2 (Existing Conditions) which make it challenging to follow the description of existing conditions.  For example, some components necessary to describe existing conditions for Boreal Caribou are included in Section 13.1 and not discussed at all in Section 13.2, such as Range Condition, survival estimates, recruitment estimates, population trend estimates, Cumulative Disturbance, Habitat Amount and Arrangement, and Sub-range Habitat Features (i.e., General Habitat Description Category 1, 2, and 3 habitat). Whereas information included in Section 13.2 (Existing Conditions) generally describe survey methods for field studies that were undertaken, results of those field studies, and limited information on some of the analyses undertaken with the information collected.	Please update Section 13.2 of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include all relevant information necessary to describe existing conditions for species at risk.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
15.	Pg. 13-8 / 13.1.1 / Table 13-1	The list of regulations, legislation and policies referenced in Table 13-1 does not include the following relevant species at risk policies: - Categorizing and Protecting habitat under the ESA - Policy Guidance on Harm and Harass under the ESA - General Habitat Description for the Forest-dwelling Woodland Caribou	Please update Table 13-1 of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include all relevant species at risk related policies.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
16.	Pg. 13-21 / 13.1.2.1	The Draft EAR/IS Report states, “ <i>Bank Swallow (Riparia riparia) was not selected as there are no known occurrences within the RSA. Ontario Breeding Bird Atlas (OBBA) data indicate that Bank Swallow does not occur in proximity to the proposed WSR corridor. The closest records are along the Winisk River approximately 75 km north of the RSA. The closes records on eBird are in Lansdowne House about 75 km to the southwest. No formal Bank Swallow surveys were conducted in the RSA, but no suitable habitat (i.e., natural exposed banks) was recorded in the RSA. For these reasons Bank Swallows were not included in the assessment.</i> ”	Please consider the <a href="#">Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario</a> and updating the Final EAR/IS Report to include appropriate mitigation measures to deter Bank Swallows from nesting.	B – Recommended for EA  D – Permitting Related	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<p>Based on the information provided, MECP SARB understands the Project Team has concluded there are no naturally occurring suitable habitat within the RSA. It is relevant to note that Bank Swallow historically nested in eroding slopes along rivers and lakes, but have successfully adjusted to human-influenced and created environments, with many colonies now located in sand and gravel pits. Recognizing the proposed Project includes the construction and operation of two aggregate sites, one of which is anticipated to be permanent, there will be potential for these activities to create suitable nesting habitat for Bank Swallow. MECP SARB encourages the Project Team consider the <a href="#">Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario</a> and include mitigative actions in the EAR/IS Report to discourage nesting in areas where project activities will occur (e.g., reduce slopes to 70 degrees or less).</p> <p>Should Bank Swallows establish a nesting colony in the Project aggregate sites at any time, the area will be protected habitat under the ESA.</p>				
17.	Pg. 13-23 / 13.1.2.2.1	<p>The WSR Terms of Reference (ToR) requires an assessment of the General Habitat Description Category 1, 2 and 3 habitats for Boreal Caribou, which includes travel corridors as part of Category 1 habitat.</p> <p>As it relates to this ToR requirement to consider Category 1, 2 and 3 habitat, the draft EAR/IS Report characterizes existing conditions (i.e., Section 13.1; 13.2), describes and quantifies potential effects, pathways, and indicators (i.e., Section 13.3.3), discusses mitigation and enhancement measures (i.e., Section 13.4.3), characterizes net effects (i.e., Section 13.5.1.2; 13.5.2.1), and outlines the determination of significance (i.e., Section 13.6.1). Further detailed information is also provided in Section 11 of Appendix F.</p> <p>The Draft EAR/IS Report states, "<i>Caribou have sensitive periods throughout the year, where activities that result in sensory disturbance of the species are restricted</i> (Ontario Woodland Caribou Recovery Team, 2008). Sensitive periods are associated with Caribou life-stages such as calving, wintering, and travel. Ontario has specific sensitive time periods for Caribou that are used in the identification, delineation, and consideration of habitat features, which include nursery areas (May 1 to July 14 – very low tolerance, July 15 to September 15 – low tolerance), winter use areas (December 1 to March 31), and travel corridors (April and/or November)." [emphasis added]</p> <p>For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA</p>	Provided for awareness.	D – Permitting Related	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	A. Satisfied with response

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		<p>is scoped to the dwelling place (i.e., nursery area, wintering area, rutting area) and the area immediately around the dwelling place (i.e. 10 km), which differs from the previous General Habitat Description that identified the entire range as habitat and how Category 1, 2, and 3 habitat is currently described in the draft EA.</p> <p>Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.</p>																
18.	Pg. 13-23 / 13.1.2.2.1	<p>The Draft EAR/IS Report summarizes the results of previous estimates of adult female survival, recruitment rates and population trend for the Missisa and Ozhiski Ranges, based on the Integrated Range Assessments (MNR 2014).</p> <p>For awareness, the Ministry of Natural Resources (MNR) Science and Research Branch recently updated estimates of adult female survival rates, annual recruitment rates, and population growth rates (i.e., trend) for <b>Boreal Caribou</b> in the Missisa and Ozhiski Ranges (unpublished):</p> <table border="1"> <thead> <tr> <th></th> <th>Missisa</th> <th>Ozhiski</th> </tr> </thead> <tbody> <tr> <td>Adult Female Survival Rate</td> <td>86%<sup>1</sup></td> <td>88%<sup>4</sup></td> </tr> <tr> <td>Annual Recruitment Rate (calves/100 adult females)</td> <td>50<sup>2</sup></td> <td>33.7<sup>5</sup> 35.2<sup>6</sup></td> </tr> <tr> <td>Population Growth Rate (<math>\lambda</math>)</td> <td>1.14<sup>3</sup></td> <td>1.00<sup>7</sup> 1.10<sup>8</sup></td> </tr> </tbody> </table> <p><sup>1</sup> Boreal Caribou, pooled across years (2020-23); <math>n = 147</math> collar-years  <sup>2</sup> Boreal Caribou, calf-at-heel, pooled across years (2020, 2021 &amp; 2023); <math>n = 54</math> adjusted cows + calves  <sup>3</sup> Boreal Caribou, Geometric mean (2020-23)  <sup>4</sup> Boreal Caribou, pooled across years (2019-23); <math>n = 241</math> collar-years  <sup>5</sup> Geometric mean of the two recruitment estimates recorded during 2018 and 2019 (i.e., 2018 group composition-based estimate of 35.4 calves/100 cows [<math>n = 329</math> adjusted cows + calves]; and 2019 calf-at-heel estimate of 32.1 calves/100 cows [<math>n = 37</math> adjusted cows + calves])  <sup>6</sup> Geometric mean of the two recruitment estimates recorded during 2021, 2022 &amp; 2024 (i.e., pooled 2021, 22 &amp; 24 group composition-based estimate of 31 calves/100 cows [<math>n = 199</math> adjusted cows + calves]; and pooled 2021, 22 &amp; 24 calf-at-heel estimate of 40.1 calves/100 cows [<math>n = 70</math> collared cows + calves])  <sup>7</sup> Boreal Caribou, mean recruitment (2018-19); adult survival (2019)</p>		Missisa	Ozhiski	Adult Female Survival Rate	86% <sup>1</sup>	88% <sup>4</sup>	Annual Recruitment Rate (calves/100 adult females)	50 <sup>2</sup>	33.7 <sup>5</sup> 35.2 <sup>6</sup>	Population Growth Rate ( $\lambda$ )	1.14 <sup>3</sup>	1.00 <sup>7</sup> 1.10 <sup>8</sup>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include MNR's recent updated estimates of adult female survival rates and annual recruitment rates for the Missisa and Ozhiski Ranges for comparative purposes at the range level; and describe what these results suggest.</p>	<p>B – Recommended for EA</p> <p>D – Permitting Related</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p>	<p>A. Satisfied with response</p>
	Missisa	Ozhiski																
Adult Female Survival Rate	86% <sup>1</sup>	88% <sup>4</sup>																
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		<p><sup>8</sup> Boreal Caribou, mean recruitment (pooled group. comp. and CAH for 2021, 2022 &amp; 2024); mean adult survival</p> <p>The above estimates of adult female survival in the Missisa Range (86%) and Ozhiski Range (88%) are above the estimated 85% adult survival rate that is necessary for a stable to increasing population (EC 2008, 2011).</p> <p>The above estimates of annual recruitment rates in the Missisa Range (50 calves/100 adult females) and Ozhiski Range (33.7-35.2 calves/100 adult females) are above the “persistence threshold” of 28.9 calves per 100 adult females generally considered necessary for a stable or increasing population assuming an adult survival rate of 85% (EC, 2008).</p> <p>The above estimates of lambda (<math>\lambda</math>) in the Missisa Range (1.14) and Ozhiski Range (1.00-1.10) suggest the short-term population trend is increasing in the Missisa Range and is stable or increasing in the Ozhiski Range.</p> <p>MECP SARB recommends the above information be considered in the Draft EAR/IS Report.</p> <p>For awareness, the assessment of potential impacts of the proposed Webequie Supply Road will need to consider the best available information, including the above estimates of survival, recruitment and population growth rates, during the authorization process, should an authorization under the ESA or SCA be required.</p> <hr/> <p>Environment Canada. 2008. <a href="#">Scientific Review for the Identification of Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada</a>. August 2008. Ottawa: Environment Canada. 72 pp. plus 180 pp Appendices.</p> <p>Environment Canada, 2011. <a href="#">Scientific Assessment to Inform the Identification of Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada: 2011 update</a>. Ottawa, Ontario, Canada. 102 pp. plus appendices.</p>				

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19.	Pg. 13-25 / 13.1.2.2.1  and  Table 13-2	<p>The WSR Terms of Reference (ToR) requires an assessment of the General Habitat Description Category 1, 2 and 3 habitat for Boreal Caribou, which includes travel corridors as part of Category 1 habitat.</p> <p>As it relates to this ToR requirement to consider Category 1, 2 and 3 habitat, the draft EAR/IS Report characterizes and quantifies existing conditions (i.e., Section 13.1; 13.2), describes and quantifies potential effects, pathways, and indicators (i.e., Section 13.3.3), discusses mitigation and enhancement measures (i.e., Section 13.4.3), characterizes net effects (i.e., Section 13.5.1.2; 13.5.2.1), and outlines the determination of significance (i.e., Section 13.6.1). Further detailed information is also provided in Section 11 of Appendix F.</p> <p>However, the draft EAR/IS Report states, “<i>It is anticipated that the habitat mapping will be updated following a review from MECP SARB of relevant information. AtkinsRéalis is committed to include and consider this updated information for the Final EAR/IS.</i>”</p> <p>As per previous advice, MECP SARB encourages the Project Team to consider the best available information, including all Caribou collaring data collected by the Project Team and other projects in the area (e.g., MFCAR, NRL, MNR), to identify additional potential new Category 1 habitat (i.e., Nursery Areas, Winter Use Areas); and consider these in the EAR/IS. Specifically, it appears the information provided in Table 13-2 only reflects the general habitat mapping product provided by MECP, which was limited to the available data when it was shared (e.g., not all delineations have been completed and refinements are ongoing. These can be made available upon completion; the data layer was produced using the most current caribou observations, distribution, and habitat information available at the time of issue; etc.).</p>	Please update Table 13-2 of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include a comprehensive assessment and quantification of known and potential new Category 1 habitat (i.e., Nursery Areas, Winter Use Areas) within the Project Footprint, LSA and RSA.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA								
20.	Pg. 13-25 / 13.1.2.2.1	<p>For awareness Ontario has recently updated estimates of cumulative disturbance between 2017 - 2022 for Boreal Caribou in the Missisa and Ozhiski Ranges (unpublished). Below is the total cumulative disturbance (i.e., natural and anthropogenic disturbance including a 500 meter buffer on all anthropogenic disturbances [except operational mining cell claims]) in each range between 2017 - 2022:</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">Total Cumulative Disturbance (%)</th> </tr> <tr> <th>Missisa Range</th> <th>Ozhiski Range</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>14.4<sup>1</sup></td> <td>27.6<sup>1</sup></td> </tr> </tbody> </table>	Year	Total Cumulative Disturbance (%)		Missisa Range	Ozhiski Range	2013	14.4 <sup>1</sup>	27.6 <sup>1</sup>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to consider the recent updated estimates of cumulative disturbance for the Missisa and Ozhiski, Ranges for comparative purposes at the range level; and describe what these results suggest in the context of the threshold identified in the <a href="#">Scientific Assessment to Inform the Identification of</a>	B – Recommended for EA  D – Permitting Related	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
Year	Total Cumulative Disturbance (%)													
	Missisa Range	Ozhiski Range												
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		<table border="1"> <tr><td>2015</td><td>11.3<sup>1</sup></td><td>27.0<sup>1</sup></td></tr> <tr><td>2017</td><td>8.5</td><td>20.6</td></tr> <tr><td>2018</td><td>8.5</td><td>21.5</td></tr> <tr><td>2019</td><td>8.4</td><td>20.9</td></tr> <tr><td>2020</td><td>8.4</td><td>20.7</td></tr> <tr><td>2021</td><td>8.4</td><td>20.6</td></tr> <tr><td>2022</td><td>8.4</td><td>20.5</td></tr> </table> <p><sup>1</sup> Estimates of cumulative disturbance in 2013 and 2015 are considerably higher than those between 2017 to 2023 as a result of generalized mineral claims data available for the earlier estimates which are understood to have over-inflated cumulative disturbance estimates in 2023 and 2015. Estimates generated between 2017 to 2022 incorporated more detailed “operational cell claim” data which represents an improvement to the earlier estimates.</p> <p>Note, the above estimates may be subject to change following potential refinements to the analysis.</p> <p>The results suggest cumulative disturbance in the Missisa and Ozhiski Ranges has remained relatively <b>stable</b> between 2017-2022 and has consistently been and is currently <b>below</b> the level that is expected to support a self-sustaining caribou population.</p> <p>For awareness, the assessment of potential impacts of the proposed Webequie Supply Road will need to consider the best available information, including the above estimates of cumulative disturbance, during the project authorization process, should an authorization under the ESA or SCA be required.</p>	2015	11.3 <sup>1</sup>	27.0 <sup>1</sup>	2017	8.5	20.6	2018	8.5	21.5	2019	8.4	20.9	2020	8.4	20.7	2021	8.4	20.6	2022	8.4	20.5	<p><a href="#">Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population in Canada: 2011 update</a> (Environment Canada, 2011) and provincial policy (i.e., principle 1 of the <a href="#">Range Management Policy in Support of Woodland Caribou Conservation and Recovery</a>).</p>		
2015	11.3 <sup>1</sup>	27.0 <sup>1</sup>																								
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2021	8.4	20.6																								
2022	8.4	20.5																								
21.	Pg. 13-27 / 13.1.2.2.2	<p>The Draft EAR/IS Report states, “<i>While regulated habitat in the form of a general habitat description is not currently available for this species, MECP has identified that known, active dens and the area within a radius of two km around the den is a critical habitat feature and that project activities are to be avoided in therein (Kevin Green personal communication, 2021).</i>” [emphasis added]</p> <p>Please note, Ontario has generally considered the den and area within a 4km radius as the “denning area” (i.e., not limited to 2 km). Further, recent information collected in the Red Lake area suggests reproductive female Wolverine may rely on areas up to 8 km or more around their natal and maternal den(s).</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to consider relevant information relating to the area used by reproductive Wolverines around Wolverine dens.</p>	<p>B – Recommended for EA D – Permitting Related</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p>	<p>A. Satisfied with response</p>																				

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		For awareness, the assessment of potential impacts of the proposed Webequie Supply Road on Wolverine habitat will need to consider the best available information, including best available information on habitat use in Ontario, during the project authorization process, should an authorization under the ESA or SCA be required.				
22.	Pg. 13-33 / 13.1.2.2.10	The Draft EAR/IS Report states, " <i>Provincially, the status of Short-eared Owls was changed from Special Concern to Threatened on January 23, 2023, meaning its habitat will receive protection under Ontario's ESA.</i> "  For clarity, Short-eared Owl receives both species and habitat protection under the <i>Endangered Species Act, 2007</i> .	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to accurately reflect that Short-eared Owl receive both species and habitat protection in Ontario.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
23.	Pg. 13-35 / 13.1.2.2.12  Table 13-3	Clarification is required on how Caribou, both Boreal Caribou and Eastern Migratory Caribou, are being assessed in the EAR/IS Report. Specifically:  <ul style="list-style-type: none"> <li>- Section 13.1.2.2.12 of the Draft EAR/IS Report generally discusses the differences between the two ecotypes of Caribou, however based on Table 13-3 it appears only Boreal Caribou have been selected as a Valued-component sub-component – or possibly that the assessment of Boreal Caribou is being assumed to apply to Eastern Migratory Caribou based on Table 3-7?</li> <li>- Section 13.2.1.1 generally discusses the two ecotypes as it relates to the field studies undertaken (e.g., Winter Aerial Surveys, Caribou Collaring Study).</li> <li>- Section 13.3.3 appears to be specific to Boreal Caribou based on the title of the section, yet states:  <i>"Indigenous community members expressed concerns about the impacts of the Project on caribou migration routes. To assess the movement of caribou (Boreal and Eastern Migratory populations), the Project Team has reviewed background studies and Indigenous Knowledge shared by communities and conducted field investigations that include aerial surveys and caribou collaring. The results of the assessment of the Project's potential impacts to caribou are described in Section 13.3.3. Proposed mitigation measures and monitoring approach to address potential effects of the Project to Caribou are outlined in Section 13.4 and Section 13.10."</i> [emphasis added]</li> <li>- Section 13.4.3 does not specify which ecotype of Caribou the information applies to, simply referring to "Caribou".</li> </ul>	Please consider the potential for the proposed Project to affect Boreal Caribou and Eastern Migratory Caribou differently, particularly movement/migration.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<ul style="list-style-type: none"> <li>- Section 13.5.2.1 appears to generally apply to both Boreal Caribou and Eastern Migratory Caribou.</li> <li>- Section 13.6.1 appears to be specific to Boreal Caribou.</li> <li>- Section 13.7 does not specify which ecotype of Caribou the information applies to, simply referring to "Caribou".</li> <li>- Section 13.8 does not specify which ecotype of Caribou the information applies to, simply referring to "Caribou" with a single reference to Caribou (Boreal population).</li> <li>- Section 13.9 appears to be specific to Boreal Caribou, with several references to Caribou (Boreal population).</li> <li>- Section 13.10 does not specify which ecotype of Caribou the information applies to, simply referring to "Caribou".</li> </ul> <p>Boreal Caribou and Eastern Migratory Caribou represent two separate and distinct populations, or "designatable units", which acknowledges that these are spatially, ecologically or genetically discrete and evolutionarily significant units - and behavioural variability reflective of both plasticity and adaptation to local environments - as described in COSEWIC's <a href="#">Designatable Units for Caribou (<i>Rangifer tarandus</i>) in Canada</a> (2011).</p> <p>As such, it may not be appropriate to assume Eastern Migratory Caribou will face the same effects as Boreal Caribou (e.g., potential effects on movement may differ and result in different effects on access to important habitats and/or movement patterns). The Webequie Supply Road may also result in effects to Eastern Migratory Caribou that may also have broader affects to other disciplines (e.g., Indigenous harvest).</p>				
24.	Pgs. 13-36 to 13-37 / 13.1.3 / Table 13-4	<p>The Draft EAR/IS Report states, "A number of data collection methods and tools have been used to inform the EA/IA, including: aerial surveys (developed with input from MNR and MECP biologists), WSR collaring data, MNR collaring data, NHIC caribou occurrence data, caribou habitat mapping, Far North Land Cover Data, aerial photography and Indigenous Knowledge. <b>Section 13.2</b> includes a summary of data collection methods. Detailed description of data collection methods is provided in Appendix F of this Draft EAR/IS – Natural Environment Existing Conditions Report (NEEC Report)."</p> <p>Based on this statement, it appears other Caribou collaring data available within the Project Footprint, LSA and RSA collected by the Northern Road Link and Marten Falls Community Access Road Projects were not used to characterize existing conditions, assess effects of the Project on Boreal Caribou (and Eastern Migratory Caribou), inform mitigation measures,</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report (e.g., Section 13.2.1.1.3 – Seasonal Patterns of Habitat Use) and associated Appendices (e.g., Appendix F) as appropriate, to include and incorporate additional information collected by the Northern Road Link and Marten Falls Community Access Road Projects, where available, in the characterization of existing conditions, assessment of effects of the Project on Boreal Caribou (and Eastern Migratory Caribou), identification of appropriate	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	A. Satisfied with response  Note: Based on discussion with WSR Project Team on December 19, 2025, in which the Project Team clarified that the Final EA will include consideration of WSR, NRL and MNR caribou collar data; and that the Proponent Response will be updated to "3. Item will be

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		determine residual effects, and assess cumulative effects. Section 3.2 of the Terms of Reference states, "The Webequie Project Team acknowledges that assembly and use of the best available information from all sources will be required to conduct the EA."  The Final EAR/IS Report should include all available caribou collaring data, including that collected by the Project as well as that collected by the Ministry of Natural Resources, Northern Road Link, and Marten Falls Community Access Road, where its relevant to the Project study areas (i.e., Project Footprint, LSA, and RSA).	mitigation measures, determination of residual effects, and assessment of cumulative effects.  Alternatively, please update this section of the EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to provide rationale and justification as to why this additional information was not considered and incorporated into the assessment.			addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)" and the Final EAR/IS will include a commitment to address this in detailed design by the owner/operator (i.e., consider MFCAR collar data to inform ESA/SCA authorization).
25.	Pg. 13-38 / 13.1.3 / Table 13-4	Attawapiskat First Nation and Neskantaga First Nation indicated "The assessment area must be large enough to assess the accumulated environmental conditions and to capture stressors from actions other than the proposed Project. For example, this will require an assessment of impacts on caribou based on the entire herd ranges."  The Project Teams response states, "Potential effects to Caribou have been assessed at Project, Local and Regional scales. Assessment at the regional scale includes the Ozhiski and Missisa Caribou Ranges. Section 13.1.6.1 describes spatial boundaries of the assessment."  The Ozhiski and Missisa Caribou Ranges are relevant for Boreal Caribou. Recognizing Eastern Migratory Caribou demonstrate different habitat and space-use requirements throughout portions of the year, it may be necessary to clarify if the community's concerns are specific to Boreal Caribou, Eastern Migratory Caribou, or both; and whether the regional scale defined using the Ozhiski and Missisa Caribou Ranges adequately addresses the community's concerns.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify whether the community's concerns are specific to Boreal Caribou, Eastern Migratory Caribou, or both; and whether the regional scale defined using the Ozhiski and Missisa Caribou Ranges adequately addresses the community's concerns.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
26.	Pg. 13-43 / 13.1.5 / Table 13-6	Table 8-1 of the Webequie Supply Road Terms of Reference listed the following preliminary Indicators for Species at Risk: - Habitat availability (i.e., quantify and quality) - Habitat Distribution (i.e., configuration and connectivity) - Survival and Reproduction  The Draft EAR/IS Report lists the following Indicators for Species at Risk:	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to describe how the preliminary Indicators identified in the ToR were considered and/or align with the Indicators identified in the EAR/IS Report.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

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		<ul style="list-style-type: none"> <li>- Wildlife Habitat Loss/Destruction (Changes to SAR habitat availability (quantity – hectare and quality)</li> <li>- Wildlife Habitat Alteration/Degradation (Changes to abundance and distribution of SAR habitat (number/ha)</li> <li>- Wildlife Injury or Death (Changes in SAR populations or SAR mortality)</li> <li>- Alteration in Wildlife Movement (Changes to distribution of SAR species (i.e., configuration and connectivity) or changes in predator access, habitat use and populations).</li> </ul> <p>Additional information is required to describe how the preliminary Indicators identified in the ToR were considered and/or align with the indicators identified in the Draft EAR/IS Report.</p>				
27.	<p>Pg. 13-43 / 13.1.5 / Table 13-6</p> <p>Pgs. 13-187 to 13-200 / 13.3.12.3 / Table 13-35</p>	<p>The Draft EAR/IS Report lists the following Indicators for Species at Risk:</p> <ul style="list-style-type: none"> <li>- Wildlife Habitat Loss/Destruction (Changes to SAR habitat availability (quantity – hectare and quality)</li> <li>- Wildlife Habitat Alteration/Degradation (Changes to abundance and distribution of SAR habitat (number/ha)</li> <li>- Alteration in Wildlife Movement (Changes to distribution of SAR species (i.e., configuration and connectivity) or changes in predator access, habitat use and populations)</li> <li>- Wildlife Injury or Death (Changes in SAR populations or SAR mortality)</li> </ul> <p>For each Indicator, the Draft EAR/IS Report identifies a number of “potential effects” and “measurable parameters”. However, the potential effects and measurable parameters do not appear to be outlined/summarized. Specifically, the Draft EAR/IS Report states, “<i>Potential effects, indicators, nature of the interactions, and threat assessments for the SAR and SAR Habitat VC are described in the following subsections and are summarized in Table 13-14.</i>”</p> <p>However, Table 13-14 on page 13-96 of the Draft EAR/IS Report does not appear to summarize potential effects, indicators, nature of the interactions and threat assessment. Rather, it is titled “<i>Details of Categorized Caribou Habitat Loss in the LSA and RSA.</i>”</p> <p>Was the reference potentially supposed to be “Table 13-35”, between pages 13-187 to 13-200?</p> <p>Additionally, there is a lack of consistent terminology that makes it challenging to understand the assessment. For instance:</p> <ul style="list-style-type: none"> <li>- Table 13-6 lists “Indicators” as:</li> </ul>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clearly and consistently outline the VC's, Indicators, Potential Effects, Effect Pathways, and/or Threats.</p>	<p>B – Recommended for EA</p>	<p>1. Item will be addressed in the Final EAR/IS submission.</p>	<p>A. Satisfied with response</p>

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		<ul style="list-style-type: none"> <li>○ Wildlife Habitat Loss/Destruction (Changes to SAR habitat availability (quantity – hectare and quality)</li> <li>○ Wildlife Habitat Alteration/Degradation (Changes to abundance and distribution of SAR habitat (number/ha)</li> <li>○ Alteration in Wildlife Movement (Changes to distribution of SAR species (i.e., configuration and connectivity) or changes in predator access, habitat use and populations)</li> <li>○ Wildlife Injury or Death (Changes in SAR populations or SAR mortality)</li> </ul> <p>Whereas Section 3.3, Table 13-8, 13-9, and 13-35 lists those as Potential Effects</p> <ul style="list-style-type: none"> <li>- Section 13.3.3 and Table 13-35 refer to Potential Effects and Effects Pathways separately, but Tables 13-37, 13-38, 13-39, and 13-40 group both Potential Effects and Effect Pathways into a single column titled "Potential Effect". Whereas Tables 13-17, 13-20, 13-23, 13-28, and 13-32 refer to the same "Potential Effects" as "Threat"</li> </ul>				
28.	Pgs. 13-43 to 13-44 / 13.1.5	<p>Based on the information provided and following a review of the Existing Conditions, Identification of Potential Effects, Pathways, and Indicators, Characterization of Net Effects, and Determination of Significance, it appears several important factors for Boreal Caribou were not considered.</p> <p>Boreal Caribou use habitat at multiple spatial scales. At the broad landscape scale, caribou require large, undisturbed areas of old or mature conifer upland forest and lowlands dominated by jack pine and/or black spruce. These areas allow caribou to effectively separate themselves from higher densities of moose, white-tailed deer, grey wolves and black bears which tend to be associated with younger mixed or deciduous forest. At smaller scales, caribou seasonally select specific habitat features and areas that support successful reproduction and calf rearing, provide summer and/or winter forage, and/or facilitate movement between discrete areas of use.</p> <p>Caribou depend directly and indirectly on the entire range as habitat. The sum of all constituent sub-range habitat features is required for caribou to carry out their life processes and for populations to persist for multiple generations. While the availability, amount, and distribution of these features shift spatially and temporally within the range due to natural and anthropogenic disturbance events and successional change, the primary ecological function of the range</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to incorporate the following:</p> <ul style="list-style-type: none"> <li>- Wildlife Habitat Loss/Destruction (Changes to SAR habitat availability) and Wildlife Habitat Alteration/Degradation (Changes to abundance and distribution of SAR habitat) <ul style="list-style-type: none"> <li>○ Changes to the amount of cumulative disturbance within the LSA, RSA and individual Caribou ranges (i.e., Principle 1 of the RMP and the 3<sup>rd</sup> line of evidence in the determination of range condition);</li> </ul> </li> </ul>	<p>B – Recommended for EA</p> <p>D – Permitting Related</p>	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	<p>B. Satisfied for now but will need to see final EA</p>

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		<p>is the collective provision of effective refuge from predation (Rettie and Messier 2000; Racey and Arsenault 2007).</p> <p>The <a href="#">Range Management Policy in Support of Woodland Caribou Conservation and Recovery</a> (RMP) describes the Range Management Approach which involves managing both broad range-level influences and impacts including cumulative disturbance, and habitat amount and arrangement, as well as smaller scale components including the ecological function of sub-range habitat features, which result in a caribou demographic response (i.e. increasing, stable or declining population trend) within the range.</p> <p>The objective of the RMP is to maintain or move toward a sufficient range condition in all caribou ranges in Ontario, which will be achieved through the consideration of range condition in activity review and assessment and the collective implementation of three principles – cumulative disturbance, habitat amount and arrangement, and sub-range habitat features.</p> <p>As such, measurable parameters for Caribou (Boreal population) should include the following under the proposed Indicators, as per the RMP:</p> <ul style="list-style-type: none"> <li>- Wildlife Habitat Loss/Destruction (Changes to SAR habitat availability) and Wildlife Habitat Alteration/Degradation (Changes to abundance and distribution of SAR habitat) <ul style="list-style-type: none"> <li>o Changes to the amount of range-level cumulative disturbance within the LSA, RSA and individual Caribou ranges (i.e., Principle 1 of the RMP and the 3<sup>rd</sup> line of evidence in the determination of range condition);</li> <li>o Changes to the amount and arrangement of habitat within the LSA, RSA and individual Caribou ranges (i.e., Principle 2 of the RMP and the 2<sup>nd</sup> line of evidence in the determination of range condition);</li> <li>o Changes in the spatial configuration and connectivity of categorized habitats (i.e., Category 1, 2 and 3 habitat as per the <a href="#">General habitat description for the Forest-dwelling Woodland Caribou</a> (i.e., Principle 3 of the RMP); and</li> <li>o Changes in the spatial distribution and movement of animals.</li> </ul> </li> <li>- Wildlife Injury or Death (Changes in SAR populations or SAR mortality) <ul style="list-style-type: none"> <li>o Changes to population size (e.g., minimum animal count or population estimate, where available) (i.e., 1<sup>st</sup> line of evidence in the determination of range condition)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>o Changes to the amount and arrangement of habitat within the LSA, RSA and individual Caribou ranges (i.e., Principle 2 of the RMP and the 2<sup>nd</sup> line of evidence in the determination of range condition);</li> <li>o Changes in the spatial configuration and connectivity of categorized habitats (i.e., Category 1, 2 and 3 habitat as per the <a href="#">General habitat description for the Forest-dwelling Woodland Caribou</a> (i.e., Principle 3 of the RMP); and</li> <li>o Changes in the spatial distribution and movement of animals.</li> </ul> <ul style="list-style-type: none"> <li>- Wildlife Injury or Death (Changes in SAR populations or SAR mortality) <ul style="list-style-type: none"> <li>o Changes to population size (e.g., minimum animal count or population estimate, where available) (i.e., 1<sup>st</sup> line of evidence in the determination of range condition)</li> <li>o Changes to survival rates;</li> <li>o Changes to recruitment rates; and</li> </ul> </li> </ul>			

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		<ul style="list-style-type: none"> <li>o Changes to survival rates;</li> <li>o Changes to recruitment rates; and</li> <li>o Changes to population trend (<math>\lambda</math>) as estimated through consideration of survival and recruitment estimates ( i.e., 2<sup>nd</sup> line of evidence in the determination of range condition).</li> </ul> <p>- Range Condition</p> <ul style="list-style-type: none"> <li>o Additionally, the above changes should be described and considered in an assessment of the potential change to Range Condition for each range in the RSA (i.e., Missisa and Ozhiski).</li> </ul> <p>Please note, this comment also applies to the assessment of cumulative effects in Section 21.4.8.1 (pgs. 21-129 to 21-241).</p> <p>For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nursery area, wintering area) and the area immediately around the dwelling place (i.e. 10 km), which may influence how some or all components of the above will need to be considered under the ESA/SCA.</p> <p>Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.</p>	<ul style="list-style-type: none"> <li>o Changes to population trend (<math>\lambda</math>) as estimated through consideration of survival and recruitment estimates ( i.e., 2<sup>nd</sup> line of evidence in the determination of range condition).</li> </ul> <p>- Range Condition</p> <ul style="list-style-type: none"> <li>o Additionally, the above changes should be described and considered in an assessment of the potential change to Range Condition for each range in the RSA (i.e., Missisa and Ozhiski).</li> </ul>			
29.	Pg. 13-44 / 13.1.6.1	<p>The information provided in the Draft EAR/IS Report scopes assessments of potential effects and net effects at the Project Footprint, LSA and RSA scales. However, information should also be provided at the individual range level.</p> <p>For Boreal Caribou, the range is considered the appropriate biological scale for conservation planning and management. This scale acknowledges that caribou rely on the entire range, including high-use areas, seasonal ranges, and the overall landscape, to carry out their life processes.</p> <p>Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to also consider potential effects at the individual range level.</p>	B – Recommended for EA	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	B. Satisfied for now but will need to see final EA
30.	Pg. 13-74 / 13.2.3.1.1	<p>The Draft EAR/IS Report states, <i>"In 2018, a total of 45 Caribou were recorded across seven (7) locations. Seven groups, each having between one (1) and</i></p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and</p>	B – Recommended for EA	<p>1. Item will be addressed in the Final EAR/IS submission.</p>	A. Satisfied with response

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		<p>13 individuals, were observed. Sixteen (16) Caribou cows and 15 Caribou bulls were identified, with the sex of the remaining 16 being unconfirmed.”</p> <p>This makes no mention of whether calves were identified. Please confirm whether surveyors attempted to age individuals observed in 2018, and if calves were identified. If none were identified, please specify that.</p>	associated Appendices (e.g., Appendix F) as appropriate, to describe whether surveyors attempted to age individual Caribou observed in 2018 and, if so, what the results were. Alternatively, clarify if age was not estimated in 2018.			
31.	Pg. 13-75 / 13.2.3.1.3	<p>The Draft EAR/IS Report states, “<i>The values collected assist with establishing a baseline for comparison during any sampling that may take place post-construction.</i>”</p> <p>In addition to post-construction monitoring, MECP SARB encourages the Project Team to also consider sampling cortisol levels in Caribou during the construction to compare levels between existing conditions (baseline), construction and post-construction.</p> <p>This type of monitoring can support effects and effectiveness monitoring associated with the EA and during the project authorization process, should an authorization under the ESA or SCA be required.</p>	<p>Please consider updating this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report (e.g., Section 22) and associated Appendices (e.g., Appendix F) as appropriate, to also consider sample cortisol levels in Caribou during construction activities and post-construction by revise the statement as follows:</p> <p><i>“The values collected assist with establishing a baseline for comparison during any sampling that may take place <b>during construction and post-construction.</b>”</i></p>	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
32.	Pg. 13-76 / 13.2.3.1.3	<p>The Draft EAR/IS Report states, “<i>Overall, two study members were determined to part of the Boreal population, 049128 and 049132. Caribou 049128 may have had a calf in 2022, but did not have a calf in 2023 and 2024. This individual was too far outside of the study area in 2024 to pursue. Caribou 049132 did not have a calf-at-heel in 2022 and perished prior to the 2023 recruitment survey.</i>”</p> <p>Additional information should be provided, including the age of the two collared Boreal Caribou at the time of capture, and discuss potential reasons why Caribou 049128 may not have had a calf in 2023 and 2024.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to identify the age of the two collared Boreal Caribou at the time of capture and discuss potential reasons why Caribou 049128 may not have had a calf in 2023 and 2024.</p>	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
33.	Pg. 13-76 / 13.2.3.1.3	<p>The Draft EAR/IS Report does not include analysis informed by the Caribou collaring information that the Project Team identified in Section 13.2.1.1.3 (Methods - Caribou Collaring Study) as being informative to the assessment of potential impacts on Caribou and their habitat, including:</p> <ul style="list-style-type: none"> <li>- Annual home range size</li> <li>- Calving areas</li> <li>- Calving events</li> <li>- Parturition dates and locations</li> </ul>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include all relevant information, analyses, and results to describe existing conditions based on the information collected as part of the WSR</p>	A – Required for EA	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>Data from MFCAR and NRL was not available during the WSR baseline but would be considered as part of</p>	<p>A. Satisfied with response</p> <p>Note: Based on discussion with WSR Project Team on December 19, 2025, in which the Project Team clarified that the Final EA</p>

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		<ul style="list-style-type: none"> <li>- Distance travelled to calving sites</li> <li>- Wintering ranges</li> <li>- Travel routes and corridor crossing points</li> <li>- Seasonal movement timeframes</li> <li>- Fidelity to critical habitat features</li> </ul>	<p>Caribou Collaring Study.</p> <p>Note, this should also include Caribou collaring information collected by MNR, NRL, and MFCAR.</p>		detailed design and permitting phase	will include consideration of WSR, NRL and MNR caribou collar data; and that the Proponent Response will be updated to "3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)" and the Final EAR/IS will include a commitment to address this in detailed design by the owner/operator (i.e., consider MFCAR collar data to inform ESA/SCA authorization).
34.	Pg. 13-77 / 13.2.3.1.3	<p>The Draft EAR/IS Report states, "Probability of use for all seasons are given in Figure 13.2, Figure 13.3, Figure 13.4 and Figure 13.5."</p> <p>However, Figure 13-2 illustrates the Caribou and Wolverine Study Areas and none of the Figures show the probability of use by Caribou for the summer season.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a figure of the probability of use by Caribou for the summer season.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
35.	Pg. 13-77 / 13.2.3.1.3  Appendix F / Appendix 11-F	<p>The Draft EAR/IS Report states, "The following paragraphs present a summary of the results of seasonal modelling, for additional details, please refer to Appendix 11-F (Report on Caribou Seasonal Patterns of Habitat Use in the NRL and WSR Study Areas) in Appendix F – NEEC Report." and "The importance of variables differed among seasons, with importance identified in the variable influence diagrams and table of all variables with influence &gt; 1 (refer to Appendix 11-F in Appendix F – NEEC Report)."</p> <p>However, Appendix 11-F in Appendix F was not provided. As such, the details of the seasonal pattern of habitat use are unclear and MECP SARB is unable to provide input on this analysis or its relevance to conclusions made.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include the details associated with the seasonal pattern of habitat use.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
36.	Pg. 13-82 / 13.2.3.1.4	The sections on Survey Results (i.e., Winter Aerial Results) and Wolverine Occupancy Study (i.e., Trail Cameras, Confirmed Individuals) do not reference	Please update this section of the Final EAR/IS Report, and all other relevant	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

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		Appendix F making it difficult to understand all relevant information associated with these field studies and associated results.	locations within the EAR/IS Report, to include reference to Appendix F for more details.			
37.	Pg. 13-83 / 13.2.3.1.4	<p>The Draft EAR/IS Report states, “W06 was recorded four times at the same camera in 2021 and was determined to be a female through genetic analysis. She was presumed to be a young animal based on an absence of visible sexual characteristics, despite being well photographed. W06 was not recorded in 2022 and is presumed to have dispersed or perished.”</p> <p>It's relevant to note adult female Wolverine may only reproduce every 2 years. As such, the absence of sexual characteristics (e.g., visible teats) does not necessarily suggest that this individual was young or non-reproductive.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to either, revise this statement to indicated that W06 was well photographed in 2021 but did not have any visible sexual characteristics, or provide additional rationale and justification to substantiate the statement as is.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
38.	Pg. 13-83 / 13.2.3.1.4	<p>The Draft EAR/IS Report states, “W09 was determined to be a female via photo-documentation, only because she bathed in a puddle in front of run pole. She showed no evidence of lactation and is presumed to have been immature. She is presumed to have a territory adjacent to the LSA and may occasionally cross into the LSA where their ranges overlap with the core population of the LSA.”</p> <p>It's relevant to note adult female Wolverine may only reproduce every 2 years. As such, the absence of sexual characteristics (e.g., visible teats) does not necessarily suggest that this individual was young or non-reproductive.</p> <p>Additional information should be provided on the year(s) in which W09 was photographed.</p> <p>Further, insufficient rationale and justification, including references to literature, was provided on the conclusions made regarding W09 being a female or the assumption her territory was adjacent to the LSA.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to either, revise this statement to indicated that W06 was well photographed in 2021 but did not have any visible sexual characteristics, or provide additional rationale and justification, to substantiate the statement as is; and provide additional rationale and justification, including references to literature, for the conclusions that W09 was female and had a territory adjacent to the LSA.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
39.	Pg. 13-83 / 13.2.3.1.4	<p>The Draft EAR/IS Report states, “A total of four (4) males were confirmed via photo and genetic evidence. Of the four (4), sex for W05 was determined through genetic testing only in 2021. As such W05 is presumed to be a younger male of perhaps 2-4 years old. Males W01, W03, and W10 are presumed adults.”</p> <p>It is unclear why W05 was presumed to be a younger male or why W01, W03 and W10 were presumed to be adults.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include additional rationale for the assumptions of age for these male Wolverine.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA

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40.	Pg. 13-84 / 13.2.3.1.4  and  Appendix F / Pg. 633 / 131.3.3.1.5	<p>The Draft EAR/IS Report states, “A simple estimation of population size for this Mark-Recapture study was calculated using the Lincoln Index (see Appendix F– NEEC Report for details).”</p> <p>Insufficient information was provided on the use of the Lincoln Index to estimate population size (i.e., description of the Lincoln Index, pros/cons, etc.), typical violations and associated consequences (e.g., open population [immigration/emigration, births, deaths] can bias estimate and invalidates closed-population estimator), how the Project Team tested assumptions (e.g., use a colure test or compare multiple close-interval samples), and alternative methods or models explored.</p> <p>Additionally, Section 11.3.3.1.5 of Appendix F of the Draft EAR/IS Report states, “The Lincoln Index makes several assumptions that must be met if the estimate is to be accurate. These assumptions are:</p> <ol style="list-style-type: none"> <li>1. The population of organisms must be closed, with no immigration or emigration;</li> <li>2. The time between samples must be very small compared to the life span of the organism being sampled; and</li> <li>3. The marked organisms must mix completely with the rest of the population during the time between the two samples.</li> </ol> <p>The current study meets assumption 2 and likely assumption 3.”</p> <p>The Draft EAR/IS Report does not discuss the implications of not meeting assumption 1, and possibly assumption 3.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include additional information on the use of the Lincoln Index to estimate population size within the LSA and RSA.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA
41.	Pg. 13-84 / 13.2.3.1.4  and  Appendix F / Pg. 633 / 131.3.3.1.5	<p>The Draft EAR/IS Report states, “A simple estimation of population size for this Mark-Recapture study was calculated using the Lincoln Index (see Appendix F– NEEC Report for details). Through qualitative analysis and use of the Lincoln Index, the population of wolverines using the LSA can be interpreted to range between seven (7) and twelve (12) wolverines. An average of these estimations is 9.4 wolverines.”</p> <p>Section 11.3.3.1.5 of Appendix F of the Draft EAR/IS Report states, “From the seven intervals, six Lincoln Indices were calculated. Once averaged, the population for the study area was calculated to be 9 (9.25) Wolverines.”</p> <p>Insufficient information was provided in this section of the Draft EAR/IS Report and in Appendix F regarding how the Project Team calculated the population of wolverines using the LSA. Additional information should be provided, including:</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include additional information associated with the population estimates and rationale for why the estimated population using the study area is less than the minimum number of individuals confirmed to use the LSA based on the results of the Occupancy Study.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA

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		<ul style="list-style-type: none"> <li>- raw inputs (size of first sample, size of second sample, number of marked individuals recaptured in second sample, etc.), and results (i.e., total size of population) for each of the 7 intervals calculated</li> <li>- variance and confidence intervals</li> <li>- discussion of assumption checks and potential biases</li> </ul> <p>Further, the conclusion that the population for the study area was 9 (9.25) individuals does not appear to align with the results of the Occupancy Study, which the Draft EAR/IS Report states, "A total of twelve (12) individual wolverines were distinguished by way of the occupancy study conducted between 2021 and 2022" (Section 13.2.3.1.4 / page 13-84).</p> <p>This would suggest the Project has the potential to adversely affect a minimum of 12 individuals.</p>				
42.	Pg. 13-85 / 13.2.3.1.4	<p>The Draft EAR/IS Report states, "Evidence of lactation was noted for two (2) of the three (3) females whose territories are expected to overlap more widely across the LSA, indicating that two (2) reproductive females are present. Both females were recorded in 2021 and 2022."</p> <p>Based on the information provided and as per earlier comments regarding conclusions made about W06, it cannot be concluded that this individual was young or of a non-reproductive age given adult female Wolverine may only reproduce every 2 years.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to revise the statement as follows:</p> <p>"Evidence of lactation was noted for two (2) of the three (3) females whose territories are expected to overlap more widely across the LSA, indicating that a <b>minimum of two (2) reproductive females are present. Both females were recorded in 2021 and 2022.</b>"</p>	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
43.	Pg. 13-85 / 13.2.3.1.4	<p>The Draft EAR/IS Report should include a discussion on the likelihood that all Wolverine within the LSA and/or RSA visited the run pole stations and/or were captured on camera (i.e., what is the likelihood there are other Wolverine with home ranges that overlap the LSA and/or RSA that did not visit or approach the run pole stations).</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to revise the statement as follows:</p> <p>"Evidence of lactation was noted for two (2) of the three (3) females whose territories are expected to overlap more widely across the LSA, indicating that a <b>minimum of two (2) reproductive females</b></p>	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA

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			<i>are present. Both females were recorded in 2021 and 2022."</i>			
44.	Pg. 13-85 / 13.2.3.1.4	<p>The Draft EAR/IS Report and supporting information (i.e., Appendix F) lacks a detailed description of Wolverine habitat, both qualitative and quantitative, within the LSA and RSA as it relates to the existing conditions, effects assessment, net effects, and cumulative effects.</p> <p>Section 13.2.3.1.4 of the Draft EAR/IS Report states, "<i>Data from wolverine run pole station occurrences and winter aerial survey data are indicative of preferred habitat in the more upland, densely wooded, and varied habitats present in the west of the Wolverine LSA</i>".</p> <p>Section 13.3.4.1 of the Draft EAR/IS Report states, "<i>Wolverine habitat loss is described as a reduction in total available habitat for the species during one or more stages of their life cycle. Wolverines are a far-ranging species that has been detected at survey sites across the Wolverine LSA. As such, the entire Wolverine LSA and project footprint is considered wolverine habitat, with the possible exception of deep lakes (although these are also utilized as travel paths during the winter).</i>"</p> <p>Section 11.3.3.1.6 of Appendix F notes "<i>As previously stated, no GHD for Wolverine is currently available for Ontario. Wolverine habitat quality appears to be determined by year-round food availability, variety and abundance of both prey and habitat types, and presence of an abundance of denning locations (Banci, 1994; Hornocker and Hash, 1981)</i>".</p> <p>However, neither the Draft EAR/IS Report or Appendix F provides a quantification of the existing amount of Wolverine habitat within the LSA or RSA, as was done for other wildlife species (e.g., Caribou, Bats, etc).</p> <p>MECP SARB acknowledges that the entire LSA and RSA is used by Wolverine, and therefore considered habitat. With this in mind, MECP SARB is supportive of characterizing habitat use as a function of large undisturbed areas, seasonal variation in food abundance and denning requirements, as per supporting literature. However, this will require a clear qualitative description and quantification of large undisturbed areas, food abundance, and potential denning habitat as it relates to the existing environment, effects assessment, residual effects, and cumulative effects.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide a qualitative description and quantification that supports the stated characterization of Wolverine habitat – including current state of large undisturbed areas, food abundance (i.e., moose, caribou, beaver, etc.), and denning habitat – as it relates to the existing condition, effects assessment, residual effects, and cumulative effects. This should include:</p> <ul style="list-style-type: none"> <li>- a quantification of large undisturbed areas that considers an appropriate amount and arrangement necessary to support Wolverine (e.g., use a range of average home range sizes estimated for males and females reported from supporting literature);</li> <li>- a quantification of food abundance drawing on the results of the relevant wildlife disciplines in the Final EAR/IS Report (e.g., moose, caribou, beaver) and/or literature; and</li> <li>- a quantitative and/or qualitative description of potential denning habitat (e.g., amount of forested habitat which may provide the necessary structure[s] to support</li> </ul>	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA

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			den establishment).			
45.	Pg. 13-82 / 13.2.3.1.4	The Draft EAR/IS Report indicates a minimum of 12 unique individuals were identified from photos that provided views of distinct markings, and of those 12 individuals five were female and four were male. The EAR/IS Report should include a discussion on how the other three (3) individuals, which were not sexed, were considered in the calculations of density and reproduction.  Additionally, the EAR/IS Report should discuss how additional Wolverine captured on camera at the run pole stations, but were not identified as an individual or sexed, were considered in the calculations of density and reproduction.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to discuss how the Project Team considered the three individuals which were not sexed, and additional Wolverine captured on camera at the run pole stations, but were not identified as an individual or sexed.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
46.	Pg. 13-88 / 13.2.3.1.5	The Draft EAR/IS Report states, “ <i>Hardwood and mixed treed ecosites older than 80 years, which are most likely to contain the best candidate sites, account for a total of 180.44 ha of suitable bat maternity roost habitat within the LSA.</i> ”  Additional rationale is required, including references to literature, to support scoping hardwood and mixed treed ecosites to older than 80 years.  Additionally, a summary of ecosites sampled through Bat Acoustic Studies should be included.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include rationale and justification, including references to literature, to support scoping hardwood and mixed treed ecosites to older than 80 years.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
47.	Pg. 13-88 / 13.2.3.1.5	The Draft EAR/IS Report states, “ <i>the EA/IA will consider all potential maternity roosting habitat as defined using the ELC communities.</i> ”  However, based on the information provided in Section 13.2.3.1.5 of the Draft EAR/IS Report, Section 10.2.5.1.2 and 10.2.5.2 of Appendix F, and Table 10.5 and Figure 10.6 in Appendix F, it is unclear how the Project Team has characterized species at risk Bat maternity roosting habitat. It appears consideration was given to “treed bat ELC classes” (i.e., potential bat maternity roosting habitat) and “best candidate maternity colony ecosites” (i.e., suggested/best maternity habitat), as discussed and represented in Section 10.2.5.2 of Appendix F. However, it is unclear how the treed bat ELC classes were further scoped to identify best candidate maternity colony ecosites; and if these were used to characterize existing conditions.  Additional clarity is required on how the Project Team identified bat maternity roost habitat, the considerations and decisions made to refine mapping, and the rationale and justification for those decisions. Maps of potential bat maternity roost habitat would also be helpful.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify how the Project Team identified bat maternity roost habitat, the considerations and decisions made to refine mapping, and the rationale and justification for those decisions; and include maps of potential bat maternity roost habitat.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA

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48.	Pg. 13-90 / 13.2.3.2.4	<p>Insufficient information provided on existing conditions for Lesser Yellowlegs. The Existing Conditions portion of the EAR/IS Report should include, at a minimum:</p> <ul style="list-style-type: none"> <li>- <i>Potential Habitat:</i> In the absence of sufficient information to produce a Boosted Regression Tree (BRT) density model or Resource Selection Function (RSF) occurrence mode, use expert opinion based on existing knowledge of Lesser Yellowlegs habitat use/requirements to identify, quantify, and discuss habitat suitability (high, moderate, low, poor) or potential suitable habitat for Lesser Yellowlegs, including associated figures (i.e., comparable to the mapping done as part of the Webequie Supply Road Geotechnical Drilling Programs).</li> <li>- <i>Potential Breeding Pairs:</i> Use the above potential habitat and the existing information on the species' average breeding densities (i.e., average of 1.13 defended territories/10 ha; COSEWIC assessment and status report - Canada 2020) to calculate the potential number of breeding pairs that may be using the Project footprint and LSA.</li> </ul> <p>It's relevant to note that Section 13.3.8.1 of the Draft EAR/IS Report uses the habitat modelling via ELC to quantify the amount of vegetation communities removed by the Project. However, there is little to no information provided in Sections 13.1.2.2.7 or 13.2.3.2.4 that discuss this modelling and/or related vegetation communities relevant to Lesser Yellowlegs to inform the assessment of potential effects.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include additional information to support characterization of existing conditions for Lesser Yellowlegs and effects assessment.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
49.	Pg. 13-91 / 13.2.3.2.7	<p>Insufficient information provided on existing conditions for Short-eared Owl. The Existing Conditions portion of the EAR/IS Report should include, at a minimum:</p> <ul style="list-style-type: none"> <li>- <i>Potential Habitat:</i> In the absence of sufficient information to produce a Boosted Regression Tree (BRT) density model or Resource Selection Function (RSF) occurrence mode, use expert opinion based on existing knowledge of Short-eared Owl habitat use/requirements to identify, quantify, and discuss potential suitable for Short-eared Owl, including associated figures habitat (i.e., comparable to the mapping done as part of the Webequie Supply Road Geotechnical Drilling Programs).</li> <li>- <i>Potential Breeding Pairs:</i> Use the above potential habitat and the existing information on the mean defended territory size (i.e., 82 ha; Ontario Species at Risk Evaluation Report for Short-eared Owl COSSARO 2021) to calculate the potential number of defended</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include additional information to support characterization of existing conditions for Short-eared Owl and effects assessment.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA

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		territories that may be used by multiple breeding pairs to nest within the Project footprint and LSA.  It's relevant to note that Section 13.3.11.1 of the Draft EAR/IS Report uses the habitat modelling via ELC to quantify the amount of vegetation communities removed by the Project. However, there is little to no information provided in Sections 13.1.2.2.10 or 13.2.3.2.7 that provide sufficient information to inform the assessment of potential effects.				
50.	Pg. 13-91 / 13.2.3.2.7	The Draft EAR/IS Report states, " <i>Short-eared Owl were not detected during field studies for the Project, incidentally or otherwise. No Short-eared Owls were detected at any point count locations and given that Short-eared Owls are a relatively non-vocal species, no detections were made on ARUs during the breeding season and fall. Additionally, due to battery and SD card failure, no recordings were available for processing from late winter (February-April).</i> "  Recognizing the Project Team has indicated no Short-eared Owls were detected at any point count locations, additional information on the Breeding Bird Surveys is required to explain why, including: <ul style="list-style-type: none"> <li>- the number of breeding bird point count survey locations were within suitable Short-eared Owl habitat</li> <li>- the percent of Short-eared Owl habitat that was targeted by breeding bird surveys</li> <li>- whether the methodology used for the breeding bird surveys (e.g., survey effort, time of year, time of day, environmental conditions, etc.) aligned with available Short-eared Owl survey protocols (e.g., Species Detection Survey Protocol: 6.0 Short-eared Owl Surveys - Government of Saskatchewan. 2020)</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to provide additional information on the Breeding Bird Surveys to provide a greater understanding of why no Short-eared Owls were detected during surveys.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
51.	Pgs. 13-92 to 13-200 / 13.3.	It is unclear which Project components are being considered as part of "clearing activities" (e.g., ROW, access roads, construction camps, laydown areas, aggregate/quarry sites, etc.) and if all of the Project components were used to estimate the amount of habitat removed by clearing activities – for example, 232.4 ha of Caribou Nursery Area, 546.57 ha of wolverine habitat, etc.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify which Project activities were considered as part of "clearing activities" and used to estimate the amount of habitat removed by clearing activities for each individual species at risk.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA

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52.	Pgs. 13-95 to 13-96 / 13.3.3.1 (Habitat Loss)  Pgs. 13-96 to 13-99 / 13.3.3.2 (Habitat Alteration or Degradation)	In addition to the amount of area that will be removed by clearing activities associated with the Project components, the Project Team should attempt to, where possible: <ul style="list-style-type: none"> <li>- Quantify the number of known and potential new Nursery Areas and Winter Use Areas that will be damaged or destroyed (i.e., include in Table 13-14); and</li> <li>- Quantify the number of known and potential new Nursery Areas and Winter Use Areas within, and within 10 km of, Project Activities that are likely to be impacted by sensory disturbances associated with the Project activities.</li> <li>- Quantify the total amount of area within, and within 10 km of, known and potential new Nursery Areas and Winter Use Areas that are likely to be impacted by sensory disturbances associated with the Project activities.</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include the number of known and potential new Nursery Areas and Winter Use Areas in the assessment of habitat loss, as a result of clearing activities, and habitat alteration and degradation, as a result of sensory disturbance.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
53.	Pg. 13-95 / 13.3.3.1	The Draft EAR/IS Report states, “ <i>The 232.40 ha of Category 1 Nursery Areas estimated to be removed during construction activities represents 0.1% of the known Nursery Areas in the Missisa and Ozhiski Caribou Ranges (RSA).</i> ”  It appears this estimate in Section 13.3.3.1 was based on the area of habitat in which clearing activities are expected to directly remove vegetation based on the physical limits of the ROW and other Project components (e.g., aggregate/quarry sites, work camps, etc.) <u>and did not</u> include a 500 m buffer around each of the Project components to reflect the expected functional habitat loss.  Environment Canada (2011) national meta-analysis showed that a buffer width of approximately 500 metres applied to all anthropogenic disturbance boundaries to account for expected functional habitat loss resulted in the best performing disturbance-recruitment relationship.  As such, the 500 m buffer should be considered in the assessment of habitat loss during construction and operation as the function of areas within 500 metres are an expected loss. The 500 m buffer should not be scoped to the assessment of habitat alteration or degradation, rather the assessment of habitat alteration and degradation should consider the maximum extent in which Project activities are likely to result in a sensory disturbance (i.e., 10 km) and quantify accordingly.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a 500 m buffer on all project components and re-estimate the total amount of known and potential new Category 1 (Nursery Area and Winter Use Area), Category 2 habitat, and Category 3 habitat likely to be lost.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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54.	Pg. 13-95 / 13.3.3.1  Pgs. 13-96 to 13-97 / 13.3.3.2	The Draft EAR/IS Report states, “ <i>The 232.40 ha of Category 1 Nursery Areas estimated to be removed during construction activities represents 0.1% of the known Nursery Areas in the Missisa and Ozhiski Caribou Ranges (RSA).</i> ”  This metric appears to be scoped to the amount of Nursery Area removed by clearing activities during construction as identified by MECP’s GHD Mapping Product. However, as per previous comments the Project Team should be using the best available information (e.g., Caribou collaring data from all available sources, including the NRL, MFCAR and MNR collaring projects) to identify potential new Nursery Areas; and include these in the assessment of potential effects.  Additionally, while Table 13-14 indicates there are no (known) Winter Use Areas within the Caribou LSA or RSA, as identified by MECP’s GHD Mapping Product, the Project Team should also be using the best available information (e.g., Caribou collaring data from all available sources, including the NRL, MFCAR and MNR collaring projects) to identify potential new Winter Use Areas; and include these in the assessment of potential effects.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to update the assessment of impacts to reflect all known and potential new Nursery Areas (and Winter Use Areas).	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.  The reviewer should be aware that both NRL and MFCAR were not available during the writing of the existing conditions report (Appendix F)	B. Satisfied for now but will need to see final EA
55.	Pg. 13-97 / 13.3.3.2	As per previous comments, the 500 m buffer should not be considered in the assessment of habitat alteration and degradation. Rather, the assessment of habitat alteration and degradation should consider the maximum extent in which Project activities are likely to result in a sensory disturbance (i.e., 10 km) and quantify accordingly.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to reconsider how the 500 m buffer is considered as part of the assessment of habitat loss.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
56.	Pg. 13-97 / 13.3.3.2 / Table 13-15	It is unclear why the seasonal use of habitat within 500 m buffered area of Disturbance was scoped to only Spring and Winter Use. Additional information is required on the Summer and Fall Use of habitat within 500 m buffered area.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify why the seasonal use of habitat within 500 m buffered area of Disturbance was scoped to only Spring and Winter Use; and provide additional information on the summer and fall use of habitat within 500 m buffered area.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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57.	Pg. 13-98 / 13.3.3.2	While the Draft EAR/IS Report provides a description of habitat structural changes that may occur, and how that may affect Caribou and/or their habitat, it does not attempt to quantify the amount of habitat likely to be altered or degraded as a result of construction activities.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to provide additional information on the amount of habitat likely to be altered or degraded as a result of construction activities in hectares and percent. Alternatively, describe why this is not possible.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA
58.	Pg. 13-98 / 13.3.3.2	<p>The Draft EAR/IS Report states, “<i>At a minimum, the application of a 500 m buffer on anthropogenic disturbance in Caribou habitat is recommended by ECCC, as 500 m represents an estimated zone of influence imparted by human-caused disturbance (ECCC, 2024a; ECC, 2020; EC, 2011). Within this buffer, approximately 4.68% of existing Category 2 Seasonal Ranges would be altered in the Caribou LSA, and 5.41% of Category 3 habitat; in the Caribou RSA, this reflects an addition of 12,124 ha or 0.12% new anthropogenic disturbance to the area.</i>”</p> <p>As per previous comments, the 500 m buffer should not be considered in the assessment of habitat alteration and degradation. Rather, the assessment of habitat alteration and degradation should consider the maximum extent in which Project activities are likely to result in a sensory disturbance (i.e., 10 km) and quantify accordingly.</p> <p>This section in the Draft EAR/IS Report should be updated to include a description and quantification of the area of Caribou habitat (i.e., Category 1 Nursery Areas and Winter Use Areas, Category 2, and Category 3) within 10 km buffer of all Project components (e.g., ROW, access roads, aggregate and quarry sites, construction camps, etc.) likely to result in a sensory disturbance (e.g., aircraft, tree clearing, aggregate extraction and processing, etc.).</p> <p>A table should be added that is similar to Table 13-14 that summarizes to following:</p> <ul style="list-style-type: none"> <li>- The number of Category 1 habitat (Nursery Areas and Winter Use Areas) within 10 km of the Project components likely to result in a temporary and/or permanent sensory disturbance;</li> <li>- The amount of Category 1 and 2 habitat within 10 km of the Project components likely to be degraded as a result of temporary and/or permanent sensory disturbances; and</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to re-assess Caribou habitat likely to be altered or degraded due to sensory disturbance.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA

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		- The change in area in hectares and percent as a result of the Project likely to be degraded as a result of temporary and/or permanent sensory disturbances, assuming the entire area within 10 km will be affected by construction and operation activities.				
59.	Pg. 13-98 / 13.3.3.2	The Draft EAR/IS Report states, “ <i>During construction, activities such as blasting at quarries/pits, earth hauling and vegetation clearing, and the use of construction lighting, may reduce the ability of Caribou to use habitat in the LSA along the ROW and supportive infrastructure due to sensory disturbances.</i> ”  Other additional Project activities are likely to result in sensory disturbances, including aircraft activity, hauling, grading, etc.  Where possible, it would be helpful to include a detailed table outlining each individual Project activity that is likely to result in a sensory disturbance, and identify whether the sensory disturbance is likely to be temporary or permanent and the distance in which that activity is likely to result in a sensory disturbance to Boreal Caribou during the Nursery Period (May 1 to Sept. 15) degrading Nursery Area habitat, the Winter Use Period (Dec. 1 to Mar. 31) degrading Winter Use Area habitat, and throughout the rest of the year degrading Category 2 habitat. Rationale and justification, including references to literature where available, should be provided to support the Project Teams identification of specific distances.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, providing a comprehensive list of each individual activity likely to result in a sensory disturbance.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
60.	Pgs. 13-98 to 13-99 / 13.3.3.2	The Draft EAR/IS Report states, “ <i>The effects of roads on hydrology and Caribou habitat can occur up to 250 m from the ROW; the habitat alteration assessment uses the same values as those shown in Section 11.3.3.3, with significant effects expected within 20m, moderate effects within 60m and minimal effects experienced at 250 m.</i> ”  Additional information is required on the amount of Caribou habitat within 20 m, 60 m, and 250 m of the Project components, including the ROW, access roads, construction camps, aggregate and quarry sites, etc. This should be summarized in a table which identifies the amount of Category 1, 2 and 3 habitat within those distances as a way to quantify the amount of Caribou habitat likely to be altered or degraded as a result of hydrological changes.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a table summarizing the amount of Caribou habitat within 20m, 60 m, and 250 m of the Project components.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.  2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	B. Satisfied for now but will need to see final EA
61.	Pg. 13-102 / 13.3.3.4	The Draft EAR/IS Report states, “ <i>In the context of the collaring study conducted to describe the baseline conditions, nine (9) of twenty-nine (29) collared caribou tracked over four (4) years died, presumed to have been due to wolf predation, with an annual mortality rate of 12.5%.</i> ”	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F)	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		It is unclear if this metric reflects the full 4 years of survival information associated with the Caribou Collaring Study. Please clarify the years in which each collared caribou died and the results of each mortality investigation. This should also be included for each collared caribou from all available Caribou collaring studies (i.e., NRL, MFCAR, MNR). It would be helpful here to include a table that summarizes the above information.	as appropriate, to clarify the years in which each collared caribou died and the results of each mortality investigation associated with the WSR Caribou Collaring Study, as well as all other Caribou collaring studies (i.e., NRL, MFCAR, MNR).			
62.	Pg. 13-103 / 13.3.3.4	Will there be an increase potential for more trails to be created, particularly snowmobile during the winter, stemming from the creation of the Project which in-turn may increase access for predators and further impact the predator-prey dynamics?	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to expand on the potential for the Project to increase access beyond the Project itself by providing greater access for predators through snowmobile trails.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
63.	Pg. 13-105 / 13.3.3.5 / Table 13-17	Additional rationale and justification are required to support the Project Team's conclusions for each threat assessment criteria associated with each individual threat. For example: <ul style="list-style-type: none"> <li>- based on the description of the threat of habitat loss associated with clearing activities, including loss of Category 1 habitat, it is unclear why the Project Team concluded the scope is small, severity is slight, and magnitude is low. As per previous comments, MECP SARB is also seeking further clarity on the considerations for the best available information (i.e., caribou collaring data from NRL, MFCAR and MNR) as it may affect the assessment and conclusions made regarding the scope, severity and magnitude of this threat.</li> <li>- Based on the description of the threat of habitat alteration and degradation (sensory disturbance), duration of those disturbances throughout construction and operation, and previous comments regarding the consideration of sensory disturbances up to 10 km from Project activities that may result in a sensory disturbance, it is unclear why the Project Team concluded the scope is restricted, severity is slight, magnitude is low, irreversibility is low and degree of effect is low.</li> </ul> <p>For clarity, the above are two examples which are intended to highlight the need for additional rationale and justification for each threat assessment criteria associated with each individual threat.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a detailed description of rationale and justification to support the conclusions for each threat assessment criteria associated with each individual threat.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission. Additional text has been added on constraints and limitations to threats assessment and criteria used. In general the threats assessment has met the requirements in the TISG and this item will not be fully addressed as its considered out of the scope of the approved EA Terms of Reference (ToR).	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
64.	Pg. 13-107 / 13.3.4.2 / Figure 13.7	The Draft EAR/IS Report states, " <i>Figure 13.6 shows the predicted use of the RSA under current conditions for wolverine. Figure 13.7 shows the predicted use under future conditions.</i> "  However, Figure 13.6 on pg. 13-109 is a map of Probability of Use by Caribou for the Summer Season in the Ranges overlaying the RSA; and Figure 13.7 on pg. 13-110 is a map of GHD Caribou Category Two and Three for Existing Conditions.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include the correct figure.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
65.	Pg. 13-108 / 13.3.4.2	Additional information is required on the amount of Wolverine habitat likely to be functionally altered and/or degraded due to sensory disturbance as a result of the Project activities. Based on the information provided and available literature, reproductive females use areas a up to 4 km or more during the Denning Period (January 15 to May 31) (i.e., denning area); and may move kits, abandon the den, and/or abandon the kits when human activities occur within 4 km or more of the den. As such, MECP SARB encourages the Project Team to consider and quantify the amount of Wolverine habitat within 4 km of the ROW and associated infrastructure (e.g., access roads, construction camps, etc.) to represent the amount of area likely to be altered or degraded by sensory disturbances during construction and operation.  This should be summarized in a table as a way to quantify the amount of Wolverine habitat likely to be altered or degraded as a result of hydrological changes.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a table summarizing the amount of Wolverine habitat within 4 km of the Project components likely to be altered or degraded due to sensory disturbance.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
66.	Pg. 13-111 / 13.3.4.2	The Draft EAR/IS Report states, " <i>The effects of roads on hydrology and wolverine habitat can occur up to 250 m from the ROW; the habitat alteration assessment uses the same values as those shown in Section 11.3.3.3, with significant effects expected within 20 m, moderate effects within 60 m and minimal effects experienced at 250 m.</i> "  Additional information is required on the amount of Wolverine habitat within 20 m, 60 m, and 250 m of the Project components, including the ROW, access roads, construction camps, aggregate and quarry sites, etc. This should be summarized in a table as a way to quantify the amount of Wolverine habitat likely to be altered or degraded as a result of hydrological changes.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a table summarizing the amount of Wolverine habitat within 20m, 60 m, and 250 m of the Project components.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
67.	Pg. 13-113 / 13.3.4.2	The Draft EAR/IS Report does not consider the potential for incidental take of Wolverine due to clearing activities as part of the Injury or Death effects. If clearing activities are undertaken during the Wolverine denning period (January 15 to May 31 of any given year) there is potential for kit abandonment resulting in the death of one or more kits.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to incorporate consideration for injury or death due to	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA

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			incidental take.			
68.	Pg. 13-115 / 13.3.4.5	The Draft EAR/IS Report states, " <i>The degree of effect is low for clearance activities, and medium for all others except for the two effects related to sensory disturbances, which is high, and clearance activities, which is very high.</i> "  This appears to contradict itself for the degree of effect for clearance activities. For clarity, Table 13-20 identifies the degree of effect as "very high" for clearance activities.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify the assessment of the degree of effect for habitat loss (clearance activities)	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
69.	Pg. 13-115 / 13.3.4.5	Additional rationale and justification are required to support the Project Team's conclusions for each threat assessment criteria associated with each individual threat for Wolverine.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a detailed description of rationale and justification to support the conclusions for each threat assessment criteria associated with each individual threat for Wolverine.	A – Required for EA	Refer to response to Comment # 63.	B. Satisfied for now but will need to see final EA
70.	Pg. 13-116 / 13.3.5.1	The Draft EAR/IS Report states, " <i>The Project Footprint was overlayed, and the underlying habitat removed. For Myotis bats, this represents a loss of approximately 1.91% of high-use habitat in the LSA and a loss of 0.71% of high-use habitat in the RSA due to road construction and operations (Table 13-21).</i> "  Additional information is required on the amount of bat habitat, in hectares, will be removed by the Project footprint. Table 13-21 should be updated to include this metric.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include the amount of bat habitat removed by the Project footprint.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
71.	Pg. 13-116 / 13.3.5.1 / Figure 13.8	The Draft EAR/IS Report states, " <i>Figure 13.8 shows the predicted use of the RSA under current conditions for bats.</i> "  However, Figure 13.8 on pg. 13-117 is a map of GHD Caribou Category Two and Three for Future Conditions.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include the correct figure.	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
72.	Pg. 13-116 / 13.3.5.1 / Figure 13.8	The Draft EAR/IS Report states, " <i>The results of habitat modelling via Ecological Land Classification (refer to Section 11), and an understanding of the Project Footprint, estimate construction activities will result in the removal of 9.22 ha of high use bat habitat in the LSA, comprised of Mixedwood Swamps (2.45 ha), Open Shore Fen/Thicket Swamp (0.02 ha), Open Shore Shrub Fen (0.83 ha) and River/Open Water (0.92 ha). Mixedwood Swamp is</i>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify how the Project Team identified and quantified potential bat maternity roost habitat and, as	A – Required for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<p><i>rare in the study areas, typically occurring in very small pockets within a Conifer Swamp mosaic.</i></p> <p>As per previous comments, it is unclear how the Project Team identified and mapped potential bat maternity roost habitat; and arrived at these metrics.</p> <p>For clarity, ECL communities identified as Hardwood Forests, Mixedwood Forests, Coniferous Forests, Hardwood Swamp, Mixedwood Swamps, and Coniferous Swamps should be considered potential bat maternity roost habitat, unless sufficient rationale and evidence is provided to support an alternate conclusion.</p>	necessary, provide rationale and justification for decisions to include or remove areas from potential bat maternity roost habitat.			
73.	Pg. 13-120 / 13.3.5.2	<p>The Draft EAR/IS Report states, <i>“The effects of roads on hydrology and bat habitat can occur up to 250 m from the ROW; the habitat alteration assessment uses the same values as those shown in Section 11.3.3.3, with significant effects expected within 20 m, moderate effects within 60 m and minimal effects experienced at 250 m.”</i></p> <p>Additional information is required on the amount of bat habitat within 20 m, 60 m, and 250 m of the Project components, including the ROW, access roads, construction camps, aggregate and quarry sites, etc. This should be summarized in a table as a way to quantify the amount of bat habitat likely to be altered or degraded as a result of hydrological changes.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a table summarizing the amount of bat habitat within 20m, 60 m, and 250 m of the Project components.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
74.	Pg. 13-122 / 13.3.5.4	The section discussing injury and death due to incidental take generally discusses the potential for clearing activities to result in injury or death to bats if conducted during the active season. However, more information should be provided and discussed on the potential for clearing activities to specifically injure or kill pups which are non-volant during the maternity roost period.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to discuss the potential for clearing activities to specifically injure or kill pups which are non-volant during the maternity roost period.	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
75.	Pg. 13-124 / 13.3.5.5	Additional rationale and justification are required to support the Project Team's conclusions for each threat assessment criteria associated with each individual threat for species at risk Bats.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a detailed description of rationale and justification to support the conclusions for each threat assessment criteria associated with each individual threat for species at risk Bats.	A – Required for EA	Refer to response to Comment # 63.	B. Satisfied for now but will need to see final EA

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76.	Pg. 13-142 / 13.3.8.1	<p>The Draft EAR/IS Report states, “<i>While changes are generally concentrated downstream of the effect, they can also take place on the upstream side if channel restriction causes changes to water impoundment. Extreme changes, such as those due to poor road design or large fluctuations in water levels, can lead to death of vegetation and loss of Lesser Yellowlegs habitats as they are converted to open water habitats (Bocking et al., 2017).</i>”</p> <p>Additional clarity is required on the distance in which the potential for hydrological changes may result in habitat loss. In similar sections related to other species at risk (e.g., bats, wolverine, etc.) the Project Team has suggested the effects can occur up to 250 m from the ROW, with significant effects expected within 20 m, moderate effects within 60 m and minimal effects experienced at 250 m.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify the distance(s) in which the potential for hydrological changes may result in habitat loss.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
77.	Pg. 13-144 / 13.3.8.2	<p>The Draft EAR/IS Report states, “<i>It is widely accepted that roads can alter the hydrologic function and characteristics of the landscapes they traverse. While destruction of habitat can result in extreme cases, alteration and degradation of shorebird habitat can occur in many others (Bocking et al., 2017). Flooding events during construction may result in erosion of the ROW and deposition of granular materials into adjacent wetlands and waterways. Conversely, hydrological changes associated with construction may affect wetland drainage patterns, resulting in lower or higher water levels and altering the plant community (Miller et al. 2015). These changes can be extensive, a study within boreal fens in Alberta found pronounced differences in canopy cover up to 250 m from road edges in both rich and poor treed fens (Willier et al., 2022).</i>”</p> <p>Additional information is required on the amount of potential Lesser Yellowlegs habitat within 250 m of the Project components, including the ROW, access roads, construction camps, aggregate and quarry sites, etc. This should be summarized in a table as a way to quantify the amount of potential habitat likely to be altered or degraded as a result of hydrological changes.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a table summarizing the amount of potential Lesser Yellowlegs habitat within 250 m of the Project components.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
78.	Pg. 13-144 / 13.3.8.2	<p>Additional information is required, including references to literature if available, on the distance between Lesser Yellowlegs nests and Project activities which are likely to result in sensory disturbances (e.g., noise, light, dust, vibration), particularly during the nesting period and trigger defensive behaviour from nesting Lesser Yellowlegs. This is necessary to support the threat assessment of habitat alteration or degradation due to sensory disturbances.</p> <p>For instance, in the section related to <i>Habitat Alteration or Degradation due to Sensory Disturbances</i> for Lesser Yellowlegs during operations on page 13-145, the Draft EAR/IS Report states, “<i>Acoustic modeling places the 50 db zone</i></p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include additional information on the distance between Lesser Yellowlegs nests and Project activities which are likely to result in sensory disturbances (e.g., noise, light, dust, vibration), particularly during the	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<p><i>of influence at approximately 125 m beyond the Project footprint (See Appendix J – Noise and Vibration Impact Assessment Report), and 50 dB is the noise level Environment and Climate Change Canada uses in their guidelines to avoid harm to migratory birds (EEEC, 2023)."</i></p> <p>This information should also be included in the section related to <i>Habitat Alteration or Degradation due to Sensory Disturbances</i> for Lesser Yellowlegs during construction on page 13-144.</p>	nesting period and trigger defensive behaviour from nesting Lesser Yellowlegs.			
79.	Pg. 13-148 / 13.3.8.4	The threat assessment for injury or death due to incidental take and predator-prey dynamics should consider the number of breeding pairs that may be injured or killed by vegetation clearing within the Project footprint and LSA. This estimate should be based on the potential habitat and the existing information on the species' average breeding densities (i.e., average of 1.13 defended territories/10 ha; COSEWIC assessment and status report - Canada 2020) to calculate the potential number of breeding pairs that may be using the Project footprint and LSA.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to update the threat assessment for injury or death due to incidental take and predator-prey dynamics associated with Lesser Yellowlegs.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
80.	Pgs. 13-149 to 13-150 / 13.3.8.5	Additional rationale and justification are required to support the Project Team's conclusions for each threat assessment criteria associated with each individual threat for Lesser Yellowlegs.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a detailed description of rationale and justification to support the conclusions for each threat assessment criteria associated with each individual threat for Lesser Yellowlegs.	A – Required for EA	Refer to response to Comment # 63.	B. Satisfied for now but will need to see final EA
81.	Pgs. 13-169 to 13-170 / 13.3.11.1	<p>The Draft EAR/IS Report states, "<i>Project construction may lead to changes in the local hydrogeological environment by increasing, decreasing or redirecting groundwater flows. Changes in surface water conditions can also occur with the installation of crossing structures, changes are generally concentrated downstream of the effect but can also take place on the upstream side if channel restriction causes changes to water impoundment. If these changes are extreme due to poor road design or water level fluctuations, they can lead to death of vegetation and loss of Short-eared Owl habitats, including nest sites.</i>"</p> <p>Additional clarity is required on the distance in which the potential for hydrological changes may result in habitat loss. In similar sections related to other species at risk (e.g., bats, wolverine, etc.) the Project Team has suggested the effects can occur up to 250 m from the ROW, with significant</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to clarify the distance(s) in which the potential for hydrological changes may result in Short-eared Owl habitat loss.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		effects expected within 20 m, moderate effects within 60 m and minimal effects experienced at 250 m.				
82.	Pg. 13-171 / 13.3.11.2	<p>The Draft EAR/IS Report states, “<i>While destruction of habitat can result in extreme cases, it is more probable that alteration and degradation of Short-eared Owl habitat may occur from hydrological changes (Bocking et al., 2017). Hydrological changes associated with construction may affect wetland drainage patterns, resulting in lower or higher water levels and altering the plant community (Miller et al. 2015). As described in Section 11.3.3.3, 91.82% of the project RSA is wetlands, primarily peatlands susceptible to changes in the flow of surface and subsurface water resulting from the bisection of these features by roads with the effects extending up to 250 m from the ROW. Based on the Groundwater assessment (Section 8.5) these changes are certain in the RSA, expected to be low in magnitude and moderate in context, but also permanent, occurring infrequently. Effects on Short-eared Owl habitat could include the loss of nesting locations if the water-table rises, while death of the tree canopy due to higher water tables could make some areas more suitable for Short-eared Owl use.</i>”</p> <p>Additional information is required on the amount of potential Short-eared Owl habitat within 250 m of the Project components, including the ROW, access roads, construction camps, aggregate and quarry sites, etc. This should be summarized in a table as a way to quantify the amount of potential habitat likely to be altered or degraded as a result of hydrological changes.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a table summarizing the amount of potential Short-eared Owl habitat within 250 m of the Project components.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
83.	Pg. 13-171 / 13.3.11.2	<p>The Draft EAR/IS Report states, “<i>Sensory disturbances generated during construction activities such as blasting, quarrying, hauling and clearing may occur during all hours, degrading Short-eared Owl habitat causing avoidance of the ROW and adjacent areas of the LSA.</i>”</p> <p>Additional information is required, including references to literature if available, on the distance between Short-eared Owl habitat and Project activities which are likely to result in sensory disturbances (e.g., noise, light, dust, vibration), particularly during the nesting period. This is necessary to support the threat assessment of habitat alteration or degradation due to sensory disturbances.</p> <p>The Saskatchewan Ministry of Environment's <i>Saskatchewan Activity Restriction Guidelines for Sensitive Species</i> (currently available at <a href="https://publications.saskatchewan.ca/#/products/79241">https://publications.saskatchewan.ca/#/products/79241</a>) includes a setback distance of 500 m from nesting area or suitable habitat during restricted activity periods for Short-eared Owl for high levels of disturbances (e.g., road, battery or compressor station construction, seismic, drilling rigs, trench-in pipeline,</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include additional information on the distance between Short-eared Owl habitat and Project activities which are likely to result in sensory disturbances (e.g., noise, light, dust, vibration), particularly during the nesting period.	B – Recommended for EA	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR).</p>	B. Satisfied for now but will need to see final EA

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		blasting, mines, gravel pit, quarries, rock crushing, asphalt batching, renewable energy projects), which provides an indication of sensory disturbances associated with these activities.				
84.	Pg. 13-148 / 13.3.8.4	The threat assessment for injury or death due to incidental take and predator-prey dynamics should consider the number of defended territories as a means to estimate the number of breeding pairs that may be injured or killed by vegetation clearing within the Project footprint and LSA. This estimate should be based on the potential habitat and the existing information on the species' mean defended territory size (i.e., 82 ha; Ontario Species at Risk Evaluation Report for Short-eared Owl COSSARO 2021) to calculate the potential number of defended territories that may be used by multiple breeding pairs to nest within the Project footprint and LSA.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to update the threat assessment for injury or death due to incidental take and predator-prey dynamics associated with Short-eared Owl.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
85.	Pgs. 13-149 to 13-150 / 13.3.8.5	Additional rationale and justification are required to support the Project Team's conclusions for each threat assessment criteria associated with each individual threat for Short-eared Owl.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices (e.g., Appendix F) as appropriate, to include a detailed description of rationale and justification to support the conclusions for each threat assessment criteria associated with each individual threat for Short-eared Owl.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
86.	Pgs. 13-200 to 13-311 / 13.4 and Appendix E	Broadly, the information provided in Section 13.4 and Appendix E lacks sufficient detail on the proposed mitigation measures and generally do not focus on specific Project activities (e.g., construction of ROW, construction and operation of aggregate sites, work camps, access roads, etc.). Additionally, information provided in Section 13.10 lacks sufficient detail on the proposed pre-construction monitoring, construction monitoring, and post-construction monitoring.  MECP SARB acknowledges the Draft EAR/IS Report indicates an Environmental Management Plan (CMEP) and Operations Environmental Management Plan (OMEP) and associated sub-plans will be developed, including: - Construction Environmental Management Plan (CMEP), including: o Vegetation Management and Monitoring Plan o Wildlife Management and Monitoring Plan o Site Restoration and Monitoring Plan o Air Quality and Dust Control Management Plan o Surface Water and Storm Water Management and Monitoring Plan	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include a commitment that the Project Team will engage the Ministry of the Environment, Conservation and Parks Species at Risk Branch during detailed design stage of the Project in the development of the Environmental Management Plan (CMEP) and Operations Environmental Management Plan (OMEP) and sub-plans as they relate to species at risk, as necessary.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period  3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA

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		<ul style="list-style-type: none"> <li>o Noise and Vibration Management Plan</li> <li>o Construction Blasting Management Plan</li> <li>o Light Management Plan</li> <li>o Construction Waste Management Plan</li> <li>o Health and Safety Management Plan</li> </ul> <ul style="list-style-type: none"> <li>- Operations Environmental Management Plan (OMEP), including updates to the above Plans</li> <li>- Follow-up Monitoring Plan</li> <li>- Vegetation and Invasive Species Management Plan</li> <li>- Erosion and Sediment Control Plan</li> <li>- Site-specific mitigation and monitoring plans to mitigate sensory disturbances where construction activities cannot be avoided during sensitive time periods (referenced in Section 13.4.3.2.1 on page 13-229).</li> </ul> <p>However, these plans should be developed and provided to MECP SARB for review along with the Final EAR/IS Report to inform whether the proposed mitigation and monitoring is appropriate and sufficient.</p>				
87.	Pgs. 13-200 to 13-311 / 13.4 and Appendix E	<p>The proposed measures in Section 13.4 of the Draft EAR/IS Report and Appendix E include actions to eliminate, reduce, or control the effects of the Project, but generally do not appear to include enhancement measures to offset net effects.</p> <p>For awareness, should an authorization be required under the ESA or SCA, various authorization pathways (e.g., Section 17 permit under the ESA; registration under the SCA) may require actions to mitigate lasting impacts to impacted species at risk (e.g., actions to offset net effects). This may include offsite actions to create or enhance species at risk habitat within the LSA or RSA.</p> <p>For example, for some species – such as Caribou and Wolverine – the effective removal and restoration of linear features, such as a winter road or trails, can be a means of mitigating lasting impacts to the species (i.e., removal of other linear features to enhance habitat, improve connectivity, etc. elsewhere in the species distribution within the RSA).</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include enhancement measures for Boreal Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, and Short-eared Owl.	B – Recommended for EA  D – Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA
88.	Pg. 13-207 / 13.4.2.1.1 and	In addition to the proposed mitigation measures to minimize the effects of sensory disturbances, MECP SARB encourages the Project Team to consider ensuring any aircraft used for the Project will maintain an altitude of a minimum 400 m above ground level, except when necessary to land or for safety purposes.	Please updated the Final EAR/IS Report, and all other relevant locations within the Report (e.g., 13.4.2.1.1; 13.4.2.2.1) and associated Appendices (e.g., Appendix E) as appropriate, to include additional	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
	Pg. 13-213 / 13.4.2.2.1		mitigation, as appropriate.			
89.	Pg. 13-211 / 13.4.2.1.2	<p>The Draft EAR/IS Report states, “<b>Impacts from other sources of sensory disturbance are expected to be minimal during the operations phase of the Project. With the predicted low volume of vehicular traffic on the road, operational sensory disturbance is expected to have little effect on SAR beyond what occurs during the construction phase.</b>” [emphasis added]</p> <p>The Draft EAR/IS Report estimates an average annual daily traffic volume of less than 500 vehicles per day during the operation phase of the Project; however, different levels of traffic volume (e.g., low, moderate, or high) are not described. For clarity, assuming a maximum traffic volume of 500 vehicles per day along the 107 km road, a vehicle could be expected to pass approximately every 3 minutes which will likely result in sensory disturbances to species at risk.</p> <p>Additionally, the Project Team's conclusion above does not align with the threat assessment for potential effects on habitat alteration and degradation for Wolverine; and MECP SARB has provided some comments that raise questions about the potential effects for Boreal Caribou.</p> <p>Additional rationale and justification, including references to literature, should be provided to support the Project Teams conclusion that the operational sensory disturbances associated with predicted traffic volume on the road is expected to have little effect on species at risk.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to provide rationale and justification, including references to literature, should be provided to support the Project Team's conclusion that the operational sensory disturbances associated with predicted traffic volume on the road is expected to have little effect on species at risk.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
90.	Pg. 13-213 / 13.4.2.2.1	<p>The Draft EAR/IS Report states, “<b>Avoiding activities (such as heavy machinery use) that are likely to disturb SAR wildlife during sensitive periods in their life cycle.</b>”</p> <p>Additional clarity should be provided on the specific construction activities that will be avoided during SAR sensitive periods.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to clarify which specific construction activities that will be avoided during SAR sensitive periods.</p> <p>If this is not provided in the Final EAR/IS Report, please include a commitment in Final EA for this to be addressed at the detailed design stage.</p>	<p>B – Recommended for EA</p> <p>D – Permitting Related</p>	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed</p>

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91.	Pg. 13-214 / 13.4.2.3.1	In addition to the proposed mitigation measures to minimize the potential for the injury or death of species at risk from collisions with project vehicles and equipment during construction, MECP SARB encourages the Project Team to consider lowering speed limits along portions of the construction site adjacent to, or within a biologically-relevant distance of, species at risk habitat used for the purpose of breeding, rearing or wintering (e.g., within 4 km of Wolverine dens, etc.).	Please updated the Final EAR/IS Report, and all other relevant locations within the Report (e.g., 13.4.2.1.1; 13.4.2.2.1) and associated Appendices (e.g., Appendix E) as appropriate, to include additional mitigation, as appropriate.	B – Recommended for EA  D – Permitting Related	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	design) B. Satisfied for now but will need to see final EA
92.	Pg. 13-215 / 13.4.2.3.2	The Draft EAR/IS Report states, “Where practicable, incorporating measures that reduce the effectiveness of predators during detailed design. These measures may include.”  This appears to be an incomplete sentence.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to complete the sentence.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
93.	Pg. 13-227 / 13.4.3.1.1 (Caribou)  Pg. 13-238 / 13.4.4.1.1 (Wolverine)  Pg. 13-250 / 13.4.5.1.1 (SAR Bats)  Pg. 13-261 / 13.4.6.1.1 (SAR Birds)	MECP SARB acknowledges the commitment to “Developing a Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan in advance of construction. These plans will form subcomponents of the CEMP and will be implemented following Project initiation. To the extent possible, restoration and management plans will be developed in cooperation with Local Rights Holders, relevant Federal and/or Provincial Agencies and other Stakeholders.”  MECP SARB recommends the following as it relates to the proposed Plan(s): <ul style="list-style-type: none"> <li>- The development of the proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan should be completed by a qualified professional with expertise in site reclamation within the Hudson Bay and James Bay Lowlands, or comparably similar ecological conditions.</li> <li>- The development of the proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan should include clear objectives for site restoration with a particular focus on habitat restoration for species at risk, including Boreal Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, and Short-eared Owl.</li> <li>- The proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan should include detailed site-specific preparation and silvicultural actions necessary to achieve the stated objective(s) and consider the</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to include consideration of the <a href="#">Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario   ontario.ca</a> in the development of the proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan during the detailed design stage of the Project; and engage MECP SARB on the Plan to ensure it is appropriate and sufficient for species at risk.	B – Recommended for EA  D – Permitting Related	2  3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA

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		<p>unique type of temporary disturbances (e.g., road, trail, aggregate site, laydown areas, camps, etc.) and pre-existing site conditions (e.g., ecosite, upland or lowland, conifer, mixedwood, deciduous, etc.). For example, temporary roads constructed on upland conifer sites may require active restoration actions such as de-compacting soil and seedling planting to regenerate the site(s) to natural conditions and create of movement barriers to limit predator (e.g., wolf) line-of-sight, movement and hunting efficiency. Alternatively, in some limited instances where temporary disturbance feature(s) in lowland sites receive limited sunlight (e.g., foot trails) passive restoration actions may be appropriate (e.g., natural regeneration).</p> <ul style="list-style-type: none"> <li>- The development of the proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan should be completed with consideration for the <a href="#">Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario   ontario.ca</a>. At a broad scale, this direction is also relevant to Wolverine.</li> <li>- The proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan should include detailed monitoring plans, including timing (e.g., at year 1, 2, 5 and 10 post-planting) and adaptive management actions that will be employed (and when) should monitoring determine the initial restoration efforts are not tracking towards the stated objects for a given site.</li> <li>- In addition to engaging with Indigenous communities, the Ministry of Natural Resources, and local foresters to confirm the proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan, the Ministry of the Environment, Conservation and Parks Species at Risk Branch should also be engaged to ensure the proposed Plan(s) are appropriate and sufficient for species at risk.</li> </ul> <p>Additionally, MECP SARB encourages the Project Team to include a commitment in the Final EAR/IS Report that the proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site</p>				

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		Restoration and Monitoring Plan will be developed <b>in advance of an ESA or SCA authorization of the Project</b> , should an authorization be necessary, to ensure all appropriate actions are taken to restore temporary Project components to suitable habitat for species at risk (e.g., Caribou, Wolverine, Bats, Birds, etc).				
94.	Pg. 13-227 / 13.4.3.1.1	The Draft EAR/IS Report states, <i>“Having qualified project personnel search for aquatic feeding areas, calving areas, and areas of high use for Caribou prior during Construction.”</i>  Additional clarity is required on the methods proposed for field surveys to identify these areas. Alternatively, the methods could be outlined in the appropriate Plan (e.g., Wildlife Management Plan, etc.) in advance of construction.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to clarify the field survey methods for identifying Caribou habitat.  If this is not provided in the Final EAR/IS Report, please include a commitment in Final EA for this to be addressed at the detailed design stage.	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA  Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)
95.	Pg. 13-227 / 13.4.3.1.1	The Draft EAR/IS Report states, <i>“Areas of temporary disturbance will be reclaimed during the construction phase, with vegetation expected to regenerate naturally over time. These areas will be restored to a functional state as soon as possible following the completion of work.”</i>  In some instances, natural regeneration may not be the best approach to restoration of temporary disturbances, and active restoration actions may be preferable, and necessary. MECP SARB encourages the Project Team to consider and implement the guidance related to rehabilitation in the <a href="#">Best management practices for renewable energy, energy infrastructure and energy transmission activities and Woodland Caribou in Ontario</a> .  Please note, adjustments to all mitigation actions related to restoration of temporary disturbances for all species at risk (i.e., Boreal Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, Short-eared Owl) should be modified to indicate the best approach to restoration will be taken, including soil decompaction, natural regeneration (where appropriate), seeding, planting of tree seedlings, etc.; and that site-specific restoration actions will be developed by a Qualified Professional (i.e., forester with input from a biologist with	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to modify mitigation actions associated with restoration of temporary disturbances to the following:  <i>“Areas of temporary disturbance will be reclaimed during the construction phase, with <del>vegetation expected to regenerate naturally over time</del> in alignment with the <a href="#">Best management practices for renewable energy, energy infrastructure and energy transmission activities and Woodland Caribou in Ontario</a>. These areas will be restored to a functional state as soon as possible following the completion of work.”</i>	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA  Note: Based on discussion with Project Team on December 19, 2025, in which the Project Team indicated they would modify the Proponent Response to “1. Item will be addressed in the Final EAR/IS submission”. Specifically, the Project Team indicated they would review terminology in Final EAR/IS to ensure consistency and include high-level commitment to

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		expertise in each species at risk) with consideration for ecosite characteristics (e.g., soil, moisture regime) and relevant factors (e.g., surrounding vegetation, available light, etc.) and outlined in the Site Restoration and Monitoring Plan.				rehabilitate/restore temporary areas and likely remove terminology such as "decommission".
96.	General	<p>Broadly, the Draft EAR/IS Report indicates that reclamation (restoration) approaches will facilitate natural regeneration (i.e., succession), and will occasionally be augmented by planting or seeding self-sustaining species native to the RSA or transplanting self-sustaining species from within the RSA.</p> <p>MECP SARB strongly encourages the Project Team to adjust all mitigation actions related to restoration of temporary disturbances for all species at risk (i.e., Boreal Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, Short-eared Owl) to indicate:</p> <ul style="list-style-type: none"> <li>- The best approach to restoration will be taken, including the application of all necessary silvicultural actions (e.g., soil decompaction, scarification, etc.) and either natural regeneration, seeding, or planting of tree seedlings, as appropriate.</li> <li>- Site-specific restoration actions will be developed by a Qualified Professional (i.e., forester with input from a biologist with expertise in each species at risk) with consideration for ecosite characteristics (e.g., soil, moisture, nutrient, and vegetation conditions, etc.) and other relevant factors (e.g., available light, etc.) and outlined in the Site Restoration and Monitoring Plan.</li> </ul> <p>The above mitigation measures may be required as part of an authorization under the ESA or SCA, should one be required.</p>	<p>Please update the Final EAR/IS Report, and associated Appendices (e.g., Appendix E) as appropriate, to update all mitigation actions related to restoration of temporary disturbances for all species at risk (i.e., Boreal Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, Short-eared Owl) to indicate:</p> <ul style="list-style-type: none"> <li>- The best approach to restoration will be taken, including the application of all necessary silvicultural actions (e.g., soil decompaction, scarification, etc.) and either natural regeneration, seeding, or planting of tree seedlings, as appropriate.</li> <li>- Site-specific restoration actions will be developed by a Qualified Professional (i.e., forester with input from a biologist with expertise in each species at risk) with consideration for ecosite characteristics (e.g., soil, moisture, nutrient, and vegetation conditions, etc.) and other relevant factors (e.g., available light, etc.) and outlined in the Site Restoration and Monitoring Plan.</li> </ul>	<p>B – Recommended for EA</p> <p>D – Permitting Related</p>	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	<p>B. Satisfied for now but will need to see final EA</p>
97.	Pg. 13-227 / 13.4.3.1.1	<p>For awareness, Ontario has delineated Nursery Areas and Winter Use Areas based on observations of animals, evidence of use (e.g., tracks, beds, pellets, slushing, cratering, etc.), and collaring information collected between May 1 to September 15 and December 1 to March 31, respectively.</p> <p>The Draft EAR/IS Report should include an additional commitment that the appropriate entity for the construction and operation of the road (e.g., owner,</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include an additional commitment to acquire Boreal Caribou protected habitat information; and request</p>	<p>B – Recommended for EA</p>	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	<p>B. Satisfied for now but will need to see final EA</p>

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		contractor) will establish a sensitivity data license agreement with the Ministry of the Environment, Conservation and Parks Species at Risk Branch for the Project to acquire Boreal Caribou protected habitat information which will support other proposed mitigation commitments (e.g., avoid activities within nursery areas and winter use areas during the sensitive periods).  Additionally, MECP SARB recommends the EAR/IS Report include a commitment to seek updated protected habitat information annually to ensure the Project is using the best available information.	updated mapping annually during the detailed design stage, Construction stage, and operation stage of the Project to ensure the Project is using the best available information throughout all stages of the Project.			
98.	Pg. 13-228 / 13.4.3.1.1	The Draft EAR/IS Report states, “ <i>Qualified personnel will carry out site visits and inspections to verify environmental protection measures have been correctly implemented and are maintained until vegetation has re-established itself.</i> ”  MECP SARB encourages the Project Team to consider a comprehensive monitoring program of all areas in which restoration measures have been undertaken, specifically monitoring areas in years 2, 5, and 10 after restoration actions and modifying actions to achieve the objective for each area, as necessary.  Please note, should an authorization under the amended ESA be required this type of effectiveness monitoring is likely to be required. It is also anticipated that effectiveness monitoring will also be required as part of an authorization under the future SCA, should authorization be required.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include a commitment to develop and implement a comprehensive habitat restoration monitoring program for all areas in which restoration measures are undertaken as part of the Operation Environmental Management Plan and all relevant component management plans during the detailed design stage of the Project.	B – Recommended for EA  D – Permitting related	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
99.	Pg. 13-228 / 13.4.3.2.1	The Draft EAR/IS Report states, “ <i>The creation of early successional habitat may benefit Caribou as this will create areas of browse in construction clearances and near the road during both construction and operations phases.</i> ”  Areas of early succession are not beneficial to Boreal Caribou as they typically create browse species which attract alternate prey and increase predator densities. Please clarify what is meant by this statement.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to clarify the statement.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
100.	Pg. 13-229 / 13.4.3.2.1  and  Pg. 13-230 / 13.4.3.3.1	Section 13.4.3.2.1 of the Draft EAR/IS Report states, “ <i>It is anticipated that these measures will effectively mitigate any potential short-term changes to the movement of Caribou caused by sensory disturbance at the Project site (i.e., during the construction phase). As a result, the topic of ‘Sensory Disturbance’ has not been carried forward to Section 12.5 (Characterization of Net Effects).</i> ”  Additionally, Section 13.4.3.3.1 of the Draft EAR/IS Report states, “ <i>It is anticipated that these measures, along with those described in Section Error! Reference source not found. (Measures to Mitigate Against Potential Effects of</i>	Please consider updating the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to reconsider the mitigation measures and their effectiveness in avoiding sensory disturbances to Boreal Caribou and carry forward the topic of sensory disturbances	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<p><i>Sensory Disturbance on SAR Movement) and those in Appendix E (Mitigation Measures) will effectively alleviate potential changes to Caribou movement caused by sensory disturbance during the construction phase. This topic has therefore not been carried forward to Section 13.5 (Characterization of Net Effects)."</i></p> <p>MECP SARB disagrees with the Project Team's conclusion that the proposed mitigation measures will effectively mitigating any potential short-term changes to the movement of Caribou caused by sensory disturbances, and encourages the Project Team carry forward the topic of sensory disturbances to Section 12.5 (Characterization of Net Effects).</p> <p>While the proposed mitigation measures may minimize sensory disturbances, they will not avoid them altogether given the Project construction and operation will increase sound, light, dust, etc. above current levels, despite mitigation measures. Further, the Project Team has acknowledged that some key proposed mitigation measures may not be practicable or adhered to (e.g., adherence to timing windows). It is understood that some construction activities will be undertaken during the sensitive time periods for Boreal Caribou and operation of the Project will occur year-round. Consequently, it will not be possible to avoid sensory disturbances. As such, it is anticipated that sensory disturbances will likely alter and degrade Boreal Caribou habitat and alter their movement in the short, medium and long term.</p> <p>Please also consider previous comments from MECP SARB regarding the consideration of the best available information (e.g., collaring data) in characterizing existing conditions and potential sensory disturbances to Boreal Caribou and their habitat.</p>	to Section 12.5 (Characterization of Net Effects).			
101.	Pg. 13-230 / 13.4.3.3.1	<p>The Draft EAR/IS Report does not include any mitigation measure specific to aggregate operations to minimize sensory disturbances to Caribou.</p> <p>MECP SARB encourages the Project Team to consider avoiding activities that generate loud noises within 10 km of known and potential new Caribou nursery areas and winter use areas during the nursery period (May 1 to Sept. 15) and winter use period (Dec. 1 to Mar. 31), respectively – such as blasting, rock crushing and screening, sustained use of heavy equipment (e.g., bulldozers and graders), and any other activities that generate loud noises.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include mitigation measures that will minimize sensory disturbances to Caribou during the nursery period (May 1 to Sept. 15) and winter use period (Dec. 1 to Mar. 31) associated with aggregate operations.</p> <p>If this is not provided in the Final EAR/IS</p>	<p>B – Recommended for EA</p> <p>D – Permitting related</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address</p>

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		Alternatively, if the Project is unable to avoid undertaking activities that result in a sensory disturbance to Caribou during the sensitive periods, an authorization under the ESA or SCA will be required.	Report, please include a commitment to incorporate mitigation measures in the Operation Environmental Management Plan and all relevant component management plans during the detailed design stage that will minimize sensory disturbances to Caribou during the nursery period (May 1 to Sept. 15) and winter use period (Dec. 1 to Mar. 31) associated with aggregate operations.			outside of the EAR/IS review process (i.e., permitting, detailed design)
102.	Pg. 13-232 / 13.4.3.4.1	The Draft EAR/IS Report states, " <i>Road maintenance activities will not occur during sensitive life cycle periods, such as calving season.</i> "  Please clarify if the contractor will be able to adhere to this mitigation measure, recognizing the sensitive period for Boreal Caribou breeding (i.e., calving) and rearing is considered May 1 to September 15 and wintering is considered December 1 to March 31. Will there be instances where road maintenance will be required for health and safety purposes, regardless of the area or time period?	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to clarify the statement and modify, as necessary.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
103.	Pg. 13-232 / 13.4.3.4.1	The Draft EAR/IS Report states, " <i>Speed limits will be enforced in known Caribou crossing areas and other sensitive habitats.</i> "  Please clarify if speed limits will be reduced within a biologically relevant distance of Nursery Areas and Winter Use Areas during the sensitive periods for Boreal Caribou (May 1 to Sept. 15 and Dec. 1 to Mar. 31, respectively); and if so, what the speed limits will be in these areas.  Specific reduced speed limits should also be specified for all other species at risk (i.e., Wolverine, bats, Lesser Yellowlegs, Short-eared Owl) within appropriate biologically relevant distances.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to clarify if speed limits will be reduced within a biologically relevant distance of Boreal Caribou habitat and other species at risk; and if so, what the speed limits will be in these areas.  If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA

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104.	Pg. 13-238 / 13.4.4.1.1	The Draft EAR/IS Report states, “ <i>Having qualified biologists or resource specialists review aerial imagery and make note of vegetation communities that may contain fallen trees (e.g., areas of blowdown) while conducting aerial surveys (targeting Caribou) prior to construction.</i> ” [emphasis added]  Please clarify if pre-construction surveys will also be undertaken within 4 km of construction activities to identify potential Wolverine dens and/or denning areas through the identification of tracks leading to/from areas of fallen trees, boulders, snow drifts, etc.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to clarify if pre-construction surveys will also be undertaken to identify potential Wolverine dens and/or denning areas through the identification of tracks leading to/from areas of fallen trees, boulders, snow drifts, etc.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
105.	Pg. 13-238 / 13.4.4.1.1	The Draft EAR/IS Report states, “ <i>Clearly marking a vegetation protection zone (buffer or setback) between key ecological features for wolverine (e.g., confirmed wolverine den sites) and the Project Footprint. A minimum setback distance of 2km from den sites will be implemented between June 2 and January 31 of the calendar year, unless den use continues beyond this date, in which these measures will continue to be implemented.</i> ” [emphasis added]  As per previous comments, please consider existing evidence which indicates reproductive females use areas double that identified in this mitigation measure (i.e., 4 km or more) during the Denning Period (January 15 to May 31); and may move kits, abandon the den, and/or abandon the kits when human activities occur within 4 km of the den. As such, setback distances from Wolverine dens should be expanded to a minimum of 4 km buffer (i.e., diameter of 8 km centred on the den site).  Additionally, it is unclear why June 2 and January 31 have been identified for application of the setback distances. MECP SARB encourages the Project Team to avoid construction activities and maintenance activities during operation of the Project between January 15 to May 31 within 4 km or more of <b>confirmed or suspected</b> den sites. As per previous comments, suspected den sites can be identified through winter aerial surveys in which high track density (e.g., 2+ sets of tracks) and/or tracks leading to/from areas of fallen trees, boulders, snow drifts, etc. are observed.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to modify the proposed mitigation measure as follows:  “ <i>Clearly marking a vegetation protection zone (buffer or setback) between key ecological features for wolverine (e.g., confirmed and suspected wolverine den sites) and the Project Footprint. A minimum setback distance of 2 4 km or more from den sites will be implemented between <b>January 15 to May 31</b> <del>June 2 and January 31 of the calendar year,</del> unless den use continues beyond this date, in which <b>case</b> these measures will continue to be implemented.</i> ”	B – Recommended for EA	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA
106.	Pg. 13-241 / 13.4.4.3.1	The Draft EAR/IS Report states, “ <i>Construction of the WSR will be completed in phases, with construction sites having breaks in between to permit wildlife passage. The physical breaks between construction sites should be at least 1km, and preferably more if the presence of wolverine has been confirmed or is considered highly probable.</i> ”	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include a commitment to consider biologically appropriate breaks	B – Recommended for EA  D – Permitting related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA  Note: based on discussion with the WSR Project Team on

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		Recognizing field studies undertaken to inform characterization of existing conditions demonstrated Wolverine are distributed throughout the Project footprint and LSA, and existing evidence demonstrating Wolverine avoidance of human activities by 4 km or more, a 1 km break between construction sites is unlikely to mitigate effects on the species. MECP SARB encourages the Project Team to consider implementing a minimum 4 km break between construction sites to enable Wolverine movement.	in construction sites for Wolverine, as appropriate, and where this is not possible include a statement that acknowledges an authorization under the amended ESA or future SCA may be required.			December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)
107.	Pg. 13-241 / 13.4.4.3.1	<p>The Draft EAR/IS Report does not include any mitigation measure specific to aggregate operations.</p> <p>MECP SARB encourages the Project Team to consider avoiding activities that generate loud noises within 4 km of Wolverine dens, or suspected Wolverine denning areas, during the denning period – such as blasting, rock crushing and screening, sustained use of heavy equipment (e.g., bulldozers and graders), and any other activities that generate loud noises.</p> <p>Alternatively, if the Project is unable to avoid undertaking activities that result in a sensory disturbance to Wolverine during the denning period (i.e., January 15 to May 30), an authorization under the ESA or SCA will be required.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include mitigation measures that will minimize sensory disturbances to Wolverine during the denning period associated with aggregate operations.</p> <p>If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.</p>	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)</p>
108.	Pg. 13-243 / 13.4.4.4.1	<p>The Draft EAR/IS Report states, <i>“If an active den is encountered, construction work will stop immediately, and the appropriate project personnel and regulatory agencies will be contacted. The den will be marked, and a buffer established. No work will take place within the buffer until clearance is issued by the MECP.”</i></p> <p>Please note work should stop if a Wolverine den is encountered or suspected, and a setback distance of a minimum of a 4 km buffer should be applied in which all work is ceased during the denning period (i.e., January 15 to May 31). For work to continue during the denning period, an authorization under the ESA (i.e., permit) or SCA (e.g., permit or registration) will be required in advance of activities.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to modify the proposed mitigation, as follows:</p> <p><i>“If an active den is encountered, construction work will stop immediately, and the appropriate project personnel and regulatory agencies will be contacted. The den will be marked, and a 4 km buffer established. No work will take place within</i></p>	<p>B – Recommended for EA</p> <p>D – Permitting Related</p>	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA

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			<i>the buffer until <del>clearance is issued by the MECP</del> after the denning period. Where this is not possible, an authorization under the Endangered Species Act, 2007 or Species Conservation Act, 2025 will be required, as appropriate."</i>			
109.	Pg. 13-250 / 13.4.5.1.1	<p>The Draft EAR/IS Report states, "<i>Having qualified biologists or resource specialists delineate (with flagging, fencing or another appropriate marker) a <b>vegetation setback (i.e., buffer or protection zone) of 120 m from any maternity roosting habitat identified during monitoring for construction.</b></i></p> <p><i>Avoiding vegetation removal within this protection zone, to the extent practicable, until there has been engagement with and approval from the appropriate regulatory agencies (e.g., MECP, CWS-ECCC)."</i> [emphasis added]</p> <p>The Draft EAR/IS Report further states, "<b>To the extent practicable</b>, avoiding other construction or maintenance-related activities within 120 m of suitable maternity roosting habitat for SAR bats between May 1 and August 31.</p> <ul style="list-style-type: none"> <li>- If there is a proposal to remove potential maternity roosting habitat during this window, qualified biologists will carry out <b>pre-clearance ground sweeps</b> to assess habitat occupancy.</li> <li>- Removal of confirmed maternity roosting habitat or its buffer will be subject to federal or provincial (depending on jurisdiction) species at risk permitting requirements and site-specific mitigation measures that would be developed in consultation with MNR, MECP, and CWS/ECCC. Local Indigenous communities will be notified." <p>Based on these mitigation measures, it appears tree/vegetation clearing could still be carried out during the bat maternity roost period. However, it is unclear how often trees/vegetation will be cleared during the bat maternity roost period and how often pre-clearance ground sweeps will be carried out, how potential roost trees will be identified to be surveyed, the forest types where the pre-clearance ground sweeps will be completed, the timing of pre-clearance ground sweeps during the maternity roost period (e.g. carried out when pups are volant), the timing of pre-clearance ground sweeps at potential maternity roosts prior to clearing of potential roosts, the survey effort and survey timing at potential maternity roost trees to rule out as used as maternity roosts, the use of acoustic monitoring paired with exit surveys, and if stop-work measures or</p> </li></ul>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to modify the mitigation, as appropriate, or provide additional details on proposed mitigation measures to support understanding and input.</p> <p>If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.</p>	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)</p>

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		<p>clearing setbacks/buffers will be implemented if maternity roost trees are encountered during the surveys.</p> <p>For awareness, pre-clearance ground sweeps in forested habitats may not be effective, are generally not supported, and would likely not avoid all impacts to species at risk bats if tree/vegetation clearing is proposed during the bat maternity roost period. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer prohibited. Undertaking an activity that results in harm to species at risk or killing a species at risk continues to be prohibited. As such, any activities associated with the Webequie Supply Road should consider adverse impacts to species at risk Bats and their habitat (e.g. maternity roosts) if tree/vegetation clearing during the bat maternity roost period is proposed and seek authorization under the ESA or SCA, as required.</p> <p>MECP SARB encourages the Project Team to consider implementing a setback distance of 1 km from all maternity roost habitat and avoid vegetation clearing within this zone during the maternity roost period (i.e., Apr. 15 to Oct. 15).</p> <p>Additionally, please note an authorization under the ESA (i.e., permit) or SCA (e.g., permit or registration) may be required for vegetation clearing of species at risk maternity roost habitat in advance of activities.</p>				
110.	Pg. 13-252 / 13.4.5.2.1	<p>The Draft EAR/IS Report states, "<i>In Northern Ontario, the active season for these species extends from May 1 to August 31.</i>"</p> <p>MECP SARB notes that the active season for the two bat species considered in the Draft EAR/IS Report, Little Brown Myotis and Northern Myotis, is May 1 to August 31. However, as per previous comment regarding the listing of Hoary Bat, Silver-haired Bat, and Eastern Red Bat, please note that the active season for these migratory species in Northern Ontario is April 15 to Oct. 15.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to modify the mitigation, as appropriate.</p> <p>If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.</p>	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)</p>

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111.	Pg. 13-252 / 13.4.5.2.1	<p>The Draft EAR/IS Report states, “<i>If it is determined that there is a need to conduct blasting within 500 m of probable maternity roosting habitat for these two species during the previously mentioned window, qualified biologists will carry out pre-blasting sweeps to assess habitat occupancy.</i></p> <p><i>Should habitat use be confirmed, a minimum 500 m setback from the habitat will be flagged or otherwise marked. The vegetation barrier will be maintained between the Project Footprint and maternity-roosting habitat. Blasting in that area will be subject to federal or provincial authorizations (e.g., CWS-ECCC, MECP) and will likely require site-specific mitigation measures and/or adherence to SAR permitting requirements.</i>”</p> <p>Please note, MECP SARB is generally unsupportive of pre-blasting sweeps given the extensive area that would need to be monitored and potential for some treed roosts to be missed.</p> <p>Should this mitigation measure be supported, additional information is required on the proposed methods for pre-blasting sweeps.</p> <p>Despite pre-blasting sweeps, an authorization under the ESA (i.e., permit) or SCA (e.g., permit or registration) will likely be required for any blasting activities within 500 meters of potential bat maternity roost habitat during the active period (i.e., Apr. 15 to Oct. 15) of any given year.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to modify the mitigation, as appropriate.</p> <p>If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.</p>	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)</p>
112.	Pg. 13-254 / 13.4.5.2.2	<p>The Draft EAR/IS Report states, “<i>Continuing to implement Best Management Practices that minimize soil compaction and retain permeability.</i></p> <p><i>Continuing to implement BMPs that minimize dewatering during operations.</i>”</p> <p>Please provide details on the specific mitigation measures the contractor will implement outlined in BMP's. Alternatively, please update this mitigation measure to reference the specific BMP's or section of the EAR/IS Report where these actions are provided.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to modify the mitigation, as appropriate.</p> <p>If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.</p>	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)</p>

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113.	Pg. 13-261 / 13.4.6.1.1	<p>The Draft EAR/IS Report states, “<i>Having qualified biologists or resource specialists conduct ground sweeps prior to the onset of construction to confirm that the nests of SAR birds, and other critical habitats have been identified.</i>”</p> <p>These mitigation measures suggest that tree/vegetation clearing could still be carried out during the migratory bird nesting period. Based on the information provided, it is unclear how often trees/vegetation will be cleared during the bird nesting period and how often ground sweeps will be carried out, the spacing of transects/meanders during the survey, what habitat types the ground sweeps will be completed in, if stop-work measures will be implemented if species at risk nests/birds are encountered, and the setback distance of activity disturbance buffers implemented around Lesser Yellowlegs and Short-eared Owl nests if these nests are encountered during the surveys.</p> <p>Additionally, while ground sweeps can be effective for some bird species, caution should be taken for Lesser Yellowlegs and Short-eared Owl given these are ground nesting species. Additionally, Short-eared Owl nests are typically only found by flushing the individuals which may result in adverse effects to the nesting pair, their eggs, or young.</p> <p>Specific field survey methods should be provided. MECP SARB recommends the following as a starting point and encourages the Project Team to provide any additional details, as appropriate:</p> <p><u>Lesser Yellowlegs</u></p> <ul style="list-style-type: none"> <li>Ground surveys completed by a Qualified Professional before work is started during the Nesting Period (May 1 to August 31) to detect Lesser Yellowlegs nests and/or nesting behaviour (e.g., distraction displays, defensive dives, alarm calls/vocalizations, repeated low flights/approaches to one locality, adult carrying nesting material, food-carrying, etc.) in suitable habitat within 200 m of construction activities. Where possible, repeat visits (e.g., 4+) should be conducted to increase likelihood of identifying presence of nesting individuals. Note, once Lesser Yellowlegs are detected within 200 m of construction activities, subsequent survey visits are not necessary within that breeding season. However, if the appropriate number of repeat surveys are not conducted to detect the species, presence should be assumed in suitable habitat within 200 m of the geotechnical activity location(s).</li> </ul>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include specific field survey methods for undertaking ground sweeps.</p> <p>If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.</p>	<p>B – Recommended for EA</p> <p>D – Permitting Related</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	<p>B. Satisfied for now but will need to see final EA</p> <p>Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)</p>

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		<ul style="list-style-type: none"> <li>▪ If a potential nest is identified based on visual observation or nesting behaviour, or assumed to be present, nests should not be approached and activities within 200 m of the nest or suitable habitat (if assumed) should be rescheduled to outside of the Nesting Period (i.e., May 1 to August 31), where possible.</li> <li>▪ Where rescheduling the activity outside the Nesting Period is not possible, an authorization under the ESA (i.e., permit) or SCA (e.g., permit or registration) will likely be required in advance of activities.</li> </ul> <p><u>Short-eared Owl</u></p> <ul style="list-style-type: none"> <li>○ Ground surveys completed by a Qualified Professional before work is started during the Nesting Period (May 1 to August 31) to detect Short-eared Owl nesting behaviour (e.g., distraction displays, defensive dives, wing-claps, delivering prey) in suitable habitat within 500 m of construction activities. Note, surveys should not include playback calls. Where possible, repeat visits (e.g., 4 - 6) should be conducted to increase likelihood of identifying presence of nesting individuals. Once Short-eared Owl are detected within 500 m of construction activities, subsequent survey visits are not necessary within that breeding season. However, if the appropriate number of repeat surveys are not conducted to detect the species, presence will be assumed in suitable habitat within 500 m of the geotechnical activity location(s). <ul style="list-style-type: none"> <li>▪ If a nesting area is identified based on visual observation or nesting behaviour, or assumed to be present, nests should not be approached and activities within 500 m of the nesting area or suitable habitat (if assumed) should be rescheduled to outside of the Nesting Period (i.e., May 1 to August 31), where possible, in alignment with the recommended setback distances in the <i>Saskatchewan Activity Restriction Guidelines for Sensitive Species</i> currently available at <a href="https://publications.saskatchewan.ca/#/products/79241">https://publications.saskatchewan.ca/#/products/79241</a>.</li> </ul> </li> <li>▪ Where rescheduling the activity outside the Nesting Period is not possible, an authorization under the ESA</li> </ul>				

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		(i.e., permit) or SCA (e.g., permit or registration) will likely be required in advance of activities.  For awareness, ground sweeps for Lesser Yellowlegs and Short-eared Owl may not be effective and are generally not supported, and would likely not completely avoid impacts to species at risk birds and nests if tree/vegetation clearing is proposed during the bird nesting period. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a species at risk is no longer prohibited. However, undertaking an activity that results in harm to species at risk or killing a species at risk continues to be prohibited. As such, any activities associated with the Webequie Supply Road should consider adverse impacts to Lesser Yellowlegs and Short-eared Owl and their habitat (e.g. nests) if tree/vegetation clearing during the bird nesting period is proposed and seek Project authorization under the ESA or SCA, as required.				
114.	Pg. 13-261 / 13.4.6.1.1	The Draft EAR/IS Report states, “ <i>To the extent practicable, avoiding vegetation clearance and activities that disturb the ground between April 25 and August 29 of the calendar year, which is the active season for migratory birds in Northern Ontario.</i> ”  Please note, if vegetation clearing cannot be avoided during the nesting period for Lesser Yellowlegs and/or Short-eared Owl an authorization under the ESA (i.e., permit) or SCA (e.g., permit or registration) will be required in advance of activities. Broadly, the nesting period for these species in the Far North of Ontario should be April 15 to August 31, consistent with the nesting periods outlined for Nesting Zone C6 ( <a href="#">Nesting periods - Canada.ca</a> ) and consideration for fall migration, unless sufficient rationale can be provided for alternate dates.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to specify that the proponent of the Project will obtain an authorization under the ESA (i.e., permit) or SCA (e.g., permit or registration) in advance of activities if vegetation clearing cannot be avoided during the nesting period for Lesser Yellowlegs and/or Short-eared Owl.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
115.	Pg. 13-267 / 13.4.6.3.1	Consistent with mitigation measures associated with blasting for species at risk Bats, MECP SARB encourages the Project Team to consider including the following mitigation measures to minimize sensory disturbance to all species at risk birds or, at a minimum, Lesser Yellowlegs and Short-eared Owl:  <ul style="list-style-type: none"> <li>- If it is determined that there is a need to conduct blasting within 500 m of potential Lesser Yellowlegs and/or Short-eared Owl habitat during the nesting period (i.e., April 15 to August 31), qualified biologists will carry out pre-blasting sweeps to assess habitat occupancy.</li> <li>- Should habitat use be confirmed, a minimum 500 m setback from the habitat will be flagged or otherwise marked. The vegetation barrier will be maintained between the Project Footprint and maternity-roosting habitat. Blasting in that area will be subject to federal or provincial</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix E) as appropriate, to include additional mitigation, as appropriate.  If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.	B – Recommended for EA  D – Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA  Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS

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		<p>authorizations (e.g., CWS-ECCC, MECP) and will likely require site-specific mitigation measures and/or adherence to SAR permitting requirements.</p> <p>Should this mitigation measure be supported, additional information is required on the proposed methods for pre-blasting sweeps, as per previous comments on sweeps for Lesser Yellowlegs and Short-eared Owl.</p> <p>Despite pre-blasting sweeps, an authorization under the ESA (i.e., permit) or SCA (e.g., permit or registration) will likely be required for any blasting activities within 500 meters of potential Lesser Yellowlegs and Short-eared Owl habitat during the nesting period (i.e., Apr. 15 to Aug. 31) of any given year.</p>				review process (i.e., permitting, detailed design)
116.	Pg. 13-316 / 13.5.2 / Table 13-42	<p>Additional rationale is required to support the Project Team's approach to "Quantitative Measures or Definitions of Qualitative Categories" associated with <b>Duration</b>.</p> <p>Based on the information provided, MECP SARB understands there are no plans at this time to decommission the Project (i.e., the Project is permanent); however, the EAR/IS is using a 75 year operations phase for evaluation purposes.</p> <p>As such, the description of "Permanent" (i.e., Recovery to baseline conditions unlikely) fits all predicted net effects associated with operations given there are no plans to decommission the Project.</p> <p>Consequently, MECP SARB encourages the Project Team to:</p> <ul style="list-style-type: none"> <li>- consider two duration categories (i.e., Short-Term and Permanent), removing "Medium-Term" and "Long-Term"; and</li> <li>- reconsider the assessment of duration associated with all potential effects for all species at risk that extend beyond the short-term (i.e., ~5 years) and identify duration as <b>Permanent</b>.</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's approach to defining "Quantitative Measures or Definitions of Qualitative Categories" associated with Duration, or consider two duration categories (i.e., Short-Term and Permanent) and reconsider the assessment of duration associated with all potential effects for all species at risk that extend beyond the short-term (i.e., ~5 years) and identify duration as <b>Permanent</b> .	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
117.	Pgs. 13-317 to 13-335 / 13.5.2.1	MECP SARB encourages the Project Team to consider including individual range-level (i.e., Missisa, Ozhiski) and sub-range level information (e.g., range condition, estimates of range-level cumulative disturbance, survival rates, recruitment rates, and population trend, and Category 1, 2 and 3 habitat) as rationale for characterization criteria in the predicted net effects for Boreal Caribou, specifically <i>Direction</i> , <i>Magnitude</i> , and <i>Context</i> .	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to update the rationale for characterization criteria in the predicted net effects for Boreal Caribou, specifically <i>Direction</i> , <i>Magnitude</i> , and <i>Context</i> .	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		For example, as it relates to habitat loss during construction, providing information related to range condition, estimates of range-level cumulative disturbance, survival rates, recruitment rates, and population trend, and Category 1, 2 and 3 habitat provide more relevant rationale for Boreal Caribou than " <i>habitat is not limiting</i> ". Note, this should be done separately for the Missisa Range and Ozhiski Range to reflect the individual assessments of these measurable parameters.				
118.	Pgs. 13-317 / 13.5.2.1.1	Additional details are required to clarify how the amount of Caribou habitat (i.e., Category 1, 2 and 3 habitat) was quantified.  Impacts to habitat should consider both direct and indirect habitat loss due to direct removal of habitat (e.g., vegetation clearing) and indirect impacts to habitat (e.g., sensory disturbances which reflect existing evidence – e.g., 10 km) that lead to the loss of functional habitat.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide clarity on how the amount of Caribou habitat (i.e., Category 1, 2 and 3 habitat) was quantified.  If it does not reflect both direct and indirect habitat loss, update this section of the EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to include a quantification of both direct and indirect habitat loss; and update relevant assessments of potential effects, net effects, significance, and proposed mitigation measures.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
119.	Pgs. 13-317 to 13-318 / 13.5.2.1.1 / Table 13-43	Additional consideration should be given to the best available information and effects of habitat loss on the additional measurable parameters previously mentioned.  As per previous comments – including those related to a lack of assessment of measurable parameters (e.g., changes to range condition, range-level cumulative disturbance, population size, survival rates, recruitment rates, and population trend), potential lack of consideration for the best available information (i.e., Caribou collaring data collected by the NRL, MFCAR and MNR), conclusions of magnitude during the assessment of potential effect, etc. – <b>MECP SARB does not support the Project Team's conclusion regarding the magnitude of Caribou habitat loss during construction (i.e., negligible).</b>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions or reconsider the assessment of magnitude as it relates to Caribou habitat loss.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<p>Based on the information provided and the quantitative measures described in Table 13-42, the Project is expected to have a measurable change to Boreal Caribou habitat loss at the Project Footprint, LSA and RSA scales (e.g., increase range-level cumulative disturbance, impair the function of Category 1 habitat through direct and indirect habitat loss likely affecting recruitment and survival rates, etc.). However, based on the updated estimates of cumulative disturbance, recruitment rates, survival rates, and population trend it may be within the adaptive capability of the species in the Missisa Range and possibly within the Ozhiski Range (i.e., unlikely to increase cumulative disturbance above the level that supports a self-sustaining population, unlikely to increase mortality below the level necessary for a stable to increasing population, unlikely to decrease recruitment rates below the persistence threshold necessary for a stable or increasing population, unlikely to affect population growth such that populations will be declining, unlikely to reduce range condition).</p> <p>As such, the magnitude of habitat loss is likely <b>Moderate</b> (i.e., a measurable change that could cause impacts to a wildlife species within the area but likely can be managed. This effect would cause an observable effect to the wildlife species but would be within the adaptive capability of the species).</p>				
120.	<p>Pg. 13-323 / 13.5.2.1.2 / Table 13-50</p> <p>And</p> <p>Pg. 13-325 / 13.5.2.1.3 / Table 13-52</p>	<p>Additional rationale is required to support the Project Team's conclusions that duration of sensory disturbances associated with (a) Caribou habitat alteration or degradation and (b) alteration of Caribou movement during operations is <b>Medium-Term</b>, respectively.</p> <p>The net effects of sensory disturbances on Caribou during operations is anticipated to be <b>Permanent</b> recognizing the road is expected to be permanent and will not be restored.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of duration as it relates to Caribou habitat alteration or degradation and alteration of Caribou movement from Sensory Disturbance during operations.</p>	B – Recommended for EA	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	B. Satisfied for now but will need to see final EA
121.	<p>Pg. 13-317 / 13.5.2.1.1 / Table 13-43</p>	<p>Additional rationale is required to support the Project Team's conclusions that geographic extent associated with the loss of Caribou habitat during construction is confined to the <b>LSA</b>.</p> <p>Based on the quantitative measures described in Table 13-42, the net effects of loss of Caribou habitat during construction is anticipated to extend into the <b>RSA</b> (i.e., range level) given Boreal Caribou is landscape species. Please also consider previous comments associated with consideration of additional measurable parameters (e.g., changes to range condition, range-level</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions or reconsider the assessment of geographic extent associated with the loss of Caribou habitat during construction.</p>	B – Recommended for EA	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	B. Satisfied for now but will need to see final EA

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		cumulative disturbance, population size, survival rates, recruitment rates, and population trend).				
122.	Pgs. 13-324 to 13-325/ 13.5.2.1.3 / Tables 13-51 and 13-52	Additional rationale is required to support the Project Team's conclusions that geographic extent associated with the alteration in Caribou movement due to sensory disturbance during construction and operation is confined to the <b>LSA</b> .  Based on the quantitative measures described in Table 13-42, the net effects of alteration in Caribou movement due to sensory disturbance during construction and operations is anticipated to extend into the <b>RSA</b> (i.e., range level) given Boreal Caribou uses habitat at multiple spatial scales and travel between Nursery Areas and Winter Use Areas. Consequently, sensory disturbances associated with the construction and operation of the Project may impact individuals within the population to move between Nursery Areas and Winter Use Areas. This may affect the population within the range(s) (i.e., Missisa, Ozhiski).	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of geographic extent associated with the alteration in Caribou movement due to sensory disturbance during construction and operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
123.	Pg. 13-327 / 13.5.2.1.3 / Table 13-54	Additional rationale is required to support the Project Team's conclusions that magnitude associated with the alteration in Caribou movement due to loss of connectivity during operations is <b>Low</b> .  The same rationale that was applied to this characterization criteria for alteration in Caribou movement due to loss of connectivity due to construction also applies to operations.  As such, based on the quantitative measures described in Table 13-42 net effects are anticipated to be <b>Moderate</b> given it will have a measurable change that could cause impacts to a wildlife species within the area but likely can be managed. This effect would cause an observable effect to the wildlife species but would be within the adaptive capability of the species.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of magnitude associated with the alteration in Caribou movement due to loss of connectivity during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
124.	Pg. 13-327 / 13.5.2.1.3 / Table 13-54	Additional rationale is required to support the Project Team's conclusions that duration associated with the alteration in Caribou movement due to loss of connectivity during operations is <b>Medium-Term</b> .  Based on the quantitative measures described in Table 13-42, the net effects of alteration in Caribou movement due to loss of connectivity during operations is anticipated to be <b>Permanent</b> recognizing there are no plans to restore the road.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of duration associated with the alteration in Caribou movement due to loss of connectivity during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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125.	Pg. 13-328 / 13.5.2.1.3 / Table 13-56	<p>Additional rationale is required to support the Project Team's conclusions that magnitude associated with Caribou injuries or death due to collisions during operations is <b>Negligible</b>.</p> <p>The rationale provided includes, "<i>The magnitude of the effect is predicted to be negligible as Caribou generally avoid active roads, and mitigation measures such as slower speeds and driver vigilance are expected to prevent collision mortalities.</i>"</p> <p>However, it is unclear if slower speed limits will be applied in areas of caribou habitat (e.g., Category 1 and 2), and what those speeds would be. Additionally, rationale that Caribou generally avoid active roads is not relevant to magnitude, rather it should be considered as part of other characterization criteria, such as frequency and likelihood of occurrence.</p> <p>Based on the quantitative measures described in Table 13-42, should injuries or death to Boreal Caribou due to collisions with vehicles occur during operations, net effects are anticipated to be <b>Moderate</b> given it will have a measurable change that could cause impacts to a wildlife species within the area but likely can be managed. This effect would cause an observable effect to the wildlife species but would be within the adaptive capability of the species.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions or reconsider the assessment of magnitude associated with injuries or death due to collisions with vehicles during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
126.	Pg. 13-330 / 13.5.2.1.4 / Table 13-58	<p>Additional rationale is required to support the Project Team's conclusions that magnitude and likelihood of occurrence associated with injuries or death of Caribou due to increased access during operations is <b>Low</b> and <b>Unlikely</b>, respectively.</p> <p>The rationale provided for magnitude and likelihood of occurrence are scoped to illegal poaching of Caribou and does not appear to consider the effects of legal Indigenous harvest as a result of increased access. Based on the information provided in the Draft EAR/IS Report, there is limited information on Indigenous harvest of Boreal Caribou within the Missisa and Ozhiski Ranges (e.g., number of Caribou harvest each year), however some Indigenous communities have indicated they do harvest Caribou within the RSA.</p> <p>Applying the precautionary principle, should an increase in injuries or death of Boreal Caribou due to increased access occur during operations through legal harvest of Boreal Caribou by Indigenous hunters, it is reasonable to anticipate:</p> <ul style="list-style-type: none"> <li>- Magnitude to be <b>Moderate</b> given it could have measurable change that could cause impacts to Boreal Caribou within the area but can likely be</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of magnitude and likelihood of occurrence associated with injuries or death due to increased access during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<p>managed. This effect would cause an observable effect to Boreal Caribou but would likely be within the adaptive capability of the species.</p> <ul style="list-style-type: none"> <li>- Likelihood of Occurrence to be <b>Probable</b> given the effect is likely to occur.</li> </ul> <p>Alternatively, MECP SARB encourages the Project Team to provide the following information to clarify and support the Project Team's conclusions:</p> <ul style="list-style-type: none"> <li>- A summary of Caribou harvested by Indigenous communities within or near the study area(s) (i.e., Project Footprint, LSA, RSA), where this information is available and able to be shared.</li> </ul>				
127.	Pgs. 13-331 to 13-332 / 13.5.2.1.4 / Tables 13-59 and 13-60	<p>Additional rationale is required to support the Project Team's conclusions that the likelihood of occurrence associated with injury or death due to predator-prey dynamics during construction and operations is <b>Probable</b> and <b>Possible</b>, respectively.</p> <p>Based on existing evidence in peer-reviewed literature, linear features have been demonstrated to increase predator efficiency and encounters resulting in increased mortality of Boreal Caribou. As such, it is reasonable to expect the likelihood of construction and operation of the Project leading to injury or death due to predator-prey dynamics to be <b>Certain</b>.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of likelihood of occurrence associated with injuries or death due to changes in predator-prey dynamics during construction and operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
128.	Pgs. 13-336 / 13.5.2.2.1	<p>Additional details are required to clarify how the amount of Wolverine habitat was quantified.</p> <p>Impacts to habitat should consider both direct and indirect habitat loss due to direct removal of habitat (e.g., vegetation clearing) and indirect impacts to habitat (e.g., sensory disturbances which reflect biologically relevant distance – e.g., 4 km) that lead to the loss of functional habitat.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide clarity on how the amount of Wolverine habitat was quantified.</p> <p>If it does not reflect both direct and indirect habitat loss, update this section of the EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to include a quantification of both direct and indirect habitat loss; and update relevant assessments of potential effects, net</p>	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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			effects, significance, and proposed mitigation measures.			
129.	Pgs. 13-332 to 13-332 / 13.5.2.1.4 / Tables 13-61 and 13-62	Additional rationale is required to support the Project Team's conclusions that magnitude associated with injuries or death of Caribou due to increased energy expenditures during construction and operations is <b>Low</b> .  Based on the quantitative measures described in Table 13-42, the net effects of an increase in injuries or death of Boreal Caribou due to increased energy expenditures occur during construction and operations, it is reasonable to anticipate magnitude to be <b>Moderate</b> given it could have measurable change that could cause impacts to Boreal Caribou within the area but can likely be managed. This effect would cause an observable effect to Boreal Caribou but would likely be within the adaptive capability of the species. Likelihood of Occurrence to be <b>Probable</b> given the effect is likely to occur.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of magnitude and likelihood of occurrence associated with injuries or death due to increased energy expenditures during construction and operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
130.	Pgs. 13-337 to 13-338 / 13.5.2.2.2 / Table 13-67	Additional rationale is required to support the Project Team's conclusions that the direction associated with Wolverine habitat alteration or degradation from habitat structural change during construction is <b>Positive</b> .  Based on existing evidence in peer-reviewed literature, Wolverine generally avoid disturbed areas, particularly in the presence of human activity (i.e., construction activities). Furthermore, it is highly unlikely that Wolverine will use slash piles or debris piles for denning within the close proximity to the Project Footprint during construction. As such, it is more likely that habitat alteration or degradation from habitat structural change will have a <b>Negative</b> effect on Wolverine.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of direction associated with habitat alteration or degradation from habitat structural change during construction.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
131.	Pg. 13-342 / 13.5.2.2.3 / Table 13-72	Additional rationale is required to support the Project Team's conclusions that duration associated with Wolverine habitat alteration or degradation from sensory disturbance during operations is <b>Medium-Term</b> .  Based on the quantitative measures described in Table 13-42, the net effects of habitat alteration or degradation from sensory disturbance from sensory disturbance during operations is anticipated to be <b>Permanent</b> recognizing there are no plans to restore the road.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of duration associated with the alteration in Wolverine movement due to sensory disturbance during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
132.	Pg. 13-343 / 13.5.2.2.3 / Table 13-73	Additional rationale is required to support the Project Team's conclusions that duration associated with the alteration in Wolverine movement due to loss of connectivity during construction and operations is <b>Medium-Term</b> and <b>Short-Term</b> , respectively.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

Comment #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		Based on the quantitative measures described in Table 13-42, the net effects of alteration in Wolverine movement due to loss of connectivity during construction and operations is anticipated to be <b>Permanent</b> recognizing there are no plans to restore the road.	Project Team's conclusions, or reconsider the assessment of duration associated with the alteration in Wolverine movement due to loss of connectivity during construction and operations.			
133.	Pg. 13-343 / 13.5.2.2.3 / Table 13-73	Additional rationale is required to support the Project Team's conclusions that duration associated with the alteration in Wolverine movement due to sensory disturbance during operations is <b>Medium-Term</b> .  Based on the quantitative measures described in Table 13-42, the net effects of alteration in Wolverine movement due to sensory disturbance during operations is anticipated to be <b>Permanent</b> recognizing there are no plans to restore the road.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of duration associated with the alteration in Wolverine movement due to sensory disturbance during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
134.	Pg. 13-346 / 13.5.2.2.4	Section 13.5 of the Draft EAR/IS Report does not include an assessment of predicted net effects associated with Wolverine injury and death due to incidental take.  Section 13.4.4.4.1 of the Draft EAR/IS Report states, " <i>The effectiveness of mitigation will be evaluated, with measures being modified or enhanced as necessary. Although measures will be implemented to mitigate against the impacts of incidental take on wolverine, it is anticipated that net effects will remain in the LSA. As a result, additional discussion about this topic has been carried forward to Section 13.5 (Characterization of Net Effects).</i> "  Please note, the assessment of net effects associated with Wolverine injury and death due to incidental take should consider any potential for vegetation clearing to be carried out during the Wolverine denning Period (i.e., January 15 to May 31).	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide an assessment of the net effects associated with Wolverine injury and death due to incidental take.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
135.	Pgs. 13-350 to 13-351 / 13.5.2.2.4 / Tables 13-81 and 13-82	Additional rationale is required to support the Project Team's conclusions that magnitude associated with Wolverine injury or death due to increased energy expenditure during construction and operation is <b>Low</b> .  Reproductive success of Wolverine is dependent, in part, on the female's body condition entering and during the winter denning period. Wolverine experience delayed implantation (embryonic diapause) in which fertilized embryos only implant if the female has enough stored energy by winter. Disruption to resource availability, including from human activity such as construction and operation of the Project, can lead to increased energy expenditure and poor	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of magnitude and likelihood of occurrence associated with the injury or death due to increased access during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<p>body condition, resulting in reproductive failure or skipping a breeding season altogether. Recognizing Wolverine have low population numbers and low reproductive rates, any loss of individuals is a considerable threat to the species.</p> <p>Applying the precautionary principle, should an increase in injuries or death of Wolverine due to increased energy expenditure occur during construction and/or operations avoidance of the Project, it is reasonable to anticipate the magnitude to be <b>Moderate</b> given the effect may have a measurable change that could cause impacts to a wildlife species within the area but likely can be managed. This effect would cause an observable effect to the wildlife species but would be within the adaptive capability of the species.</p>				
136.	Pgs. 13-350 to 13-351 / 13.5.2.2.4 / Tables 13-81 and 13-82	<p>Additional rationale is required to support the Project Team's conclusions that duration associated with Wolverine injury or death due to increased energy expenditure during construction and operations is <b>Long-Term</b> and <b>Medium-Term</b>, respectively.</p> <p>Based on the quantitative measures described in Table 13-42, the net effects of Wolverine injury or death due to increased energy expenditure during construction and operations is anticipated to be <b>Permanent</b> recognizing there are no plans to restore the road.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of duration associated with Wolverine injury or death due to increased energy expenditure during construction and operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
137.	Pg. 13-353 / 13.5.2.2.4 / Table 13-84	<p>Additional rationale is required to support the Project Team's conclusions that magnitude associated with Wolverine injury or death due to increased access during operations is <b>Moderate</b>.</p> <p>Incidental harvest reported to MECP and MNR in southern portions of Wolverine distribution demonstrates a minimum of ~8-12 Wolverine are incidentally trapped in the province each year. Recognizing Wolverine have low population numbers and low reproductive rates, incidental trapping poses a considerable threat to the species.</p> <p>Applying the precautionary principle, should an increase in injuries or death of Wolverine due to increased access occur during operations through incidental trapping, it is reasonable to anticipate the magnitude to be <b>High</b> given the effect may not be manageable and the change may exceed the ability for a species to continue sustained existence within the area.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of magnitude and likelihood of occurrence associated with the injury or death due to increased access during operations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
138.	Pg. 13-353 / 13.5.2.2.4	Additional rationale is required to support the Project Team's conclusions that context associated with Wolverine injury or death due to increased access during operations is <b>Moderate</b> .	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
	/ Table 13-84	Incidental harvest reported to MECP and MNR in southern portions of Wolverine distribution demonstrates a minimum of ~8-12 Wolverine are incidentally trapped in the province each year. Recognizing Wolverine have low population numbers and low reproductive rates, incidental trapping poses a considerable threat to the species.  Applying the precautionary principle, should an increase in injuries or death of Wolverine due to increased access occur during operations through incidental trapping, it is reasonable to anticipate the context to be <b>High</b> .	associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions, or reconsider the assessment of context associated with the injury or death due to increased access during operations.		the twenty-three-week review period	
139.	Pgs. 13-356 to 13-376 / 13.5.2.3	As per previous comment, additional consideration is required in the Predicted Net Effects section of the Draft EAR/IS Report for additional species at risk Bats recently listed as endangered on the Species at Risk in Ontario List under the <i>Endangered Species Act, 2007</i> , specifically Hoary Bat, Eastern Red Bat, and Silver-haired Bat. This should recognize these species' different habitat requirements/use and migratory behaviour.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to consider and incorporate Hoary Bat, Eastern Red Bat, and Silver-haired Bat in the assessment of net effects.  If this is not provided in the Final EAR/IS Report, please include a commitment in Final EAR/IS Report for this to be addressed at the detailed design stage.	B – Recommended for EA  D – Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	B. Satisfied for now but will need to see final EA  Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)
140.	Pg. 13-369 / 13.5.2.3.4 / Table 13-101	Additional rationale is required to support the Project Team's conclusions that direction and likelihood of occurrence associated with injury or death of species at risk Bats due to incidental take during construction is <b>Neutral</b> and <b>Unlikely</b> , respectively.  Based on the information provided, it is unclear if vegetation clearing will be completely avoided during the maternity roost season (April 15 to October 15 – inclusive of all bats species listed as threatened or endangered under the ESA). Specifically, mitigation proposed to minimize incidental take of species at risk Bats in Section 13.4.5.4.1 of the Draft EAR/IS Report states, " <b>To the extent practicable, avoiding other construction or maintenance-related activities within 120 m of suitable maternity roosting habitat for SAR bats between May 1 and August 31.</b> "	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to: <ul style="list-style-type: none"><li>- provide additional rationale to support the Project Team's conclusions, including updating the wording associated with all relevant mitigation measures in Section 13.4 and Appendix E to clearly state vegetation clearing will not be carried out during the bat maternity roost season (no</li></ul>	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<ul style="list-style-type: none"> <li><i>If there is a proposal to remove potential maternity roosting habitat during this window, qualified biologists will carry out pre-clearance ground sweeps to assess habitat occupancy.</i></li> <li><i>Removal of confirmed maternity roosting habitat or its buffer will be subject to federal or provincial (depending on jurisdiction) species at risk permitting requirements and site-specific mitigation measures that would be developed in consultation with MNR, MECP, and CWS/ECCC. Local Indigenous communities will be notified.</i> [emphasis added]</li> </ul> <p>Based on this wording it appears there may be instances where bat maternity habitat could be removed during the bat maternity roost season, if doing otherwise is not practicable. Additionally, in the absence of detailed methodology on the proposed "pre-clearance ground sweeps" it is unclear if these are possible given this would likely require in-person visual exit surveys; and despite this, pre-clearance ground sweeps are unlikely to provide definitive results to conclude absence without sufficient repeat surveys. Consequently, vegetation clearing during the bat maternity roost season would likely result in injuring or killing species at risk Bats.</p> <p>Applying the precautionary principle, the assessment of net effects should acknowledge this possibility. Should injuries or death of species at risk Bats due to incidental take occur during construction through vegetation clearing, it is reasonable to anticipate the direction to be <b>Negative</b> given this effect would result in a net loss/adverse effect and likelihood of occurring to be <b>Probable</b> given the effect is likely to occur.</p> <p>Alternatively, if the Project Team can confidently confirm vegetation clearing will be completely avoided during the bat maternity roost season, MECP SARB encourages the Project Team to update the proposed mitigation measures in Section 13.4 and Appendix E to clearly state this and remove any wording that would suggest otherwise (e.g., "to the extent practicable", etc).</p> <p>Please note, should this type of wording be changed in Section 13.4 and Appendix E, and vegetation clearing activities need to be carried out within the bat maternity roost season, this would likely represent a significant change to the EAR/IS.</p>	<ul style="list-style-type: none"> <li>exceptions); or</li> <li>- reconsider the assessment of direction and likelihood of occurrence associated with the injury or death of species at risk Bats due to incidental take during construction.</li> </ul>			
141.	Pg. 13-440 / 13.5.2.7.4	Additional rationale is required to support the Project Team's conclusions that magnitude and likelihood of occurrence associated with injury or death of	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	B. Satisfied for now but will need to see final EA

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	/ Table 13-178	<p>Lesser Yellowlegs due to incidental take during construction is <b>Low</b> and <b>Possible</b>, respectively.</p> <p>Based on the information provided, it is unclear if vegetation clearing will be completely avoided during the bird nesting period (April 15 to August 31). Specifically, mitigation proposed to minimize incidental take of species at risk Birds (including Lesser Yellowlegs) in Section 13.4.6.4.1 of the Draft EAR/IS Report states, "<i>Scheduling vegetation removal to occur outside the migratory bird nesting period (April 25 to August 29) to the extent practicable.</i>" [emphasis added]</p> <p>Based on this wording it appears there may be instances where Lesser Yellowlegs habitat could be removed during the nesting period, if doing otherwise is not practicable. This would likely result in injuring or killing Lesser Yellowlegs.</p> <p>Applying the precautionary principle, the assessment of net effects should acknowledge this possibility. Should injuries or death of Lesser Yellowlegs due to incidental take occur during construction through vegetation clearing during the nesting period, it is reasonable to anticipate:</p> <ul style="list-style-type: none"> <li>- the magnitude to be <b>Moderate</b> given this effect would result in a measurable change that is not expected to cause significant losses, and the net effect will be unlikely to affect the overall population but is above negligible, and</li> <li>- the likelihood of occurring to be <b>Probable</b> given the effect is likely to occur.</li> </ul> <p>Alternatively, if the Project Team can confidently confirm vegetation clearing will be completely avoided during the nesting period, MECP SARB encourages the Project Team to update the proposed mitigation measures in Section 13.4 and Appendix E to clearly state this and remove any wording that would suggest otherwise (e.g., "to the extent practicable", etc.).</p> <p>Please note, should this type of wording be changed in Section 13.4 and Appendix E, and vegetation clearing activities need to be carried out within the nesting period, this would likely represent a significant change to the EAR/IS.</p>	<p>associated Appendices, as appropriate, to:</p> <ul style="list-style-type: none"> <li>- provide additional rationale to support the Project Team's conclusions, including updating the wording associated with all relevant mitigation measures in Section 13.4 and Appendix E to clearly state vegetation clearing will not be carried out during the Lesser Yellowlegs nesting period (no exceptions); or</li> <li>- reconsider the assessment of magnitude and likelihood of occurrence associated with the injury or death of Lesser Yellowlegs due to incidental take during construction.</li> </ul>		the twenty-three-week review period	
142.	Pg. 13-479 / 13.5.2.10.2	Additional rationale is required to support the Project Team's conclusion that the habitat alteration or degradation of Short-eared Owl habitat due to sensory disturbances during construction will extend approximately 125 m.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	B. Satisfied for now but will need to see final EA

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	/ Table 13-220	The <i>Saskatchewan Activity Restriction Guidelines for Sensitive Species</i> (currently available at <a href="https://publications.saskatchewan.ca/#/products/79241">https://publications.saskatchewan.ca/#/products/79241</a> ) includes a setback distance of 500 m from nesting area or suitable habitat during restricted activity periods for Short-eared Owl for high levels of disturbances, specifically roads, battery or compressor station construction, seismic, drilling rigs, trench-in pipeline, blasting, mines, gravel pit, quarries, rock crushing, asphalt batching, renewable energy projects.	associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusion, or modify the distance to align with the setback distance of 500 m.		the twenty-three-week review period	
143.	Pgs. 13-383 to 13.384 / 13.5.2.10.4 / Table 13-225	<p>Additional rationale is required to support the Project Team's conclusions that magnitude and likelihood of occurrence associated with injury or death of Short-eared Owl due to incidental take during construction is <b>Low</b> and <b>Possible</b>, respectively.</p> <p>Based on the information provided, it is unclear if vegetation clearing will be completely avoided during the bird nesting period (April 15 to August 31). Specifically, mitigation proposed to minimize incidental take of species at risk Birds (including Short-eared Owl) in Section 13.4.6.4.1 of the Draft EAR/IS Report states, "<i>Scheduling vegetation removal to occur outside the migratory bird nesting period (April 25 to August 29) to the extent practicable.</i>" [emphasis added]</p> <p>Based on this wording it appears there may be instances where Lesser Yellowlegs habitat could be removed during the nesting period, if doing otherwise is not practicable. This would likely result in injuring or killing Short-eared Owl.</p> <p>Applying the precautionary principle, the assessment of net effects should acknowledge this possibility. Should injuries or death of Short-eared Owl due to incidental take occur during construction through vegetation clearing, it is reasonable to anticipate:</p> <ul style="list-style-type: none"> <li>- the magnitude to be <b>Moderate</b> given this effect would result in a measurable change that is not expected to cause significant losses, and the net effect will be unlikely to affect the overall population but is above negligible, and</li> <li>- the likelihood of occurring to be <b>Probable</b> given the effect is likely to occur.</li> </ul> <p>Alternatively, if the Project Team can confidently confirm vegetation clearing will be completely avoided during the nesting period, MECP SARB encourages the Project Team to update the proposed mitigation measures in Section 13.4</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to:</p> <ul style="list-style-type: none"> <li>- provide additional rationale to support the Project Team's conclusions, including updating the wording associated with all relevant mitigation measures in Section 13.4 and Appendix E to clearly state vegetation clearing will not be carried out during the Short-eared Owl nesting period (no exceptions); or</li> <li>- reconsider the assessment of magnitude and likelihood of occurrence associated with the injury or death of Short-eared Owl due to incidental take during construction.</li> </ul>	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		and Appendix E to clearly state this and remove any wording that would suggest otherwise (e.g., "to the extent practicable", etc.).  Please note, should this type of wording be changed in Section 13.4 and Appendix E, and vegetation clearing activities need to be carried out within the nesting period, this would likely represent a significant change to the EAR/IS.				
144.	Pgs. 13-500 to 13-548 / 13.6	MECP SARB encourages the Project Team to consider previous comments on the Project Team's approach to "Quantitative Measures or Definitions of Qualitative Categories" associated with duration and reconsider the assessment of duration associated with all potential net effects for all species at risk during operations (i.e., identifying duration as "Permanent" for all potential effects for all species at risk).	Please update Section 13.6 of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to consider previous comments on the the Project Team's approach to "Quantitative Measures or Definitions of Qualitative Categories" associated with duration and reconsider the assessment of duration associated with all potential net effects for all species at risk during operations (i.e., identifying duration as "Permanent" for all potential effects for all species at risk).	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
145.	Pgs. 13-500 to 13-501 / 13.6 / Table 13-241	The Draft EAR/IS Report does not provide rationale for the Project Team's decisions related to the assigned scores (i.e., how did the Project Team determine appropriate scores).	Please update Section 13.6 of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide rationale and justification for the assignment of scores.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
146.	Pgs. 13-500 to 13-501 / 13.6 / Table 13-241	The Draft EAR/IS Report does not provide rationale for the Project Team's decisions related to the determination of significance based on the aggregated scores. Specifically, it is unclear how the Project Team determined Negligible, Low, and Moderate are not significant, and only High is significant.  The precautionary principle may suggest that an overall determination of significance of "Moderate" should also be considered significant.	Please update Section 13.6 of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide rationale and justification for the determination that Negligible, Low, and Moderate are not significant, and only High is significant.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
147.	Pgs. 13-500 to 13-501 / 13.6 / Table 13-241	The Quantitative Categories for "Context" listed in Table 13-242 (i.e., resilient, moderate, vulnerable) do not align with those listed in Table 13-42 (pgs. 13-315 to 13-317) (i.e., Low, Moderate, High) or the Key Criteria identified for each predicted net effect in subsequent species-specific tables.	Please update the Quantitative Categories for "Context" listed in Table 13-242	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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148.	Pgs. 13-500 to 13-548 / 13.6	<p>MECP SARB encourages the Project Team to reconsider the determination of overall significance for Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, and Short-eared Owl, as appropriate, with consideration for previous comments on the predicted net effects and effects characterizations highlighted below:</p> <p><b>All Species at Risk</b></p> <ul style="list-style-type: none"> <li>- Duration in the net effects assessment associated with all potential effects for all species at risk during operation</li> </ul> <p><b>Caribou</b></p> <ul style="list-style-type: none"> <li>- Geographic extent associated with the loss of Caribou habitat during construction</li> <li>- Magnitude associated with habitat loss during construction</li> <li>- Duration associated with Caribou habitat alteration or degradation due to sensory disturbance during operations</li> <li>- Geographic extent associated with the alteration in Caribou movement due to sensory disturbance during construction and operation</li> <li>- Duration associated with alteration of Caribou movement due to sensory disturbance during operations</li> <li>- Magnitude associated with the alteration in Caribou movement due to loss of connectivity during operations</li> <li>- Duration associated with the alteration in Caribou movement due to loss of connectivity during operations</li> <li>- Magnitude associated with Caribou injuries or death due to collisions during operations</li> <li>- Magnitude associated with injuries or death of Caribou due to increased access during operations</li> <li>- Likelihood of occurrence associated with injuries or death of Caribou due to increased access during operations</li> <li>- Likelihood of occurrence associated with injury or death due to predator-prey dynamics during construction</li> <li>- Likelihood of occurrence associated with injury or death due to predator-prey dynamics during operations</li> <li>- Magnitude associated with injuries or death of Caribou due to increased energy expenditures during construction</li> </ul>	Please update Section 13.6 of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to reconsider the determination of overall significance for Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, and Short-eared Owl, as appropriate, with consideration for previous comments on the predicted net effects and effects characterizations.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

Comment #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<ul style="list-style-type: none"> <li>- Magnitude associated with injuries or death of Caribou due to increased energy expenditures during operations</li> </ul> <p><b>Wolverine</b></p> <ul style="list-style-type: none"> <li>- Direction associated with Wolverine habitat alteration or degradation from habitat structural change during construction</li> <li>- Duration associated with Wolverine habitat alteration or degradation from sensory disturbance during operations</li> <li>- Duration associated with the alteration in Wolverine movement due to loss of connectivity during construction</li> <li>- Duration associated with the alteration in Wolverine movement due to loss of connectivity during operations</li> <li>- Duration associated with the alteration in Wolverine movement due to sensory disturbance during operations</li> <li>- Magnitude associated with Wolverine injury or death due to increased energy expenditure during construction</li> <li>- Magnitude associated with Wolverine injury or death due to increased energy expenditure during operation</li> <li>- Duration associated with Wolverine injury or death due to increased energy expenditure during construction</li> <li>- Duration associated with Wolverine injury or death due to increased energy expenditure during operations</li> <li>- Magnitude associated with injury or death due to increased access during operations</li> <li>- Context associated with Wolverine injury or death due to increased access during operations</li> <li>- All characterization criteria associated with Wolverine injury and death due to incidental take</li> </ul> <p><b>Species at Risk Bats</b></p> <ul style="list-style-type: none"> <li>- Direction associated with injury or death due to incidental take during construction</li> <li>- Likelihood of occurrence associated with injury or death due to incidental take during construction</li> </ul> <p><b>Lesser Yellowlegs</b></p>				

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		<ul style="list-style-type: none"> <li>- Magnitude associated with injury or death due to incidental take during construction</li> <li>- Likelihood of occurrence associated with injury or death due to incidental take during construction</li> </ul> <p><b>Short-eared Owl</b></p> <ul style="list-style-type: none"> <li>- Magnitude associated with injury or death due to incidental take during construction</li> <li>- Likelihood of occurrence associated with injury or death due to incidental take during construction</li> </ul>				
149.	Pgs. 13-549 to 13-550 / 13.7	<p>MECP SARB encourages the Project Team to reconsider the predicted net effects of the Project on the Species at Risk VC that should be carried forward for the assessment of cumulative effects within the Species at Risk RSA's, as appropriate, with consideration for previous comments on the predicted net effects associated with magnitude and likelihood of occurrence highlighted below:</p> <p><b>Caribou</b></p> <ul style="list-style-type: none"> <li>- Magnitude associated with habitat loss during construction</li> <li>- Magnitude associated with the alteration in Caribou movement due to loss of connectivity during operations</li> <li>- Magnitude associated with Caribou injuries or death due to collisions during operations</li> <li>- Magnitude associated with injuries or death of Caribou due to increased access during operations</li> <li>- Likelihood of occurrence associated with injuries or death of Caribou due to increased access during operations</li> <li>- Likelihood of occurrence associated with injury or death due to predator-prey dynamics during construction</li> <li>- Likelihood of occurrence associated with injury or death due to predator-prey dynamics during operations</li> <li>- Magnitude associated with injuries or death of Caribou due to increased energy expenditures during construction</li> <li>- Magnitude associated with injuries or death of Caribou due to increased energy expenditures during operations</li> </ul>	Please update Section 13.6 of the Final EAR/IS Report, and all other relevant locations within the Report (i.e., Section 21) and associated Appendices, as appropriate, to reconsider the predicted net effects of the Project on the Species at Risk VC that should be carried forward for the assessment of cumulative effects within the Species at Risk RSA's, as appropriate, with consideration for previous comments on the predicted net effects associated with magnitude and likelihood of occurrence.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<p><b><u>Wolverine</u></b></p> <ul style="list-style-type: none"> <li>- Magnitude associated with Wolverine injury or death due to increased energy expenditure during construction</li> <li>- Magnitude associated with Wolverine injury or death due to increased energy expenditure during operation</li> <li>- Magnitude associated with injury or death due to increased access during operations</li> <li>- Magnitude and Likelihood of Occurrence characterization criteria associated with Wolverine injury and death due to incidental take</li> </ul> <p><b><u>Species at Risk Bats</u></b></p> <ul style="list-style-type: none"> <li>- Likelihood of occurrence associated with injury or death due to incidental take during construction</li> </ul> <p><b><u>Lesser Yellowlegs</u></b></p> <ul style="list-style-type: none"> <li>- Magnitude associated with injury or death due to incidental take during construction</li> <li>- Likelihood of occurrence associated with injury or death due to incidental take during construction</li> </ul> <p><b><u>Short-eared Owl</u></b></p> <ul style="list-style-type: none"> <li>- Magnitude associated with injury or death due to incidental take during construction</li> <li>- Likelihood of occurrence associated with injury or death due to incidental take during construction</li> </ul>				
150.	Pgs. 13-504 to 13-506 / 13.6.1	<p>The following six "Context" key criteria identified as "High" based on the assessment of predicted net effects and were assigned scores of 3. However, based on the scores outlined in Table 13-241 these should have been assigned scores of 4:</p> <ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Sensory Disturbance during construction</li> <li>- Habitat Alteration or Degradation – Sensory Disturbance during operations</li> <li>- Alterations in Movement – Sensory Disturbance during construction</li> <li>- Alterations in Movement – Sensory Disturbance during operations</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during construction</li> </ul>	Please correct the scores and determination of significance in Table 13-242 accordingly.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<ul style="list-style-type: none"> <li>- Injury or Death – Changes to Predator-Prey Dynamics during operations</li> </ul> <p>The following three instances result the predicted net effects being significant with the correct score of 4:</p> <ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Sensory Disturbance during construction</li> <li>- Alterations in Movement – Sensory Disturbance during operations</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during operations</li> </ul> <p>Additionally, the following seven “Context” key criteria identified as “Moderate” based on the assessment of predicted net effects and were assigned scores of 1. However, based on the scores outlined in Table 13-241 these should have been assigned scores of 2:</p> <ul style="list-style-type: none"> <li>- Habitat Loss during construction</li> <li>- Habitat Alteration or Degradation – Habitat Structure Change during construction</li> <li>- Habitat Alteration or Degradation – Hydrological Changes during construction</li> <li>- Alterations in Movement – Loss of Connectivity during construction</li> <li>- Injury or Death – Collisions with Vehicles during construction</li> <li>- Injury or Death – Increased Energy Expenditure during construction</li> <li>- Injury or Death – Increased Energy Expenditure during operations</li> </ul>				
151.	Pgs. 13-504 to 13-506 / 13.6.1 / Table 13-242	<p>The following six “Context” key criteria in Table 13-242 are identified as “High” based on the assessment of predicted net effects for Caribou and were assigned scores of 3. However, based on the scores outlined in Table 13-241 these should have been assigned scores of 4:</p> <ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Sensory Disturbance during construction</li> <li>- Habitat Alteration or Degradation – Sensory Disturbance during operations</li> <li>- Alterations in Movement – Sensory Disturbance during construction</li> <li>- Alterations in Movement – Sensory Disturbance during operations</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during construction</li> </ul>	Please correct the scores and determination of significance in Table 13-242 accordingly.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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		<ul style="list-style-type: none"> <li>- Injury or Death – Changes to Predator-Prey Dynamics during operations</li> </ul> <p>Of these, the following three instances result the predicted net effects being significant (i.e., score = 16+) with the correct score for “Context” of 4</p> <ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Sensory Disturbance during construction</li> <li>- Alterations in Movement – Sensory Disturbance during operations</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during operations</li> </ul> <p>Additionally, the following seven “Context” key criteria identified as “Moderate” based on the assessment of predicted net effects and were assigned scores of 1. However, based on the scores outlined in Table 13-241 these should have been assigned scores of 2:</p> <ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Habitat Structure Change during construction</li> <li>- Habitat Alteration or Degradation – Hydrological Changes during construction</li> <li>- Alterations in Movement – Loss of Connectivity during construction</li> <li>- Injury or Death – Collisions with Vehicles during construction</li> <li>- Injury or Death – Collisions with Vehicles during operations</li> <li>- Injury or Death – Increased Energy Expenditure during construction</li> <li>- Injury or Death – Increased Energy Expenditure during operations</li> </ul>				
152.	Pgs. 13-509 to 13-511 / 13.6.2 / Table 13-243	<p>The following three “Context” key criteria in Table 13-243 are identified as “High” based on the assessment of predicted net effects for Wolverine and were assigned scores of 3. However, based on the scores outlined in Table 13-241 these should have been assigned scores of 4:</p> <ul style="list-style-type: none"> <li>- Habitat Loss during construction</li> <li>- Habitat Alteration or Degradation – Sensory Disturbance during construction</li> <li>- Habitat Alteration or Degradation – Sensory Disturbance during operations</li> </ul> <p>While two of these were already determined to be significant, the following predicted net effect is also significant (i.e., score = 16+) with the correct score for “Context” of 4:</p>	Please correct the scores and determination of significance in Table 13-243 accordingly.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

Comment #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Sensory Disturbance during construction</li> </ul> <p>Additionally, the following thirteen “Context” key criteria identified as “Moderate” based on the assessment of predicted net effects and were assigned scores of 1. However, based on the scores outlined in Table 13-241 these should have been assigned scores of 2:</p> <ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Habitat Structure Change during construction</li> <li>- Habitat Alteration or Degradation – Hydrological Changes during construction</li> <li>- Alterations in Movement – Sensory Disturbance during construction</li> <li>- Alterations in Movement – Sensory Disturbance during operations</li> <li>- Alterations in Movement – Loss of Connectivity during construction</li> <li>- Injury or Death – Collisions with Vehicles during construction</li> <li>- Injury or Death – Collisions with Vehicles during operations</li> <li>- Injury or Death – Increased Access during construction</li> <li>- Injury or Death – Increased Access during operations</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during construction</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during operations</li> <li>- Injury or Death – Increased Energy Expenditure during construction</li> <li>- Injury or Death – Increased Energy Expenditure during operations</li> </ul>				
153.	Pgs. 13-514 to 13-515 / 13.6.1 / Table 13-244	<p>The following fifteen “Context” key criteria identified as “Moderate” based on the assessment of predicted net effects and were assigned scores of 1. However, based on the scores outlined in Table 13-241 these should have been assigned scores of 2:</p> <ul style="list-style-type: none"> <li>- Habitat Loss during construction</li> <li>- Habitat Alteration or Degradation – Habitat Structure Change during construction</li> <li>- Habitat Alteration or Degradation – Sensory Disturbance during construction</li> <li>- Habitat Alteration or Degradation – Hydrological Changes during construction</li> <li>- Alterations in Movement – Sensory Disturbance during construction</li> <li>- Alterations in Movement – Sensory Disturbance during operations</li> <li>- Alterations in Movement – Loss of Connectivity during construction</li> </ul>	Please correct the scores and determination of significance in Table 13-244 accordingly.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<ul style="list-style-type: none"> <li>- Injury or Death – Collisions with Vehicles during construction</li> <li>- Injury or Death – Collisions with Vehicles during operations</li> <li>- Injury or Death – Incidental Take during construction</li> <li>- Injury or Death – Incidental Take during operations</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during construction</li> <li>- Injury or Death – Changes to Predator-Prey Dynamics during operations</li> <li>- Injury or Death – Increased Energy Expenditure during construction</li> <li>- Injury or Death – Increased Energy Expenditure during operations</li> </ul> <p>Of these, the following instance results in the predicted net effects being significant (i.e., score = 16+) with the correct score for "Context" of 4</p> <ul style="list-style-type: none"> <li>- Habitat Alteration or Degradation – Hydrological Changes during construction</li> </ul>				
154.	Pg. 13-554 / 13.8.10	<p>The Draft EAR/IS Report states, "<i>The level of confidence in the predictions for Project-related net effects on Short-eared Owls is moderate. The predictions are based on information collected as part of background information and data gathering, multi-year data collected from baseline studies, GIS data analyses, an understanding of Project activities, the known effectiveness of mitigation measures, relevant peer-reviewed studies, experience of the assessment team, and an understanding of existing conditions. The level of confidence for the habitat net effects (loss and alteration or degradation) predictions is moderate because habitat requirements, locations and use in the RSA are not fully understood.</i></p> <p><b>Short-eared Owls were not detected during field programs; however, as a relatively non-vocal species they can be difficult to detect during the breeding season and fall migratory period, and as such there is a low level of understanding of their occurrence, distribution and habitat associations throughout the study areas, if they should occur.</b>" [emphasis added]</p> <p>Based on the statements made above, lack of targeted baseline field studies to identify the presence of Short-eared Owl (e.g., targeted point counts within potential suitable Short-eared Owl habitat following a recognized survey protocol, such as the Saskatchewan Species Detection Survey Protocol: 6.0 Short-eared Owl Surveys – April 2020), and non-detection during breeding bird point count surveys and ARU surveys, it is unclear how the Project Team</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions regarding the level of confidence in the predictions for Project-related net effects on Short-eared Owls.</p> <p>Alternatively, consider revising the level of confidence to <b>Low</b> and remove reference to "multi-year data collected from baseline studies"</p>	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

Comment #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		determined confidence in the predictions for Project-related net effects on Short-eared Owls is moderate.				
155.	Pg. 13-558 / 13.10.1	<p>Additional rationale is required to support the Project Team's conclusions that sufficient baseline monitoring was completed for Lesser Yellowlegs and Short-eared Owl.</p> <p>The Draft EAR/IS Report states, "<i>Baseline monitoring for the WSR project took place between 2019 and 2025. Collection of caribou collaring data took place between 2021 and 2025. Winter aerial surveys were conducted in 2018, 2019, and 2021 within the RSA and recorded both caribou and wolverine. Wolverine run poles we deployed in 2021 and 2022. Bat ARUs were deployed in 2019, 2020 and 2023. For all SAR birds ARUs were deployed to survey bird presence in 2020 and 2021. Breeding bird point count surveys were conducted in 2019 and 2020. Shorebirds including Lesser Yellowlegs was included as part of waterfowl aerial surveys that took place during 2019 and 2020. Bald Eagle nests were noted when they were observed during winter aerial surveys and during surveys for waterfowl and shorebirds. These studies are presumed to meet the requirements for pre-construction monitoring and additional pre-construction monitoring is not required.</i>" [emphasis added]</p> <p><b>Lesser Yellowlegs - Waterfowl Migration Surveys:</b> Based on the information provided, it appears Shorebird Migration Studies were conducted in conjunction with the Waterfowl Aerial Surveys in 2019 and 2020 (i.e., Section 13.2.1.2.3). However, limited information was provided in the Draft EAR/IS Report or associated Appendices on the methods and results for the Waterfowl Aerial Surveys (referred to as Waterfowl Migration Surveys in Appendix F). Despite this, differentiating between Lesser Yellowlegs and Greater Yellowlegs from the air can be challenging. Typical distinguishing factors include:</p> <ul style="list-style-type: none"> <li>- <i>Size</i> - Greater Yellowlegs are larger than Lesser Yellowlegs</li> <li>- <i>Bill</i> - Greater Yellowlegs have a longer, thicker bill that is often slightly upturned, while the Lesser has a shorter, thinner, and straighter bill</li> <li>- <i>Plumage</i>: Plumage differences are minimal and less helpful. Both are grayish-brown, but Greater Yellowlegs often shows more prominent breast streaking</li> <li>- <i>Call</i>: Their vocalizations are a key differentiator.</li> </ul>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to provide additional rationale to support the Project Team's conclusions that the field studies undertaken meet the requirements for pre-construction monitoring for Lesser Yellowlegs and Short-eared Owl and additional pre-construction monitoring is not required.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

Comment #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<p>The difficulty increases when birds are viewed from a distance or from a single, non-comparative perspective. It is also challenging to compare size and bill shape when the two species are not seen together.</p> <p>Additionally, Section 10.2.5.5.1 of Appendix F describes the methodology of the James Bay Shorebird Project used to identify shorebirds during the Waterfowl Migration Surveys and states, "<i>Greater and Lesser Yellowlegs (Tringa melanoleuca and T. flavipes) were generally counted as "yellowlegs species".</i>"</p> <p>As such, additional information is required on the waterfowl aerial surveys, including methods, results and the level of confidence that observers were able to differentiate between Lesser Yellowlegs and Greater Yellowlegs during surveys, or additional consideration should be given to the efficacy of the Waterfowl Migration Surveys for detecting Lesser Yellowlegs for the purpose of characterising existing conditions.</p> <p><b>Lesser Yellowlegs – Breeding Bird Point Count Surveys and ARUs:</b> Limited information was provided on the number of breeding bird point count stations and ARUs within suitable Lesser Yellowlegs habitat; and what percentage of Lesser Yellowlegs habitat was surveyed by either survey method. Additional information is required to support the Project Team's conclusion that the surveys conducted meet the requirements for pre-construction monitoring for Lesser Yellowlegs and additional pre-construction monitoring is not required.</p> <p><b>Short-eared Owl – Breeding Bird Point Count Surveys and ARUs:</b> As stated in Section 13.8.10, "<i>Short-eared Owls were not detected during field programs; however, as a relatively non-vocal species they can be difficult to detect during the breeding season and fall migratory period...</i>"</p> <p>As such, the ARUs deployed to survey bird presence are not likely appropriate or sufficient.</p> <p>Limited information was provided on the number of breeding bird point count stations within suitable Short-eared Owl habitat; and what percentage of Short-eared Owl habitat was surveyed. Additional information is required to support the Project Team's conclusion that the surveys conducted meet the requirements for pre-construction monitoring for Short-eared Owl and additional pre-construction monitoring is not required.</p>				

Comment #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
156.	Pg. 13-558 / 13.10.1	<p>The Draft EAR/IS Report states, “<i>These studies are presumed to meet the requirements for pre-construction monitoring and additional pre-construction monitoring is not required.</i>”</p> <p>The conclusion that existing baseline monitoring for species at risk, including Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, and Short-eared Owl, is expected to be adequate for pre-construction monitoring, and additional pre-construction monitoring is not required, may be valid for some wildlife species and in the short-term.</p> <p>However, should the initiation of construction be delayed for an extended period of time (e.g., 5+ years) following the completion of the provincial environmental assessment and any necessary authorizations, additional pre-construction monitoring may be required to inform an updated assessment of adverse effects and application of mitigation measures during the project authorization process, should an authorization be required under the ESA or SCA.</p> <p>Additionally, Wolverine lives at especially low densities and their dens are difficult to identify. Baseline data collected for existing conditions confirmed the presence of Wolverine within the LSA and RSA, but did not include a high density aerial transect survey across the entire Project during the denning period to identify Wolverine dens. As such, MECP SARB recommends the Project Team consider carrying out winter aerial transect surveys consistent with the methods previously developed and applied for the Webequie Supply Road Aerial Wolverine Denning Surveys to inform the WSR hydrogeological drilling program.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to recognize that additional baseline monitoring may be required to update an assessment of adverse effects during the ESA authorization process (i.e., permitting), should authorization under the ESA or SCA be required.	B - Recommended for EA  D - Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
157.	Pg. 13-558 / 13.10.1	<p>The Draft EAR/IS Report states, “<i>These studies are presumed to meet the requirements for pre-construction monitoring and additional pre-construction monitoring is not required.</i>”</p> <p>While the existing baseline data collected from the caribou studies identified were sufficient to inform baseline characterization for the purposes of the EAR/IS, additional pre-construction monitoring may be advisable to confirm areas that have not been identified as known or potential nursery areas or winter use areas are not being used by Caribou for the purposes of breeding and rearing, or wintering, respectively.</p>	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to include a commitment for additional pre-construction monitoring for Caribou (Boreal population) necessary to identify areas being used by Caribou for the purposes of breeding and rearing (i.e., nursery areas) or wintering (i.e., winter use areas).	B - Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
158.	Pgs. 13-558 to 13-	MECP SARB is unable to provide comment on the proposed Construction Monitoring without additional information; and some of the Construction	Please update this section of the Final EAR/IS Report, and all other relevant	B – Recommended for EA	3. Item will be addressed outside of the EAR/IS review process (i.e.,	B. Satisfied for now but will need to see final EA

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	560 / 13.10.2	<p>Monitoring may or may not be supported in part or entirely, depending on the survey methodology. Additional information is required regarding the proposed survey methodology or when the detailed survey methodology will be developed. As per previous comments, MECP SARB should be engaged on the development of the CEMP and OEMP.</p> <p>However, MECP SARB is providing the following preliminary comments for the Project Team's consideration:</p> <ul style="list-style-type: none"> <li>- <i>Caribou Collaring:</i> <ul style="list-style-type: none"> <li>o Please note, MECP SARB is supportive of carrying forward Caribou Collaring efforts to inform an assessment of effects of the Project and effectiveness of mitigation measures.</li> <li>o MECP SARB encourages the Project Team to consider developing and implementing a long-term Caribou Collaring monitoring approach to assess the effect of sensory disturbances associated with the construction, operation and maintenance of an all-season road on Caribou on Caribou, as part of the Construction Environmental Monitoring Program and Operation Environmental Monitoring Program.</li> </ul> </li> <li>- <i>Caribou Aerial Sweeps:</i> <ul style="list-style-type: none"> <li>o Aerial Sweeps for Boreal Caribou during the Nursery Period (May 1 to September 15) are not recommended given: <ul style="list-style-type: none"> <li>▪ There is a low likelihood of observing a reproductive female and/or calf, or evidence of calving and rearing.</li> <li>▪ Reproductive Boreal Caribou and their calves are especially sensitive to human activity during this period. Low-level aerial sweeps are likely to result in sensory disturbances which may increase stress, displace individuals, etc.</li> </ul> </li> </ul> </li> <li>- <i>Wolverine Denning Surveys:</i> <ul style="list-style-type: none"> <li>o The Draft EAR/IS Report states, "<i>Where clearance of construction activities is required within the wolverine denning period (February 1 to May 1) target denning surveys will be conducted within a 2 km radius of the proposed activity.</i>" [emphasis added]</li> </ul> </li> </ul>	<p>locations within the Report and associated Appendices, as appropriate, to include consideration for MECP SARB's preliminary comments and in the development of the CEMP and OEMP.</p> <p>Additionally, please plan to provide sufficient time to consult relevant ministries, including MECP, and Indigenous communities and organizations, on the development of appropriate monitoring activities.</p>	D – Permitting Related	taken on by the ultimate owner/operator)	Note: based on discussion with the WSR Project Team on December 19, 2025 in which they confirmed the Final EAR/IS would include a commitment for the ultimate owner/operator to address outside of the EAR/IS review process (i.e., permitting, detailed design)

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		<p>The Denning Period is broadly considered January 15 to May 31). Additionally, as per previous comments, surveys should be conducted up to 4 km from Project activities (i.e., a 4 km buffer of the activity for an 8 km diameter).</p> <ul style="list-style-type: none"> <li>- <i>Pre-construction Bat Maternity Roost Surveys:</i> <ul style="list-style-type: none"> <li>o It is unclear how these would add value. Based on background information, pre-construction surveys to inform existing conditions, etc., there is a moderate to high level of certainty regarding species at risk Bat habitat use. MECP SARB encourages the Project Team to assume any potential suitable habitat already identified as part of the EAR/IS is in fact potential maternity roost habitat and treat accordingly.</li> </ul> </li> <li>- <i>Species at Risk Bat Exit Surveys:</i> <ul style="list-style-type: none"> <li>o Additional information is required. This may be challenging to implement and/or cost-prohibitive given the amount of potential maternity roost habitat within the Project Footprint and LSA.</li> </ul> </li> <li>- <i>Species at Risk Bat Acoustic Monitoring:</i> <ul style="list-style-type: none"> <li>o It is unclear how these would add value. Based on background information, pre-construction surveys to inform existing conditions, etc., there is a moderate to high level of certainty regarding species at risk Bat habitat use. MECP SARB encourages the Project Team to assume any potential suitable habitat already identified as part of the EAR/IS is being used by species at risk Bats and treat accordingly.</li> </ul> </li> <li>- <i>Species at Risk Bat Acoustic Monitoring:</i> <ul style="list-style-type: none"> <li>o It is unclear how these would add value. Based on background information, pre-construction surveys to inform existing conditions, etc., there is a moderate to high level of certainty regarding species at risk Bat habitat use. MECP SARB encourages the Project Team to assume any potential suitable habitat already identified as part of the EAR/IS is being used by species at risk Bats and treat accordingly.</li> </ul> </li> </ul> <p>In addition to the proposed Construction Monitoring, MECP SARB encourages the Project Team to also consider the following in addition to any other effects and effectiveness monitoring the Project Team may propose:</p>				

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		<ul style="list-style-type: none"> <li>- Remote Camera Wolverine Den Survey of the Wolverine den and denning area identified during the pre-construction monitoring. The objective should be to determine if the denning area continues to be used during and after construction of the Project.</li> <li>- Acoustic Bat Surveys within the LSA.</li> <li>- Breeding Bird Point Count Surveys, with an emphasis on stations within suitable Lesser Yellowlegs and Short-eared Owl habitat.</li> <li>- ARU Surveys, with an emphasis on stations within suitable Lesser Yellowlegs habitat.</li> </ul> <p>MECP SARB highlights the importance of developing a detailed Construction Environmental Monitoring Program for species at risk, including Boreal Caribou, Wolverine, Bats, Lesser Yellowlegs, and Short-eared Owl; and consulting with the ministry and other relevant ministries and Indigenous communities and organizations. Please note, detailed information will be required to inform future authorizations under the ESA or SCA, should an authorization be required.</p> <p>Please note, an authorization under the ESA or SCA, should one be required, may include the construction monitoring proposed in the EAR/IS Report and/or any additional effects and effectiveness monitoring, as necessary.</p>				
159.	Pgs. 13-558 to 13-560 / 13.10.2	<p>Additional information is required regarding proposed ground sweeps and aerial surveys to clarify the proposed survey methodology, frequency, response (e.g. stop work processes), or when the detailed survey methodology will be developed (e.g., Environmental Protection Plan).</p> <p>MECP SARB notes a number of mitigation measures and construction monitoring programs include “ground sweeps” or aerial surveys in advance of construction.</p> <p>Please note, MECP SARB strongly encourages proponents avoid impacts to species at risk, including avoiding conducting development activities during sensitive time periods (e.g., nesting, roosting, rearing, denning, wintering, etc.). In some instances, ground sweeps and/or aerial surveys are not sufficient to determine <u>absence</u> and may result in unintended impacts to species at risk depending on the species, proposed methodology, frequency, timing, etc., thereby causing more harm. As such, MECP SARB generally does not support the use of wildlife sweeps as a means to <u>avoid</u> impacts to species at risk when undertaking development activities during sensitive time periods.</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to either:</p> <ol style="list-style-type: none"> <li>a. Include the species-specific methodology, frequency, response (e.g. stop work processes), and training associated with the proposed pre-clearing surveys; or</li> <li>b. If this level of detail will not or cannot be provided during the EAR/IS, include the following language:</li> </ol>	<p>B - Recommended for EA</p> <p>D – Permitting Related</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	<p>B. Satisfied for now but will need to see final EA</p>

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		<p>However, in situations where ground sweeps and/or aerial surveys are appropriate (e.g., wolverine transect surveys during the denning period), the Draft EAR/IS Report should either:</p> <ul style="list-style-type: none"> <li>a. Include additional details on specific methodology, frequency, training, and response (e.g. stop work processes) associated with the proposed ground sweeps and/or aerial surveys; including training of all field staff by a qualified biologist with expertise in audible and visual identification of species at risk and wolverine dens and denning areas, avian ground nests and nest defensive behaviours, and bat maternity roost habitat, and include separate methods for each species at risk and/or unique habitat (e.g., general SAR presence, wolverine dens and denning areas, caribou nursery areas, caribou winter use areas, bat maternity roost habitat, lesser yellowlegs nests, short-eared owl nests, etc.); or</li> <li>b. If this level of detail will not or cannot be provided during the EAR/IS, include the following language: <ul style="list-style-type: none"> <li>o <i>"The details of the ground-based and/or aerial-based pre-clearing surveys will be described in the Wildlife Management and Monitoring Plan which will be prepared prior to the project authorization process so as to inform provincial and federal authorizations, as necessary."</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>o <i>"The details of the ground-based and/or aerial-based pre-clearing surveys will be described during the detailed design stage of the Project in the Wildlife Management and Monitoring Plan which will be prepared prior to the project authorization process so as to inform provincial and federal authorizations, as necessary."</i></li> </ul>			
160.	Pgs. 13-560 to 13-561 / 13.10.3	<p>MECP SARB is unable to provide comment on the proposed Operations Monitoring without additional information; and some of the Operations Monitoring may or may not be supported in part or entirely, depending on the survey methodology. As per previous comments, MECP SARB should be engaged on the development of the CEMP and OEMP.</p> <p>However, MECP SARB is providing the following preliminary comments for the Project Team's consideration:</p> <ul style="list-style-type: none"> <li>- <i>Caribou Collaring:</i> <ul style="list-style-type: none"> <li>o Please note, MECP SARB is supportive of carrying forward Caribou Collaring efforts to inform an assessment of effects of the Project and effectiveness of mitigation measures.</li> </ul> </li> <li>- <i>Wolverine Run-pole Station Surveys:</i></li> </ul>	Please consider these preliminary comments in the development of the CEMP and OEMP.	B – Recommended for EA  D – Permitting Related	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response

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		<ul style="list-style-type: none"> <li>o Please note, MECP SARB is supportive of carrying forward a Wolverine Run-pole Station Survey to inform an assessment of effects of the Project and effectiveness of mitigation measures.</li> <li>- <i>Short-eared Owl Road-side Surveys:</i> <ul style="list-style-type: none"> <li>o Please note, in addition to ECCC, MECP SARB should also be consulted in the development of Short-eared Owl road-side surveys.</li> </ul> </li> <li>- <i>Lesser Yellowlegs Surveys:</i> <ul style="list-style-type: none"> <li>o Please note, in addition to ECCC, MECP SARB should also be consulted in the development of Lesser Yellowlegs Surveys.</li> </ul> </li> </ul> <p>In addition to the proposed Operations Monitoring, MECP SARB encourages the Project Team to also consider the following in addition to any other effects and effectiveness monitoring the Project Team may propose:</p> <ul style="list-style-type: none"> <li>- Remote Camera Wolverine Den Survey of the Wolverine den and denning area identified during the pre-construction monitoring. The objective should be to determine if the denning area continues to be used during and after construction of the Project.</li> <li>- Acoustic Bat Surveys within the LSA.</li> <li>- Breeding Bird Point Count Surveys, with an emphasis on stations within suitable Lesser Yellowlegs and Short-eared Owl habitat.</li> <li>- ARU Surveys, with an emphasis on stations within suitable Lesser Yellowlegs habitat.</li> </ul> <p>Please note, an authorization under the ESA or SCA, should one be required, may include the construction monitoring proposed in the EAR/IS Report, or include additional effects and effectiveness monitoring, as necessary.</p>				
161.	Pg. 21-20 / 21.3.4 / Table 21-2	The Draft EAR/IS Report scopes the project spatial boundaries of Species at Risk associated with the Juno Corporation Mining Exploration Activity to Caribou. However, these activities may also intersect with net effects to Wolverine from the Project.	Please consider updating this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to include Wolverine in the cumulative effects assessment associated with Juno Corporation Mining Exploration Activity.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
162.	Pgs. 21-129 to 21-205 / 21.4.8	MECP SARB encourages the Project Team to consider previous comments on the net effects assessment of species at risk, specifically Caribou, Wolverine, species at risk Bats, Lesser Yellowlegs, and Short-eared Owl, for the Project and update the cumulative effects assessment, as necessary.	Please update this section of the Final EAR/IS Report, and all other relevant locations within the Report and associated Appendices, as appropriate, to	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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			reflect MECP SARB's previous comments on the net effects assessment.			
163.	Pgs. 21-129 to 21-141 / 21.4.8.1	<p>As per previous comments, it appears several important factors for Boreal Caribou were not considered in the determination of Cumulative Effects.</p> <p>Boreal Caribou use habitat at multiple spatial scales. At the broad landscape scale, caribou require large, undisturbed areas of old or mature conifer upland forest and lowlands dominated by jack pine and/or black spruce. These areas allow caribou to effectively separate themselves from higher densities of moose, white-tailed deer, grey wolves and black bears which tend to be associated with younger mixed or deciduous forest. At smaller scales, caribou seasonally select specific habitat features and areas that support successful reproduction and calf rearing, provide summer and/or winter forage, and/or facilitate movement between discrete areas of use.</p> <p>Caribou depend directly and indirectly on the entire range as habitat. The sum of all constituent sub-range habitat features is required for caribou to carry out their life processes and for populations to persist for multiple generations. While the availability, amount, and distribution of these features shift spatially and temporally within the range due to natural and anthropogenic disturbance events and successional change, the primary ecological function of the range is the collective provision of effective refuge from predation (Rettie and Messier 2000; Racey and Arsenault 2007).</p> <p>The <a href="#">Range Management Policy in Support of Woodland Caribou Conservation and Recovery</a> (RMP) describes the Range Management Approach which involves managing both broad range-level influences and impacts including cumulative disturbance, and habitat amount and arrangement, as well as smaller scale components including the ecological function of sub-range habitat features, which result in a caribou demographic response (i.e. increasing, stable or declining population trend) within the range.</p> <p>The objective of the RMP is to maintain or move toward a sufficient range condition in all caribou ranges in Ontario, which will be achieved through the consideration of range condition in activity review and assessment and the collective implementation of three principles – cumulative disturbance, habitat amount and arrangement, and sub-range habitat features.</p> <p>As such, measurable parameters for Caribou (Boreal population) should include the following under the proposed Indicators, as per the RMP:</p>	<p>Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to incorporate the following:</p> <ul style="list-style-type: none"> <li>- Wildlife Habitat Loss/Destruction (Changes to SAR habitat availability) and Wildlife Habitat Alteration/Degradation (Changes to abundance and distribution of SAR habitat) <ul style="list-style-type: none"> <li>o Changes to the amount of cumulative disturbance within the LSA, RSA and individual Caribou ranges (i.e., Principle 1 of the RMP and the 3<sup>rd</sup> line of evidence in the determination of range condition);</li> <li>o Changes to the amount and arrangement of habitat within the LSA, RSA and individual Caribou ranges (i.e., Principle 2 of the RMP and the 2<sup>nd</sup> line of evidence in the determination of range condition);</li> <li>o Changes in the spatial configuration and connectivity of categorized habitats (i.e., Category 1, 2 and 3 habitat as per the <a href="#">General habitat</a></li> </ul> </li> </ul>	<p>B – Recommended for EA</p> <p>D – Permitting Related</p>	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	<p>B. Satisfied for now but will need to see final EA</p>

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		<ul style="list-style-type: none"> <li>- Wildlife Habitat Loss/Destruction (Changes to SAR habitat availability) and Wildlife Habitat Alteration/Degradation (Changes to abundance and distribution of SAR habitat) <ul style="list-style-type: none"> <li>o Changes to the amount of range-level cumulative disturbance within the LSA, RSA and individual Caribou ranges (i.e., Principle 1 of the RMP and the 3<sup>rd</sup> line of evidence in the determination of range condition);</li> <li>o Changes to the amount and arrangement of habitat within the LSA, RSA and individual Caribou ranges (i.e., Principle 2 of the RMP and the 2<sup>nd</sup> line of evidence in the determination of range condition);</li> <li>o Changes in the spatial configuration and connectivity of categorized habitats (i.e., Category 1, 2 and 3 habitat as per the <a href="#">General habitat description for the Forest-dwelling Woodland Caribou</a> (i.e., Principle 3 of the RMP); and</li> <li>o Changes in the spatial distribution and movement of animals.</li> </ul> </li> <li>- Wildlife Injury or Death (Changes in SAR populations or SAR mortality) <ul style="list-style-type: none"> <li>o Changes to population size (e.g., minimum animal count or population estimate, where available) (i.e., 1<sup>st</sup> line of evidence in the determination of range condition)</li> <li>o Changes to survival rates;</li> <li>o Changes to recruitment rates; and</li> <li>o Changes to population trend (<math>\lambda</math>) as estimated through consideration of survival and recruitment estimates (i.e., 2<sup>nd</sup> line of evidence in the determination of range condition).</li> </ul> </li> <li>- Range Condition <ul style="list-style-type: none"> <li>o Additionally, the above changes should be described and considered in an assessment of the potential change to Range Condition for each range in the RSA (i.e., Missisa and Ozhiski).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- <a href="#">description for the Forest-dwelling Woodland Caribou</a> (i.e., Principle 3 of the RMP); and <ul style="list-style-type: none"> <li>o Changes in the spatial distribution and movement of animals.</li> </ul> </li> <li>- Wildlife Injury or Death (Changes in SAR populations or SAR mortality) <ul style="list-style-type: none"> <li>o Changes to population size (e.g., minimum animal count or population estimate, where available) (i.e., 1<sup>st</sup> line of evidence in the determination of range condition)</li> <li>o Changes to survival rates;</li> <li>o Changes to recruitment rates; and</li> <li>o Changes to population trend (<math>\lambda</math>) as estimated through consideration of survival and recruitment estimates (i.e., 2<sup>nd</sup> line of evidence in the determination of range condition).</li> </ul> </li> <li>- Range Condition <ul style="list-style-type: none"> <li>o Additionally, the above changes should be described and considered in an assessment of the potential change to Range Condition for each range in the RSA (i.e., Missisa and Ozhiski).</li> </ul> </li> </ul>			

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164.	Pg. 21-141 / 21.4.8.1.5 / Table 21-53	The specific cumulative effect scores are not included in Table 21-53 for Caribou.	Please update Table 21-53 of the Final EAR/IS Report to include the cumulative effect scores for Caribou.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
165.	Pg. 21-150 / 21.4.8.2.5 / Table 21-56	The specific cumulative effect scores are not included in Table 21-56 for Wolverine.	Please update Table 21-56 of the EAR/IS Report to include the cumulative effect scores for Wolverine.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
166.	Pg. 21-205 / 21.4.8.9.5 / Table 21-80	The specific cumulative effect scores are not included in Table 21-80 for Short-eared Owl.	Please update Table 21-80 of the EAR/IS Report to include the cumulative effect scores for Short-eared Owl.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
<b>Appendix C-3 Multiple Accounts Assessment Datasets</b>						
167.	Wildlife / Wolverine, Species at Risk / Area of den habitat sites within 2 km impacted	<p>Appendix C-3 identifies one of the indicators for the Wolverine Species at Risk Criteria as, “<i>Area of den habitat sites within 2 km impacted. (den + 2km buffer around den &amp; the area of this buffer that intersects the ROW).</i>”</p> <p>For clarity, existing evidence indicates reproductive females use areas double that identified in this indicator (i.e., 4 km) or more during the Denning Period (January 15 to May 31); and may move kits, abandon the den, and/or abandon the kits when human activities occur within 4 km of the den. As such, consideration of impacts to Wolverine dens should be expanded to a minimum of 4 km (i.e., buffer den sites 4 km and quantify the are of impact as the amount of the denning area within 4km of the ROW).</p> <p>Alternatively, please provide additional rationale and justification, including references to literature, to support the Project Team’s decision to limit consideration of this indicator to 2 km of den sites.</p>	Please update this section of Appendix C-3, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to provide additional rational and justification to support the Project Team’s decision to limit consideration of this indicator to 2 km of den sites.	A – Required for EA	<p>The 2 km area for the Wolverine Species at Risk Criteria for denning sites was strictly applied to the comparison of potential routes and selection of the preferred route during the alternatives assessment. The potential routes that were being compared against each other in the alternatives assessment were so tightly spaced (geographically), that extending the area of assessment for the Wolverine Species at Risk Criteria for denning sites to 4 km would not have resulted in a difference between them.</p> <p>This was not carried forward into the assessment of effects on Wolverine denning sites where the LSA consisted of an 11 km (2,513 km<sup>2</sup>) offset from the centreline of the preferred route, and from supportive infrastructure and the RSA consisted of a 75 km (37,986 km<sup>2</sup>) buffer from either of LSA boundaries.</p>	A. Satisfied with response

Comment #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
168.	Wildlife / Wolverine, Species at Risk / Area of habitat impacted (500 m buffer around the ROW)	<p>Appendix C-3 identifies one of the indicators for the Wolverine Species at Risk Criteria as, “<i>Area of habitat impacted (500 m buffer around the ROW).</i>”</p> <p>It is unclear why 500 m was selected as the maximum spatial extent in which to quantify impacts to Wolverine habitat. Additional rationale and justification are required, including references to literature.</p> <p>Wolverine have large home ranges and use landscapes at broad geographic scales much larger than 500 m. Existing evidence indicates Wolverine may alter their use of habitat within 4 km or more of anthropogenic activities.</p>	Please update this section of Appendix C-3, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to provide additional rationale and justification to support the Project Team's decision to quantify impacted habitat within 500 m of the ROW.	A – Required for EA	<p>The 500 m area for the Wolverine Species at Risk Criteria for habitat impacts was strictly applied to the comparison of potential routes and selection of the preferred route during the alternatives assessment. The potential routes that were being compared against each other in the alternatives assessment were so tightly spaced (geographically), that extending the area of assessment for the Wolverine Species at Risk Criteria for habitat impacts to 4 km would not have resulted in a difference between them.</p> <p>This was not carried forward into the assessment of effects on Wolverine for habitat impacts where the LSA consisted of an 11 km (2,513 km<sup>2</sup>) offset from the centreline of the preferred route, and from supportive infrastructure and the RSA consisted of a 75 km (37,986 km<sup>2</sup>) buffer from either of LSA boundaries.</p>	A. Satisfied with response
<b>Appendix F Natural Environment Existing Conditions Report</b>						
169.	Pg. 453 / 10.2.5.2.1	Based on the information provided in Section 13.2.3.1.5 of the Draft EAR/IS Report, it appears 25 acoustic detection stations were monitored in 2023. However, no information is provided on the 2023 Acoustic Surveys.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report as appropriate, to include relevant information for the 25 Acoustic Surveys.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
170.	Pg. 453 / 10.2.5.2.2	It is unclear what ELC codes were considered potential bat maternity habitat as shown in Figure 10.6 on pg. 454 (i.e., treed bat ELC classes). Additional clarity is required (i.e., list each ELC class used to map potential bat maternity habitat) and provide rationale and justification for the inclusion or exclusion of each.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report as appropriate, to include a list of each ELC class used to map potential bat maternity habitat and provide rationale and justification for the inclusion or exclusion of each.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
171.	Pg. 494 / Table 10.24	Based on the results of recorded passes for each species during the maternity roosting season in 2019 and 2020, it appears very few bat passes were recorded at several stations (i.e., BAT 4, BAT 5, BAT 6, BAT 9). Additional information should be provided discussing why these ARU's recorded no, or very few, bat passes.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to include a discussion on why some ARU's recorded no, or very few, bat passes.	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
172.	Pg. 622 / 11.3.2.4	The Draft EAR/IS Report, including this appendix, lack sufficient information on, and discussion of, potential biases in the Caribou collaring data because of clustered collar deployment in the western half of the LSA. Additional information should also be provided on the capture work, including maps showing areas searched and/or tracklogs of the capture crew, all relevant information associated with the individuals captures (e.g., group size, group composition, etc.).	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to include additional information on the capture work, including maps showing areas searched and/or tracklogs of the capture crew, all relevant information associated with the individuals captures (e.g., group size, group composition, etc.).	B – Recommended for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
173.	Pg. 622 / 11.3.2.4.3	As stated, the analysis of spatial movements and ecotype evaluations was limited to Caribou collaring data collected between collar deployment (i.e., February/March 2021) and December 31, 2021. Recognizing an additional 2-3 years of data was collected by the WSR Project, these analyses need to be updated to consider all data collected by the WSR Project, as well as MNR's collaring data, and MFCAR and NRL's collaring data, and reflected in the Final EAR/IS Report.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to incorporate all Caribou collaring data collected by the WSR, NRL, MFCAR, and MNR Projects in the analysis of spatial movements and ecotype evaluations.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
174.	Pg. 622 / 11.3.2.4.3	Additional information should be provided on the ecotype evaluation carried out by the Project Team, including separate maps of individuals movement and calculation of mean distance to treeline for each individual. This should also be done for each unique calving season, as some Caribou have been known to switch behaviours.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to incorporate all Caribou collaring data collected by the WSR, NRL, MFCAR, and MNR Projects in the analysis of spatial movements and ecotype evaluations.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
175.	Pg. 622 / 11.3.2.4.4	As stated, the analysis of mortalities was limited to collared Caribou up to December 31, 2021. Recognizing an additional 2-3 years of data was collected by the WSR Project, these analyses need to be updated to consider all data collected by the WSR Project, as well as MNR's collaring data, and MFCAR and NRL's collaring data, and reflected in the Final EAR/IS Report.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to incorporate all Caribou collaring data collected by the WSR, NRL, MFCAR, and MNR Projects in the analysis of mortalities.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
176.	Pg. 622 / 11.3.2.4.4	Additional information should be provided for each individual that died during the course of the Caribou Collaring Study, including relevant information about the mortality investigations (e.g., date, weather, etc.), the Project Team's determination of cause of mortality for each individual, and any photos taken that would support the determination.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report and other Appendices as appropriate, to provide additional details on the mortalities.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
177.	Pg. 634 / 11.3.3.1.5 (Home Range)	Additional information should be provided showing the MCP's created for the six (6) Wolverine (i.e., W01, W02, W03, W04, W05, and W08).	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report as appropriate, to include Figures showing the MCP's created for each Wolverine.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
178.	Appendix 10-A1	Based on the information provided in Section 13.2.3.1.5 of the Draft EAR/IS Report, it appears 25 acoustic detection stations were monitored in 2023. However, these stations are not included in Appendix 10-A1.	Please update this section of Appendix F, and all other relevant locations within the EAR/IS Report as appropriate, to include relevant information for the 25 acoustic detection stations in 2023.	A - Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
179.	Appendix 10-B / Table 10B-1	The information provided in Appendix 10-B appears to be related to Birds, and not Caribou Nursery Habitat Surveyed in 2018.	Please update Appendix 10-B of Appendix F to include the relevant information associated with Caribou Nursery Habitat Surveyed in 2018.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
180.	Appendix 11-A2	The information provided only includes distinct visits by Wolverine to run pole stations in 2021. Additional information should be provided for the 145 distinct appearances at run pole stations in 2022.	Please update Appendix 11-A2 of Appendix F to include the relevant information for distinct visits by Wolverine to run pole stations in 2022.	A – Required for EA	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

**MECP:**

**Drinking Water  
and Environmental  
Compliance Division;  
Northern Region**



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Jacinth Gilliam-Price, Surface Water Specialist

**Ministry and Branch:** Ministry of the Environment, Conservation and Parks; Drinking Water and Environmental Compliance Division; Northern Region

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent’s response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
1.	Environmental Assessment/ Impact Statement (EA/IS) Pages 4-41 – 4-43 / Section 4.4.2.3.3	Section 4.4.2.3.3 discusses aggregate extraction and processing at pits/quarries and identifies that extraction of groundwater and surface water may be needed for the processing of aggregate. It also indicates that a drainage management system will be used for capturing and treating runoff at pit/quarry sites. This section further identifies that a Permit to Take Water (PTTW) or Environmental Activity and Sector Registration (EASR) would be secured when necessary. However, in many cases, an Environmental Compliance Approval (ECA) is also required for treatment of aggregate processing water and other site drainage that may have come into contact with blasted material. Sources of water are also often needed at pit/quarry sites for dust	Section 4.4.2.3.3 should be updated to identify the potential need for PTTWs for dust suppression, etc., and an ECA for the management of site drainage water and treatment of aggregate processing water. These sections should also discuss measures to be put in place to mitigate impacts from wash-off of explosive residue to nearby waterbodies.	B	Section 4.4.2.3.3 has been revised to indicate that the PTTW or EASR may also be required for dust suppression. The potential requirement for ECA for the treatment of aggregate processing water and site drainage features that come into contact with blasted materials have also been added to this section.  In addition, dewatering/pumping and PTTW requirements for the aggregate sites (including pits and quarries) have been assessed and discussed in Section 8.3.5.2.  Associated mitigation measures and monitoring plans for the discharge water are provided in Section 8.4.5. Sources of water for dust suppression and control can be obtained from discharge water pumped out from the quarry or pit sumps and from one of the recycling ponds (settling ponds) to be constructed at the site. However, if	A. Satisfied with response, however Section 8.4.5 identifies that discharge water quality will be compared against Provincial Water Quality Objectives (PWQO). It is recommended that Section 8.4.5 be updated to ensure that discharge water quality is compared against appropriate water quality guidelines (WQG)/benchmarks, as recommended under the MECP’s Comment # 2. A hierarchical approach to the selection of WQG/benchmarks is recommended to be followed. The MECP’s direction in the selection of guidelines considers whether the benchmark is a regulatory standard, as well as scientific methods and approaches of other jurisdictional programs, alignment with Ontario protection policies, age of the benchmarks, and applicability to

Comment #	GRT Comments				Proponent Response	GRT Follow Up
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		<p>suppression activities, which will require a PTTW.</p> <p>Blasting is proposed for aggregate sourcing. In addition to the proper transport and storage of explosives, measures should be put in place to mitigate impacts from wash-off of explosive residue to nearby waterbodies.</p>			<p>needed, a supply well can also be drilled to provide water for dust control. The wash-off effluent can be managed by a series of onsite recycling ponds including settling ponds. The ponds can receive water from quarry sumps and rainwater, and surface water runoff and discharge offsite when overflow is needed with an ECA.</p>	<p>Ontario (e.g., similar species or climate conditions). For the purpose of developing WQG/benchmarks for the protection of aquatic life, the MECP considers the following:</p> <ol style="list-style-type: none"> <li>1. Use the most recently developed of: <ol style="list-style-type: none"> <li>a. Provincial Water Quality Objective (PWQO) or</li> <li>b. Canadian Water Quality Guideline (CWQG) or</li> <li>c. ECCC Federal Water Quality Guidelines (FWQGs)</li> </ol> </li> <li>2. In absence of above: <ol style="list-style-type: none"> <li>a. British Columbia MOE Approved Water Quality Criteria (WQC, deterministic only)</li> </ol> </li> <li>3. In absence of above, use the following with caution: <ol style="list-style-type: none"> <li>a. British Columbia MOE Approved Water Quality Criteria (WQC, statistical)</li> <li>b. European Union Water Quality Standards / Environmental Risk Limits</li> <li>c. US EPA Ambient Water Quality Criteria</li> </ol> </li> </ol>
2.	Environmental Assessment/Im	Table 7-1 identifies Key Regulation, Legislation, Policy Relevant to Surface	It is recommended that Section 7.1 include reference to a	B	Table 7-1 has been modified by adding the Federal Water Quality Guidelines	A. Satisfied with response

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	Impact Statement (EA/IS) Page 7-6 / Table 7-1	Water Resources. The table references the Provincial Water Quality Objectives (PWQO) and the use of these objectives as acceptable limits during road construction and aggregate pit operations for dewatering effluent to meet for surface water quality to protect aquatic life and recreation. Table 7-1 also identifies the Canadian Water Quality Guidelines (CWQG) for the Protection of Aquatic Life used for tracking changes at one site over time and comparisons among sites. It should be noted that MECP relies on both provincial and federal guidelines for the selection of water quality guidelines(WQG)/benchmarks to be used in protecting surface water quality and aquatic life. Selection of applicable benchmarks considers whether the benchmark is a regulatory standard, as well as scientific methods and approaches of other jurisdictional programs, alignment with Ontario protection policies, age of the benchmarks, and applicability to Ontario (e.g., similar species or climate conditions).	hierarchical approach to the selection of WQG/benchmarks. The MECP's direction in the selection of guidelines considers whether the benchmark is a regulatory standard, as well as scientific methods and approaches of other jurisdictional programs, alignment with Ontario protection policies, age of the benchmarks, and applicability to Ontario (e.g., similar species or climate conditions). For the purpose of developing WQG/benchmarks for the protection of aquatic life, the MECP considers the following: 1. Use the most recently developed of: a. Provincial Water Quality Objective (PWQO) or b. Canadian Water Quality Guideline (CWQG) or c. ECCC Federal Water Quality Guidelines (FWQGs) 2. In absence of above: a. British Columbia MOE Approved Water Quality		(FWQGs) to the list, in addition to PWQO and CWQG. Typically, these three guidelines would cover all parameters but the other options will be examined if a parameter of concern is missing from the three primary guideline documents. This will include, as recommended, consideration of the documents identified by the reviewer in Items 2 and 3.	

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			<p>Criteria (WQC, deterministic only)</p> <p>3. In absence of above, use the following with caution:</p> <p>a. British Columbia MOE Approved Water Quality Criteria (WQC, statistical)</p> <p>b. European Union Water Quality Standards / Environmental Risk Limits</p> <p>c. US EPA Ambient Water Quality Criteria</p>			
3.	Environmental Assessment/ Impact Statement (EA/IS) Page 7-26 / Table 7-5	Table 7-5 identifies Project Interactions with Surface Water Resources VC and Potential Effects. Potential for Accidents and Malfunctions has been listed as a project activity and within this, "flooding" is listed; however, change in surface water quantity was not identified as a potential effect. This should be selected as it is anticipated that changes to water quantity (flows and levels) would occur as a result of flooding, otherwise further explanation is needed here to clarify what is meant by "flooding".  Table also indicates not change to flow during operations; however,	It is recommended that either a change in surface water quantity should be identified as a potential effect in Table 7-5 in relation to accidents and malfunctions, or further explanation should be included to clarify what is meant by "flooding".	B	Table 7-5 has been modified to remove "flooding" as it's not appropriate in this context. The table has also identified change in water quantity as a potential effect in any accident or malfunction during operations that may block or alter that water pathway.	A. Satisfied with response

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		section 7.3.1 thoroughly acknowledges that changes to surface water quantity is possible throughout operations.				
4.	Environmental Assessment/ Impact Statement (EA/IS) Page 7-32 / Table 7-6	Table 7-6 listed water quality sampling sites by watershed name and sampling sites (waterbody crossings), while the sampling locations are depicted in Figure 7.2. The figure provides an appropriate visual of sampling locations across the project; however, Table 7-6 should be updated to list water crossing names (stream/lake names where available) and geographic coordinates.	It is recommended that Table 7-6 be updated to include water crossing names (stream/lake names where available) and geographic coordinates for each of the sampling sites codes.	B	Table 7-6 has been modified to include coordinates for each crossing. However, no crossing names are proposed to be added as our preference is to retain identifier (ID #'s) for the crossings to minimize potential duplication or confusion to the reader. We note that many of the water crossings have no formal names, hence would be labelled as unnamed waterbody.	A. Satisfied with response
5.	Environmental Assessment/Impact Statement (EA/IS) Page 7-32 / Table 7-7	The MECP's previous comments on the Webequie Supply Road Project – Draft Technical Work Plan included surface water quality parameters/analytes recommendations. Dissolved organic carbon (DOC) was one of these parameters but does not appear to be listed in Table 7-7. This parameter is important and is often needed in the calculation of water quality guidelines for other parameters.	Clarification is needed respecting whether DOC was assessed during the surface water quality baseline studies. If not, it is recommended that additional representative baseline surface water quality sampling be carried out to assess this parameter.	B	Dissolved Organic Carbon was not one of the water quality parameters examined as part of the surface water sampling program to characterize existing conditions. The proponent makes commitment to capture DOC at select waterbody crossings in subsequent stages of project development as additional representative of baseline conditions and in future surface monitoring programs during the construction and operation phases of the Project.	A. Satisfied with response; however, it is recommended that the additional representative <u>baseline</u> surface water quality sampling for DOC be carried out prior to the initiation of construction activity in the vicinity of the watercourse/waterbody to be sampled.  <b>Proponent's response:</b> Yes, it will be carried out prior to construction.
6.	Environmental Assessment/Impact Statement	Baseline sediment samples were collected in October 2020 from only five waterbodies due to poor weather	It is recommended that EA/IS include a commitment to carry out additional baseline	B	A commitment has been made to collect additional baseline sediment samples at select waterbody crossings	A. Satisfied with response

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	(EA/IS) Page 7-33 / Section 7.2.1.4.1	and access conditions. Although sampling from every water body within the study area is not expected, a sample size of five is not sufficient to provide adequate representative sediment quality baseline data.	sediment sampling during pre-construction monitoring that will ensure adequate representative sediment quality baseline data.		prior to construction to provide supplemental sediment quality baseline data.	
7.	Environmental Assessment/Impact Statement (EA/IS) Page 7-51 / Section 7.4.1	Section 7.4.1 discusses mitigation measures associated with dewatering, water takings, and discharges and identifies the potential need for PTTWs and EASRs; however, as discussed under comment 1 above, an Environmental Compliance Approval (ECA) is also required for treatment of aggregate processing water and other site drainage that may have come into contact with blasted material.	It is recommended that section 7.4.1 be updated to identify the potential need for an ECA for the management of site drainage water and treatment of aggregate processing water at pit/quarry locations.	B	Section 7.4.1 has been revised to add that an ECA may be required for the treatment of aggregate processing water at pits/quarries and/or site drainage features that come into contact with blasted materials. Refer to responses for comment #1.	A. Satisfied with response.
8.	Environmental Assessment/Impact Statement (EA/IS) Page 22-7 / Table 22-1	Table 22-1: Summary of Proposed Follow-up and Monitoring Programs provides a summary of all follow-up and monitoring programs to be carried out following construction. Under the Fish and Fish Habitat valued component, periodic fish community and habitat surveys will be completed to detect changes in fish assemblages; however, it is not clear if this includes benthic macroinvertebrate sampling. In addition to surface water quality sampling, results from invertebrate	Clarification is needed to confirm that follow-up benthic macroinvertebrate sampling will be carried out in conjunction with fish and fish habitat monitoring. This should be added to Table 22-1.	B	No follow-up benthic macroinvertebrate sampling is proposed at this time in conjunction with the fish and fish habitat monitoring. However, we note that follow-up benthic macroinvertebrate sampling may be a monitoring requirement at select waterbody crossings where an authorization under the <i>Fisheries Act</i> is anticipated for the project.	A. Satisfied, so long as follow-up benthic macroinvertebrate sampling is carried out at waterbody crossings where an authorization under the <i>Fisheries Act</i> is anticipated.

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		sampling provides indications of potential impacts to surface water quality and in turn fish communities and their habitat.				

# MECP: Drinking Water and Environmental Compliance Division, Technical Support Section



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Matthew Agombar, Air Quality Analyst

**Ministry and Branch:** MECP, Drinking Water and Environmental Compliance Division, Technical Support Section

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
1.	Appendix G. Page 12 – Table 1-1, Section 1.5	<ul style="list-style-type: none"> <li>Ozone is not listed as an Air Quality Valued Component (VC) despite being referenced in the 2020 WSR Climate Change and Air Quality Work Plan and the Tailored Impact Statement Guidelines (TISG). Including ozone aligns with the work plan, meets federal requirements and ensures consistency with other Criteria Air Contaminants (CACs).</li> </ul>	<ul style="list-style-type: none"> <li>Add Ozone to the list of indicators in Table 1-1 and clarify its inclusion in the rationale.</li> </ul>	B	Ozone will be added as an indicator for the Air quality VC in the revised Air Quality Impact Assessment (AQIA) report.	
2.	Appendix G. Page 24 Section 2.4, Table 2-2	<ul style="list-style-type: none"> <li>Diesel Particulate Matter (DPM) should be compared to Health Canada's acute and chronic exposure guidance values (2016) for informational purposes, even if no regulatory standard exists.</li> </ul>	<ul style="list-style-type: none"> <li>Include reference values from Health Canada (2016) for DPM in Table 2-2 or in a footnote, and clarify that these are for informational context.</li> </ul>	B	The DPM guidance values for chronic exposure (5 µg/m³ - annual) and short-term exposure (10 µg/m³ - average over 2 hours) will be added to the study. Health Canada (2016) does not provide indications on the statistical representation to use for the short-term exposure guidance value. Considering that the PM <sub>2.5</sub> 24-h CAAQS and Ontario 24-h AAQC are based on	

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					the 3-year average of the annual 98 <sup>th</sup> percentile of the daily 24-hr average concentrations, then the same statistical approach will be used for the 2-h DPM guidance value.	
3.	Appendix G. Page 25 – Table 2-2	<ul style="list-style-type: none"> <li>The first footnote (geometric mean) is not referenced in the table, causing misalignment in footnote numbering. This may confuse interpretation of PM<sub>2.5</sub> and PM<sub>10</sub> values.</li> </ul>	<ul style="list-style-type: none"> <li>Add a "(1)" reference in the table where applicable, renumber footnotes accordingly, and ensure footnote (4) is complete and legible.</li> </ul>	C	References have been corrected in the revised AQIA report.	
4.	Appendix G Page 25 – Table 2-2	<ul style="list-style-type: none"> <li>The nitrogen dioxide (NO<sub>2</sub>) values listed in Table 2-2 do not reflect the most current Ontario AAQC conversions. According to the Ontario AAQC documentation: <ul style="list-style-type: none"> <li>400 µg/m<sup>3</sup> is equivalent to 200 ppb</li> <li>200 µg/m<sup>3</sup> is equivalent to 100 ppb</li> </ul> </li> <li>The table lacks explanatory notes for annual NO<sub>2</sub> CAAQS.</li> <li>The sulphur dioxide (SO<sub>2</sub>) values listed in Table 2-2 do not reflect the most current Ontario AAQC conversions. According to the Ontario AAQC documentation and ONTARIO AIR STANDARDS FOR SULPHUR DIOXIDE (SO<sub>2</sub>): <ul style="list-style-type: none"> <li>4 ppb is equivalent to 10 µg/m<sup>3</sup></li> <li>40 ppb is equivalent to 100 µg/m<sup>3</sup></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Correct the NO<sub>2</sub> values in the table to align with Ontario AAQC conversions: <ul style="list-style-type: none"> <li>1-hour AAQC: 400 µg/m<sup>3</sup> = 200 ppb</li> <li>Annual AAQC: 200 µg/m<sup>3</sup> = 100 ppb</li> </ul> </li> <li>Ensure consistent presentation of both units and cite the Ontario AAQC documentation as the source if needed</li> <li>Include the following explanatory note for the annual NO<sub>2</sub> CAAQS value to ensure consistency with other CAAQS entries: <ul style="list-style-type: none"> <li>"Applicable starting in 2025. The average over a single calendar year of all 1-hour average concentrations."</li> </ul> </li> </ul>	B	<p>Items 1 and 4: Modifications have been completed, but please note that the conversion factors presented in Ontario's Ambient Air Quality Criteria website (as of November 2025) do not reflect the numbers provided in this comment for SO<sub>2</sub>. Also, please note that 200 µg/m<sup>3</sup> for NO<sub>2</sub> is for the 24-h AAQC, not the annual one.</p> <p>Item 2: Consistent presentation of both units and citation of the Ontario AAQC has been completed.</p> <p>Item 3: Agreed. Footnote has been added.</p>	

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		<ul style="list-style-type: none"> <li>67 ppb is equivalent to 180 µg/m³</li> </ul>	<ul style="list-style-type: none"> <li>Correct the SO<sub>2</sub> values in the table to align with Ontario AAQC conversions:               <ul style="list-style-type: none"> <li>10-minute AAQC: 180 µg/m³ = 67 ppb</li> <li>1-hour AAQC: 100 µg/m³ = 40 ppb</li> <li>Annual AAQC: 10 µg/m³ = 4 ppb</li> </ul> </li> </ul>			
5.	Appendix G Page 25 – Table 2-2	<ul style="list-style-type: none"> <li>The 24-hour AAQC value for Benzo(a)pyrene (BaP) is incorrectly listed as the Daily Assessment Value (DAV).</li> <li>For the purposes of this EA, comparison should be made to the AAQC and not the DAV.</li> </ul>	<ul style="list-style-type: none"> <li>Replace the DAV with the correct 24-hour AAQC value of 0.00005 µg/m³ for comparison purposes.</li> </ul>	B	The proposed replacement and correction has been completed for the revised AQIA report.	
6.	Appendix G Page 25 – Table 2-2 & Table 3-16, Table 3-17 etc.  Appendix P – Table 3-2	<ul style="list-style-type: none"> <li>The annual AAQC for dustfall is missing, which is necessary for evaluating long-term deposition impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Add the annual AAQC for dustfall (4.6 g/m²) in addition to the monthly dustfall AAQC to the appropriate tables and ensure it is referenced in relevant modeling result tables.</li> </ul>	B	Annual dustfall results to compare with the annual AAQC have been added to the revised AQIA report.	
7.	Appendix G Page 25 – Table 2-3	<ul style="list-style-type: none"> <li>The report uses maximum observed concentrations from monitoring stations to represent background levels for short-term averaging periods (e.g., 1-hour, 8-hour, 24-hour). While this is a conservative approach, it may bias the background values high. In contrast,</li> </ul>	<ul style="list-style-type: none"> <li>None Required</li> </ul>	-	Noted.	

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		annual background concentrations are often derived from multi-year averages or percentile-based metrics (e.g., 3-year average of the annual 98th or 99th percentile). This is noted as an observation and no action required.				
8.	Appendix G Page 25 – Table 2-3	<ul style="list-style-type: none"> <li>Provide a rationale explaining how each selected monitoring station is representative of baseline air quality conditions in the study area, including geographic and environmental similarities.</li> </ul>	<ul style="list-style-type: none"> <li>Include a paragraph explaining the representativeness of each selected station to this project.</li> </ul>	B	A table has been added in the revised AQIA report listing all stations used to determine the different background concentrations with short descriptions about their location, nearby environment and how it relates to the project site.	
9.	ES 8.1.3, Section ES 8.4.3  Appendix G – Section 4.4, Section 7.1,  Appendix P – Executive Summary	<ul style="list-style-type: none"> <li>Several mitigation measures related to air quality and dust control are described throughout the report. These include operational practices and equipment standards that are important to track as formal commitments.</li> <li>Include a mechanism for verifying Tier 4F engine usage in the Air Quality and Dust Control Management Plan.</li> <li>Include the monitoring procedure for Dustfall effects and measures to control or limit particulate emissions as stated in Appendix P.</li> </ul>	<p>Ensure the following mitigation measures are formally committed to in the EA tables and tracked through the Air Quality and Dust Control Management Plan</p> <ul style="list-style-type: none"> <li>Development and implementation of an <b>Air Quality and Dust Control Management Plan</b> for both construction and operations phases.</li> <li>Use of <b>dust suppression systems at quarries</b>.</li> <li>Use of <b>water sprays</b> from trucks to suppress dust on haul roads and stockpiles.</li> </ul>	B	Mitigation measures as identified will be reflected in the EA tables, where applicable and will be reflected and tracked in the Air Quality and Dust Control Plan for implementation during the construction and operation phases of the Project.	

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			<ul style="list-style-type: none"> <li>• <b>Limiting vehicle speeds</b> and restricting movement to designated areas.</li> <li>• <b>Minimizing idling</b> of equipment and vehicles.</li> <li>• Use of <b>environmentally certified equipment</b>, with a commitment that <b>80% of mobile and stationary engines will meet Tier 4F standards</b>.</li> <li>• <b>Eco-driving training</b> for work crews to reduce fuel consumption.</li> <li>• <b>No use of sand or salt for de-icing</b> during winter operations.</li> <li>• Possibility of air quality monitoring and reporting as part of the <b>Air Quality and Dust Control Management Plan</b> and broader follow-up program.</li> <li>• <b>Restrict or halt operations during high wind or dry conditions</b> to prevent excessive dust generation near sensitive receptors.</li> </ul>			
10.	Appendix G Page 87– Section 5.6	<ul style="list-style-type: none"> <li>• The uncertainty analysis identifies meteorological data and emission factors as key sources of uncertainty but does not quantify their potential impact on model results.</li> </ul>	<ul style="list-style-type: none"> <li>• Consider including a qualitative or quantitative estimate of how these uncertainties may affect predicted concentrations, especially for pollutants near or above AAQC/CAAQS thresholds.</li> </ul>	B	A quantitative assessment of uncertainties is considered a significant endeavor given the number of variables that can impact the results. Hence, the qualitative	

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					judgement on uncertainties in Section 5.6 of the AQIA will be enhanced by specifying expected (but not calculated) relative uncertainties for the main variables (for example, ±50%) and judgement if altogether the results are more likely to overestimate real conditions or underestimate real conditions in certain cases.	
11.	Appendix P – Section 8.3, Section 3.7.1	<ul style="list-style-type: none"> <li>The HHRA recommends a comprehensive approach to managing air quality impacts during construction and operation. This includes installing real-time monitoring stations, implementing dust control measures, and ensuring regular reporting and review. These actions are essential for validating model predictions, protecting sensitive receptors, and maintaining transparency with stakeholders.</li> </ul>	<p>Can the proponent clarify whether the following recommendations are being carried forward as formal commitments in the EA tables or mitigation tracking framework?</p> <ul style="list-style-type: none"> <li>Installation of real-time air quality monitoring stations at key locations, particularly near predicted points of impingement.</li> <li>Monitoring of TSP, PM<sub>10</sub>, PM<sub>2.5</sub>, and NO<sub>2</sub> to ensure compliance with applicable guidelines.</li> <li>Implementation of dust suppression techniques, including: <ul style="list-style-type: none"> <li>Water spray trucks operating over the gravel-surface road</li> </ul> </li> </ul>	B	<p>For clarification, the following are the proposed formal commitments to real-time air quality monitoring during construction and operations that will be reflected in the HHRA and AQIA reports.</p> <p><u>Construction</u></p> <p>Real-time AQ monitoring stations along the length of the WSR and/or near predicted points of impingement are considered cost prohibitive, particularly due to the remote nature</p>	

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			<p>from May to November, or as needed, until the road is surfaced with asphalt or chip seal.</p> <ul style="list-style-type: none"> <li>○ Additional dust control systems at quarries and stockpiles.</li> <li>○ If exceedances are observed.</li> <li>● Provision of regular updates on air quality data to stakeholders and rights-holders, including Webequie First Nation.</li> <li>● Periodic review of monitoring data to identify trends and implement corrective actions if necessary.</li> </ul>		<p>of the project where there is no power supply and access challenges to the stations by qualified professionals. Therefore, it is recommended that a station for real time AQ monitoring be limited to one location near the community of Webequie, such as the airport. This station would monitor TSP, PM<sub>10</sub>, PM<sub>2.5</sub>, and NO<sub>2</sub> to ensure compliance with applicable guidelines. In addition to the monitoring station, it also recommended that hand-held analyzers and visual observations along the road and at aggregate pits be utilized by Environmental Monitors to assess AQ/dust conditions and need for dust suppression. The equipment and monitoring approach will be developed as part of the Air Quality and Dust Control Plan for the construction phase.</p> <p><u>Operations</u> The recommended dust</p>	

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					<p>suppression techniques, to be specified into the Air Quality and Dust Control Plan for the operations phase, are considered reasonable based on the anticipated low traffic volume and interim road surface (half gravel and half chip seal/asphalt) and ultimate proposed road surface (chip seal/asphalt).</p> <p>The approach proposed for real-time AQ monitoring during construction (single station near Webequie) is also proposed for the operations phase (for a period of 5-years post-construction). Other proposed aspects about AQ monitoring as identified by the reviewer will be included in the HHRA and AQ monitoring commitments.</p>	

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12.	Appendix G Page 50–Table 3-15	<ul style="list-style-type: none"> <li>Note 3: Incorrect Reference to CAAQS Percentile</li> <li>The CAAQS for NO<sub>2</sub> (1-hour) is based on the 3-year average of the annual 98th percentile of the daily maximum 1-hour concentrations, not the 88th highest value. The reference to the "88th highest" is incorrect and does not reflect the actual statistical basis of the CAAQS.</li> </ul>	<ul style="list-style-type: none"> <li>Revise Note 3 in Table 3-15 to accurately reflect the CAAQS methodology.</li> </ul>	C	In Table 3-15, the maximum hourly SO <sub>2</sub> concentration result was presented as a simplification given it already represents less than 2% of the CAAQS and that applying the statistical representation would result in lower values. That said, Note 3 is indeed incorrect and should read "maximum of 3-year average of the annual 99 <sup>th</sup> percentile of the SO <sub>2</sub> daily maximum 1-hour average concentrations". The note has been corrected in the revised AQIA report.	

# MECP: Environmental Assessment Modernization Branch



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Peter Brown, Senior Advisor - Outreach

**Ministry and Branch:** Ministry of the Environment, Conservation and Parks, Environmental Assessment Modernization Branch

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1.	ES 5.1 and Section 2.2.2.1, Page 2-7	It states that Ontario “have formally delegated some procedural aspects of consultation required under the EA Act to Webequie First Nation”, and I think this is consultation required under the Constitution Act (because Ontario is making a decision under the EA Act). While it is true that consultation is also required under the EA Act, this may confuse the reader.	Please remove “under the EA Act” from this sentence.	C.	The phrase “under the EA Act” has been removed from the sentence noted in the comment.	
2.	ES 5.2 and Section 2.3.1, Page 2-8	It states that “Collectively, the Crown (MECP and IAAC) provided a list of First Nations and Métis.” which suggests that Ontario and Canada provided a list together.	Please re-phrase to indicate that Ontario and IAAC provided lists of First Nations and Metis... Consider indicating that a preliminary list identifying communities for consultation on the Project was provided in a letter from MECP dated December 19, 2018 and confirmed in the MOU signed February 2020.	C.	The sentence noted in the comment has been re-phrased as suggested by the reviewer.	
3.	ES 5.2.1 and Section 2.3.1, Page 2-9.	Wapekeka First Nation was identified by Ontario as having Aboriginal or treaty rights potentially impacted by the Project.	Please add an asterisk to Wapekeka in the table in ES 5.2.1 and Table 2-1.	A.	An asterisk has been added to Wapekeka in the table in ES 5.2.1 and Table 2-1.	
4.	Section 2.2.2, Page 2-6	The Draft EAR/IS references Section 5.1 of Ontario’s EA Act related to consultation with interested persons.	Please update references to the EA Act throughout. For example, this reference should now cite Section 17.3 of the EA Act.	C.	References to Section 5.1 of the EA Act have been updated to cite Section 17.3 of the EA Act in the EAR/IS.	

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5.	Section 2.4.2, Page 2-15	The draft EAR/IS states that the Project Team invited all 22 Indigenous communities to participate in the IKLRU Program. It is understood that Ontario only funded communities being consulted on a rights-basis.	Please confirm that the proponent provided this opportunity to all 22 communities.	C.	The Project Team confirmed that all 22 Indigenous communities were invited to participate in the IKLRU Program.	
6.	Section 2.4.3, Table 2-2, Page 2-21	It is stated in this table that a notification letter was circulated on Sept. 20, 2024 about the early circulation of the Draft EAR/IS for Indigenous community review.	While the Sept 2024 letter gave communities advanced notice of the release of the draft EAR/IS for review, it was the June 9, 2025 letter to communities that notified them of the start of the early review period – please add reference to this letter.	C.	Reference to the June 9, 2025 letter has been added to Table 2-2.	
7.	Section 2.4.5, Table 2-7	There are issues identified in Table 2-7 for which it is difficult to find the response or answer in the sections listed. For example, Section 21 does not reference the Regional Assessment (Section e.g., 16.2.2.1.7 does), Section 1 does not answer the question about the proponent's technical and financial ability to apply mitigation. Some sections of the EAR/IS have tables of how input informed the sections, which is great, but they do not always align with Table 2-7.	Where an issue is not addressed or a question not clearly answered in the Draft EAR/IS section identified in the Status/Where Addressed column please consider adding the response to Table 2-7 and/or identify more precisely where in the sections (e.g., summary of input tables) the issue is addressed.	C.	Comment acknowledged. The column 'Status/Where Addressed in the Draft EAR/IS' has been updated to provide specific sub-sections to clarify the location where the issue/concern received has been addressed in the EAR/IS.	
8.	Section 2.4.5, Table 2-7	There are "key issues/concerns" identified in the consultation progress reports that are not listed in Table 2-7 (e.g., Round 2: Indigenous Knowledge interviews with Webequie First Nation Elders and Land Users identified climate change as a key issue; Round 3: Kitchenuhmaykoosib Inninuwug First Nation expressed concerns of the Project on caribou migration routes).	Please make sure that all relevant issues (comments or questions) are carried forward from the logs/progress reports in the Record of Engagement and Consultation submitted with the Final EAR/IS to the summary of key issues in Section 2 of the EAR/IS and into the relevant VC sections of the EAR/IS.	A.	All concerns/ issues/ comments received have been compared and updated between Table 2-7, Record of Engagement and Consultation, and the EAR/IS sections.	

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9.	Section 2.5, Page 2-54, Table 2-7	It states that the public “will have an opportunity to review the current Draft EAR/IS and future Final EAR/IS during the public review periods at the participating municipal offices and public libraries”. The most common way to access these documents for review by the public is likely from the project website if this is an option.	Please indicate if the draft and/or final EAR/IS are being made available for public review from the project website.	C.	Wording has been added to Table 2-7 indicating that the draft EAR/IS was made available for public review through the project website and the same opportunity to review the Final EAR/IS will be provided through the project website.	
10.	Section 2-7, Page 2-71	This section includes some commitments related to ongoing or future engagement.	Suggest including clear commitments (in a commitments section or table) including any related to engagement with Indigenous communities and others, as applicable.	B.	No change required. Paragraph 2 is clear that future planned engagement and consultation activities for the Project will involve various engagement options for the Indigenous communities to allow for the Project Team to explain the assessment findings in the Draft EAR/IS.	
11.	Pages 3-24 – 3-51; Section 3.2.2 - 3.2.5.	It is understood that input from Indigenous communities that informed the selection (factors, etc.) of the preferred corridor was collected around 2017-19. Input to inform the identification of alternative routes and their assessment was also collected from stakeholders and Indigenous communities during this EA. One of the alternative routes is referred to as Webequie First Nation community's preferred route. It is not clear if this was determined prior to the EA or during	Please be clear when describing feedback obtained prior to vs. during (e.g., Round 1 of) consultation on the EAR/IS. Also recommend clarifying if possible when referring to Webequie First Nation, either as the proponent or one of the communities being consulted on the EA.	B.	Community engagement activities for the All-Season Community Road Pre-Feasibility Study (ASCRS) was conducted between August 2015 and June 2016. This study focused on engaging its four participating communities including Eabametoong, Neskantaga, Nibinamik	

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		the EA. It is understood from Section 2.4.4.1 that during Round 1 consultation activities criteria and indicators for evaluation and selection of a preferred route would be discussed.			and Webequie First Nations. The Community Coordinator and Community Land Use Planner in each community led local community working groups comprised of community members, land users, harvesters, elders and youth representatives. Meetings were generally conducted face-to-face with community members. During these meetings, factors and criteria used to select the preferred corridor were initially identified. On August 29, 2017, the community engagement consultant and technical consultant conducting baseline fieldwork visited the Webequie community in support of the TPA1B Project (Webequie Community Supply Road Extension). Additional in-community meetings were conducted by the consultants in Webequie on October 3 and November 16, 2017 for the	

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					<p>purposes of keeping community members aware of project activities and providing them with the technical materials to support intra-community engagement. An off-reserve meeting was also conducted by the consultants on October 26, 2017 in Thunder Bay. Internal community discussions led by the appointed community coordinator involved various age groups both independently and together, harvesters, land users, as well as with the hereditary chiefs. They were able to finalize the Webequie First Nation community's preferred route through intense effort involving over forty community members that were interviewed one-on-one between September 28 and October 3, 2017. Consultation Round 1 of the Engagement and Consultation Program for WSR's EA/IS phase occurred in Spring/Summer 2022.</p>	

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					Round 1 provided details and sought input on criteria and indicators for evaluation and selection of a preferred route and the approach for evaluation of alternatives through community meetings, virtual information sessions, Wawatay radio sessions, newsletters. Consultation Round 2 was conducted from Fall 2022/Winter 2023 to Summer 2023. Round 2 provided details and sought input on the identification and evaluation of alternatives and the preliminary recommended preferred route and supportive infrastructure (aggregate/rock source areas, construction camps, access roads), including rationale for selection, through community meetings, virtual information sessions, Wawatay radio sessions, newsletters.	

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12.	Pages 4-74 – 4-83; Section 4.5	The Project Description is expected to include project workforce requirements, etc.; however, measures to prioritize or enhance local or Indigenous employment and training are typically addressed in the effects assessment/impact management sections of the EAR/IS. Impact or benefit enhancement measures can be identified in the assessment and added to a section or table of commitments.	Please make sure that impact or benefit enhancement measures related to employment and training are included in the effects assessment and commitments section or table, as applicable.	B.	No change required. Changes to Education, Training and Traditional Learning are covered as an effect in Section 14 of the EAR/IS.	
13.	Page 5-8; Section 5.2.1.2	It states that 'Comments received to date and responses provided are included in Record of Engagement and Consultation'. The Record of Engagement and Consultation included with the draft includes correspondence with Indigenous communities, but not in a comment-response format. Table 2-7 summarizes key issues and concerns raised, but does not include all comments and responses.	Recommend being clear that correspondence with Indigenous communities is appended in the Record of Engagement and Consultation, and that key issues and how they are addressed are summarized in Section 2 and/or in relevant VC sections of the EAR/IS.	B.	The wording in Section 5.2.1.2 has been revised to indicated that correspondence with Indigenous communities is appended in the Record of Engagement and Consultation, and that key issues and how they are addressed are summarized in Section 2 and/or in relevant VC sections of the EAR/IS, as suggested by the reviewer. Table 2-7 has been updated to include all comments and responses.	
14.	Page 5-10; Section 5.2.1.3, Figure 5.2	Figure 5.2 only references fishing, while there are other VCs relevant to Indigenous Knowledge and Land and Resource Use.	Please indicate that Figure 5.2 is an example for illustrative purposes.	C.	A note has been added for Figure 5-2 to indicate that it is an example for illustrative purposes.	

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
15.	Page 5-10, Section 5.2.1.3	It states that 'Due to confidentiality constraints and the need to respect the wishes of Indigenous communities and groups about sharing of IKLRU information, it may not be possible to illustrate or describe the location or bounds of features and/or sensitivities of value or interest to communities, such as boundaries of Indigenous territories or areas of spiritual, cultural and/or sacred importance.'	It is understood that there may be information shared by Indigenous communities that is deemed confidential and not shared with Ontario because we cannot guarantee its protection from disclosure. It is understood that this information will be incorporated into the EAR/IS to the extent possible, but that information about e.g., precise locations of values may not be shared with Ontario or the public. It is expected that the general locations or bounds will be illustrated to inform decision-making and consultation, but not to the extent that it would reveal the location of sensitive values or contradict an information sharing agreement with an Indigenous community. Please clarify in this section how sensitive information will inform the EAR/IS and if/how the proponent of the EA (Webequie First Nation) will convey relevant information to the constructor/operator, as needed, to avoid sensitive values.	B.	We have added content to this section to clarify how the sensitive information has informed the EA/IA, including if this will be shared with the constructor/operator of the Webequie Supply Road. Draft text is as follows:  "The IKLRU information both sensitive and non-sensitive was used to inform the EA/IA with respect to understanding existing conditions and sensitivities, and for the effects assessment including recommended mitigation measures and monitoring program. The IKLRU information provided to date is for use in the EA/IA phase only, in accordance with data sharing agreements between the Webequie First Nation and the above listed First Nations and are consistent with the principles of First Nation Ownership, Control, Access and Possession as defined by the First Nations Information	

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
					Governance Centre. Confidential information from First Nations used to inform the EA/IA may also be shared with the proponent constructor and/or operator, who are unknown at this time. Where First Nations are prepared to share IKLRU information with the future constructor or operator, separate data sharing agreements are anticipated for the use, storage and disclosure of confidential information.	
16.	Page 5-14 - 15, Table 5-3. Section 5.2.3	This section describes how direct and indirect effects of the project, and their pathways, are considered in the EAR/IS, including "Linked VCs". It is not clear in this description how impacts on one VC might be carried forward for consideration of indirect effects on another VC.	It would be helpful to understand in the description of how effect pathways are considered whether e.g., a net effect (similar to cumulative effects) on a VC that may represent an indirect effect pathway on another VC is carried forward. It is not clear how the Linked VCs referenced in Table 5-3 and in each VC section (6 - 20) are systematically assessed.	B.	Linked VCs noted in Section 5.2.3 and sample Table 5-3 and specified in each VC section (Section 6 to 20 of the EAR/IS) indicate VC assessments that can be informed by or inform the assessment of other VCs.  For clarity, the following wording has been added before the list of VCs in the "Linked VCs" column of the respective table (of sample Table 5-3) in each VC section (Section 6 to 20 of	

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
					<p>the EAR/IS): “<i>The assessment of this VC will inform or be informed by the effects assessment for other VCs:...</i>”</p> <p>More details about identification of potential effects and pathways are provided in individual VC sections including inter-relationships of different VCs or effects on linked VCs (e.g., Section 8.3 Geology, Soil and Terrian changes on groundwater VC, and groundwater changes on surface water and wetland VCs).</p>	
17.	Sections 6 - 20	Each VC Section (6-20) includes sub-sections summarizing consideration of input from engagement and consultation, and Indigenous Knowledge.	Having sub-sections in each VC section to summarize consideration of input from engagement and consultation as well as Indigenous Knowledge are much appreciated. With respect to Section 19 (Indigenous Peoples and Aboriginal and Treaty Rights), please ensure that all impacts to Aboriginal or treaty rights identified by Indigenous communities through consultation (including on this Draft EAR/IS) are captured in the Final.	C.	Comment acknowledged. These sections will be reviewed so that all impacts identified by Indigenous communities through consultation have been added to Section 19.	
18.	Section 19.2.2, 19.3. 19.4 and 19.5	Information throughout these sections deemed confidential by Indigenous communities is redacted (from the version made available to the public). It is understood that agreements are	Please ensure for the Final EAR/IS that all redacted information is summarized in the EAR/IS to the extent that it can without violating the terms of any applicable	A.	Comment acknowledged. Where redacted information can be provided in the final	

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	Pages 19-36 - 19-205	in place with a number of communities about the sharing of information.	agreement. Where a whole section is redacted I suggest removing and indicating that it has been redacted, for readability. Please continue to make available to the public any information not deemed confidential. Any commitments that are made as part of mitigation or impact management measures for example should be included to the extent possible.		version of the EAR/IS, it will be provided.	
19.	ES 5.0 and Section 2.1, Page 2-4; Record of Engagement and Consultation and Milestone Progress Reports	Thank you for including logs of all correspondence in the Record of Engagement and Consultation and Milestone Progress Reports, available from the project website. It is understood that these elements comprise the complete Record of Engagement and Consultation to-date. The effort to assemble these records is commendable, and they demonstrate that a comprehensive program was undertaken to incorporate the views of all Indigenous communities identified by Ontario. There may be some documents specific to other projects (e.g., summary of February 2023 ATRI specific to NRL) that were not intended to be included.	I am looking forward to the complete Record of Engagement and Consultation submitted as part of the Final EAR/IS (minus information deemed confidential by a community), including the milestone progress reports, etc. Please include a table of contents and bookmarks to help the reader navigate the different sections (e.g., the logs of correspondence organized by Indigenous community). Please ensure that all records, as appropriate, are included in the record.	A.	Comment acknowledged. The completed Record of Engagement and Consultation will be made available with the final EAR/IS.	
20.	Throughout	Ministry names (e.g., ENDM) are out of date throughout.	Update ministry names.	C.	Ministry names have been updated throughout the EAR/IS.	

**MECP:**

**Northern Region  
Technical Support  
Section, Air, Pesticides  
and Environmental  
Planning Unit**

AtkinsRéalis



**WSR**  
WEBEQUIE  
SUPPLY ROAD



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Madhi Ramadoss, Pesticides Specialist

**Ministry and Branch:** MECP Northern Region Technical Support Section, Air, Pesticides and Environmental Planning Unit

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
1.	N/A	The Pesticide Section of the Northern Region has no comments on the draft Environmental Assessment for the WSR project. Under Ontario Regulation 63/09, once the WSR all-season road is completed and designated as public infrastructure (i.e., a right-of-way), it qualifies as a public work. This designation permits the use of pesticides for maintaining road access and promoting public safety. The Ontario Pesticides Act supports pesticide use on rights-of-way to ensure safe operation, facilitate inspection of utility infrastructure, prevent hazards to nearby communities, and maintain compliance with federal and provincial regulations.	For awareness.	N/A	We acknowledge the regulatory framework outlined under Ontario Regulation 63/09 and the <i>Ontario Pesticides Act</i> , and remain committed to ensuring that all future pesticide use for road maintenance, if implemented, will strictly adhere to provincial and federal requirements.	

# MECP: Environmental Permissions Branch



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** David Lee, Lead Engineer – Waste Approvals

**Ministry and Branch:** Environmental Permissions Branch, MECP

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
1.	Appendix E – Mitigation measures, s. 5.5 Materials Handling and Storage, pp. 29-31	Proponent details waste management procedures to be undertaken during the project. Wastes that are generated from construction activities should be managed in accordance with the EPA and Reg. 347 and long-term storage facilities should obtain an ECA where necessary. (s. 27 of the EPA) No establishment of an onsite landfill is proposed as part of the project.	N/A	C/D	Comments are noted.	
2.	Appendix E – Mitigation measures, s. 2.1.17 Soil Mgmt, p. 13	It should be noted that soil mgmt. activities must also adhere to the requirements of Reg. 406/19.	N/A	C	The note that soil management activities must also adhere to the requirements of Reg. 406/19 has been added.	
3.	Draft EA, s. 4.3.3 – Temporary and Permanent Supporting Structure, pp. 4-24 – 4-36	Any long term waste handling and storage facility proposed must obtain an ECA if it is required under s. 27 of the EPA. Wastes hauled to and from a project area must be conducted by approved haulers (EASR registration) and waste must go to approved receiving facilities for disposal or further processing/reuse.	N/A	A/B/D	Noted waste requirements have been added to Section 4.3.3.	

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		Any waste incineration facilities under consideration will require an ECA to operate and may have implications under the EAA as well. Reg. 50/24 provides triggers for thermal treatment projects requiring approval subject to the EAA (p. 4-36).				
4.	Draft EA, s. 4.4.2.9 – Environmental Monitoring pp. 4-64	If vacuum trucks will be used for excavation, and if uncontrolled soil dewatering activities take place at any material storage location, the need for groundwater and/or surface water monitoring to measure any impacts from that dewatering should be considered.	N/A	C	Requirements reflected in the reviewer's comments regarding dewatering activities have been added to Section 4.4.2.9.	
5.	Draft EA – s. 4.4.3.1.9 Maintenance and Storage Facility	This section contains another reference to a potential on-site incinerator. The establishment of a facility to incinerate waste will require an ECA and may also have requirements under the EAA (Reg. 50/24)	N/A	D	Noted, and this captured in terms of commitment and in various sections to adhere to all applicable provincial and federal laws and regulations	
6.	Draft EA – s. 7.4.9 – Disposal of Waste (p. 7-54)	No mention of on-site incinerator in this section.	If an on-site incinerator is proposed then the design should be assessed to see if there are any requirements under the EAA that may apply.	B	It has been noted in Section 4 and other sections that on-site waste incineration may occur, and if so an ECA will be obtained as well as adhering to all other applicable provincial and federal laws and regulations. We don't feel it's appropriate to repeat in Section 7 in order to minimize redundancy of requirements already stated elsewhere in the document.	

# Ministry of Citizenship and Multiculturalism, Heritage Operations Branch, Heritage Planning Unit



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Dan Minkin, Heritage Planner

**Ministry and Branch:** Ministry of Citizenship and Multiculturalism, Heritage Operations Branch, Heritage Planning Unit

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
1.	Throughout EA Report	The EA Report refers several times to the Ministry of Heritage, Sport, Tourism and Culture Industries. While the current name for that ministry is the Ministry of Tourism, Culture and Gaming (MTCG), responsibility for cultural heritage related functions has been transferred to the Ministry of Citizenship and Multiculturalism (MCM).	All references to MHSTCI related to cultural heritage planning and documentation should be replaced with MCM, except when referring historically to MHSTCI's participation in the project before October 2022.	B	The EAR/IS has been updated to reflect MCM in reference to cultural heritage planning. MHSTCI will continue to be referenced for any project participation prior to October 2022.	A
2.	Throughout EA Report	The term “cultural heritage resources” includes archaeological resources, built heritage resources, and cultural heritage landscapes, and the approved Terms of Reference uses it in this way. For consistency, please use the correct terminology when referring to each one, and the term “cultural heritage resources” when referring to all three types. “Cultural Heritage and Archaeological Resources” is therefore a redundant term that suggests a separation between archaeological and cultural heritage resources.	Change “cultural heritage and archaeological resources” to simply “cultural heritage resources” in all instances, including the title of Section 20.	A	The EAR/IS has been updated to reflect “cultural heritage resources” as a replacement for “cultural heritage and archaeological resources”	A

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3.	20.1.1 Regulatory and Policy Setting p.20-4	This section should include the correct title of the 2011 Standards & Guidelines (MCM) and include reference to the Standards and Guidelines for Conservation of Provincial Heritage Properties. Those are mentioned under Table 20-1.  We would also recommend that the 'Technical Guidance for Assessing Physical and Cultural Heritage be included in both the Section and Table 20-1. It is mentioned in the Tailored Impact Statement Guidelines.	Revise section as follows: <i>(...) the Ontario Heritage Act (OHA), the Standards and Guidelines for Conservation of Provincial Heritage Properties (issued under section 25.2 of OHA), the Ministry of Citizenship and Multiculturalism's (MCM) 2011 Standards and Guidelines for Consultant Archaeologists Conducting Archaeological Assessments,</i>	A	The proponent acknowledges the recommendations to update Section 20 with the correct title of the 2011 Standards & Guidelines (MCM), as well as include reference to the Standards and Guidelines for Conservation of Provincial Heritage Properties. The proponent has added the 'Technical Guidance for Assessing Physical and Cultural Heritage' to both Section 20.1.1 and Table 20-1.	A
4.	20.2.1.2.2 Stage 2 Archaeological Assessment p. 20-20	This section notes that "Further Stage 2 Archaeological Assessment efforts to support the geotechnical program are also planned in late spring 2025". This statement is of course outdated now and will be more so when the final EA Report is issued.	Update the statement to reflect the current status of Stage 2 Archaeological Assessment.	B	Section 20 of the EAR/IS will be updated to reflect the current status of the Stage 2 Archaeological Assessment.	B
5.	20.2.2.3.2	Please refer to the previous comment, and to the comments in the cover letter. Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports. The findings and recommendations of the Stage 2 AAs shall be considered preliminary at this time.	Revise this section to reflect the current status of Stage 2 Archaeological Assessment, and note that results will be considered preliminary, and archaeological concerns not fully addressed, until the reports have been entered into the Ontario Public Register of Archaeological Reports.	A	See response to Comment #4.	B

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6.	20.4.1 Built Heritage Resources and Cultural Heritage Landscapes p. 20-30	This section may need to be revised to reflect the revisions we are recommending below to the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment. Additionally, we note that where direct impacts to a potential cultural heritage resource on provincially-owned Crown land are expected, an evaluation against the criteria of Ontario Regulation 10/06 should be undertaken during the EA process (as opposed to during the detail design phase) in order to determine whether it is a Provincial Heritage Property of Provincial Significance and would therefore require exercise of the MCM Minister's Consent authority under sec. 25.2 of the OHA. This may mean that this section needs to incorporate the results of additional evaluation (a Cultural Heritage Evaluation Report, CHER) carried out before the final EA Report is submitted.  Beyond this, recommendations from supporting technical studies, where incorporated into the EA Report as mitigation measures, should be rephrased as specific commitments. This is especially true where the recommendations include suggestions made by community participants that	Revise section after Cultural Heritage Report has been revised and a CHER, including O.Reg. 10/06 evaluation, carried out per these comments. Rephrase mitigation measures as explicit statements of actions to be taken and approaches to be followed.	A	See Response to Comment #14.	B – see row #14

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		have not been explicitly adopted as recommendations of the study itself.				
7.	20.4.2 Archaeological Resources p. 20-31	<p>This section says that “an Archaeological Resources Contingency Plan will be developed to guide contractors in the event that a previously unidentified heritage or archaeological resources ... are suspected or encountered unexpectedly during construction”. While the details of this plan can be developed at a later stage as stated here, the EA Report should include the basic requirements for such a scenario, to support compliance with the <i>Ontario Heritage Act</i>.</p> <p>There should also be a clear commitment that “Stage 2 archaeological assessment (and further stages, if recommended) will be carried out by a licensed archaeologist as early as possible during the detailed design phase and prior to any ground disturbing activities”.</p>	The section should note that if previously unidentified archaeological resources are encountered unexpectedly during construction, work impacting the resources will cease, MCM will be notified, and an archaeologist licensed under <i>the Ontario Heritage Act</i> will be engaged to further assess the site as necessary. Please refer to the disclaimer at the bottom of the cover letter for language. It could also reference Section 5.13 of Appendix E, which includes this commitment in more detail.	A	Suggested note and reference have been added to Section 20.4.2 and Section 5.13 of Appendix E as outlined in the MCM comment.	B

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8.	Table 20-8: Summary of Potential Effects, Mitigation Measures and Predicted Net Effects for Cultural Heritage and Archaeological Resources VC p. 20-33  Rows: Built Heritage Resources (BHRs) and Cultural Heritage Landscapes (CHLs)	Our comment #6 above also applies to the Mitigation Measures field in this row.	Revise the Mitigation Measures field after Cultural Heritage Report has been revised per these comments, phrasing mitigation measures as explicit statements of actions to be taken and approaches to be followed.	A	See Response to Comment #14.	B – see row #14
9.	Table 20-8: Summary of Potential Effects, Mitigation Measures and Predicted Net Effects for Cultural Heritage and Archaeological Resources VC	The Mitigation Measures field should explicitly commit to the completion of all necessary stages of archaeological assessment during detail design, and to their entry into the Ontario Public Register of Archaeological Reports before the commencement of ground-disturbing construction activities. It should also include the basic requirements for the unexpected discovery of archaeological resources	Revise the Mitigation Measures field as follows:  <i>Mitigation of archaeological resources may involve <b>avoidance and protection</b> or <del>avoidance</del> or <del>salvage</del> excavation according to <b>in accordance with MCM Standards and Guidelines for Consultant Archaeologists for Stage 4 Mitigation, as</b></i>	A	Revised wording as outlined in MCM comment has been included in Table 20-8.	A

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	p. 20-33  Row: Archaeological Resources	during construction. Additionally, "salvage excavation" is a confusing term that could be construed to refer to excavation of archaeological sites after they have been damaged by construction or other activities.	<p><b>determined through Stage 2 and 3 Archaeological Assessments. The outstanding Stage 2 assessment work, and any further stages of archaeological assessment recommended by its results, will be carried out as early as possible during detail design and prior to any ground disturbing activities.</b></p> <p><i>Webequie First Nation Elders and Knowledge Holders will be consulted for advice on scope, methodology and approach in the development of appropriate mitigation measures.</i></p> <p><b>Ground-disturbing activities will not commence until archaeological assessment reports recommending no further assessment have been entered into the Ontario Public Register of Archaeological Reports.</b></p> <p><b>If previously unidentified archaeological resources are encountered unexpectedly during construction, the proponent or person discovering the archaeological resources shall cease</b></p>			

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			<i>alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the Ontario Heritage Act. Any person discovering human remains shall cease all activities immediately and notify the police or coroner.</i>			
10.	Appendix E, Mitigation Measures  Throughout	This appendix frequently uses the word “heritage” without the modifier “cultural”. This can create confusion between cultural and natural heritage, particularly given that this appendix applies to all disciplines, and is inconsistent with the usage in the body of the EA Report. Please also refer to Comment 1 and 2.	Replace “heritage” with “cultural heritage” in all instances where that is the intent.	C	The EAR/IS has been revised to use “cultural heritage” instead of “heritage” in cultural contexts.	A
11.	Appendix E, 3.3.2 Provincial p. 19	The bulleted list in this section includes the “ <i>Heritage Act, 1990</i> ”. The name of the statute is the <b>Ontario Heritage Act</b> . The list should also include the Standards and Guidelines for Consultant Archaeologists.	Add “Ontario” to the name of the statute and add “Standards and Guidelines for Consultant Archaeologists (MCM, 2011) as a sub-bullet to it.	C	Appendix E, Section 3.3.2 of the EAR/IS has been revised to reference the <i>Ontario Heritage Act</i> , along with the “Standards and Guidelines for Consultant Archaeologists (MCM, 2011).	A
12.	Appendix E, 5.13 Heritage and Archaeological Resources	This section references the Ministry of Citizenship and Multiculturalism (Heritage Unit). This is not the name of a unit at the Ministry. The appropriate MCM contact for this purpose is the Archaeology email address.	Replace “(Heritage Unit)” with “at <a href="mailto:archaeology@ontario.ca">archaeology@ontario.ca</a> ”.	C	Appendix E, 5.13 of the EAR/IS has been revised to include the appropriate MCM contact by replacing “(Heritage Unit)” with “at <a href="mailto:archaeology@ontario.ca">archaeology@ontario.ca</a> ”.	A

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
13.	Appendix S, Figure 5	The location of CHL1 is not clear from the figure.	Revise map and legend to more clearly indicate the location of CHL1.	C	Figure 5 in Appendix S will be revised to indicate the location of CHL1 on the map and in the legend.	B
14.	Appendix S, 6.1 Recommendations p. 100	We recognize that further study of built heritage resources and cultural heritage landscapes may be an iterative process, but it is important from the perspective of EA compliance and accountability that this process flow from clear commitments undertaken in the EA Report based on recommendations presented in the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment. Therefore, the Recommendations section in the Cultural Heritage Report should make clear recommendations as to the form of the next step – that is, the types of study to be carried out, their timelines, and what they will determine. Note that where direct impacts are expected to a potential cultural heritage resource on provincially-owned Crown land, an evaluation against the criteria of Ontario Regulation 10/06 needs to take place during the EA process (as opposed to detail design) in order to determine whether it is a Provincial Heritage Property of Provincial Significance and would therefore require exercise of the	Revise the section to make concrete recommendations as to the next studies to be carried out, for example Cultural Heritage Evaluation Reports (CHERs) of each of the identified potential resources, or alternately, a joint CHER for all of the identified potential resources given their overlapping boundaries. Include the timelines for additional studies relative to the overall project, bearing in mind the Minister's Consent provision for Provincial Heritage Properties of Provincial Significance. Note that CHERs should include a discussion of jurisdiction, given that the resources overlap Provincial crown land and First Nation reserve.	A	The recommendation section in the Cultural Heritage Report will be updated to make clear recommendations as to the types of study to be carried out and their timelines, and what they will determine. This will include the commitment to prepare a CHER for each of the identified Cultural Heritage Landscapes (CHLs): CHL 1 – Travel Routes, CHL 2 – Harvesting Sites and Areas; and CHL 3 – Cultural, Spiritual and Ceremonial Sites and Areas in the next stage of the project planning and design (i.e., Detail Design phase) for the purpose of developing more detailed mitigation measures, and will specifically occur after approval of the EA/IA (if received). The assessment of whether the CHL's on Crown lands meet Ontario Regulation 9/06 as well as Ontario Regulation 10/06 of the <i>Ontario Heritage Act</i> will be undertaken, including identifying whether Minister's Consent may	B – MCM has consistently advised, including in other FN-led and Ring of Fire-associated projects, that provincially owned or controlled properties with CHVI be evaluated against O. Reg. 10/06 to determine whether the Consent of the MCM Minister may be required for the demolition or removal of any buildings or structures on said properties, or for their transfer out of provincial control, and that this evaluation be completed before the EA is concluded. However, MCM acknowledges the EA will be completed on a compressed timeline, pursuant to the Ontario-Webequie FN partnership agreement signed on October 29, 2025, and that this does not allow for CHERs to be completed according to the normal recommended sequence. Without an evaluation to determine the level of significance, it cannot be determined whether the MCM Minister's authority applies and it

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		MCM Minister's Consent authority under the Standards and Guidelines for Conservation of Provincial Heritage Properties.			<p>be required.</p> <p>Given the size and geographical location of the study area, and the long-standing Indigenous connections and uses of the study area lands, appropriate incorporation of Indigenous Knowledge (IK) forms an integral source of input and knowledge-sharing necessary for further analysis of cultural heritage significance. As such, more information, engagement and validation with Webequie First Nation community members may be required to complete the CHERs in order to gain a better understanding of the identified CHLs and their potential value.</p> <p>CHERs will be completed in collaboration with the proponent and their Consultation Lead, Webequie First Nation Elders and Knowledge Holders (as appropriate), and while following provincial guidelines, to determine the appropriate scope, methodology, and approach to the completion of CHER(s) of these culturally sensitive sites and areas. This approach aligns with the First Nations principles of</p>	is acknowledged that the Minister's authority will be determined post EA decision. This being the case, we have no concerns with the proposed timing and approach.

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					ownership, control, access and possession (OCAP) with respect to their information and knowledge. Finally, as part of completing CHERs involving Crown owned lands, the ministry or agency vested with care and control of those Crown owned lands will be engaged as part of scoping and defining the approach for preparing the CHERs.	

# Ministry of Indigenous Affairs and First Nations Economic Reconciliation, Indigenous Relations Branch



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Colin Crowell, Senior Advisor, Indigenous Relations Unit, & Lars Eedy, Senior Advisor, Consultation Resource Unit

**Ministry and Branch:** Ministry of Indigenous Affairs and First Nations Economic Reconciliation, Indigenous Relations Branch

Comment #	Page/ Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
1.	Section 2: Engagement and Consultation Summary	<p>IAFNER (Consultation Resource Unit) believes that Webequie First Nation has advanced a unique and effective approach to building a consultation process. IAFNER has no substantive comments or concerns with the WSR Draft EA.</p> <p>Engagement and consultation activities for the EA are based on Webequie First Nation's Three-Tier Approach to engagement. This approach is based on the principles of communication and dialogue with all identified Indigenous communities, opportunities for interested parties to communicate with the project team and provide input, flexible planning and decision-making processes, and follow-up with all participants to demonstrate how their input was considered and incorporated into project plans.</p> <p>WFN's engagement and consultation plan for Indigenous communities was developed and conducted in accordance with Elders' guiding principles and WFN's Three Tier Approach to Indigenous consultation and engagement.</p>	N/A	N/A	We appreciate the Ministry of Indigenous Affairs and First Nations Economic Reconciliation's feedback regarding our approach to engagement and consultation in the Environmental Assessment process for the Webequie Supply Road Project. We remain committed to upholding the principles of meaningful dialogue, transparency, and cultural respect in all aspects of our work, and we value your acknowledgment of our efforts.	

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		<p>The engagement and consultation methods used for the EA during three separate rounds of consultation include conventional tactics (formal notices, monthly newsletters, virtual meetings, social media and on-reserve community meetings) as well as unique approaches such as Aboriginal and Treaty Rights Interest Forums, Three Roads Project Expo, and Live Stream and Radio Call-In Shows. This demonstrates a commitment to engage and consult broadly.</p> <p>Throughout the EA documents, WFN uses the term 'engagement' to describe both its delegated procedural aspects and relationship-building activities that apply to its traditional cultural values, customs and beliefs. The consultation report recognizes that the ultimate responsibility for meeting any Duty to Consult rests with the Crown.</p>				

**Ministry of Energy  
and Mines (Energy),  
Transmission Policy,  
Energy Networks and  
Indigenous Policy  
Branch, Strategic  
Network and Agency  
Policy Division**



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Callee Robinson, Senior Policy Advisor

**Ministry and Branch:** Ministry of Energy and Mines (ENERGY), Transmission Policy, Energy Networks and Indigenous Policy Branch, Strategic Network and Agency Policy Division

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
1.	N/A	<p>The Independent Electricity System Operator (IESO) is currently evaluating possible energy supply options for the Ring of Fire region, including to connect remote First Nation communities through the Northern Ontario Connection Study. The preliminary results of this study indicate that the most effective option, from a technical and cost-efficiency perspective, is via a north-south option consisting of a double circuit 230 kV transmission line, connecting to the existing East West Tie Line near Nipigon Bay.</p> <p>IESO is currently engaging with Indigenous communities on the potential energy supply options and will be seeking to publish a final report by the end of 2025.</p> <p>If there is community support and a business case for building a north-south electricity transmission line to connect the remote communities and the Ring of Fire region, it may be desirable and most cost effective to co-locate that line with the road infrastructure.</p>	<p>While the potential transmission line would undergo a separate planning and environmental assessment process, this EA could, where appropriate, reflect IESO's study and reference the potential benefits of co-locating linear infrastructure to reduce environmental impacts.</p>	B	<p>The IESO evaluation of potential energy supply options is at a conceptual planning level (e.g. Northern Ontario Bulk Planning Study – North-South Transmission Reinforcement Plan, and other studies such as the Northern Ontario Connection Study), and as noted by the reviewer is subject to a separate environmental assessment process, including further identification and evaluation of alternative routing corridors for a double circuit 230 kV transmission line. It is acknowledged there are benefits of co-locating linear infrastructure to reduce environmental impacts, however we do not feel it is appropriate to cite the IESO planning initiatives in the WSR Environmental Assessment Report / Impact Statement. It is suggested, and it may be more appropriate, for the Ministry of Energy and Mines to direct their request to the other road EAs in the region (i.e., Marten Falls Community Access Road and Northern Road Link) that are proposed to provide a north south connection to the Ring of Fire.</p>	

# Ministry of Energy and Mines (MEM), Mines and Minerals Division



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

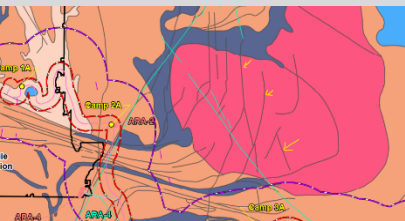
**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** ICPB, OGS, ILB

**Ministry and Branch:** Ministry of Energy and Mines (MEM), Mines and Minerals Division

Comment #	GRT Comments				Proponent Response	GRT Follow Up
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MMD1	ES 2.0 Pg 2-9  ES 3.2 Pg 3-11  Et.al.	The following sentence is misleading in that it implies that the Ring of Fire region is host to a single mineralized deposit, while in reality it hosts numerous: "... near the <i>McFaulds Lake within the mineralized deposit area known as the Ring of Fire</i> ".  Within the document the phases "mineralized deposit area" or "mineral deposit" is used to describe the Ring of Fire area and needs to be changed as this is also a general comment as this wording and similar are found throughout the document and is awkward to read.	The following sentence "... near the <i>McFaulds Lake within the mineralized deposit area known as the Ring of Fire</i> " should be reworded to "...near McFaulds Lake within the Ring of Fire region."  It might be best to remove the references to "mineralized deposit area" or "mineral deposit" and just refer to it as the "Ring of Fire area" or "Ring of Fire region" throughout.	C	The phrase noted in the comment has been revised as "...near <i>McFaulds Lake, within an area referred to as the Ring of Fire.</i> " and subsequently as "...near <i>McFaulds Lake area within the Ring of Fire region.</i> " as appropriate throughout the EAR/IS.	
MMD2	ES 5.2.3 Pg 5-19	Incorrect name used of the Ministry of Energy and Mines.	Change "Ministry of Mines and Energy" to "Ministry of Energy and Mines"	C	"Ministry of Mines and Energy" has been changed to "Ministry of Energy and Mines" or "MEM" throughout the EAR/IS.	
MMD3	2.2.2.1 Pg 2-7  2.3.2.1 Pg 2-10  Et.al.	References to past ministry names i.e. ENDM and MINES, while accurate in a specific point in time over the last 7 years, may cause confusion now as they are no longer valid names for our ministry.	Suggest updating any reference to ENDM, MNDM and/or MINES as it may pertain to mines and minerals business to the Ministry of Energy and Mines (MEM) throughout.  Perhaps include ( <i>formerly Ministry of X</i> ) in cases where it makes sense to.	C	Reference to ENDM, MNDM and/or MINES has been updated to the Ministry of Energy and Mines (MEM) throughout the EAR/IS. Former names of ministries are included in brackets where appropriate in the	

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			Pervious ministry names are acceptable if referring to documents such as Ontario's Critical Mineral Strategy in the references (ex. ENDM, 2022).		EAR/IS.	
MMD4	2.2.2.1 Pg 2-7	Noted that the section reference for a description of the Webequie 3-Tier Approach is incorrect. It points to Section 2.3 but it's in Section 2.4.  Noted this same issue in some table references and links in Section 19	Recommend verifying section/table/figure references and associated links in the text throughout	B	Comment acknowledged and cross references checked and corrected in Sections 2 and 19.	
MMD5	Table 2-2	Recognizing that it is likely a function of timing around the preparation of this draft; noted a couple items missing in the table. For instance, the February 2025 Three-Roads Forum and the release date of this draft.	Recommend updating Table 2-2 with recent achievements/items for the final document.	B	Comment acknowledged and recent communications have been added in Table 2-2.	
MMD6	2.4.5 Pg 2-40	In Table 2-7, the following should be updated: <i>"Need to clarify that cumulative effects will include the proposed Noront (now Wyloo Ring Fire Metals) Eagles Nest mine..."</i> as Wyloo Ring of Fire Metals no longer exists.	"Wyloo Ring of Fire Metals" should be changed to "Wyloo Pty Ltd." throughout.	C	"Wyloo Ring of Fire Metals" has been changed to "Wyloo Pty Ltd." throughout the EAR/IS.	
MMD7	3.4.1.2 Pg 3-58	Under the description for Aggregate Source Alternative TP19-02, there is a typo, regarding the spelling of the Ontario Geological Survey, it should read "Ontario Geological Survey" not "Ontario Geological Society"	Change Ontario Geological Society to Ontario Geological Survey.	C	The noted typo has been corrected.	
MMD8	6.1.1 Pg 6-6	Ministry of Energy and Mines is missing from table 6-1 under as Regulatory Agency – Provincial. This ministry oversees and enforces the Ontario <i>Mining Act</i> , which governs land tenure associated with mineral exploration activities, including Mineral Right Withdrawals.	Updated Table 6-1, to include the Ministry of Energy and Mines, and the same project relevance text can be used from Table 1-3.	D/C	The Ministry of Energy and Mines has been added to Table 6-1. The comment is also noted for permitting requirements.	

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MMD9	6.1.4 Pg 6-17  6.3 Pg 6-52  Et.al.	In Table 6-4, Geology, Terrain, and Soils VC – Subcomponents, Indicators, and Rationale; the “Indicators” column text is awkwardly written as you can’t change the geology of the area, you can only physically impact the <b>topography</b> and/or <b>geomorphology</b> of the area by extracting material.  <i>“Landscape deformation such as slumping, folds, or sliding as well as visual loss of geologic features can indicate changes to geology.”</i>  This text also appears within other tables and sections of the EA-IS and should be corrected.	The sentence should be reworded throughout the documents when used.	C	The sentence noted in the comment has been reworded throughout the EAR/IS, as suggested by the reviewer.	
MMD10	6.2.2.1.2 Pg 6-24	In Figure 6-2, are the displayed fault lines overlaying the regional bedrock geology actual fault and not just the polygon outlines used in the OGS Bedrock of Ontario MRD 126-REV1 layer? As it looks like the polygons have an outline fill of grey set to them- this is particularly noticeable within Paleozoic Unit 55.  Were the faults outlined on the map confirmed by any of the federal or provincial government funded airborne geophysical surveys or interpreted from the most recent OGS bedrock mapping from the following OGS publications: P3607, P3804, P3805, P3806 and OFR6359.	Please confirm that these are actual faults and not artifacts of the polygon creation and the most recent data sources available was used to develop this section.	C	It was confirmed that the OGS dataset available as of 2021 was used to develop Figure 6-2 and that the grey line - faults (indicated with yellow arrows in the screen capture below) represent fault lines, not artifacts from polygon creation.  	

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		This is relevant as the number of faults is likely overestimated with orientations that appear to not follow/match what is mapped/interpreted by recent OGS mapping/geophysics as this may impact the structural geology interpretation used for the WSR.				
MMD11	6.2.2.4 Pg 6-29	The following is awkwardly worded sentence: "...the intersection with the Mackenzie mafic dyke swarm (1,267 Ma) Precambrian." and should be reworded.	The sentence could be reworded to ... <i>the intersection with the Mackenzie mafic dyke swarm (1,267 Ma).</i> "	C	The sentence noted in the comment has been reworded as suggested by the reviewer.	
MMD12	6.2.2.6 Pg 6-37	Update the company name to the current one "...the terminus of the proposed WSR and Noront Resources Inc. exploration camp", as Noront no longer exists.	Change all references to "Noront" to "Wyloo Pty Ltd." Throughout.	C	We have changed "Noront" to "Wyloo Pty Ltd." or added "(formerly Noront Resources Inc.)" where appropriate for the final EAR/IS.	
MMD13	6.11 Pg 6-72	The reference section seems to be lacking Ontario Geological Survey (OGS) references regarding geologic maps, and datasets used to generate this section.  For instance, there is no reference provided for OGS MRD 126-REV1 (it is only listed in the notes on the map), it also appears that only older OGS maps/data products were used in this section, were no recent sources used in putting this section together?	Please ensure that all OGS data sources used in this section are properly referenced.	C/B	Section 6.11 will be reviewed to confirm that the most recent Ontario Geological Survey (OGS) data sources were used, and the figures and reference section will be updated to accurately reflect the sources cited in this section.	
MMD14	8.2.1.1 Pg 8-21	Why was Ontario Geological Survey Map P3607 the only bedrock geology map used in this section and not the more recent OGS mapping found in P3804, P3805 and P3806 and OFR6359.	Please ensure that all OGS data sources used in this section are properly referenced and the most recent data sources available was used to develop this section.	C/B	Section 8.2.1.1 will be reviewed to ensure that the most recent and all Ontario Geological Survey (OGS) data sources used in this section are properly referenced in the final	

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					EAR/IS. Only those maps that are within the groundwater LSA and RSA will be referenced.	
MMD15	8.11 Pg 8-65	No OGS publications are referenced, despite the Desktop Study section stating: <i>“Topography, surficial geology, quaternary geology and bedrock geology (OGS Maps) where the project study areas are located”</i> and that OGS map P3607 was used in this section.	Please ensure that all OGS data sources used in this section are properly referenced.	C/B	Section 8.11 will be reviewed to ensure that the most recent and all Ontario Geological Survey (OGS) data sources used in this section are properly referenced in the final EAR/IS. Only those maps that are within the groundwater LSA and RSA will be referenced.	
MMD16	16.1.1.3 Pg 16-71	Regarding Table 16-11  When was the mining cell/claim data downloaded for the table? There should be a date indicating when this was done as footnote and within the body of the text as the data is no longer accurate once downloaded and that information provides temporal context to readers/commentators.  The header “Number of Claims/Deposits” is misleading as the table only refers to mining cell/claim numbers in the area and not the number of mineral deposits.  Within Figure 16.12, there should be a date added to the legend as part of the Mining Claims and Tenure label to indicate when the claim data displayed is from; as the	Update the table/text to include the date the claim information is from.  Update the header to reflect what is displayed within the column.  Update the map legend to include the date the claim information is from as part of the Mining Claims and Tenure label.	B/C	Comment acknowledged. Table 16-11 information is updated, and a date provided. The header has removed the word "deposits" and figure 16.12 is updated along with a date.	

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		data is no longer accurate once downloaded and that information provides temporal context to readers/commentators.				
MMD17	16.1.1 Pg 16-14	The Ministry of Northern Development does not oversee the Ontario Mining Act (1982), this is overseen by the Ontario Ministry of Energy and Mines.	Please change the Ministry listed to Ministry of Energy and Mines.	C	Table 16-1 has been updated so that the Ministry of Energy and Mines has been replaced as the regulatory agency responsible for the Ontario Mining Act (1982).	
MMD18	16.1.1.3 Pg 16-81  16.3.2.1.1 Pg 16-138	Regarding Table 16-16 & 16-41  When was the mining cell/claim data downloaded for the table? There should be a date indicating when this was done as the data is no longer accurate once downloaded and that information provides temporal context to readers/commentators.  The header "Number of Claims/Deposits" is misleading as the table only refers to mining cell/claim numbers in the area and not the number of mineral deposits.  Within Figure 16.12, there should be a date added to the legend as part of the Mining Claims and Tenure label to indicate when the claim data displayed is from; as the data is no longer accurate once downloaded and that information provides temporal context to readers/commentators.	Update the header to reflect what is displayed within the column.  Update the map legend to include the date the claim information is from as part of the Mining Claims and Tenure label.	B/C	Table 16-16 and 16-41 information is updated, and a date is provided. "Deposits" word is removed from the header.	
MMD19	Table 19-2	Reference to " <i>Matawa First Nation</i> " implies they are a First Nation in their own right. This is incorrect – they are a Tribal Council.	For consistency and accuracy, suggest ensuring all references to Matawa First	C	All relevant references to Matawa First Nation have	

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		Noticed in other sub-sections that they are referenced to as " <i>Matawa First Nations Management</i> ", which is the correct legal name for them.	Nations Management are annotated correctly throughout.		been changed to Matawa First Nations Management.	
MMD20	Section 16  Section 19, Pg 19-46	Using colloquial terms like "starvation mode" or colloquial place names (you know the ones!) does not necessarily add value to the report and could be misinterpreted or taken out of context.	Suggest removing / editing.	C	The sentence on page 16-33 has been replaced to; "Fur-bearing animals were hunted to near extinction, with the beaver population having been nearly decimated, which led to severe food insecurity for the people living in their homelands."	
MMD21	21.3.4 Pg 21-13 Pg 21-14	Company/project names need to be updated as these have changed.	Goldcorp's Musselwhite Mine changes to Orla Mining Ltd.'s Musselwhite Mine.  Greenstone Gold's Hardrock Mine changes to Equinox Gold Corp.'s Greenstone Mine (formerly Hardrock Project) and update the Status/Timing column to currently active mine and project description to reflect this.	C	The company/project names noted in the comment have been changed for final EAR/IS as directed by the reviewer.  Status and project description for the Greenstone Mine has been updated.	
MMD22	21.3.4 Pg 21-18	Company/project names need to be updated in Table 21-2 as these have changed.	KWG Resources Inc., is now The Canadian Chrome Company Inc. Noront Resources Ltd., is now Wyloo Pty Ltd.	C	We have changed "KWG Resources Inc." to "The Canadian Chrome Company Inc." or added "(formerly KWG Resources Inc.)" where appropriate for the final EAR/IS. We have changed "Noront" to "Wyloo Pty Ltd." or added	

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
					“(formerly Noront Resources Inc.)” where appropriate for the final EAR/IS.	
MMD23	21.3.4 Pg 21-20	The following sentence is misleading and needs to be corrected:  <i>“The Black Thor, Blackbird, and Black Label Mining Deposits”.</i>  as the above listed projects/mineral deposits are not in production and are only in the exploration to advanced exploration stage and needs to be changed to reflect this.	Change “Mining Deposits” in the following sentence “The Black Thor, Blackbird, and Black Label <b>Mining</b> Deposits” to “ <b>Mineral</b> Deposits”.  Suggest making this same edit throughout where this same reference occurs.	C	The words “Mining Deposits” noted for the reference in the comment have been changed to “Mineral Deposits” for the final EAR/IS.	
APPENDICES						
MMD24	Appendix L 1.3 Pg 23	<b>General Comment</b> – this section repeatedly speaks for all Indigenous Nations or Peoples.  <b>General Comment</b> - It would be helpful for the reader to contextualize that comments/quotes are from a first-person interview with a WFN community member.	Suggest focusing on the historical and contemporary context of Webequie FN – be specific, rather than speak for all Indigenous People across the province, or Canada.  ie) As described during a community interview - Colonial impacts have been devastating in Anishinaabe and Mushkegowuk Homelands. Before the Hudson Bay Company (HBC) established itself and exploited fur-bearing animals to support trade in Europe, the people lived sustainably with the land. Fur-bearing animals were hunted to near extinction, with the beaver population having been nearly decimated, which resulted in starvation mode for the people living in their homelands (SNC-Lavalin, 2022).	C	Appendix L was reviewed and pan-Indigenous content was reworded, and content from interviews (Chief Wabasse) were added where necessary.	

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
			Before that time, Anishinaabemowin had never before been subject to a commerce style economy (SNC-Lavalin, 2022). The Indian Act, implemented in 1876 had an adverse impact on Indigenous Peoples across Canada. Perhaps the most harm was done while Indigenous children were forced to attend Indian Residential Schools, which were either government run, or church run institutions (SNC-Lavalin, 2022).			
MMD25	Appendix L Pg 24-25 incl. para. under chart	Paragraph under chart – reads as an afterthought. Broad generalizations, inaccurate and potentially offensive sentence that adds no relevant context – caution not to speak for all Indigenous Nations or Peoples. The table does not “tell the story of how Indigenous Nations arrived at their current Indigenous Knowledge (IK).”	Suggest re-writing the paragraph under the chart focusing/centering on Webequie’s experience ie) “The implementation of legislated colonial policies has impacted Indigenous Nations like Webequie First Nation, and can provide one lens through which to understand current socio-economic conditions ... “  Perhaps delete the sentence re: IK	C	Wording for the paragraph underneath the table has been rewritten as the following: " The implementation of legislated colonial policies has impacted Indigenous Nations like Webequie First Nation and can provide one lens through which to understand current socio-economic conditions."	
MMD26	Appendix L: Pg 29	Those communities that have asserted shared traditional territory with Webequie First Nation <b><u>and/or that may experience potential effects as a result of the Project</u></b>	Suggested rewrite: "...and/or whose asserted or established Aboriginal and/or Treaty rights may be adversely impacted as a result of the Project”	C	Wording has been changed on Page 29 for description of the LSA to read: "those communities that have asserted shared traditional territory with Webequie First Nation and/or whose asserted or established Aboriginal and/or Treaty rights may be adversely impacted as a result of the Project..."	

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
MMD27	Appendix F: 1.1 Pg 34	The following sentence is misleading in that it implies that the Ring of Fire region is host to a single mineralized deposit, while in reality it hosts numerous: <i>“The proposed WSR is a new all-season road of approximately 107 km in length from Webequie First Nation to the mineral deposit area near McFaulds Lake (also referred to as the Ring of Fire)”</i> .  This is also a general comment as this wording and similar is found throughout the document and is awkward to read.	The following sentence <i>“The proposed WSR is a new all-season road of approximately 107 km in length from Webequie First Nation to the <b>mineral deposit</b> area near McFaulds Lake (also referred to as the Ring of Fire)”</i> should be reworded to <i>“The proposed WSR is a new all-season road of approximately 107 km in length from Webequie First Nation to the <b>mineral deposits located near McFaulds Lake within the Ring of Fire region”</b></i> .	C	The sentence noted in the comment has been revised as suggested by the reviewer.	
MMD28	Appendix F: 4.2.2 Pg 44-45	OGS publication P3607, was referenced in the EA-IS 8.2.1.1, why is it missing from this reference list and were the other Metsaranta, R.T. and Houlé, M.G. maps P3804, P3806 and OFR 6359 used? Why isn't map P3805 referenced as being used within the EA-IS?	Please ensure that all OGS data sources used in this section are properly referenced.	B/C	Section 4.2.2 in Appendix F will be reviewed to ensure that the most recent and all Ontario Geological Survey (OGS) data sources used in this section are properly referenced in the final EAR/IS. Only those maps that are within the groundwater LSA and RSA will be referenced.	
MMD29	Appendix F: 4.3.1 Pg 48	In Figure 4-3, are the displayed fault lines overlaying the regional bedrock geology actual fault and not just the polygon outlines used in the OGS Bedrock of Ontario MRD 126-REV1 layer? As it looks like the polygons have an outline fill of grey set to them- this particularly noticeable within Paleozoic Unit 55.	Please confirm that these are actual faults and not artifacts of the polygon creation and the most recent data sources available was used to develop this section.	B/C	See the response for Comment # MMD10.	

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
		<p>Were the faults outlined on the map confirmed by any of the federal or provincial government funded airborne geophysical surveys or interpreted from the most recent OGS bedrock mapping from the following OGS publications: P3607, P3804, P3805, P3806 and OFR6359.</p> <p>This is relevant as the number of faults is likely overestimated with orientations that appear to not follow/match what is mapped/interpreted by recent OGS mapping/geophysics as this may impact the structural geology interpretation used for the WSR.</p>				
MMD30	N/A	<p><b>General comment</b> about all sections that are available on Webequie Supply Road Environmental Assessment – Supply Road Learning Engine website.</p> <p>There appear to be abundant formatting issues with all sections: missing figures, parts of figures missing, low figure image quality, strange formatting with extra lines added within sentences, tables formatted into paragraph form, etc....</p> <p>This makes these documents very hard to read and follow.</p>	Recommend re-upload correctly formatted versions of the EA-IS Sections to the Webequie Supply Road Environmental Assessment – Supply Road Learning Engine website.	B	Sections of the EAR/IS to the Supply Road Environmental Assessment – Supply Road Learning Engine website will be re-uploaded where there are formatting issues.	

# Ministry of Northern Economic Development and Growth



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Brady Lucas, Manager

**Ministry and Branch:** Ministry of Northern Economic Development and Growth

Comment #	Page/Section #	GRT Comments			Proponent Response	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/response with proponent
1.	Throughout	The ministry name Ontario Ministry of Northern Development should be updated to Ministry of Northern Economic Development and Growth.	Please update the ministry name to Ministry of Northern Economic Development and Growth (MNEDG).	C. Editorial	The ministry name Ontario Ministry of Northern Development has been updated to Ministry of Northern Economic Development and Growth (MNEDG) for the final EAR/IS.	

# Ministry of Northern Region – Northwest Region



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment  
**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Tanna Gurski, Regional Planner (submitting on behalf of the MNR government review team)  
**Ministry and Branch:** MNR – Northwest Region

**Proponent Response Legend**

- 1. Item will be addressed in the Final EAR/IS submission
- 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period
- 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
- 4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)

MNR Note: Follow Up: Categorization reflects whether MNR is satisfied that the comment will be addressed in a future stage or not at all. Because details of how the comment will be addressed were not provided in the Proponent Response column, these will be confirmed during review of the Final EA or addenda to the EA, including responses marked as “A” (satisfied).

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent’s response as follows:
1.	Example pages: 8-115/ES; 3-16; 3-19; 11-12; 14-12; 15-13; 16-38; 19-9  <b>This comment applies to several other sections</b>	<p>The Draft EA contains incorrect references to the existence of a Webequie Community Based Land Use Plan (CBLUP), completion of a Draft Community Based Land Use Plan, signing of the Webequie CBLUP in 2014 (although Webequie’s Terms of Reference was signed in 2014), and the existence of a Webequie Planning Area.</p> <p>A final/completed CBLUP is a document jointly approved by Ontario and a First Nation, and a Draft CBLUP is a document that Ontario and a First Nation jointly endorse to share publicly; it is important to make the distinction throughout the EA that the Webequie CBLUP process and the Marten Falls CBLUP process has not progressed to either of these stages.</p> <p>The status of Webequie’s CBLUP can be described as in-progress/early version of the Draft Webequie CBLUP.</p>	<p>For the Final EA, please update the references, to ensure accuracy regarding Webequie’s Draft CBLUP, Marten Fall’s Draft CBLUP and Areas of Interest for Planning.</p> <p>Please ensure reference to the ‘overlapping area’ (regarding Webequie and Marten Falls) is updated to reflect that the “Areas of Interest for Planning from the Terms of References are overlapping”.</p>	<p><b>A. Required for EA (per ministry mandate/policy /legislation)</b>  <b>B. Recommended for EA</b>  <b>C. Editorial</b>  <b>D. Permitting Related, Not Required for EA</b></p>	<p>1. Item will be addressed in the Final EAR/IS submission</p>	<p><b>A. Satisfied with response</b>  <b>B. Satisfied for now but will need to see final EA</b>  <b>C. Not satisfied – would like to discuss comment/ response with proponent</b></p>

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	<b>not listed here (including the appendices). Please review the Draft EA and update similar instances.</b>	Similarly, the <i>Far North Act, 2010</i> speaks to a Planning Area being designated by Minister's Order. Since this has not happened for the Webequie or Marten Falls CBLUP processes to date, the areas being planned for should be referenced as presented in the applicable jointly approved Terms of Reference (i.e., as an <i>Area of Interest for Planning</i> ).				
2.	Example pages: 30-19; 15-81; 16-44; 16-45; 16-58; 16-69; 16-71; 16-162; 19-66; 19-69;  <b>This comment applies to several other sections not listed</b>	The Draft EA includes incorrect content directly sourced from early versions of the Draft Webequie Community Based Land Use Plan (CBLUP).  As the Draft CBLUP has not been completed and has not been posted publicly, its content has neither been endorsed by Webequie or Ontario and will likely continue to change.  Also, as the Webequie CBLUP has not been completed and a draft has not been shared publicly, details of the Draft CBLUP should not be used as 'mitigation' or 'enhancement measures' for the WSR Draft EA (e.g. Section 16.4.1/page 16-162; page 16-175).	For the Final EA: a) MNR requests that content sourced directly from the Draft CBLUP document be removed. b) If referencing how the Project conceptually aligns with early versions of the Draft CBLUP (in-progress), please ensure the generalized references fit accurately with current CBLUP approaches/writing. c) Details of the Draft CBLUP should not be used as mitigation or enhancement measures.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	here (including the appendice s). Please review the Draft EA and update similar instances.					
3.	Page 3-17	Webequie First Nation has not 'been elected' to be involved in the CBLUP process. Webequie has chosen to be involved in the CBLUP process.	Removing the word 'been' is suggested, to make the statement accurate.	C	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
4.	Pages 11-12; 14-12; 15-13	In the sections of the Draft EA assessing effects, a table is included which outlines "key regulation, legislation and policies" that are relevant to the applicable section. In several sections (e.g. Vegetation and Wetlands, Social Environment and Economic Environment), CBLUP considerations are described. However, it is unclear how the broad considerations for CBLUP relate to the project-level specifics for these areas/effects being assessed.  A CBLUP is an overarching document that represents joint intentions of the community and Ontario, and provides overall land use direction. Its relevance is to guide what activities and developments are permitted or not permitted, and where, not to assess project-level impacts.	An update to the 'Project Relevance' in these tables is recommended, to ensure that the description is accurate, noting the level of land use direction provided in a CBLUP in comparison to the specific nature of the Project and effects being considered.  For example: a) If the intent is to clarify how the CBLUP relates to the social environment of the project, the EA could clearly explain how the	B	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			<p>plan's goals and priorities influence the social impact assessment for the Webequie Supply Road. The 'Project Relevance' section should clearly show which parts of the CBLUP connect to specific social issues in the Project, and how community values and concerns are being considered and integrated in the project.</p> <p>b) If the intent is to clarify how the broad considerations in the CBLUP relate to project-level regional and local economy issues, the EA could explain how the CBLUP's economic goals and objectives connect to the specific economic impacts of the Project. The 'Project Relevance' section should clearly show this connection by linking the community's economic priorities with the project's expected economic effects on the region and local area.</p>			<p>A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent</p>
5.	Page 16-44	It is unclear what is meant by the description of the community transitioning to make decisions that empower their future, self-sufficiency and responsible stewardship of the land, and how that is referenced in the CBLUP.	Please review the description of the CBLUP on page 16-44 and update for clarity.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
6.	Pages 14-11 & 15-11	It is unclear what is meant by “development regulation directives of the Far North regime”, or how this relates to the <i>Far North Act</i> . Also, the preceding statement does not qualify that the CBLUP direction is in an early draft stage.	Please clarify the meaning of the quoted statement or consider removing the reference. Additionally, the reference to CBLUP direction being in early draft form should be added.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
7.	Pages 14-12; 15-13; 16-15; 19-9;  This comment may apply to other sections. Please review the Draft EA and update similar instances.	The Draft EA contains incorrect references describing that the CBLUP (or draft CBLUP) “has not yet been submitted” to Ontario.	In the Final EA, please ensure that the joint approval process for CBLUP is apparent, as a CBLUP does not get submitted to Ontario for approval. Joint approval (First Nation and Ontario (MNR)) is required.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
8.	Page 15-67  This comment may apply to other sections. Please	CBLUPs are referenced in relation to unrelated programs/projects.  Under “Capacity”, a program is referenced, being an On-Reserve Land Use Plans (ORLUP). However, instead of using ‘ORLUP’ as the acronym, ‘CBLUP’ is incorrectly used.	Please ensure the accuracy of references.  Please ensure that CBLUP is not referenced in relation to other programs or projects, and vice versa.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	review the Draft EA and update similar instances.					
9.	Page 15-81	<p>There are errors associated with the concept of Areas of Interest for Planning (AIP).</p> <ol style="list-style-type: none"> <li>1) The CBLUP AIP was not identified specifically for “mining and related development”. As per the approved Terms of Reference, the AIP area was delineated based on Webequie’s historical and traditional use, as well as the community’s sustainability interests.</li> <li>2) The AIP does not include First Nations adjacent to the AIP. The First Nations are adjacent to and not necessarily included in the AIP.</li> <li>3) The measures described as being included in the CBLUP are unclear/inaccurate.</li> </ol>	<p>In the Final EA, please correct the references to AIP, with regards to how it was identified/delineated as well as referencing First Nations adjacent to (not within) the AIP.</p> <p>Please clarify the “measures” described in the CBLUP as it is unclear what these measures are.</p>	A	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA
10.	Page 16-16;  Appendix A-2 (Page 18)	<p>The reference to “monitoring the proposal to repeal the <i>Far North Act</i>” is dated (page 16-16). Also, in Appendix A-2, there is an incorrect reference to Section 12 of the <i>Far North Act</i> being repealed.</p> <p>In both circumstances, The <i>Far North Act</i> was amended, not repealed.</p>	Please update text to clarify that the <i>Far North Act</i> was amended.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
11.	Page 16-38	<p>There is an incorrect reference regarding submission of the CBLUP to the Ministry of Northern Development and Mines. In addition, CBLUPs do not get <i>submitted</i> to Ontario for approval (page 16-38).</p> <p>There is also an inaccurate statement in Appendix L, describing that the “Province must approve CBLUPs”.</p>	Please update any reference to working with a provincial ministry on CBLUP to the Ontario Ministry of Natural Resources.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	Appendix L, Part II, Page 198	Please note that CBLUPs are jointly approved by the First Nation (Council resolution) and Ontario (MNR Minister Order).	Please update any reference of CBLUP approval to accurately reflect the joint approval process.			
12.	Pages 16-38; 16-42; 16-51; 16-55; 16-134; 16-148; 19-56; 19-56; 19-56  This comment may apply to other sections. Please review the Draft EA and update similar instances.	The EA alludes to Attawapiskat First Nation having completed a Terms of Reference with Ontario under the <i>Far North Act</i> . For clarity, Attawapiskat undertook their planning initiative independently.  With regards to the associated map the area is labelled inconsistently as “area of interest for planning” or “Planning Area”.	In the final EA, please ensure that references to other First Nations’ involvement in <i>Far North Act</i> CBLUP are accurate and based on publicly available information. Where applicable, consider referencing jointly approved Terms of References between Ontario and specific First Nations. The EA could also mention other First Nations that have led independent planning efforts, clearly identifying them as such.  For the associated map(s), please confirm whether the area should be labelled an ‘Area of Interest for Planning’ or a ‘Planning Area’ as both are used on the map. Please ensure that the maps and text reflect when a planning initiative has been undertaken independently.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
13.	Pages 16-41; 16-42; 16-54; 16-56; 16-63	There are incorrect references to some First Nations having completed Terms of References, including identifying Areas of Interest for Planning, under the <i>Far North Act</i> , on page 16-41 and the map on the following page. Additionally, for First Nations that have completed Terms of References (including Areas of	For the Final EA, please: a) Ensure statements about (and maps of) other First Nations’ involvement in <i>Far North Act</i> CBLUP are accurate as per	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	This comment may apply to other sections. Please review the Draft EA and update similar instances.	Interest for Planning) under the <i>Far North Act</i> , the reference should be to completed/approved Terms of References (not 'draft' Terms of References).  Several maps incorrectly reference 'planning areas' when they should be reference 'Areas of Interest for Planning' (e.g. 16-42, 16-54, 16-56, and 16-63). In the context of the <i>Far North Act</i> , a 'Planning Area' is designated by Minister's Order, after a Terms of Reference is approved, prior to the approval of a final CBLUP.	publicly available information (e.g. approved Terms of References). b) Ensure that maps are updated to accurately reflect 'Areas of Interest for Planning' (not 'Planning Areas') for communities with approved Terms of References.	A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
14.	Pages 16-51; 16-52; 16-59; 16-60; 16-64; 16-65ggAppen dix L – Part II, Page 202ggThis comment may apply to other sections. Please review the Draft EA and update similar instances.	There are incorrect references describing that CBLUPs outline land ownership, land access, and traditional uses on the land. While it is possible to speak to some of these at a certain level, they are not required content.  Also, it may be misleading to state that 'many' First Nations have developed <i>Far North Act</i> CBLUPs. 5 First Nations have completed <i>Far North Act</i> CBLUPs for lands in Ontario.	Please update the reference to CBLUP content by removing inaccuracies in the descriptions or qualifying accordingly (e.g., if the reference is not related to a <i>Far North Act</i> CBLUP).  Please change the statement about ' <u>many</u> First Nations' to refer to <u>five</u> First Nations.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
15.	Pages 16-52; 16-135; 19-61; 19-61; 19-61; 19-61; 16-62  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Reference to the: a) Eabametoong First Nation and Mishkeegogamang First Nation Terms of Reference does not include MNR in the reference, although it was approved by the First Nations and MNR. b) Weenusk First Nation Terms of Reference do not include MNR, although it was approved by the First Nations and MNR.	In the Final EA, please: a) Add MNR in the reference "(Eabametoong and Mishkeegogamang First Nations, 2013)". b) Add MNR in the references "(Weenusk First Nation, 2017)".	A/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
16.	Page 16-86; 16-103	It is unclear what message is being conveyed by referencing the inclusion of 'recreation' and 'tourism' in Terms of References or CBLUPs, and what the intended context or relevance is. Perhaps the Draft EA is interpreting that the Terms of References express an interest in developing land use direction that can guide how/where recreational activities or tourism opportunities occur on the landscape.	In the Final EA, please provide appropriate context/relevance regarding the reference of 'recreation' and 'tourism' in the Terms of References and/or CBLUPs.	B	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA
17.	Pages 16-134; & 16-137	This section sets the context of Table 16-39 (referencing Terms of References for CBLUP) as "permission or prohibition of transportation infrastructure." The referenced context of Table 16-39 is unclear, as the Table does not include "information from First Nations CBLUP Terms of Reference on the permission or	Please review the respective Terms of Reference and ensure accurate context is provided related to the considerations identified for land use planning.	A	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
		prohibition of transportation infrastructure”, but rather it describes priorities for land use planning identified within the specific Terms of References.				
18.	Page 16-163	The sentence referencing Mining Act Section 35 (i.e. withdrawal of lands), but also references land use designations ‘made under the Far North’ and CBLUP(note the <i>Mining Act</i> and <i>Far North Act</i> are separate Acts). It is difficult to understand the intended message.	Please update grammar and references (to the Far North Act) to ensure the message is clear and correct. Alternatively, it would add clarity if the reference to CBLUP land use designations was removed from the statement.	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
19.	Page 16-167; Page 16-175/Table 16-47;	Regarding page 16-167, it is unclear how mentioning tourism as a topic in a CBLUP Terms of Reference is a mitigation for the WSR.  Regarding Table 16-47: a) With regards to ‘Land Use’, it is unclear how the completion of CBLUPs would resolve concerns in areas shared with First Nations to support Indigenous stewardship of lands. b) With regards to ‘Recreation and Tourism’, it is unclear how the development of a tourism plan could support CBLUP, and how that is related to stewardship of shared lands with other First Nations to manage remoteness and the potential impact of “outsiders” on fish and wildlife resources.  Also, please note that completion of CBLUPs is not within the control of the WSR project team so is not appropriate to use as a mitigation measure.	Please clarify or remove, for the Final EA, with regards to CBLUP and mitigation measures.	A	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA
20.	Page 16-192	Regarding table 16-52, Land Use Planning and Stewardship: a) The purpose of the CBLUP being finalized is not “for construction of WSR and operations phase activities,” and is not a requirement for the WSR. b) The relevance of “collaboration and acceptance of other First Nations in shared areas of traditional territory” is unclear, in relation to follow-up and	Please remove the statements or clarify the context, in the Final EA.  For example, it may be intended that progress of the CBLUP will be monitored to ensure that required	A	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		monitoring for the WSR. Consultation for WSR should not be confused with engagement for CBLUP.	direction in a completed/approved CBLUP will be followed and draft direction will be considered.			
21.	Pages 19-90; 19-103; 19-127  This comment may apply to other sections. Please review the Draft EA and update similar instances.	In the Draft EA, several areas refer incorrectly to "Draft Areas of Interest for Planning (AIP)" (such as for Constance Lake, Kashechewan, and Wawakapewin First Nations).  While it is understandable that the reference to the "Draft AIP" is used (since that is how it may appear as such in a Terms of Reference) it is important to note that, as Terms of Reference are approved documents, the AIP is no longer considered draft. It should be referred to as the First Nation's <i>Area of Interest for Planning</i> (reference to "draft" can be omitted).	Please update for accuracy.	A/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
22.	Pages 19-95  This comment may apply to other sections. Please review the Draft EA	The Constance Lake First Nation Terms of Reference is for developing a CBLUP, not a Draft CBLUP.  The purpose of developing a Terms of Reference document is to establish clear objectives, scope, and guidelines to ensure the successful development of a CBLUP. While the plan will go through a draft stage, the goal and final product is an approved CBLUP, not a draft version.	Please update for accuracy; references should omit "draft" and refer simply to the CBLUP, with regards to the Constance Lake First Nation Terms of Reference.	A/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	and update similar instances.					
23.	General Comment – Aggregates	<p>MNR staff appreciate that the Draft EA (e.g., Section 4.3.3.1) acknowledges that the extraction of mineral aggregate resources on Crown land to facilitate the construction of the WSR will require a permit under the <i>Aggregate Resources Act</i> (ARA), and that permit applications will need to include additional technical studies and site plans to meet the requirements of the Act and the Aggregate Resources of Ontario Standards.</p> <p>The Draft EA (e.g., page 4-31) refers to the 'Aggregate Resources of Ontario: Technical Reports and Information Standards (August 2020)'. Please note that the Aggregate Resources of Ontario: Technical Reports and Information Standards were updated in August 2023. These standards are available at the following link: <a href="https://www.ontario.ca/aggregate-resources">Aggregate resources   ontario.ca</a>.</p> <p>Additionally, applicants are required to notify and consult on permit applications, as described in sections 0.3, 0.4, 0.5 and 0.11 under Ontario Regulation 244/97.</p> <p>In recognition of the timelines associated with the permit application process (e.g., notification and consultation for applications can extend beyond six months), and the information required to support an application, it is recommended that the project team consider how permit applications can be initiated as early as possible during the detailed design phase of the project. For example, this could include phasing/prioritizing certain permit applications in the Draft EA, to align with the construction schedule for the project.</p>	<p>Please use the 2023 reference of the Technical Reports and Information Standards.</p> <p>The Draft EA may also benefit from clearly describing the required notification and consultation process for permit applications as well.</p>	B/D	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		MNR Aggregates Section would be pleased to meet with the project team (e.g., pre-consultation) to discuss the permit application process and the information requirements contained in the provincial standards.				
24.	General Comment – Aggregates	<p>The figures included in the Draft EA (e.g., page 3-60 and Appendix D-2, page 22) show that resource area ARA-4 consists of two separate deposits. However, the EA has identified only the northern deposit (e.g., Figure 1.2) as the preferred option for extraction in this area. Based on the information contained in the Draft EA, it is unclear whether the southern deposit of ARA-4 has been excluded as a preferred source of aggregate for the project.</p> <p>Any extraction from the southern deposit of ARA-4 requires a permit under the Aggregate Resources Act (ARA). If included, the EA should clarify which Ontario permits / authorizations will be required. Further consideration may be needed in the EA regarding how access to the southern/separate resource will be provided (e.g., authorizations under the <i>Public Lands Act</i>).</p> <p>Additionally, the northern deposit of ARA-4 appears to be predominantly located within the Webequie First Nation Reserve. However, a small portion extends onto provincial Crown Land, and extraction in that area would also require a permit.</p>	<p>MNR recommends that the Final EA clarify whether the southern deposit of ARA-4 is included as part of the preferred aggregate source for the project, and if so, which Ontario permits and approvals apply.</p> <p>If the intent is to limit extraction in ARA-4 to lands within the Webequie First Nation Reserve, it would be beneficial to clarify this in the EA. Please clarify in the Final EA whether extraction of ARA-4 will be limited to lands within Webequie First Nation Reserve.</p>	A/D	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
25.	General Comment – Aggregates	The Draft EA (e.g., Figure 4.9) indicates that the preliminary recommended preferred route for the WSR intersects with aggregate resource area ARA-2. As a general comment, roads (including the associated right-of-way) are typically excluded from aggregate permit operational areas.	When applying for the aggregate permit ARA-2, please do not include the road right-of-way in the proposed permit area.	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
					owner/operat or)	
26.	General Comment – Aggregates	<p>MNR staff appreciates that the Draft EA includes general information on potential effects and mitigation measures for aggregate sites in resource area ARA-2 such as in Section 8.11.3, which states that temporary infrastructure (e.g., ARA-2) will be decommissioned and restored to baseline conditions.</p> <p>However, the Draft EA (e.g. Section 8.3.5.2) also notes that aggregate extraction in ARA-2 may occur below the water table to meet construction needs for the WSR. Given this, it is unclear whether final rehabilitation of these below-water sites can fully restore pre-extraction baseline conditions, as rehabilitation may result in permanent open water features.</p>	<p>If below water extraction may be required in ARA-2, to support the construction of the WSR, it is recommended that the rehabilitation references in the EA (i.e., returning the sites to baseline conditions) be reviewed, to ensure they generally align with any proposed pit/quarry operations within the resource area.</p> <p>For example, the applicable rehabilitation references in the Final EA could be updated to include wording such as: 'aggregate permits will be rehabilitated to return the subject lands to its former condition or a condition that is compatible with the surrounding area.'</p>	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
27.	General Comment – Aggregates	<p>The Draft EA (e.g., Section 4.4.2.6), including the Appendices (e.g., Appendix E), indicate that aggregate permits will be encouraged to 'naturally revegetate' as part of progressive and final rehabilitation.</p> <p>Please note that Site Plan Standard #63 in the 'Aggregate Resources of Ontario: Site Plan (2020) Standards' requires that site plans outline the location, layout and type of vegetation that will be established on the site during progressive and final rehabilitation. The type of vegetation (e.g., trees, wetland</p>	<p>To align with the 'Aggregate Resources of Ontario: Site Plan (2020) Standards', it is recommended that the applicable references in the EA, including the Appendices, be updated to include that 'vegetation will be established through planting/seeding' during the</p>	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		plants, grass seed mixtures) established will depend on the circumstances of each site and will take into consideration surrounding land uses.  The Ministry typically does not support sites being allowed to 'naturally revegetate,' as this approach may not achieve the desired rehabilitation outcomes of the ARA.	rehabilitation of aggregate permits, as outlined on the required Rehabilitation Plan (as outlined in the required site plan to support a potential permit application under the ARA).			
28.	General Comment – Aggregates	The Draft EA (e.g., Figure 8.4) indicates that the proposed location of construction Camp 2-A will be adjacent to aggregate resource area ARA-2. Additionally, the Draft EA (e.g., Section 4.3.3.3) describes that Camp 2-A will include accommodations for workers.  It is appreciated that the EA (e.g., Section 9.3.3.1) provides some preliminary noise assessment related to Camp 2-A and potential extraction activities in ARA-2. However, based on the definitions under the ARA (Ontario Regulation 244/97), Camp 2-A may be considered a 'sensitive receptor' for the purposes of the Act.	Please review the Aggregate Resources of Ontario: Technical Report and Information Standards (August 2023), with attention to sections about Blast Design and Noise Assessment Reports, to better understand the technical reporting requirements for future permit applications for Camp 2-A.  The Project Team may want to consider whether it is more efficient/appropriate to move Camp 2-A outside of the sensitive noise receptor zone.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
29.	General Comment – Aggregates	Throughout the Draft EA, including the Appendices, the reporting describes that permitted pits and quarries under the ARA will be 'decommissioned'.  The ARA requires progressive (ongoing) rehabilitation of aggregate sites and, once the resource has been depleted, final rehabilitation is required before the site can be 'surrendered'.	To align with the requirements of the ARA, please update the 'decommissioning' references for pits and quarries in the EA, where appropriate, to describe that sites will be rehabilitated (progressive and final rehabilitation) and 'surrendered' in accordance with the Act.	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
30.	Appendix E (General Mitigation) (5.2 and 5.20.2.3)	Appendix E (e.g., Sections 5.2 and 5.20.2.3) includes references to the Ontario <i>Gasoline Handling Act</i> .  The <i>Gasoline Handling Act</i> was repealed in 2001, and guidance incorporated in the <i>Technical Standards and Safety Act, 2000</i> .	Please review the EA and appendices and update references to the <i>Gasoline Handling Act</i> accordingly.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
31.	Appendix E (General Mitigation) (5.19.3)	Section 5.19.3 (Aggregate Pit Sloping) of Appendix E states that the rehabilitation of pit faces in ARA-2 and ARA-4 will be sloped to a grade of 1:1 to meet MNR requirements.  In accordance with Ontario Regulation 244/97 (Section 0.13), the final rehabilitation of an aggregate permit is required to ensure excavation faces are sloped to at least 3:1 for a pit and 2:1 for a quarry, unless a variance from the sloping requirements is approved by the MNR and incorporated on the appropriate Site Plan.	To meet ARA requirements, MNR recommends updating Section 5.19.3 to state that rehabilitated pit slopes will be no steeper than 3:1, unless otherwise approved in the aggregate permit.	B/D	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
32.	Appendix E (General Mitigation) (5.20.1)	Section 5.20.1 (Site Selection) indicates that setbacks to sensitive natural heritage and cultural features/areas in aggregate resource area ARA-2 will be indicated on site plans or 'construction documents.'  The Aggregate Resources of Ontario: Site Plan Standards (2020) require that Site Plans include the locations of any required setbacks, including any mitigation measures identified in the Technical Reports and Information (e.g., Natural Environment Report).	To meet ARA requirements, the EA should clarify that any setbacks associated with permit applications under the Act will be incorporated in the required Site Plans.	B/D	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
33.	Appendix E (General Mitigation) (5.20.2.1)	<p>Section 5.20.2.1 (General Measures) states that aggregate extraction in aggregate resource area ARA-2 shall avoid the habitat of endangered species.</p> <p>MNR staff appreciate the intent of this mitigation measure. However, it is unclear if this could be interpreted that aggregate extraction will therefore not be permitted in these habitats.</p> <p>In accordance with the Technical Reports and Information Standards (August 2023), a Natural Environment Report in support of an aggregate permit application is required to identify if habitat of endangered or threatened species is on or within 120 metres of the site, and if present, evaluate any negative impacts on the habitat and identify any proposed preventative, mitigative or remedial measures.</p> <p>Additionally, development (e.g., aggregate extraction) within the habitat of species at risk listed as endangered and threatened under the Species at Risk in Ontario list may require an authorization under the <i>Endangered Species Act, 2007</i> (ESA), or future Species Conservation Act, 2025 (SCA).</p>	The Ministry of the Environment, Conservation and Parks (MECP) is responsible for the administration of legislation concerning species listed as endangered or threatened on the Species at Risk in Ontario List (i.e., the <i>Endangered Species Act, 2007</i> and the pending <i>Species Conservation Act, 2025</i> ). Considering the limited areas of available aggregate resources identified in the EA, it is recommended that the EA Project Team consider the feasibility of implementing this mitigation measure (i.e., avoiding the habitat of endangered and/or threatened species) and consult with MECP regarding potential adverse effects to endangered and threatened species if activities will be carried out within or near their habitat.	B	1. Item will be addressed in the Final EAR/IS submission. Wording has been adjusted in Appendix E to reflect that species at risk habitat will be avoided, where practicable/feasible.	A. Satisfied with response
34.	Appendix E (General Mitigation) (5.20.2.1)	Section 5.20.2.1 (General Measures) states that extraction shall not commence within aggregate resource area ARA-2, until a quarry permit or 'lease' has been issued by MNR. However, an aggregate permit under the ARA is required.	To ensure consistency with the ARA, it is recommended that Section 5.20.2.1 be updated to remove the reference to a 'quarry lease' and be replaced with the requirement to obtain a permit under the ARA.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
35.	Appendix E (General	Section 5.20.2.2 (Scope of Work) states that the development of a quarry shall be in accordance with the 'site plan application' under the ARA.	To ensure consistency with the ARA, it is recommended that Section 5.20.2.2	B	1. Item will be	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
	Mitigation) (5.20.2.2)	Quarry development (ARA-2) must comply with an approved 'permit' under the ARA, which requires a site plan.	be updated to state that quarry development shall be carried out in accordance with a permit (including the site plan) issued under the Act.		addressed in the Final EAR/IS submission	
36.	Appendix E (General Mitigation) (5.20.2.4)	<p>Section 5.20.2.4 (Submittals and Advance Notice) states that the Contractor shall provide notice to the MNR regarding the location of processing areas (e.g., crushing operations), the location of the initial extraction area, and other matters associated with the development of quarries in ARA-2.</p> <p>MNR staff appreciate the inclusion of this direction in Appendix E. However, it is unclear whether these mitigation measures refer to information that must be included as part of a permit application under the ARA, or if this refers to the submission of a separate notice to the Ministry.</p> <p>In accordance with the 'Aggregate Resources of Ontario: Site Plan Standards (2020)', information like the location of processing areas must be incorporated on the site plan submitted in support of a permit application. Additionally, the operation of an aggregate permit must comply with the conditions outlined in the approved permit and site plan.</p>	To align with the requirements of the ARA, it is recommended that the mitigation measures outlined in Section 5.20.2.4 be updated to clarify that the operational details associated with the development of quarries in ARA-2 will be documented in the required permit applications submitted under the Act.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
37.	7-35/ES 7.0  Also, within other figures titled "Location of Project Components".	Figure ES 7.1 shows the locations of the various project components. The waterbody crossing by culverts are depicted in a green colour which is difficult to distinguish from the background terrain (depicted in brown and green tones).	An alternative colour to green, to highlight the waterbody crossing by culvert locations, is suggested.	C	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)	

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
38.	8-46/ES 8.2.3	Under "Effects to Surface Water Quality", a number of mitigation measures are proposed during construction. However, a mitigation measure related to delaying construction during heavy rainfall or runoff is listed in the Species at Risk section, but is also applicable to surface water quality (see ES 8.8.3, P8-73).	Please consider including the following mitigation measure, in this section: "construction will be delayed during heavy precipitation or runoff events".	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
39.	4-6/4.2; 4-31/4.3.3.2  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Table 4-1 includes the design criteria for the proposed supply road. However, no design criteria were provided for the ARA-4 access road.  Details regarding the proposed design of the ARA-4 access road are required prior to permitting, however including these details in the Final EA will allow for potential effects to be better assessed and can reduce delays at the permitting stage.	Please provide the design criteria for the ARA-4 access road as part of the Final EA.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
40.	4-10 to 4-12/4.3.1.3	Cross sections are provided for two distinct road sections: (1) Upland area or north-south section, and (2) lowland area or east-west section. However, it is unclear if there is a proposed hybrid section for the transition area between the two distinct road sections.	Please consider whether a hybrid cross section is required for the transition area between the upland and lowland road portions. If so, please provide this detail in the Final EA.	B/D	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)	C)Not Satisfied – would like to discuss comment/response with proponent.  MNR recommends that this be addressed as #3 to support permitting.  The transition area will have

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
						different engineering requirements than the upland and lowland cross sections that have already been provided.
41.	4- 40/4.4.2.3.2 ; 4- 47/4.4.2.6	The section discusses temporary access roads and waterbody crossings. It is not clear if there are proposed water crossings on ARA-4 access road in addition to WC-27.	Please indicate whether there are additional waterbody crossings on the ARA-4 access road (other than WC-27), and include the design criteria and details for any additional waterbody crossings within the Final EA.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A) Satisfied with response  Please note, where additional water crossings are needed to support the project (and are not identified in the EA), an amendment to the EA will be required.
42.	4-45/4.4.2.5	The section indicates that culverts will be embedded to allow for fish passage; this will affect the hydraulic capacity of the crossing. It is unclear if the hydraulic design for the waterbody crossings outlined in <i>Appendix D-1: Preliminary Engineering Design Report</i> accounts for the loss in hydraulic capacity for culvert embedment.	As part of the Final EA, please clearly indicate whether the hydraulic design has accounted for culvert embedment.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)  Note: The hydraulic design has accounted for culvert	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
					embedment.	
43.	7-34/7.2.2	<p>This section presents the results of the peak flow analysis for waterbody crossings. Several methods were considered but ultimately excluded from use, including:</p> <ul style="list-style-type: none"> <li>• Modified Index Flood Method (MIFM)</li> <li>• Transposition of Flood Discharge (single station and regional frequency)</li> <li>• Northern Ontario Hydrology Method (NOHM)</li> <li>• Unified Ontario Flood Method (UOFM)</li> </ul> <p>The Ministry agrees that these methods are not suitable for this project due to its proximity to the Hudson Plains Ecozone and the relatively large size of the gauged watersheds compared to the study area.</p> <p>For peak flow estimation:</p> <ul style="list-style-type: none"> <li>• The Rational Method was applied to watersheds smaller than 10 km<sup>2</sup>.</li> <li>• The Index Flood Method (MNR) was used for watersheds larger than 10 km<sup>2</sup>.</li> </ul> <p>However, the Ministry questions the use of the Rational Method for smaller watersheds, given that the Index Flood Method is applicable to areas under 10 km<sup>2</sup> as well, and recommends using the Index Flood Method for all waterbody crossings, including watersheds smaller than 10 km<sup>2</sup>, rather than relying on the Rational Method for those areas.</p> <p>In addition, to validate the peak flow estimates, the Ministry suggests using independent methods that are appropriate for the Hudson Plains Ecozone, including:</p> <ol style="list-style-type: none"> <li>1. Dimensionless Flood Frequency Method (Appendix D, <i>Ontario Flow Assessment Techniques</i>, Version 1.0, MNR, June 2002); and</li> </ol>	<p>The Ministry recommends using the Index Flood Method for all streams and to validate the peak flow estimates using an independent method appropriate for watersheds near the Hudson Plains Ecozone.</p> <p>If the Rational Method continues to be used for watersheds under 10 km<sup>2</sup>, please provide:</p> <ul style="list-style-type: none"> <li>• Time of concentration calculations, and</li> <li>• The adjustment factor to account for attenuation in the watershed, as outlined in Design Chart 1.06 of the <i>MTO Drainage Management Manual (1997)</i>.</li> </ul>	<p>A</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	<p>A) Satisfied with response</p> <p>Our understanding, based on feedback from the Project Team is that: 1) the Rational method will only be applied to watersheds under 1 km<sup>2</sup>; 2) time of concentration can be provided in the detailed design report; and 3) an attenuation factor was not used as our approach was more conservative.</p>

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		2. Extreme Flow Statistics ( <i>Flood Flow and Low Flow Statistics for Southwestern Hudson Bay and Nelson River Watersheds</i> , MNR, Mapping and Information Resources, 2013).				
44.	8-9/8.1.2; Appendix D-1/4.1.4.4	<p>Section 8.1.2 discusses the floating road being constructed directly on top of the peat and suggests that the design will ensure continuous movement of the groundwater in the peatlands.</p> <p>Appendix D-1, Section 4.1.4.4, describes a 40% to 50% peat thickness compression from the road loading.</p>	<p>Within the Final EA, please comment on the impact of the compression/consolidation of the peatlands on the continuous movement of groundwater under the roadway. In particular, the EA should consider how 40% to 50% peat compression affects the continuous movement of groundwater under the road.</p>	B	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	A. Satisfied with response
45.	Appendix D-1, (30/3.3.3)	<p>The section comments that beaver dams are common features on small to medium sized streams. Beaver dams will impact the hydraulic capacity of any adjacent water crossings.</p> <p>Understanding potential impacts to drainage (such as from washouts due to beaver activity) is beneficial for us to be able to appropriately evaluate potential effects, although it can be addressed at the permitting stage.</p>	<p>In the Final EA, please comment on the presence of beaver dams at any of the waterbody crossings and describe how they were incorporated into the hydraulic design of the crossings.</p> <p>If this is not provided in the Final EA, MNR recommends that a commitment be provided in Final EA for this to be addressed at the detailed design stage.</p>	B/D	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	<p>B. Satisfied for now but will need to see final EA.</p> <p>MNR would like to reiterate the recommendation that if the comment regarding the presence of beaver dams at any of the waterbody crossings and a description of how they were incorporated into the hydraulic design of the crossings is not addressed in the Final EA, a commitment be provided in Final EA for this to be addressed at the detailed design stage.</p>

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
46.	Appendix D-1 (43/4.1.2)	The section indicates that the design flows for the waterbody crossings is based on the 100-yr flow, and that the design values could increase by up to 40% after incorporating climate change. The section further states that a hydrologic model will be developed for the crossings and will be run for existing and future conditions, to understand potential increases to peak flows associated with climate change. A per cent increase will be applied to the design flows to account for climate change.	In the Final EA, please clarify that the hydrologic modeling will be used only for establishing the per cent increase factor, and that the hydrologic model flows for future conditions will not be used as the future design flows, if that is the case.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A – Satisfied with response
47.	Appendix D-1 Section 4.1.4.4 P54	The section describes the compression of the peatland under the road loading.	In the Final EA, please comment on the anticipated timeframe for the peatland compression to be completed and how this is incorporated into the road construction schedule. These considerations could also be included in other sections related to proposed construction schedules/timing.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A – Satisfied with response
48.	Appendix D- 1:Appendix A (16/3.4)	The 2019 J.D. Mollard Report discusses the presence of channel and ladder fens having: water tables at, or near, the surface, and flowing groundwater gradients along the proposed roadway route (section 3.4). The waterbody crossing designs considered open water crossings within defined waterways.  However, Appendix F (in Appendix D-1), <i>Hydrologic and Hydraulic Analysis for Webequie First Nation Supply Road</i> , Section 1.3, states that the 31 water	In the Final EA, please describe how channel and ladder fens were incorporated into the drainage design.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by	A – Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	Appendix D-1: Appendix F (1.3)	crossings are described as having a defined channel/flow path and did not include wetlands or areas that experience transient flow. This suggests that channel and ladder fen areas may not have been incorporated into the drainage design.			the ultimate owner/operat or)	
49.	Appendix D-1:Appendix F (Table 2-6/2.1.8)	Table 2-6 provides Mean Annual Flows for the water crossings, but does not provide a source for the values.	Please provide the source for the Mean Annual Flows determined for the water crossings, within Table 2-6.	C	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	
50.	Appendix D-1:Appendix F Table 3-1	Table 3-1 provides estimated high-water levels for the 100-year flows, at the water crossings.	Supporting hydraulic calculations will be required for the high-water level calculations at the permitting stage.	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
51.	Appendix F, Page 102- 103, Table 5-10.	<p>Please confirm – for the 30 water crossings (WC-1A to WC-27), the relationships for the 100-year flood, 50-year flood and 25-year flood are as follows:</p> <p>1) <math>Q_{100} = 1.0024 DA^{0.732}</math> (<math>R^2 = 0.999</math>)  2) <math>Q_{50} = 0.8667 DA^{0.7299}</math> (<math>R^2 = 0.999</math>)  3) <math>Q_{25} = 0.72 DA^{0.7261}</math> (<math>R^2 = 0.999</math>)</p>	<p>Please confirm that these relationships are correct, and include them in the text of the EA and Appendices as appropriate.</p> <p>This will provide a quick flood estimate for drainage areas anywhere along the proposed Webequie Supply Road.</p>	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
52.	Appendix F, Section 5.3.2	<p>Daily Flow Hydrographs by Drainage Area Size The 30 water crossings can be grouped into three drainage area sizes:</p> <ul style="list-style-type: none"> <li>• Small: 0.6–50.3 km<sup>2</sup></li> <li>• Medium: 349.4–897.6 km<sup>2</sup></li> <li>• Large: 1668.0–1773.8 km<sup>2</sup></li> </ul> <p>Please provide a daily flow hydrograph for each group. These three graphs would show typical daily flow patterns from January 1 to December 31. This is general reference information that could be useful for readers.</p>	<p>Please consider including three hydrographs (associated with the small, medium and large categories) in Section 5.3.2, to display the general surface water flowing hydrology of the area.</p>	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
53.	EA Sections 7.2.1.2 & 7.3.1 & 7.5.2.1	<p>These sections address water taking and augmentation related to road construction. It is recommended to focus water taking or discharge in medium and large drainage basins, as they are more resilient to changes in water levels. Specifically:</p> <ul style="list-style-type: none"> <li>• 19 of the 30 crossings should be avoided, as they are in small basins (&lt; 50.3 km<sup>2</sup>).</li> </ul>	<p>Please consider the recommendation (to focus on medium and larger drainage basins for water taking or discharge) for the final EA, to reduce potential effects.</p>	B	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA.

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
		<ul style="list-style-type: none"> <li>The remaining 11 crossings, located in larger basins (&gt; 349.4 km<sup>2</sup>), are more suitable for water taking or discharge.</li> </ul> <p>This approach helps minimize potential impacts and effects.</p>				
54.	General Comment - Hydrology	<p>Reviewing WSC gauge 04FC003, located downstream of WC-27, shows that extremely low flow conditions can occur during summer months, such as July, August, and September 2023, for example. This suggests that similar low flow events may affect the 30 creeks, tributaries, and rivers within the Local Study Area.</p> <p>These low flows could have implications for fisheries and navigable waters, especially considering that the Webequie Supply Road Study Area is approximately 81% wetland, as noted in the EA.</p> <p>Given this context, it would be prudent to include a dedicated Low Flow section in the Hydrology / Surface Water components of the EA and its related appendices.</p>	Please consider adding a Low Flow section to the Hydrology and Surface Water components of the Final EA and related Appendices.	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A) Satisfied with Response
55.	5-17/ES5 / General – Indigenous Consultatio n	The last paragraph states that MEM and MECP have delegated procedural aspects of the Crown's duty to consult to Webequie First Nation.	For awareness, MNR may propose the delegation of procedural aspects of the Crown's duty to consult before issuing MNR permits needed for project implementation.	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
56.	General – Indigenous Consultation	Including a clear and detailed description of potential MNR permits/approvals and project activities in the EA could help streamline consultation processes related to permitting.	Please ensure that clear, detailed descriptions of potential MNR permits/approvals and project activities are included in the Final EA.	B	1. Item will be addressed in the Final EAR/IS submission. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)  Note: The Introduction section that discusses relevant regulatory permitting requirements has been revised and and is deemed sufficient for the Final EA.	If the proponent response is a 1, MNR response is: A. Satisfied with response.  For awareness, this comment also relates to MNR comment #95. The Project Team agreed to change their response from a 4 to a 1.

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
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57.	General	There appears to be typos and grammatical errors throughout the Draft EA.	Please review for typos and grammar, for the Final EA.	C	1 - Item will be addressed in the Final EAR/IS	A. Satisfied with response
58.	8-77-79/ES8.9; 8-87/ES8.12; Sec 17/17.3.3.10; Appendix N	<p>The Community Readiness Plan (CRP) is outlined to mitigate effects on the social environment, but the CRP does not explicitly address Missing and Murdered Indigenous Women and Girls (MMIWG) Calls for Justice that address issues of Human Security (ie. 4.1 to 4.8) and Extractive &amp; Development Industries (ie. 13.1; 13.5). Addressing these Calls for Justice could further enhance an otherwise well-developed CRP and provide further opportunities for monitoring and measuring progress.</p> <p>The same comment applies to ES 8.12, with regards to a missed opportunity to connect to specific Calls for Justice from MMIWG report.</p> <p>Section 17.3.3.10 provides a fairly good, in-depth discussion on the safety of women and girls in Indigenous communities alongside industrial development. There is opportunity to specifically refer to Calls for Justice (4.1-4.8), and to be more explicit/precise about Calls.</p>	It is recommended that the EA recognize the potential effects and cumulative impacts of outside workers on the social environment valued component, and make links to specific existing Calls for Justice in the MMIWG reports.	B/D	1 - Item will be addressed in the Final EAR/IS	B. Satisfied for now but will need to see final EA.
59.	2-52/Table 2-7	The comprehensive and detailed nature of this table is appreciated.	No change is being proposed.	-	Noted	
60.	3-12/3.1.2.5	The Evaluation of Project Alternatives identifies one of the disadvantages of an all season road (in comparison to an upgraded winter road) being that it is "more costly to rehabilitate at closure." It is unclear why rehabilitation costs were included in the alternatives assessment, given that the all season road is intended to be permanent, and the project describes that decommissioning not anticipated as stated in other sections of the Draft EA and within the approved Terms of Reference for the Project.	Please clarify within the alternatives assessment that decommissioning of the road is not anticipated, in accordance with the Terms of Reference.	B	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA.

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
61.	5-10/5.2.1.3	Overall scoping for the Project identified several more communities than the three whose Indigenous Knowledge and Indigenous land and resource use information (IKLRU) has been included in detail in the document. It may be necessary for the EA to describe how the current IKLRU is adequate. MNR's scoping of potential affected/interested communities for future permits in support of the project includes additional communities than the three stated.	<p>Please describe if the current IKLRU (from the three communities) is adequate for the EA, and assessing potential impacts, such as within each section of the EA where IKLRU is incorporated (e.g. 11.1.3/Table 11-3).</p> <p>For clarity, please add a brief description to section 5.2.1.3 regarding why IKLRU from only three nations is included in the EA (for example, such as describing that only three communities volunteered to provide the IKLRU).</p>	<p>A.</p>	<p>4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)</p> <p>Note - Section 5 list those First Nations that shared IKLRU and each VC section describes how it was considered in the EA/IA.</p>	<p>C. Not satisfied – would like to discuss comment/response with proponent.</p> <p>MNR recommends changing the response to a 1 or 2. The approved Terms of Reference describes eight communities to be engaged more deeply. Please provide rationale for the inclusion of IKLRA from 3 communities (as opposed to the full 8 communities identified in the ToR).</p> <p>For example, “<b>Out of the eight communities that were provided an opportunity to contribute IKLRU to the project (reference to ToR section that identifies the 8 communities), to date, the following First Nations have provided IKLRU information to the Project Team...</b>”</p> <p>This ensures transparency and understanding of the communities that were provided the opportunity</p>

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						to engage in IKLRU.  See comment #102, it is similar and is being addressed in Final EA.
62.	14- 25/Figure 14.1  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Pic River and Pic Moberg First Nations are listed on the map, but not Pays Plat First Nation.	Consider adding Pays Plat First Nation on the map(s) as well.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
63.	14- 33/14.2.1.2. 1	Off-reserve members may engage in rights-based activities in the traditional area of their “home” community. It is unclear if the review of census data also included urban Indigenous and/or off-reserve populations or whether it was scoped to on-reserve members.	Provide additional detail on the use of census data and whether this included urban indigenous and/or off-reserve populations, and applicable detail/rationale.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
64.	14-27 to 14-29/Table 14-5	The EA could consider that any change to the physical environment also has the potential to impact Traditional Learning.	Please reconsider the potential effects to the “Change to Education, Training and Traditional Learning” and consider a change from “No interaction” to “Potential interaction”.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
65.	14-163/Table 14-39	A potential effect to “education, training, and traditional learning...” could include greater access to land for land-based learning.	Please consider adding “increase in land access” to potential effects.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
66.	17-98/Table 17-6	Impact to rights-based activities are noted with regards to consumption of traditional foods. The net effect may be “neutral” in the short term, but could be net negative in the long term, depending on effects to key species and a community’s reliance on these key species (e.g. caribou, moose).	Please consider and reflect this possibility in the predicted net effects.	B	4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)  Note: the predicted net effect was based on the existing conditions of	

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					health determinants regarding consumption of country foods.	
67.	19-25/19.1.4 & Table 19-5	This section and the associated table discuss “changes to rights”. Rights are enshrined in the Constitution and in law and in theory don’t change.	Please include a definition or clarification on what might constitute a “change to rights”, perhaps through the use of an example. Of particular interest would be a situation where there is a constriction or reduction of these rights or change to how certain rights may be exercised.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
68.	Section 19 / General	Change in the ‘sense of place’ is a likely risk with large projects where there is potential to alter landscapes. For example, noise, dust, etc. may result in an area being less attractive or avoided altogether for harvesting activities. Changes at the landscape scale may impact how individuals experience a place. For example, the background noise of a highway will impact how harvesters go out and harvest.	For greater clarity, proponent should consider defining ‘sense of place’ and including an analysis of the potential impacts to ‘sense of place’, including the correlation between a change in ‘sense of place’ and an impact to rights (such as in section 19.3.1.1.3 for example).	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
69.	Appendix E/2.1.7	The bulleted list lacks detail/descriptions, regarding the Environmental and Cultural Awareness and Education Plan.	Please include a more in-depth description of each bulleted item, in the Final EA.	B	4. Item will not be addressed as considered out of the scope of the approved EA Terms of	

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
					Reference (ToR)	
70.	Appendix O/Table of Contents	The Table of contents is not in an accessible (hyperlinked) format, as seen in other sections of the Draft EA.	Please consider editing the Table of Contents formatting in this section, to hyperlink to the applicable sections.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
71.	Appendix O/Tables	In the currently used format it is difficult for readers to easily (visually) identify which results/levels could be considered "dangerous".	Please consider adding colour-coding to the tables, so that readers can visually identify any sample that exceeds the recommended limits for a particular mineral/compound/metal (e.g. highlighting in red anything "dangerous"; highlighting in yellow anything above normal).	C	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)	
72.	21- 239/21.4.12	This section states that "the assessment of cumulative effects on Indigenous Peoples and impacts to the exercise of Aboriginal and Treaty Rights is to be determined."	It would be helpful for this section to describe whether this assessment will be completed and incorporated into the Final EA.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
73.	2-39/Table 2.7	Table 2.7 lists the key issues and concerns raised by Indigenous communities, and provides a general reference to the applicable section where the issues/concerns have been addressed.	For greater clarity/ease of understanding regarding where and how issues/concerns have been addressed, it is recommended that the Final EA provide additional detail beyond the broad/general EA section (e.g. Section 21 – Cumulative Effects Assessment, 2.4.2).	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
74.	General – Forestry	The Draft EA does not include the appropriate level of detail required for licensing and permitting under the <i>Crown Forest Sustainability Act</i> (CFSA), related to the harvest of merchantable timber.  It is also unclear what type of land tenure may be issued prior to licensing and permitting. The type of land tenure or absence of (i.e. Crown land) will partly determine the type of licensing or permitting issued under the CFSA.	Please note that prior to permitting, MNR will require site-specific details in order to licence or permit any timber harvesting under the CFSA. These details will include: detailed mapping, details on end-use of timber, renewal plans (not necessarily seeding), and areas proposed for harvest (hectares).	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
75.	ES 8-59/ES 8.6.3  This comment may apply to other sections. Please review the	With regards to mitigation measures related to restoration and habitat offsetting for vegetation and wetlands, ES 8.6.3 describes activities including: “removing refuse, grading disturbed areas, contouring disturbed slopes to a stable profile, re-establishing natural drainage patterns and seeding to re-establish vegetation”.  Please note that planting trees may sometimes be more appropriate than seeding to re-establish vegetation in some cases.	Please consider tree-planting as a potential restoration and habitat offsetting measure, if it has not already been considered, and incorporate into the Final EA as appropriate.	B	1. Item will be addressed in the Final EAR/IS submission.  Note Section 11 and Appendix K-3 describe the	A. Satisfied with approach

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	Draft EA and update similar instances.				proposed habitat off- setting.	
76.	8-109/ES 8.18.3  This comment may apply to other sections. Please review the Draft EA and update similar instances.	In response to the potential effect of high-intensity short duration rainfalls, the text states that “all waterbody crossing structures are sized to convey a minimum 100-year design flow (probable rainfall event within 100-year period) after accommodating for increases in rainfall intensities due to climate change”.  The text also states that “equalization cross-culverts will be installed at appropriate intervals along the road to allow for water to pass from upstream to downstream and prevent water levels from rising or ponding on one side of the road. Furthermore, cross-culverts will be oversized to reduce potential for blockage and allow for easier maintenance”.	Please ensure that all supporting documentation regarding culvert sizing is submitted prior to permitting, as this is a requirement prior to the issuance of MNR permits.	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	A. Satisfied with response
77.	8-110/ES 8.18.3  This comment may apply to other sections. Please review the	In response to projected freeze-thaw cycles for operations, the text states that “repeated freeze-thaw cycle can destabilize the soil and gravel material around culverts which will however be designed and constructed according to codes to minimize heave or destabilization.” If culverts are installed properly, as per design and construction codes and/or best management practices, with proper compaction, this should not be an issue.  This section refers to adhering to provincial standards, but it is unclear what provincial standards are being referenced. For example, it states: “road	Please ensure that there is a reference to proper installation techniques in the Final EA.  Please include, where appropriate, what the provincial (or other) standards are and/or where they are referenced in the EA. In addition, please refer to how this relates to	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	Draft EA and update similar instances.	embankment is designed according to provincial standards and groundwater is predicted to flow underneath the road".  Regarding rain and snow events, the text states that the "WSR layout is designed with standard lane width, curves and low grades. Operation and maintenance staff will clear snow according to standards and procedures in the Health and Safety Plan". However, no reference for standards and procedures are given.  References to the mentioned standards are required prior to permitting.	groundwater flow underneath a road, in the applicable section.			
78.	8-110 & 8- 111/ ES 8.18.3  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Pages 8-110 and 8-111 in the Executive Summary both state the same text, being "The MSF building and outside supportive structures will be designed and built to codes to prevent damage from high winds." However, it is unclear which codes are being referred to.	The words "built to codes" is used in a few instances. Please expand on what code is being referenced in each instance, and/or refer to where this is referenced in the EA.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
79.	Executive Summary 8-111/ES 8.18.3	The text states the following: "Although cross winds can be a safety hazard to drivers, the road will not be designed and the ROW managed to eliminate physical hazards (e.g., trees in close proximity to road), and where applicable safety guiderail will be placed along the road where standards dictate their use."	Please review the noted text, and remove the word "not" as applicable.	B/C	1. Item will be addressed in the Final EAR/IS	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
		<p>It is unclear if perhaps the word “not” should be removed, or if the statement is written as intended.</p> <p>If the statement is written as intended, lack of maintenance/management of the road right-of-way is a concern for the safety of road users.</p>	<p>If the original text is written as intended, please note that the lack of maintenance/management of the road right-of-way is a concern for the safety of road users, and right-of-way maintenance consideration should be included.</p>		submission	
80.	8-111ES 8.18.3	<p>The text states that “the road is to be elevated at sufficient height relative to the original ground that would prevent water from rising over the road surface (overtopping). Furthermore, surface water modelling has determined the appropriate sizing for drainage components (e.g., ditches, culverts).”</p> <p>Please note that there is a formula for the height of road fill on top of culverts, contained in MNR’s technical note “CSP Culvert Installation at Water Crossings on Forest Access Roads.”</p>	<p>Please consider applying MNR’s technical note “CSP Culvert Installation at Water Crossings on Forest Access Roads” if appropriate, and include a reference to it if is used.</p> <p>Also, documentation on watershed calculations and culvert sizing will be required for review prior to permitting.</p>	A/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
81.	8-111/ ES 8.18.3  This comment may apply to other sections. Please	<p>The text states: “Riverbanks near the bridges will be revegetated and/or have erosion control measures (e.g., rock/rip rap) following construction to prevent and limit erosion over time. Operation and maintenance crews are also expected to routinely inspect bridge and culvert structures and upstream and downstream riverbanks for signs of erosion and complete repairs where required.”</p>	<p>Please update text to clarify that erosion control mitigation measures will only use clean non-erodible materials below the high-water mark and that revegetation will only be used above the high-water mark.</p> <p>Also, depending on the land tenure, ownership and management for the</p>	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
	review the Draft EA and update similar instances.	Please note that clean non-erodible material should be used below the high watermark for stabilization and revegetation is an appropriate mitigation measure to prevent erosion only when used above the high watermark.	road, the inspection schedule outlined in the Crown Land Bridge Management Guidelines (CLBMG) may need to be adhered to and should be reflected in the text, if appropriate. If the road is on Crown land administered by MNR, it should be subject to the inspection schedule outlined in the CLBMG.			
82.	Appendix F (Maps)  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Maps contained in this document depict three alternatives.	Please update the legends noting the preferred route, to provide clarity for the reader.	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
83.	Appendix K-3 (Page 6)	The text states that "preparation of the detailed restoration plan will follow approval of the conceptual plan".	Please note that the detailed restoration plan will need to be submitted and reviewed prior to permitting. However, including it within the final EA would also be	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e.,	A – Satisfied with response  Note that providing this information at the final EA stage can help streamline and reduce timelines during permitting.

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
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			beneficial and would provide the opportunity for review and comment.		taken on by the ultimate owner/operator)	
84.	Appendix E (Page 13)	The text states "The Erosion and Sediment Control Plan will include mitigation measures to control run-off, minimize erosion on exposed slopes and substrates, and prevent introduction of sediment or other deleterious materials from entering into watercourses. The plan will describe the applicable permits and best management practices and will follow existing guidelines as appropriate to mitigate erosion and sediment transport".  The text notes that there will be a <i>Vegetation Management and Invasive Species Plan</i> .	Please ensure that the mentioned plans are submitted with sufficient review time prior to permitting. The Ministry recommends including mitigation plans within the final EA to prevent delay at the permitting stage.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
85.	Appendix E (5.1, Page 27)  This comment may apply to other sections. Please review the Draft EA and update	Point 8 states that "merchantable timber shall be made available for community use free of charge upon request from community member or organizations" and "removal and or disposal of any unused merchantable timber remains the responsibility of the Contractor".	Please note that the tenure status of the right-of-way corridor will have bearing on the fees for merchantable timber. <b>Please ensure the EA does not promise that merchantable timber will be free for all uses.</b> Where a permit is required to harvest merchantable timber fees according to the CFSA will apply and be paid by the permit holder.  Furthermore, the end-use/disposal of merchantable timber will need to be	A/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	C. Not satisfied – would like to discuss comment/response with proponent.  MNR recommends that this be response 1 or 2, to ensure that the final EA accurately refers to fees for the harvesting of merchantable timber to ensure transparency and accuracy related to MNR's permitting process.  MNR is requesting that statement similar to the following be added to

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	similar instances.		described and submitted for review prior to permitting.			the EA: "Where a permit is required to harvest merchantable timber fees according to the CFSA will apply and be paid by the permit holder"
86.	Appendix E (5.1 Page 28)  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Point 13 states: "Disposal of cleared trees and brush must be done in accordance with contract specifications and may involve burning, compacting, piling, burying, windrowing and compacting, and chipping."	Please note that these details will need to be submitted for review prior to permitting.	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	A. Satisfied with response
87.	Appendix E (5.1 Page 28)	Point 14 states: "All cleared vegetation, grubbed material, and debris that is to be left in place shall be piled and compacted in windrows".  Please be aware that windrowing, depending on the method used, can impede wildlife movement and may elevate the risk of mortality, either by increasing vulnerability to predation or by creating conditions that heighten the likelihood of vehicle collisions if they become trapped.	Please ensure that details for the proposed windrowing (e.g., size, length) and any proposed mitigation (e.g., leaving gaps for wildlife at certain intervals) will be included in the final EA. Please also ensure potential impacts from proposed windrowing are considered and accounted for in	A	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate	C. Not satisfied – would like to discuss comment/response with proponent.  MNR recommends that the response be changed from a #3 to a 1 or 2. Details regarding the proposed windrowing should be included in the final EA, to help

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			wildlife-related impact determinations in the final EA.		owner/operator)  Note: Section 12 of the EAR/IS includes an assessment of potential impacts of windrowing as is considered adequate for the purposes of the EA/IA.	<p>understand and verify the potential impacts assessed. The details will also aid in future permitting.</p> <p>MNR generally discourages large-scale windrowing as it can compromise ecological integrity by altering soil structure, nutrient distribution, wildlife movement, and natural water flow. Where windrows are necessary in the short-term, they should be placed behind roadside ditches and include breaks to allow both animal passage and water movement across the right-of-way—e.g., openings of approximately 5 m every 65 m (16 ft every 200 ft) (as per the “Environmental Guidelines for Access Roads and Water Crossings”). Proper placement and spacing help maintain connectivity and reduce risks of erosion or drainage disruption.</p> <p>At a minimum, MNR would like to see a commitment in the Final EA that the owner/operator will use the Environmental Guidelines for</p>

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
						Access Roads and Water Crossings and consult with MNR on the details of windrowing.
88.	Appendix E (5.19.5, Page 46)	The text states “seeding operations shall not be carried out under adverse conditions of high winds, frozen ground, or ground covered with snow, ice, or standing water”.	Please note that it is sometimes appropriate to seed certain tree species on the snow crust in early spring. Consider adjusting the text to reflect this.	B	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response.
89.	11-72/ 11.3.2.1.1	The text states that “temporarily disturbed areas, even with rehabilitation, are likely take a significant period before they replicate the existing vegetation communities impacted during construction. Therefore, for the purposes of this assessment the losses within the Project Footprint, outlined in Table 11-19 below, will be considered a permanent direct loss of vegetation”. However, it is unclear what the term ‘replicate existing vegetation communities’ means.  Perhaps the following wording provides additional clarity: “Because of the short growing season in the Far North, temporarily disturbed areas, even with rehabilitation, are likely to take many years to replicate the pre-existing vegetation community (i.e., forest age and structural composition)...”	Consider using the suggested wording to provide context for what ‘replicate existing vegetation communities’ refers to.	B	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response.
90.	11-89/ 11.3.2.2	The text states that “the proposed road will require 31 waterbody crossings, which include 30 watercourses and 1 lake. To cross the waterbodies, 6 bridges are proposed to be constructed over major waterbodies and 25 culverts of various types (e.g., open bottom arch culverts and corrugated steel pipes) are proposed to be placed at minor waterbodies”.	Please note that final design drawings and calculations will need to be submitted for review and comment prior to permitting.	D	3. Item will be addressed outside of the EAR/IS review process.	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
91.	11- 119/11.4.1. 1	The text states: "No burning of cleared and grubbed material will occur deep in areas with organic soils." This intent of the text is not clearly written.	This sentence should be re-phrased for clarity. Perhaps it should read: "no burning of cleared and grubbed material will occur in areas with deep organic soils."	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response.
92.	11- 125/11.4.1. 3.6  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Section 11.4.1.3.6 does not include a reference to the Industrial Operations Protocol (IOP) that needs to be adhered to during the fire season.  The Ministry of Natural Resources (MNR), in collaboration with industry partners, developed the Industrial Operations section of Ontario Regulation 207/96 to help prevent and mitigate wildland fires in Ontario's forested areas. The Industrial Operations Protocol provides guidance on preventing industrial-caused wildfires and supporting suppression efforts near worksites. It supplements the Regulation, which applies during fire season (April 1 to October 31), and outlines how to prevent industrial caused wildfires and expedite the suppression of any fires occurring on or near industrial worksites in forested areas. The protocol includes three key sections applicable to industry: Fire Prevention and Preparedness Plans (Section 1.0), Preparedness Activities (Section 2.0), and Operational Modifications or Mitigation Actions (Section 3.0).	Please include a reference to the IOP in this section.	A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
93.	General Comment – Fire	Introducing new infrastructure will increase the risk of industrial and human-caused fires, impacting Aviation, Forest Fire and Emergency Services (AFFES). To mitigate these risks and support AFFES during escalated fire situations, a fire prevention and preparedness plan should be developed prior to project implementation. It is recommended that Ontario Regulation 207/96 and the Ontario Forest Fire Prevention guidelines be followed during both construction and maintenance. Additionally, the project team should implement a fire mitigation program to reduce the likelihood of unwanted fires on the landscape.	Prior to project implementation, to reduce the risk of unwanted fires, our expectations are: <ul style="list-style-type: none"> <li>• A fire prevention and preparedness plan is developed;</li> <li>• Ontario Regulation 207/96 and Forest Fire Prevention</li> </ul>	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
			<p>guidelines will be followed during construction and maintenance; and</p> <ul style="list-style-type: none"> <li>A fire mitigation program is developed.</li> </ul>		owner/operat or)	
94.	7-37/ES 7.1.1; 1-4 and 1-7/ Section 1  This comment may apply to other sections. Please review the Draft EA and update similar instances.	<p>The Draft EA describes that the road is to be classified as rural collector undivided facility, and design standards are consistent with the MTO for similarly classified roads; however, the proposed construction, maintenance and monitoring responsibilities to ensure alignment with the proposed standards are unclear.</p> <p>Clarifying the proposed ownership and operational framework will support greater transparency, particularly in relation to permitting/approvals and monitoring requirements.</p>	<p>If road ownership and operational responsibilities are confirmed prior to the Final EA, please incorporate this information into the Final EA.</p> <p>Road ownership and operations must be determined prior to the issuance of MNR permits to construction of the WSR.</p>	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	A. Satisfied with response
95.	1-21 to 1-22 / Table 1-3; General	<p>Table 1-3 lists provincial permits and approvals that may be required by the project; the following comments apply to page 1-21 and 1-22.</p> <p>a) Row 4 (1-21): The “applicability to the project” for Forest Resource Licences (FRLs) described the requirement related to harvesting/cutting timber on Crown land. It would add greater clarity to describe that FRLs may be required for tree clearing related to project implementation as well as for</p>	<p>In the Final EA:</p> <p>a) Please add/describe the requirement to harvest/cut trees for the implementation of the project and future maintenance. Please change “Forest Resource Licence” to “Permit to Remove”.</p>	A/D	1. Item will be addressed in the Final EAR/IS submission. Revision have been made to	<p>A. Satisfied with response</p> <p>This comment was thinking ahead to permitting and consultation (ie including clear lists of permits/approvals and all applicable project components can help streamline and reduce</p>

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<p>maintenance (i.e. vegetation management) throughout the life of the project. Please also change FRL to "Permit to Remove".</p> <p>b) Row 1 (1-22): "Applicability to the Project" for Work Permits lists examples of project components, but a more detailed list could be provided. Geotechnical investigation activities generally require a Land Use Permit and Letter of Permission under the <i>Public Lands Act</i> (PLA) instead rather than of a Work Permit. Construction of Access roads, trails and culverts/bridges require a Work Permit under the PLA.</p> <p>c) Row 2 (1-22): "Land Use Permit" is listed under "Permit/Act". However, occupational authority could be through a Land Use Permit, an agreement, Crown lease (for more permanent infrastructure, such as the permanent maintenance storage facility for example), or other form of tenure under the PLA, which can be listed as examples. Some project components are also missing from this row and should be clearly listed.</p> <p>d) Row 5 (1-22): Work Permit under <i>Lakes and Rivers Improvement Act</i> (LRIA) is listed. However, a Work Permit is not issued under the LRIA, but rather the PLA. Both location approval and plans and specifications approval may be required for the aspects listed as being applicable to the project. Additionally, LRIA may apply to water crossings on Crown land (where it is not already covered by a PLA work permit). Some project components are also missing from this row and should be clearly listed.</p> <p>In general, the applicable permits and approvals, such as occupational authority, will be required prior to the construction/implementation of the associated project components.</p> <p>This also relates (in part) to how clear and detailed permits/approvals/activities in the EA process supports consultation processes related to permitting (see comment #56).</p>	<p>b) Please add more project components that may be applicable to Work Permits, for a fulsome list, including construction of turn around areas, storage areas, camps, laydown areas, rest areas, infilling etc. Please remove geotechnical drilling from the examples listed.</p> <p>c) For clarity, rather than "Land Use Permit", it should read "Public Lands Act – Occupational authorizations", and specific forms of occupational authority can be listed in the examples. Also, please list aggregate exploration (under a Land Use Permit), monitoring wells, stockpiling and storage of fill, storage areas, maintenance and storage facilities, signage and fencing on Crown land, which may also require occupational authority under the PLA. These should be included in the list of possible approvals (under "Applicability to the Project"). Geotechnical investigations can also be added to the Occupational Authority row, with additional reference to a Letter</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)  B. Recommended for EA  C. Editorial  D. Permitting Related, Not Required for EA</p>	<p>Section 1 under Legislative and Regulatory Framework (Section 1.4.5).</p>	<p>timelines during permitting).</p> <p>A. Satisfied with response  B. Satisfied for now but will need to see final EA  C. Not satisfied – would like to discuss comment/ response with proponent</p>

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			of Permission as authorization to conduct the geotechnical investigations on Crown land. d) The Permit/Act for LRIA should read "authorizations under the Lakes and Rivers Act". "Applicability to the Project" can also list coffer dams, dewatering, and infilling as those were mentioned in the Draft EA as potential activities. Additionally, LRIA may apply to water crossings on Crown land and should also be listed.			
96.	3-43 / 3.5.2.3	The bottom of page 3-42 describes that the scores assigned for indicators are presented in Appendix C-2; however, the scores are not presented in Appendix C-2.	Please correct the statement at the end of page 3-43 to describe the specific location where the scores are presented.	C	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response.
97.	4-13/4.3.1.5	This section describes that "maintenance turnaround areas are intended solely for the use by operations and maintenance staff and equipment and entrances will be gated with a lock to prevent unauthorized access". This would likely pose issues with plowing and sanding, making it more difficult to operate. Additionally, turnaround areas on other highways and roadways often do not have gates and are used in emergency situations by the general public.	Consider using appropriate signage as opposed to gating.	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate	A. Satisfied with response.

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					owner/operat or)	
98.	4-33/ 4.3.3.3	This section describes that temporary construction camps will be progressively restored as they are no longer needed, with 2A being turning into a Maintenance and Storage Facility.	Although PLA authorizations for construction camps will include the standard/required restoration conditions, please describe how the camps will be restored/rehabilitated. Conditions on PLA authorizations will likely involve the replanting of trees/shrubs/natural vegetations at a minimum.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	A. Satisfied with response
99.	4- 40/4.4.2.3.2	The bottom of page 4-40 describes that MNR permits for Scientific Collectors Permits will be required; however, PLA approvals will also be required, as well as potential LRIA approvals (such as for the mentioned coffer dams and diversion channels), related to water crossings and temporary access road construction.	If potential permits and approvals are being described in this section (such as the mention of the Scientific Collectors Permits), PLA and LRIA authorizations should also be described.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	See comment #95, it is similar, and the Proponent Response is a 1 (will be addressed in the Final EA).  This comment was thinking ahead to permitting and consultation (ie including clear lists of permits/approvals and all applicable project components can help streamline and reduce timelines during permitting).
100.	4-63/4.4.2.8	It is described in this section that solid waste will be disposed of in the "solid waste stream (i.e., at existing landfill site)"; however, details regarding the existing landfill site are not mentioned.	Please indicate site specific information for the existing landfills proposed for use, such as the	B/D	3. Item will be addressed outside of the EAR/IS	Where no new landfills are being proposed to support the project: A. Satisfied with response.

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			locations and who they are being managed by.  If a new landfill site is proposed on Crown land it will require MNR authorizations, including tenure, in addition to any required MECP authorizations. Additionally, if a landfill site is being proposed, it should be included as part of the Final EA, as appropriate.		review process (i.e., taken on by the ultimate owner/operator)	Where a new landfill is required to implement the project: C. Not Satisfied – would like to discuss comment/response with proponent.
101.	15-11/Table15-1; 16-14/ Table 16-1; & 19-8/Table19-1	Table 15-1, 16-1 and 19-1 do not include the <i>Public Lands Act</i> . This legislation and associated policies are relevant to all occupations and work on Crown Land. Portions of the project will require work permits (water crossing, access roads, etc.) and other portions may require Land Use Permits (temporary construction camps etc.) or other forms of occupational authority under the PLA.  Several types of non-traditional land use, commercial use, and recreational use on Crown land is managed via the PLA, such as tourism, camping, development, commercial activities etc.	Please add this legislation into the tables and describe its relevance to the project.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
102.	15-37/ 15.2.1.2.2	This section describes how only Webequie First Nation engaged in the Focus Group discussions and Knowledge holder interviews, although 22 communities were invited.	It would be helpful for the reader if the reasoning for the lack of participation from other communities was described, if possible, within this section.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response  Note: comment #61 is similar
103.	18-6 Visual Environment	The visual quality of the landscape could be affected by the project causing it to seem less remote. This indicator may have implications to traditional user and potential eco-tourism.	This may have been discussed in other areas of the document, describe the mitigations to be implemented to	B	1. Item will be addressed in	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
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			lessen the impact to the sense of remoteness (ie. Potential community Land use planning, rehabilitating temporary development/construction).		the Final EAR/IS submission	
104.	16-66/16.2.2.3	Commercial outpost camps are a potential commercial tourism opportunity in the area. These camps are issued approvals under the PLA as either land use permits or leases.	Please consider describing how MNR authorizations/permits are involved with the management of these commercial tourism operations, for additional context.	B	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)  Note – This level of details is not considered warranted for the EA/IA, as no commercial outpost camps are proposed for the Project.	A. Satisfied with response
105.	1-7/ ES 1.0  This comment	The map on page 1-7 of the Executive Summary notes Moose Cree First Nation as being “Moose Factory 68 First Nation”.	Please update the label on the maps within the EA to refer to Moose Cree First Nation.	C	2. Item will be addressed through addenda to	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	may apply to other sections. Please review the Draft EA and update similar instances.				Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	
106.	2-9/ES 2.0 & 5-11/5.2.1.4.2  This comment may apply to other sections. Please review the Draft EA and update similar instances.	The second-last paragraph on page 2-9 (ES), and the last paragraph of section 5.2.1.4.2 describes that future decommissioning of the WSR will not be considered for the EA/IA; however, the EA does describe decommissioning of temporary infrastructure (see ES 7.2.1, page 7-38, and 4.3.3, 4.4.2.6 of the Project Description, as examples).	Although the WSR proper is not planned for decommissioning within the scope of the EA, it could be helpful for the reader to add a descriptor to section ES 2.0 and 5.2.1.4.2 regarding components of the WSR project that are being considered for decommissioning/rehabilitation.	B	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)  Note – Not considered warranted based on content within other sections of the EAR/IS.	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
107.	2-9/ES 2.0,; 4-7/4.3; 5- 11/5.2.1.4.1 This comment may apply to other sections. Please review the Draft EA and update similar instances.	The bulleted list of the main components of the project describes a "typical 35 m ROW" (pages 2-9 of ES and page 4-7), as does the project footprint description (of 5.2.1.4.1, page 5-11). However, in Section 4 (Project Description), page 4-14 (4.3.1.5), it describes how the typical 35 m ROW width will need to be extended up to 77 m to accommodate rest/maintenance areas and maintenance turn around areas.	To add clarity in the project overview/components and project footprint sections, it could be helpful to describe that the ROW width may extend from 35 m to 77 m to accommodate rest/maintenance areas and maintenance turn around areas.	B	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)  Note- Not considered warranted as ROW for rest/maintenance area are described in Section 5.	A. Satisfied with response
108.	4-13/ES 4.0	The reference to MNR's Class EA requirements being satisfied through the Comprehensive EA process is appreciated.	Where a disposition of Crown resources is needed to implement the project, MNR will require a letter from the project team confirming that they have met their EA Act obligations as part of the Comprehensive EA process (see section 2.6.1 of MNR's Class EA RSFD, 2024).	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response

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				<b>A. Required for EA (per ministry mandate/policy /legislation)</b> <b>B. Recommended for EA</b> <b>C. Editorial</b> <b>D. Permitting Related, Not Required for EA</b>		<b>A. Satisfied with response</b> <b>B. Satisfied for now but will need to see final EA</b> <b>C. Not satisfied – would like to discuss comment/ response with proponent</b>
109.	2-27/ES 6.1.1 & 3-18/3.2.2.1,  This comment may apply to other sections. Please review the Draft EA and update similar instances.	It is quite difficult to decipher the different alternative routes displayed on the map, given the level of overlap in the alternative route sections.	Please consider updating the map to make the alternative routes clearer, such as by using different symbology for the alternatives. If this map is used elsewhere in the Draft EA, the same update is recommended for those as well.	C	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
110.	6-34/ES 6.1.4; page 3-69/3.4.3  This comment may apply to other sections. Please review the Draft EA and update	The map does not indicate the actual locations of camps 1A versus 1B and 4A versus 4B, as the labels describe them together. Therefore, it is difficult to determine which camp is 4A, 4B, 1A, and 1B.	For clarity, please label camps 1A, 1B, 4A and 4B. This could be done on the "inset" maps at the top of the page perhaps.	C	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

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	similar instances.					
111.	7-38/ES 7.2.2	The last sentence of the first paragraph is an incomplete sentence, making it difficult to understand the message/thought being described.	Please review and update, to describe the complete sentence.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
112.	7-40/ES 7.4; 4.6; 22.3; 22.4; 22.5; 22.6; 22.7; General	<p>The Draft EA notes a proposed Construction Environmental Management Plan and an Operations Environmental Management Plan that will be developed and are to contain a variety “component management plans”, to provide guidance on mitigation measures to be implemented, in addition to several other mentioned plans (e.g. Sustainability Plan, Traffic Management Plan, Light Management Plan etc) as well as several follow-up/monitoring programs.</p> <p>Given that these management plans and programs are described to mitigate potential impacts, and to provide clear direction to the proponent and contractors on managing a variety of risks, development and finalization of these management plans and monitoring programs will be required prior to the issuance of MNR permits related to the project components.</p> <p>That being said, if these management plans and monitoring programs are developed and included in the Final EA, MNR staff will be able to review and comment on the proposed plans, and assess the sufficiency of proposed mitigation measures in relation to identified impacts as well as proposed monitoring programs.</p>	<p>MNR encourages these plans and programs to be developed and finalized early-on in the project phases, and preferably incorporated into the Final EA.</p> <p>If they are not provided in Final EA, MNR recommends that a commitment be provided in Final EA to provide them at the detailed design stage, with opportunity for MNR to review and approve/endorse, as appropriate. However, delaying to later stages may not result in efficiencies with review timelines.</p>	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>B. Satisfied for now but will need to see final EA.</p> <p>MNR would like to reiterate the recommendation that if the comment is not addressed in the Final EA, a commitment to provide the management plans and follow-up/monitoring programs be provided in Final EA for this to be addressed at the detailed design stage, with opportunity for MNR to review and approve/endorse, as appropriate.</p>

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
		Delaying the development of these plans and programs to the permitting stage, may result in significant delays to the project, as well as increased pressure on permitting agencies/ministries to ensure their development and sufficiency.				
113.	22.4, 22.5, 22.7  This comment may apply to other sections. Please review the Draft EA and update similar instances.	The Draft EA describes how conditions contained in permits and approvals will be included in the Construction Environmental Management Plan, Operations Environmental Management Plan, and Sustainability Plan. However, as described in the comment above, these Plans will be required (developed) <u>prior</u> to MNR permitting (and therefore prior to the permit/approval conditions being developed).  Therefore, it is assumed that the mentioned Plans would be updated to include conditions of approvals, as they get developed through permit/approval issuance.	In the Final EA, please consider clarifying whether the mentioned Plans will be updated to include applicable conditions of permits/approvals shortly thereafter conditions of permits and approvals are confirmed.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
114.	8-43/ES 8.1.3	Under the "Effects to Soil Quantity and Soil Quality", "Mitigation Measures Applicable to Construction and Operations", the last bullet listed describes an Operation Waste Management Plan. However, Section ES 7.4, page 7-40, and Appendix E, do not describe a Waste Management Plan for operations (it is only described for construction, under "construction waste management").	Please correct the description on page 8-43 to exclude the description of a Waste Management Plan for operations, or update section ES 8.1.3 and Appendix E to describe that such a plan will be developed.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
115.	8-46/ES 8.2.3	Under "Effects to Surface Water Quality", the last bullet point under "Proposed Mitigation Measures During Construction", describes that monitoring will be conducted "as per Section 7.10 (Follow-up and Monitoring)..." However, Section 7.10 does not refer to follow-up and monitoring. Perhaps the correct reference would be to section 22 of the Draft EA.	Please update to provide reference to the correct section.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
116.	8-55/ES 8.5.3; 8-83/ ES 8.11.4; 8-84/ ES 8.11.3; 8- 91/ 8.12.3  This comment may apply to other sections. Please review the Draft EA and update similar instances.	The noted sections contain descriptions that allude to the implementation of public access restrictions as mitigation measures. However, 1.1 of Section 1 (page 1-4) and 4.4.3 of Section 4 (page 4-65), describes that there are currently no access controls proposed and that it is a subject of further discussion and agreement between Webequie First Nation and Ontario.	Please update sections of the EA that describe "access controls" as mitigation measures, to reflect that the topic is one of further consideration and agreement between Webequie First Nation and Ontario and to ensure consistency with the descriptions noted in other sections of the EA regarding no access controls currently being proposed.  If road ownership and operational responsibilities are confirmed prior to the Final EA, please incorporate this information into the Final EA.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	A. Satisfied with response
117.	8-58/ES 8.2.3	The second bullet point under 'project planning and design' mitigation measures describes water crossings being designed at "right angles where possible". This description could perhaps be described more clearly, such as describing the design as being perpendicular to the watercourses, if that is the intent.	Please consider updating with a clearer description, as described.	B	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR).	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
					Note description is considered adequate.	
118.	8-88 and 8-90/ES 8.12.3	Under proposed mitigation measures during operations under “worker accommodations” (page 8-88) and “housing, including access and quality” it describes one of the construction camps being converted into housing for community needs; however, this description did not appear in Section 4: Project Description. Section 14.4.2 (page 14-150) also mentions that one camp will be retained during the operations period.	Please add details regarding the camp that is proposed to be converted into housing for community needs and retained during the operations period, within the project description section, including details such as which of the four camps, if the housing is proposed to be taken off site or utilized for community needs “on site”, and the permanency/duration of use. If the site is located on Crown land, this will also be important detail for future permitting considerations.	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or).  This is to be determined in future development stages.	The details of the referenced ‘worker accommodations being turned into housing for community needs’ is not clear, and has different implications on the EA and Permitting depending on where it is located.  Where “one of the construction camps being converted into housing for community needs” will be located on (or relocated to) Federal Lands; A) Satisfied with response;  Where the referenced camp will serve as future community housing needs on MNR administered Crown lands. B) Not Satisfied.  For clarity- MNR would like details of the long-term housing use on MNR administered lands within the EA (i.e., please address as a #1 or #2) to ensure EA coverage at the permitting stage (e.g. see

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
						comment #129).
119.	8-99/ES 8.14.3	<p>A mitigation measure is described related to the use of lands and resources for traditional purposes regarding using temporary access roads or detours to facilitate continued harvest.</p> <p>Depending on the location and specifics of the temporary access roads or detours, this has the potential to trigger MNR authorizations.</p>	It would be beneficial for the Final EA to ensure that all temporary access roads and detours are properly described and considered.	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	
120.	8-104/ES 8.15.3; Section 19; Section 20; Appendix S  This comment may apply to other sections. Please review the Draft EA and update similar instances.	<p>Proposed mitigation measures regarding cultural heritage resources describe recommendations such as the potential for additional cultural heritage studies, demarcation of areas/sites of importance prior to construction, developing protocols and schedules for working around important sites/areas, alternative design or construction approaches, contingency/management plans, additional consultation with Webequie First Nation knowledge holders and other Indigenous communities regarding the development of appropriate mitigation measures.</p> <p>Some proposed mitigation measures have the potential to change the project footprint, such as alternative design or construction approaches and avoidance for example.</p>	<p>It would be beneficial for the Final EA to:</p> <p>a) incorporate these proposed mitigation measures related to cultural heritage resources, as they have the potential to change the project footprint and design.</p> <p>b) Complete and incorporates any additional studies, engagement/consultation, protocols/schedules, etc. regarding cultural heritage resources into the proposed mitigation measures, where feasible/possible.</p> <p>Leaving this until later stages may result in challenges/delays during the</p>	B/D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
			permitting stages; these additional steps will have to occur prior to the issuance of MNR permits, to help ensure responsibilities and obligations under the <i>Ontario Heritage Act</i> are adhered to.			
121.	Section 20 (e.g. 20.4.2); Appendix T  This comment may apply to other sections. Please review the Draft EA and update similar instances.	The Draft EA describes that the project footprint will require Stage 2 Archaeological Assessments prior to construction in areas identified in the Stage 1 Archaeological Assessment.	Completion of the appropriate archaeological assessments (and acceptance into MCM's Ontario Public Register of Archaeological Reports) will be required prior to the issuance of MNR permits, within the areas recommended within the final/accepted Stage 1 Archaeological Assessment, to ensure MNR meets responsibilities and obligations under the <i>Ontario Heritage Act</i> . Any requirements and recommendations within the assessments (such as for additional assessments, mitigation etc.) will also be required prior to issuance of MNR permits.	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
122.	8-116/ES 8.21.2 & ES 8.21.3; 27-5/27.2 & 27.3	The two noted sections describe the "overall" net effects of the Project as not anticipated to result in significant adverse effects. However, the bottom of ES 8.21.2 and in other sections of the EA describes significant net negative effects. Therefore, the rationale for the aforementioned statement is unclear.  This is similar in sections 27.2 and 27.3 (page 27-5).	It would be beneficial to describe the rationale and support for the statement (of the overall net effects of the Project as not having anticipated significant adverse effects).	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

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123.	Table 2- 7/2.4.5	On page 2-45, there are three blank columns related to a noted issue/concern. Perhaps it belongs to the same community concerns noted in the row above.	Review and edit as needed.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
124.	3-68/3.4.3	Within the description of the camp selection, it describes that camp 4B is one of the selected locations.	Camp 4B appears to be located on an existing mining lease under the Mining Act. For awareness regarding permitting, a camp at this location would not be permitted by MNR under the <i>Public Lands Act</i> , but rather by consent/agreement with the leaseholder. However, tree clearing to support the camp would be authorized by MNR under the <i>Crown Forest Sustainability Act</i> .	D	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response
125.	4.3	<p>Within the described project components, temporary and permanent supportive infrastructure related to construction are described. However, helipads are not noted. On other major infrastructure projects in the Far North, helipads were cleared and utilized to help facilitate construction activities.</p> <p>The consideration and inclusion of helipads within the EA (if they are a potential component of the supportive infrastructure) will ensure that helipads have EA coverage, helping to reduce delays prior to permitting.</p>	It is recommended that the project team include helipads within the described project components, if appropriate.	B	<p>4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR).</p> <p>Note – Helipads are</p>	A. Satisfied with response

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					described as components within the construction camps and is deemed adequate.	
126.	4-31/4.3.3.2	The first paragraph under 4.3.3.2 describes that the location of the ARA-4 access road is shown on Figure 4.10. However, Figure 4.10 (page 4-9) does not show the location of the access road, as it is a cross-section diagram of the proposed WSR.	Please update the reference on page 4-31 to indicate the correct figure where the ARA-4 access road location is shown.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
127.	4-31/4.3.3.2	The last paragraph on page 4-31 describes that "the need and location for temporary and permanent access roads for the construction and operations phase will be refined..."  Leaving the refinement of the access roads to later stages may result in challenges during the permitting stages, where these additional steps will have to occur and where it may result in project changes and delays in permitting (e.g. additional EA and consultation related processes).	Please consider any required refinement of the access roads for the Final EA where possible.	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	
128.	4-45/4.4.2.5	The top paragraph under 4-45 describes that additional areas outside of the 40 m ROW limit might be required to accommodate storage/laydown areas, at the larger waterbody crossings.	Please include the requested details as part of the Final EA.	B/D	3. Item will be addressed outside of the EAR/IS	

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
		<p>It would add clarity in the EA to describe the exact water crossings where the proposed potential storage/laydown areas may be required, including details such as the potential size and approximate locations. Mapping all proposed storage/laydown areas would also be helpful.</p> <p>This will help ensure that they are properly considered and consulted on during the EA, and can also help reduce delays for future permitting.</p>			review process (i.e., taken on by the ultimate owner/operator)	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
129.	General Comment	<p>Several areas of the Draft EA allude to the potential for changes, such as to project activities and the project footprint. It would be beneficial for the Final EA to ensure that sufficient detail is provided and appropriately considered in the assessment, to ensure that EA “coverage” is provided. See comments #119, 120, 125, 127 and 128 for examples and consideration.</p>	<p>If activities are not described adequately under the comprehensive EA, MNR expects that any future potential project changes/activities would fall under the appropriate Comprehensive EA processes (as described in ES 4.0, page 4-13), and not MNR’s Class EA RSFD.</p>	B/D	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.</p> <p>Note – Management of amended changes will be documented in Section 27.</p>	<p>B. Satisfied for now but will need to see final EA.</p>

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
130.	4-45/4.4.2.5  This comment may apply to other sections. Please review the Draft EA and update similar instances.	The top paragraph under 4-45 describes that additional areas outside of the 40 m ROW limit; however other sections of the EA refer to a 35 m ROW, not 40 (see Sections ES 2.0 (page 2-9), 4.3 (page 4-7), and 5.2.1.4.1 (page 5-11), as examples).	Please ensure consistency throughout the EA with regards to the ROW width.	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
131.	4-48/4.4.2.7	The third-last paragraph on 4-48 describes that there are no upgrades/improvements being proposed to the winter road network leading to Webequie, to accommodate the construction of the WSR (transporting materials, equipment etc). Even though the winter road upgrades are not being considered within the scope of this EA, there is potential that winter road upgrades are/will be proposed along the winter road network, such as by other First Nation communities.	For accuracy, please consider updating the description to either clarify that the statement is related to the scope of the EA / WSR project, and/or to describe the potential for current or future winter road upgrades outside of the WSR project (such as by other First Nations for example). The project team could also consider inquiring with other First Nations to learn about any potential upgrades being planned along the winter road network.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
132.	4-64/ 4.4.2.10; & 4-73/4.4.3.4	These sections describe that Environmental Monitors will have the "right to stop construction activities ...in [cases] of non-compliance or in relation of failure to implement corrective actions or remedial measures". It is unclear how this	Please consider adding detail to these sections to describe where the "rights" of the Environmental Monitors stem	B	3. Item will be addressed outside of the	

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
		would be implemented and where the "rights" of the Environmental Monitors stem from.	from, such as future company policies or contract conditions perhaps, for example.  Additionally, it is recommended that the EA clearly specifies that mitigation measures and permit conditions will be built into contractor conditions.		EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
133.	4-83/4.5.3	The first bullet point under 4.5.3 describes the "opportunity for Webequie First Nation and other First Nations to own and/or construct and operate the road, including potential for subsequent investment in economic development opportunities." However, 4.4.3 (page 4-65), describes that topics such as operations of the WSR is one of further discussion and agreement between Webequie First Nation and Ontario.	Please consider updating the bullet point on 4.5.3 to describe that operations of the road is a topic of further discussion and agreement between Webequie First Nation and Ontario.	B	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR).  Note – Description throughout the EAR/IS are considered adequate regarding that operations of the road is a topic of	MNR does not feel this is out of scope of the EA, however it is acknowledged that the project team is satisfied with the description currently provided in the draft EA.

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
					further discussion and agreement between Webequie First Nation and Ontario.	
134.	14-183/14.5.2.7.4	The bullet points describing the net adverse effects on page 14-183/184 are missing 'reversibility' and 'likelihood' (as found in the other sections of Section 14. However, 'reversibility' and 'likelihood' do appear to be summarized in Table 14-41 on page 14-185.	Consider editing the bulleted list on page 14-183 to include the additional descriptions of 'reversibility' and 'likelihood', for consistency with the other sections.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
135.	16-142/16.3.3.1.1	This section describes a high potential that construction of the WSR will affect a campsite within the project footprint, and that the effect will be carried forward for further assessment. In reviewing Section 16, it does not seem clear where the effect on the camp site was further assessed.  Additionally, the mitigation to the camp site appears to be "First Nation engagement and consultation in subsequent stages of project for impact to recreational/land user camp site" (16-175), and follow-up and monitoring describes consultation with Webequie First Nation to determine a solution for the camp site during the detailed design stage (16-193).	Please ensure that further assessment of the campsite is clearly described and documented in the EA.  Consider conducting additional engagement regarding the impact to the camp site now, for inclusion in the final EA. This will allow any proposed mitigation or project changes to be incorporated into the EA process, and can also avoid potential delays prior to permitting.	B/D	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied for now but will need to see final EA
136.	16-160/16.4.1; 16-	The EA describes that members from Webequie and Marten Falls First Nations suggested implementing road tolls. This would be an aspect to be determined	Where the potential for road tolls is mentioned in the Final EA, it would add clarity to describe that it would be	B/C	1. Item will be addressed in the Final	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	167/16.4.3; 19- 183/19.4.2. 4; 19-184/ 19.4.2.5  This comment may apply to other sections. Please review the Draft EA and update similar instances.	through the ongoing discussions and agreements between Webequie First Nation and the province (as mentioned in other sections of the EA).	pending ongoing discussions and agreements between the First Nation and the province, and/or to ensure that the references to road tolls are updated as appropriate (e.g. to reflect any Webequie-Ontario agreements).		EAR/IS submission	
137.	16- 160/16.4.1/ Table 16-46	<p>This section describes that Table 16-46 notes different policy/regulatory tools (federal and provincial) that may be considered in determining road access restrictions; however, it is possible that some of the <i>Public Lands Act</i> “tools” may not be applicable, depending on road ownership and operations.</p> <p>Additionally, the reference to Section 17 of Reg 161/17 (under the <i>Public Lands Act</i> (PLA)) is incorrectly described with regards to occupying the lands under an <i>easement</i>, as this section of the Regulation is referring to 21.1 of the <i>Public Lands Act</i>, regarding “occupation for specified purposes” (such as what is described in Reg 161/17), and is not related to easements (which is section 21 of the PLA). Rather this section describes allowing prescribed structures, buildings, and things which do not require occupational authority (as per section</p>	<p>Please consider adding a clarifier to the title of Table 16-46 regarding that it describes “potential tools”.</p> <p>Please consider deleting the reference to Section 17 of Reg 161/17 of the PLA from Table 16-46, as it is not a tool to restrict access.</p> <p>If Reg 161/17 is included in Table 1646, please update the reference to Section 17 of Reg 161/17 to exclude</p>	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<p>21.1(2) of the PLA). Also, a sub-bullet is included which references forest management plans; which would not be applicable to the project. In summary, Reg. 161/17 is not a provincial tool to restrict access, rather it prescribes certain activities that are allowed without occupational authority.</p> <p>Section 13 of the PLA would not apply to restricting access, as "restricted areas" are not used to restrict access, but to regulate developments within the designated area through work permits.</p> <p>Section 28 is not noted in the table, which allows the Minister to prohibit uses of public lands or roads.</p>	<p>the reference to <i>easements</i>, as it is currently incorrect, and delete the sub-bullet regarding forest management plans. It may also be helpful to also describe the second bullet of Section 17 of the Regulation, regarding crossings of 3 m in width or less), of the reference to Reg 161/17 is included in the table.</p> <p>Please consider excluding Section 13 of the PLA in the table, as it would not apply to restricting access.</p> <p>Section 28 of the PLA could also be considered for inclusion as a potential option.</p> <p>Please see comment below, regarding Section 12 of the PLA, for consideration.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA</p>	<p>A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent</p>	
138.	16- 162/16.4.1	<p>The last paragraph of section 16.4.1 describes that if the CBLUP is not finalized, Section 12 of the <i>Public Lands Act</i> provides an alternative process to create a land use plan.</p> <p>It is unclear why reference to the development of a land use plan under the <i>Public Lands Act</i> is referenced, as it would not be the most appropriate mechanism for land use planning with this geography.</p>	<p>It is recommended that the reference to an alternate land use plan under the <i>Public Lands Act</i> (PLA) be removed, as the CBLUP process under the <i>Far North Act</i> (FNA) provides the most appropriate avenue for planning within the Far North of Ontario and provides a joint process between the province</p>	B	<p>1. Item will be addressed in the Final EAR/IS submission</p>	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
			<p>and First Nations for developing a land use plan, for which the PLA framework currently does not.</p> <p>If the reference is left in, it is recommended that a description be added that describes the CBLUP process as community-led under the FNA, with a jointly developed Terms of Reference and CBLUP, whereas as a Land Use Plan under the PLA does not provide for this type of process.</p> <p>The FNA and CBLUP as a potential tool for restricting or prohibiting access could perhaps be more clearly described in this section and/or within Table 16-160.</p>			
139.	Appendix E (Section 2.1)	"Groundwater management" is noted on page 7-40 of the Executive Summary as a component plan for the Construction Environmental Management Plan; however, it is missing from section 2.1 of Appendix E.	Please update Appendix E accordingly, to include the Groundwater management component plan, or edit the list in section the Executive Summary.	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
140.	General	In relation to consultation regarding feasibility and exploration activities carried out by MNR's Far North District (e.g. geotechnical drilling and monitoring wells), communities have brought forward concerns related to potential impacts to wildlife and traditional harvesting activities, related to the proposed activities. In response, the project team has been implementing mitigation measures for these activities that mitigate the potential concerns raised.	It is recommended that the project team consider incorporating similar mitigation measures regarding project implementation phases into the final EA, in an effort to proactively address	B	2. Item will be addressed through addenda to Final EAR/IS	B. Satisfied for now but will need to see final EA

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
			concerns that have been previously raised within the project area.		submission that will be completed by the end of the twenty-three-week review period	
141.	Section 11 / General (Natural Heritage / Vegetation)	The full references for numerous in-text citations are missing from the reference section (11.14): <ul style="list-style-type: none"> <li>- Collison &amp; Gromack 2022</li> <li>- Hanson et al. 2008</li> <li>- Ecological Stratification Working Group 1995</li> <li>- Verry and Boelter 1975</li> <li>- Sjors 1963</li> <li>- Lafleur and Roulet 1992</li> <li>- Smith et al. 2007</li> <li>- Yu et al. 2010</li> <li>- Whiting and Chanton 2001</li> <li>- Jana Müllerová et al. 2011 / Müllerová et al. 2011</li> <li>- Mark et al. 2018</li> <li>- Pérez-Rodríguez et al. 2018</li> <li>- Ries et al. 2004</li> <li>- Tschamtke et al. 2012</li> <li>- Ramady et al. 2014</li> <li>- Bilby 1989</li> <li>- Cassanova and Brock 2000</li> <li>- Mack et al. 2000</li> <li>- Carlson and Shepherd 2007</li> <li>- Truscott et al. 2008</li> </ul>	Please ensure proper references are provided in Section 11.14 References, for all in-text citations.	B/C	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<ul style="list-style-type: none"> <li>- Jodoin et al. 2008</li> <li>- Brown 1988</li> <li>- Deboah et al. 2013</li> <li>- Rusek and Marshall 2000</li> <li>- Liu et al. 2011</li> <li>- Chen et al. 1993</li> <li>- Vera Kuklina et al. 2023</li> <li>- Lutz et al. 2009</li> <li>- Narayanaraj and Wimberly 2012</li> </ul>				
142.	11-12 to 11-13 / Table 11-1	<p>Table 11-1 lists the regulation, legislation and policy relevant for vegetation and wetlands. The following is listed within the table, related to legislation administered by MNR:</p> <ul style="list-style-type: none"> <li>- <i>Lakes and Rivers Improvement Act</i></li> <li>- <i>Public Lands Act</i></li> <li>- <i>Invasive Species Act</i></li> </ul>	<p>For vegetation and wetlands, consideration can also be given to the following legislation administered by MNR:</p> <ul style="list-style-type: none"> <li>- <i>Crown Forest Sustainability Act</i> (in relation to forest harvest permitting)</li> <li>- <i>Fish and Wildlife Conservation Act</i> (in relation to the protection of habitat features, such as nesting trees)</li> <li>- <i>Aggregate Resources Act</i> (in relation to natural heritage considerations related to aggregates authorizations)</li> <li>- <i>Forest Fire Prevention Act</i> (in relation to management of clearing debris)</li> </ul>	B	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
				<b>A. Required for EA (per ministry mandate/policy /legislation)</b> <b>B. Recommended for EA</b> <b>C. Editorial</b> <b>D. Permitting Related, Not Required for EA</b>		<b>A. Satisfied with response</b> <b>B. Satisfied for now but will need to see final EA</b> <b>C. Not satisfied – would like to discuss comment/ response with proponent</b>
143.	11-14 & 11-16 / Table 11-2	Table 11-2, describes the following descriptions (among others): a) "All feasible measures will be taken during construction to limit the removals of peatlands (muskeg) [...]" b) "Develop and implement a five (5) monitoring program for all vegetation restoration/offsetting sties [...]"	In relation to the noted sections: a) Please elaborate on how removed peatland material is to be disposed or describe within this section where this information can be found within the EA. b) Please clarify in the Final EA if this is referring to a <b>5-year</b> monitoring program, or a different type of monitoring program perhaps.	A	a) 3. Item will be addressed outside of the EAR/IS review process.  b) 1. Item will be addressed in the final EAR/IS submission.	Regarding a): As per Dec 19 meeting, MNR understands that the Project Team may be able to add soil management protocols. If so, then MNR is (A) Satisfied with response.  Regarding item b) MNR is (A) Satisfied with response.
144.	11-22 / Table 11-3	In response to concerns regarding illegal dumping, Table 11-3 describes the following (among other responses): "Routine road patrols or inspections will be conducted to identify conditions which may adversely affect the road, adjacent lands and/or environment, including monitoring for illegal dumping to comply with the quality standards and/or protection measures [...]"	Please provide additional detail in the EA regarding who will be responsible for the road patrols and inspections, as well as the intended duration of these activities.	B	3. Item will be addressed outside of the EAR/IS review process and will be addressed by the ultimate owner/operat or.  It is anticipated that routine patrols and inspections	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
					would occur as long as the road is in operation.	
145.	11-27 / 11.1.5.1	This section describes the "LSA extends 1 km from the centreline of the preliminary recommended preferred route and 500 m from the boundary of the temporary and permanent supportive infrastructure." It is unclear why permanent supportive infrastructure does not have a LSA like the preferred route, rather than being grouped in with temporary infrastructure.	Please provide the rationale for having a 500 m buffer on <b>permanent</b> supportive infrastructure rather than a 1 km buffer like the road route, within the EA. MNR recommends all <b>permanent</b> infrastructure have the same buffers applied.	B	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)  The spatial boundaries for the Project's study areas apply to multiple disciplines. The proposed buffers were included in the Terms of Reference and Study Plans that MNR	C. Not satisfied – would like to discuss comment/response with proponent  MNR recommends that the response be changed to either a 1 or 2.  MNR understands from the ToR that there will be different LSA distances depending on the Valued component being assessed (e.g., caribou vs. vegetation and wetlands).  In this case, the VC is Vegetation and Wetlands. MNR is questioning why there is a difference between LSA for Vegetation and wetlands between the Right of Way (1km LSA) and the Permanent Infrastructure (500m). The RoW and 'other permanent infrastructure' are both permanent. At the time MNR reviewed the Work Plan, the supportive

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
					previously commented on.	<p>infrastructure components had yet to be determined, making it difficult to evaluate potential effects and the appropriate sizing of 500m buffer on permanent supporting infrastructure.</p> <p>MNR's recommendation on the work plan was that the study areas be revised to include supporting infrastructure, and the area where potential effects may be anticipated from those alternatives. <b>MNR is asking that the EA provide rationale to support the different buffer sizes between the Right of Way and permanent infrastructure. Our understanding from the ToR is the project footprint would have the same LSA buffer applied regardless of whether it is associated with the right of way or the ancillary infrastructure.</b></p> <p>Additional Context: The ToR states: "Project Footprint: established to identify areas of direct disturbance (i.e., the</p>

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
						<p>physical area required for construction and operation of the Project). <b>The project footprint is the preferred corridor (35 m right-of-way width) and temporary or permanent areas needed</b> to support the Project that include laydown yards, storage yards, construction camps, access roads and aggregate extraction sites."</p> <p>"The boundaries of each LSA will extend a <b>specified distance from the project footprint boundary</b> to capture the direct and nearby indirect effects on an environmental component/criterion"</p>
146.	11-30 to 11-32 / Table 11-5	<p>Within Table 11-5, it is unclear how there is no anticipated interaction between "mobilization of equipment and supplies" with "loss or alteration of vegetation communities, species and diversity" when there is predicted to be an interaction with "loss or alteration of wetland function". It seems unclear how wetland function could be impacted, without impacts to vegetation.</p> <p>Note: These same interactions are also described for "potential for accidents and malfunctions" (construction and operations) and operational "road use".</p>	Please provide rationale why there is no interaction identified for 'loss of alteration of vegetation communities', when an interaction is identified for 'loss or alteration of wetland function' within the final EA.	B	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
147.	Section 11 / Figures / General	Several figures have a large volume of features displayed on the maps. In several cases, similar colours are used to distinguish between different features, which makes it hard to distinguish between values on the map.	<p>MNR recommendations for all figures:</p> <ul style="list-style-type: none"> <li>- Switch to a topographic background instead of imagery</li> </ul>	B/C	2. Item will be addressed	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	This comment may apply to other sections not identified here. Please review the Draft EA and update similar instances.		<p>to make the other legend features clearer when at a scale that shows the entire WSR route.</p> <ul style="list-style-type: none"> <li>- Choose colours with greater contrast to distinguish more clearly between different features (e.g., project footprint compared to Webequie First Nation Reserve or Simpson's Inverse Dominance – Medium, on Figure 11-7).</li> <li>- Figures 11-1 – please include a centerline and proposed supportive infrastructure (temporary and permanent).</li> <li>- Figure 11-2 – clearer representation of ecodistricts would be helpful, as it is currently difficult to distinguish boundaries and areas.</li> <li>- Figure 11-3 – it is difficult to distinguish landcover type on the map. Two maps instead of one is recommended (e.g. one displaying the primary and secondary level and one illustrating the tertiary areas in proximity to the project).</li> </ul>	<p>A. Required for EA (per ministry mandate/policy /legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>	through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
			<ul style="list-style-type: none"> <li>- Figures 11-4 &amp; 11-5 –it would be helpful if the colour alignment corresponded with the classification groups and were broken out by subheadings within the legend, such as ELC classes grouped by category and class. Alignment with the corresponding table groups would also be helpful (e.g., Table 11-11 Upland ecosystem classes).</li> <li>- Figure 11.9 – Please add a description for the grey colour to the legend.</li> </ul>			
148.	Section 11 / Citations – General	Many sections point to additional details being provided in Appendix F (Natural Environment Existing Conditions Report), but do not provide more specific locations of where the information is within the report. Given the length of Appendix F, more specific citations would make it easier to find the relevant information.	Please provide more specific details in Section 11 regarding what sections of Appendix F apply, to assist with finding the additional information referenced more easily.	B	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
149.	11-33 / 11.2.1.2	This section describes: “A list of all vascular plants observed at each sampling point was completed [...]”.	Please clarify if there is a summary list available of all species identified across all field sampling locations, and note the section within the EA. Please include a summary list in the EA if one is not currently provided. MNR requests this summary to better gauge the species findings across the	A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
			project (from the field component) and for comparison with background research efforts.			
150.	11-35 / 11.2.1.3.1	<p>a) This section describes: “[A] 30 m buffer is assumed to represent an appropriate riparian area zone width from the edges of watercourses and riparian buffer of 40 m has been applied to lakes.” However, it is currently unclear what types of watercourses would trigger a riparian buffer.</p> <p>b) The section also notes “All naturally vegetated ecosites (both upland and wetland)”; however, it is unclear what qualifies as “naturally vegetated”.</p>	<p>a) Please define what classifies as a watercourse for the purposes of applying a riparian buffer. In addition, please provide a description of how riparian buffers will be demarked/identified on the ground for watercourses and waterbodies (e.g., starting from the high-water mark).</p> <p>b) Please define what qualifies as “all naturally vegetated ecosites” within the Final EA.</p>	A	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>Adequate detail on what is classified as a watercourse is described in Section 7. The definition of riparian areas and the process through which such areas were identified are described in</p>	<p>As per Dec 19 meeting, MNR understands that the PT will change the response to a #3 regarding own/operator to address.</p> <p>Discussion centred around how they will determine watercourses on the ground, in the future - ie high-water mark etc. The comment was seeking clarification. There is also consideration regarding if anything is encountered on a contingency basis (i.e. because it didn't show up previously). Therefore, having definitions in place helps when encountering the features on the ground, if not previously identified.</p> <p>Thank you for additional context and section references.</p> <p>A) Satisfied for now – but will need to see final EA.</p>

Comm ent #	Page/ Section #	GRT Comments			Type of Comment:	Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution				Categorize Proponent's response as follows:
						<p>Sections 9.2.2 and 9.3.4.5 of the NEEC report. The ultimate owner/operat or will further examine and classify water bodies as part of the detail design and permitting phase for the Project.</p> <p>b) ELC for Ontario, including the boreal framework, differentiates between natural and cultural vegetation communities: Natural communities are those that occur</p>	<p>A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent</p>

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
					without significant human alteration, reflecting native species types.  Descriptions of the various ecosites, including burned/cut and developed/disturbed are included in the Natural Environment Existing Conditions report.	
151.	11-35 / 11.2.1.3.2	a) With regards to section 11.2.1.3.2, it states that "Prior to conducting field surveys, a list of potential plant SAR and plant SOCC present in the study areas was compiled to inform the fieldwork." b) The section also mentions "uncommon" and "underrepresented" vegetation classifications. However, it is unclear what vegetation fell into these categories and what methodology used in this determination.	a) Please provide a reference within this section for where this list can be found. If possible, it would be helpful to provide an updated list to reflect: species presence, species absence, and additional species (not on the pre-field work list).	A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
			Similar updates can also be considered for Section 11.2.2.4. b) Please provide a citation to a list of the classifications considered as “uncommon” vegetation and “underrepresented” vegetation, along with the methodology for determining or assigning the “underrepresented” designation.			
152.	11-36 / 11.2.1.3.3 and 11.2.1.3.4	a) With regards to Section 11.2.1.3.3, it is unclear which specific species were considered to determine “areas and plants of traditional importance to Indigenous Peoples”. b) Section 11.2.1.3.4 describes that biodiversity indicators “were based on a review of existing published data and field data collected during the 2019, 2020 and 2021 field programs.”	a) Please provide the list of species considered or a citation to the list location, within Section 11.2.1.3.3. b) Please provide a summary of the review mentioned, or a citation for where this information can be found, within 11.2.1.3.4.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
153.	11-39 / 11.2.1.4.2 Section 11 - General	Section 11.2.1.4.2 states: “The modeling technique was used to quantify the importance of various environmental factors, such as wetland types, conifer forest, or eskers, and to predict the distribution and importance of habitat and how that functional habitat supports biodiversity.” However, it is unclear where the modelling technique and outcomes for eskers are described.  Section 6-37 / 6.2.2.6 states: “Field work was conducted in 2020 to characterize eskers and evaluate their potential as aggregate/rock sources for the Project.”  From reviewing Section 11, it is unclear whether the importance of eskers on this landscape for biodiversity and upland habitat value is sufficiently discussed. Eskers provide an important source of upland habitat in a landscape categorized as being over 81% wetlands in the Local Study Area, according to the EA.	Please provide the location of where the modeling technique and outcomes for eskers are described, within Section 11.2.1.4.2.  In addition, MNR requests eskers be considered as a subset of the vegetation assessment, similar to riparian areas, given the unique habitats it can support in this landscape. Eskers should be assessed not only as a potential aggregate material source as	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period.	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		Eskers are also important features for the development of spruce-lichen woodlands (Hare 1950, Hustich 1951, Ahti 1964, 1967, Kershaw and Rouse 1971, Bird et al. 1980) that support significant lichen growth used by caribou and should be considered in the identification of, and assessment of effects to, Caribou habitat.	<p>characterized in Section 6, but also for their contribution to biodiversity, unique vegetation communities, landform representation within the ecoregions and support of wildlife habitat.</p> <p>Similar considerations are also recommended for raised beaches/beach ridge complexes and scattered glaciofluvial features (Section 11.2.2.1, Regional Hydrological functions) if they are also underrepresented and unique to the landscape, and provide value for biodiversity, vegetation communities, landform representation and wildlife habitat on the landscape.</p> <p>MNR also commented during the Draft Terms of Reference phase, suggesting the consideration of eskers within the EA.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>		<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
154.	11-40 / Table 11-6	It is unclear how or if the “waterbody functional value buffers” are tied to riparian areas.	In Section 11.2.1.4.2, please describe the connection between “waterbody functional value buffers” and riparian areas, and if they are linked (Table 11-6).	A	4. Item will not be addressed as considered out of the scope of the approved EA	<p>C. Not satisfied – would like to discuss comment/response with proponent.</p> <p>It's not clear if the High, Medium, and Low fish critical-life-process</p>

Comm ent #	Page/ Section #	GRT Comments			Type of Comment:	Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Categorize Proponent's response as follows:			
						<p>Terms of Reference (ToR)</p> <p>Section 11 of the EAR/IS covers aspects of the assessment based on ToR and Vegetation Study Plan including how the biophysical functions of wetlands were determined, and more specifically, the inputs into the model that were used to assign functional values to areas</p>	<p>functional values buffers in Table 11-6 of the wetland functional habitat assessment are standalone buffers to be applied as mitigation or if this habitat is being incorporated into the riparian habitat areas being delineated? Or are riparian areas separate with their own mitigation requirements?</p> <p>It is not clear how the two interact, if at all.</p> <p>MNR requests this comment to be addressed as a 1 or 2 to clarify if there is an association between the "waterbody functional value buffers" and "riparian areas". In addition, please specify how these functional value buffers will be considered in mitigation.</p>

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					adjacent to waterbodies and watercourses .	
155.	11-40 / 11.2.1.4.3	Socio-economic functions of wetlands are described, capturing attributes such as aesthetics, recreation, education and commercial uses. However, the considerations in this section are fairly narrow in scope.  Some examples where socio-economic considerations are listed include the Ontario Wetland Evaluation System and the Wetland Environmental Impact Study Requirements Technical Manual (1995).	In Section 11.2.1.4.3, please elaborate on whether research potential, cultural, traditional harvest, spiritual and ceremonial attributes are considered under this lens as well.	A	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)  Note - Cultural, traditional harvest, spiritual and ceremonial attributes were considered.	
156.	Section 11 Tables - General	In Section 11, tables illustrating percentage of ecosystem types with relation to the Local Study Area (LSA) and Regional Study Area (RSA) are missing data regarding the project footprint.	Please include data for the project footprint whenever changes or volumes of area for LSA and RSA are being compared (see Table 11-9 to Table 11-11, as examples).	A	4. Item will not be addressed.	C. Not satisfied – would like to discuss comment/ response with proponent  MNR acknowledges the following comment from the project team:

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			In addition, where "N/A" is included in a table, please provide a footnote to explain the absence of data, if it is not clearly articulated in the text.			<p>"Section 11.2.2 summaries information contained in the Natural Environment Existing Conditions Report. At that time, only the LSA and RSA had been defined. Tables containing information about changes to the Project footprint are provided later in the EAR/IS (e.g., Table 11-19 and 11-20 in Section 11.3.2.1.1)." However, Table 11-19 and 11-20 are not directly comparable to prior tables within the section.</p> <p>As provided, Table 11-19 and 11-20 only provide hectares to be removed by ELC vegetation classification. There is no percentage by watershed or vegetation groupings. There is no ability to easily compare ecosystem availability or abundance.</p> <p>This makes it difficult to determine if one ecosystem falls primarily or at a higher ratio within the Project Footprint compared to the LSA or RSA. Therefore, it is hard to interpret or even infer what ecosystems might be more at risk or in need of greater mitigation.</p> <p>MNR maintains its request to have PF added to Tables 8 through 11, 13 and 14, and recommends that the response be changed to a 1 or 2.</p>

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
157.	11-48 / 11.2.2.2.1	It appears that 5749 vegetation units have been mapped of which 101 sites were ground sampled and 20 sites aerially checked. In addition, the text refers to a detailed list of species identified during the field surveys.	For clarity, please clearly describe the percent confidence and precision targets for the vegetation classifications, based on the field verification within 11.2.2.2.1. Please provide a reference to the detailed list of species identified, including where this information can be found in the report. A summary of the average number of species, total number of species, number of species of conservation concern, and species at risk would also be helpful to the reader.	A	1. Item will be addressed in the Final EAR/IS submission. References to the relevant sections of the Natural Environment Existing Conditions report (Appendix F) have been added to Section 11.2.1.2 and 11.2.2.2.1 of the EAR/IS.	A. Satisfied with response
158.	11-52 / 11.2.2.2.3; 11.2.2.2.4 / 11-53; 11.2.2.2.5 / 11-54	The ecosystem sections within 11.2.2.2 describe the number of plots sampled. However, there is no mention of the confidence percentage or precision targets.	Please provide the confidence percentage and precision targets the sample sets provided, for all classes and categories. Similar information for eskers and raised beaches is desired as well, if available.	A	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)	<b>First part - A</b> Satisfied for now but will need to see final EA  In terms of the statistical analysis, MNR is satisfied for now and will check the relevant page references provided. Thank you.  <b>Second part (as it relates to</b>

Comm ent #	Page/ Section #	GRT Comments			Type of Comment:	Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Categorize Proponent's response as follows:			
						<p>The scope of analysis and information provided is considered adequate to meet ToR requirements. A statistical accuracy analysis was included in Section 9.3.3.1 of the Natural Environment Existing Conditions report (Appendix F). We have included a reference to that report in Section 11.2.1.2 of the EAR/IS. Prediction confidence in the assessment</p>	<p><b>Eskers)– C</b> Not satisfied and would like to discuss comment/ response with proponent</p> <p>Please see comment 159 for more detail.</p>

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
					of net effects is described in Section 11.11.	
159.	11-52 to 11-53 / Table 11-12	A summary of "2019-2021 Field Program Upland Ecosite Sampling Plots" is provided.	Please provide similar summaries for wetland, riparian, esker and raised beach ecosystems as well. Please also include a table with percentages of project footprint, LSA and RSA by category and ecosite code.	A	4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR).  Neither eskers nor raised beaches were identified as sub VCs to be analyzed as part of the ToR. There are no raised beach ecosites in the RSA	C. Not satisfied – would like to discuss comment/response with proponent.  The ToR (Page 79) states: "Glaciofluvial esker deposits are common in the project area. Eskers are ridges that typically consist of a core of stratified sands and gravels. In esker deposits, the soils are much better drained, there is little surface organic material, and the groundwater table is further below the surface. Eskers are of particular interest for the caribou habitat values analysis at the sub-range and range scales. Being a small proportion of the landscape, eskers may have functions proportionally greater than their area alone might suggest".  MNR requests eskers be directly assessed and addressed for their habitat value to wildlife and the

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
						<p>impact this project might have on these features within the project footprint, LSA and RSA. MNR originally requested consideration toward Natural Heritage Features such as eskers when determining aggregate sources and preferred route for road location. The request was noted and a commitment was made to consider these features. (See #55 in the ToR Summary of commitments).</p> <p>In addition, the Regional Context / Regional Hydrological function subsection (Page 11-44) states "the region is dominated by muskeg (bog/fen) terrain, except near rivers, major creeks, beach ridge complexes and scattered glaciofluvial features. MNR requests more context with regard to beach ridge complexes and scattered glaciofluvial features, and would like to see them directly addressed and discussed.</p>

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
						<p>The way the EA statement is phrased suggests beach ridge complexes are present. If this is not the case, as mentioned in your response, please update the text to clarify where these features are found within the region and their lack of presence within the RSA.</p> <p>A similar discussion of the "scattered glaciofluvial features is also needed because there is no section dedicated to speaking to these features within the vegetation and wetlands section. MNR recommends addressing as a 1 or 2.</p> <p>MNR acknowledges:  1) that there is some information provided in Section 6 and in Sections 12 (Wildlife) and Section 13 (SAR) that relate to eskers and that no further analysis or inclusion of information is proposed for Section 11 - Vegetation and Wetlands.  2) Section 11.2.2 describes regional patterns at a large scale;</p>

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						for example, ecodistrict, ecoregion or watershed. Although the Hudson Bay-James Bay Lowlands include beach ridge complexes and scattered glaciofluvial features, there are few eskers and no raised beach ecosystems within the RSA. MNR recommends clarifying in the EA/IS that there are no raised beaches within the RSA.
160.	11-53 / 11.2.2.2.4	a) The definition of “muskeg” appears to change between subsections of section 11. The inconsistency in term use and groupings creates confusion about how muskeg is being address and considered within the assessment. b) In addition, the listed three broad wetland categories do not align with Table 11-13 and its groupings of wetland types. For example, are tree bogs/fens a part of a treed wetland grouping in addition to swamps, and is open wetlands a different grouping or a catch all for wetlands that do not fall under treed?	a) In the Final EA, please clarify the definition of muskeg/peatland being used and the wetland types falling within scope of the definition. Please ensure consistency throughout the Section 11. b) Please adjust the subsection to ensure table wetland types and broad wetland categories align.	A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
161.	11-55 to 11-56 / 11.2.2.3	Species richness and diversity results are provided, including where they were highest and lowest. However, there is limited discussion of the results.	While it is helpful to know which ecosite types showed highest and lowest levels of species richness, please elaborate on how these results appear at a project level and what this means on the landscape. Figure 11-7 helps illustrate the results; however, it	A	4. Item will not be addressed as considered out of the scope of the approved EA Terms of	C. Not satisfied – would like to discuss comment/response with proponent.  This is a component of the EA as written, however there is limited discussion as to what the findings mean for the project and whether

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			would also be useful to have text describing the implications of the findings.		Reference (ToR)	they are significant or not.  MNR asks that a short discussion be added summarizing the implications of the findings, in order to add clarity around the significance of the findings described and what it means in relation to potential mitigation and future actions related to the project.  Additionally, the ToR describes that potential effects on vegetation communities resulting from the project include changes to species diversity (p. 115).  MNR recommends addressing as either a 1 or 2.
162.	11-55/Table 11-14; 11-59 to 11-60 / 11.2.2.5	a) Table 11-14 appears to be missing some vegetation class categories (i.e. vegetation classes/categories/types listed in Table 11-11 to 11-13). b) Section 11.2.2.5 describes that "some" vegetation classes are not represented in Table 11-15, as the field program was based on random sampling requirements. However, only one example of a missing vegetation class is noted.	a) Please provide rationale for why some vegetation classes are missing (consider including a footnote with the rationale). Alternatively, Table 11-14 could be revised for the Final EA, to include the missing classes. Please also include columns related to the project footprint as well.	A	a) 1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response.

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			b) For clarity, in the text of 11.2.2.5, please list all classifications not represented in the text and also consider adding a footnote to the subsequent table (Table 11-15) if this is also the reason for the absence of data (e.g. absence of species for mixed forest and mixed swamp habitats). Also, please provide a brief discussion of species that have been documented in previous studies to occur in these habitat types of those species listed, and if literature or traditional knowledge exists in this regard.			
163.	11-62 to 11-63 / 11.2.2.6.1	The "geophysical wetland functions" section is missing a discussion of bogs.  The rationale for the grouping of wetland ecosystems is unclear and is described differently than in previous sections.	Please provide a consideration of bogs, similar to how fens, swamps and floodplain and lacustrine wetlands are discussed in this section.  Please also include rationale for why wetland ecosystems are being grouped and described differently than in previous sections. Ideally, the grouping should be relatively consistent throughout the assessment.	A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response.
164.	11.2.2.6	A wetland function assessment is provided. However, a similar assessment is not included for upland or riparian areas.	Please provide rationale for the absence of a similar assessment for	A	4. Item will not be addressed as	C. Not Satisfied – would like to discuss comment/response with

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			other ecosystem groupings in this section (e.g. upland and riparian ecosystems, and for unique features such as eskers and raised beaches as well).		it is considered out of the scope of the approved EA Terms of Reference (ToR)	proponent  With respect to raised beaches, MNR's understanding from comment #159 is that there are no beach ridges within the RSA.
165.	11-66 / 11.2.2.6.2	This section describes that Six major biophysical wetland functions were examined, including "maintenance of habitat for: common and SAR vegetation, breeding birds, waterfowl, mammals, amphibians, and fish." It is not clear if other plant species of conservation concern were also included (e.g. provincially tracked species).	Please clarify if plant species of conservation concern were included in the maintenance of habitat examination. If not, provide rationale for the exclusion.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response.
166.	11-68 / 11.2.2.6.3	It appears that present socio-economic functions are addressed, and historic or potential future socio-economic functions are not.	In Section 11.2.2.6.3, please include a discussion of historic or potential future socio-economic functions are not covered, or provide rationale for this omission.	A	4. Item will not be addressed as it is considered out of the scope of the approved EA Terms of Reference (ToR).  Past or future uses are not factor in the analysis.	A. Satisfied with response.
167.	11-69 / Figure 11-8	Figure 11-8 displays different Wetland Function Ratings. A similar figure and rating index would be beneficial for the other Project ecosystem types.	Please provide a rating illustration and assessment (similar to Figure 11-8) for	A	4. Item will not be	

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			the other project ecosystem types, or describe why such a rating illustration and functional indices assessment is not possible within those sections.		addressed as considered out of the scope of the approved EA Terms of Reference (ToR)	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
168.	11-72 / 11.3.2	<p>This section describes the primary effect pathways as being “clearing and grubbing; installation of water crossing structures; and indirect, long-term effects on vegetation.” However, it is unclear if perhaps the text should read “direct, long-term effects” instead. As indirect effect pathways subsequently follow the quoted text.</p> <p>It is also unclear if primary effects pathways also consider direct fragmentation and soil compaction.</p>	<p>Please clarify if “indirect” is correct or if it was meant to say “direct, long-term effects”.</p> <p>Please address whether primary effects pathways also consider direct fragmentation and soil compaction, and ensure this clarity in the EA.</p> <p>Additionally, please discuss whether increases in traffic and general use of the area (beyond current use levels) are being considered for the impacts they may impart onto the vegetation.</p>	C/A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response.
169.	11-73 to 11-74 / Table 11-19	Vegetation loss is quantified by hectares, but not by percentage of project footprint. In addition, laydown yards are missing from the removals.	<p>Please provide another column to quantify the percent of the vegetation class within the whole project footprint (e.g., 0.77 ha of burn cut would be 0.1% of the total project footprint).</p> <p>Please provide rationale within this section for the absence of laydown yards within the table, as there was</p>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of	<p>C. Not Satisfied – would like to discuss with proponent.</p> <p>In terms of the #4 prioritization, please see the MNR feedback regarding eskers in comment #159. MNR would like to understand how much of the esker will be permanently lost.</p>

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			<p>mention that some may be considered for operational maintenance yards.</p> <p>Should other access roads for aggregate sources be scoped into the Final EA (aside from ARA-4 access road already accounted for), please account for this in the vegetation loss calculations.</p> <p>Please consider including a summary table (similar to Table 11-19 and 11-20, provided for esker and raised beach features), or a separate table that captures what percentage of these features that fall within the project footprint and will be permanently lost.</p>		<p>the twenty-three-week review period</p> <p>and</p> <p>4. Item will not be addressed (re: eskers and raised beach features)</p>	<p>MNR recommends adjusting the #4 to a 1 or 2.</p>
170.	11-76 / Table 11-21	<p>Table 11-21 describes that rock barren vegetation classification has a removal of 38% of its area within the LSA.</p> <p>The text states that “these elevated effects could be the result of the mosaiced nature of the Rock Barren sites within the landscape and the small size (less than mappable scales for ELC), typically observed for this vegetation area” (11-101). However, the text does not elaborate on whether any large patches of potentially greater significance might also make up a portion of the habitat to be lost. Greater details and discussion regarding the composition and scale of this loss should be touched upon, in addition to why some of this impact is not being avoided as a part of planning.</p>	<p>Please discuss the large loss of this vegetation class and why avoidance is not possible.</p>	A	<p>4. Item will not be addressed. In the document.</p>	<p>C. Not Satisfied – would like to discuss with proponent.</p> <p>This is a substantial loss of this feature type, which can provide <b>significant wildlife habitat</b> at this patch size. This larger patch size is more significant than smaller patch sizes, due to greater self sufficiency and resilience.</p>

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						<p>MNR would like to see avoidance of some of these patches where feasible and discussion of what this loss of larger patch sizes within the LSA could mean.</p> <p>If avoidance is not possible, please provide an explanation for why it is not feasible.</p> <p>MNR recommends adjusting to a 1 or 2.</p>
171.	11-78 / 11.3.2.1.2	<p>a) Percent Area Occupied (PAO) values are developed for breeding birds, waterbirds, mammals and vegetation classes. However, it does not specifically identify eskers and raised beaches.</p> <p>b) This section describes that "These increases range between 1% and 9% of the original SDI value, and the decreases between 1% and 2%." The numbers appear to be incorrect and should be reversed.</p>	<p>a) Please consider assessing eskers and raised beaches through a similar PAO approach.</p> <p>b) Please confirm the numbers used and ensure their accuracy, to ensure alignment between Table 11-22 and the preceding text.</p>	<p>A</p>	<p>a) 4. Item will not be addressed as it is considered out of the scope of the approved EA Terms of Reference (ToR)</p> <p>b)1. Item will be addressed in the Final EAR/IS</p>	<p>For proposed action a): C. Not Satisfied – would like to discuss with proponent.</p> <p>In terms of the #4 prioritization, please see the MNR feedback regarding eskers in #159. MNR recommends adjusting the #4 to a 1 or 2.</p> <p>For proposed action b): A. Satisfied with response</p>

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					submission.	
172.	11-78 / Table 11-22	Percentage change in diversity is illustrated, but there is no discussion of what percentage of change is considered acceptable or of greater risk.	Please elaborate on the risk associated with the range of change seen in the diversity of vegetation classes.	A	4. Item will not be addressed as it is considered out of the scope of the approved EA Terms of Reference (ToR)	C. Not satisfied – would like to discuss comment/response with proponent.  While the illustration is neat, there is no indication or discussion as to what the findings mean in terms of risk to diversity for the project and whether the change is significant or not.  MNR asks that a short discussion be added summarizing the implications of the findings. MNR recommends addressing as a 1 or 2.
173.	11-79 to 11-80 / 11.3.2.1.3	The term “removal classes” is used; however, no definition is provided.	Please provide a definition of the term “removal classes”. In addition, please consider whether eskers and raised beaches can be similarly assessed for fragmentation, for inclusion within the Final EA.	A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
174.	11-76 / Table 11- 21; 11-82 / Table 11-24	There is a substantial drop in some vegetation classes.	Please discuss whether avoidance is possible in classes with a substantial size loss where the number of patches is limited (i.e., burn-cut, hardwood forest, mixed forest, rock barren and thicket swamp).  Additionally, please describe what this means for representation within the study areas.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
175.	11-88 / Table 11-27	Rock barren and thicket swamp values in Table 11-27 could be misleading, as the percentages do not reflect the loss of a whole core area.	MNR recommends adding a footnote to the table to speak to this concern.	B	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
176.	11-89 / Table 11-28	In the landscape diversity metrics section, there is no discussion of whether the predicted reduction in both diversity and evenness index scores is of significance or not at the RSA level. No information is provided for the LSA level.	Please discuss and provide an assessment of significance for the diversity and evenness index outcomes. Provide outcomes for the LSA level, or rationale for why such calculations are not included.	A	4. Item will not be addressed as it is considered out of the scope of the approved EA Terms of Reference (ToR)	C. Not satisfied – would like to discuss comment/response with proponent.  MNR acknowledges the proponents' comment that the RSA is the spatial boundary under which potential landscape level changes were evaluated in the EAR/IS, and that the change in diversity of vegetation patch classes was estimated to be less

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				<p><b>A. Required for EA (per ministry mandate/policy /legislation)</b></p> <p><b>B. Recommended for EA</b></p> <p><b>C. Editorial</b></p> <p><b>D. Permitting Related, Not Required for EA</b></p>		<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
						<p>than 0.1% of the RSA as was the change in evenness (based on Shannon's Diversity and Evenness Indices).</p> <p>MNR recommends this information to be documented within the Final EA/IS to address the following comment:</p> <p>The approved Terms of Reference states: "Potential effects on vegetation communities (e.g., riparian, wetland, upland, etc.) resulting from the construction phase of the Project include changes to community diversity, loss of vegetation, changes to wetland quantity and function, and changes to species diversity or composition" (Page 115).</p> <p>In addition, selection of ecosystem composition was rationalized as needed to assess ecosystem and landscape level biodiversity (Appendix B, Page 1).</p> <p>As a result, this commitment to assess the changes to diversity at</p>

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						<p>the ecosystem and landscape level needs to be fully addressed within the EA as a 1 or 2.</p> <p>Currently, there is limited explanation of what the findings mean for the project and whether they are significant. A short summary is requested that explains the implications of the RSA findings, includes the LSA findings, and clarifies whether the changes are significant. This will help determine if mitigation or future actions are needed.</p>
177.	11-91 to 11-92 / 11.3.2.3.1	<p>a) This section does not fully describe the considerations related to compaction in vegetation and wetland areas as a result of construction and operation. For example, will increase access off of the right-of-way result in indirect increase of wetland compaction through amplified land use?</p> <p>b) Given that the project is largely located in swamp and bog wetland types, the EA would benefit from a discussion about how different wetlands/peatlands would respond to grading and soil disturbance, as Caitlin et al. (2022) referenced in this section is specific to fens.</p> <p>According to page 11-53 to 11-54, the LSA contains 15.22% fen versus 66.55% swamp/bog. Similarly, the RSA contains 13.94% fen versus 66.77% swamp/bog.</p>	<p>a) To better understand and evaluate potential effects, please describe the considerations related to construction and operations when evaluating the potential impacts of compaction in vegetation and wetland areas.</p> <p>b) Please discuss the implications of the project being largely in swamp and bog wetlands as compared to fens, and how this might differ or align with the fen-focus of Caitlin et al. (2022). Specifically,</p>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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			<ul style="list-style-type: none"> <li>- As Caitlin et al. (2022) is the primary reference provided and specifically refers to fens, please include any hypotheses or discussion about how other wetland types (e.g., swamps and bogs) may respond to indirect effect pathways such as grading and soil disturbance.</li> <li>- Please elaborate on the differences between bogs and swamps as compared to fens, and how this may influence the disturbance within the project area.</li> <li>- Given that swamps and bogs make up most of the wetland areas within the project area, it would be helpful to reference literature that highlights how these wetland types respond to similar activities.</li> </ul>			
178.	11-95 / 11.3.2.3.6; Table 11-30	<p>With regards to increased risk of fire, this section describes that they have “predicted a distance of approximately 250 m, in keeping with the farthest distance used in assessing the other indirect effect pathways.”</p> <p>However, the noted distance is quite short if increased camping and access occurs off the right-of-way, as these activities often occur beyond 250 m distance from a road.</p>	Please discuss the fire risk associated with potential increased access or camping off of the right-of-way and consider a wider distance from the right-of-way, in the Final EA.	A	<p>2. Item will be addressed through addenda to Final EAR/IS submission that will be</p> <p>B. Satisfied for now but will need to see final EA</p>	

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					completed by the end of the twenty- three-week review period	
179.	11-99 / Table 11-32	The table shows a 60% potential area of moderate to low indirect effects for “organic poor fen”, which is substantially higher than the other wetland classes described.	Please elaborate on the reasons for the magnitude of impact (and associated risk to that vegetation class) compared to other vegetation classes.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
180.	11-101 / Table 11-33	Given the impacts to rock barren over the 1%-10% threshold, the severity characterized as “slight” does not seem to provide an accurate description.	Please describe why the severity calculations do not appear to account for the changes to rock barren patches.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

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181.	11-106 / 11.3.3.5	<p>11.3.3.5. describes how the “indirect effects are not expected to affect enough wetland areas to reach or exceed a 10% change, thus the characterization for Scope and Severity effects remains at the levels of Restricted and Moderate, respectively.”</p> <p>However, this statement does not align with wording used immediately above or below, that characterizes the change quite differently as small in scope and slight in severity (Table 11-35 also uses similar descriptions).</p>	Please confirm the statement, and if correct, describe why it differs from the wording used above and below this statement.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	A. Satisfied with response
182.	11-108 / 11.3.4.2	Plant species and communities of conservation concern are discussed.	<p>Please clarify if landforms such as eskers or raised beaches were considered. Discuss whether these features are underrepresented on the landscape and consider whether they would qualify for consideration as essential supports for locally uncommon or rare communities.</p> <p>Please describe how site preparation will be carried out on rock barrens. Clarify whether project activities, such as including specific activities such as clearing, grubbing, and blasting, pose unique risks to the vegetation communities in rock barrens—particularly those outside the right-of-</p>	A	<p>a) 4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR).</p> <p>b) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by</p>	<p>C. Not Satisfied – would like to discuss with proponent.</p> <p>In terms of the #4 prioritization, please see the MNR feedback regarding eskers in #159. Please adjust the #4 to a 1 or 2.</p> <p>In response to site preparation on Rock Barrens; A. Satisfied with response, where MNR is engaged to confirm the approach.</p>

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			way—compared to areas with deeper organic soils or treed vegetation.		the ultimate owner/operat or)	
183.	11-110 / 11.3.5.2	There is substantial changes within the rock barren vegetation class; however, this does not appear to be reflected or discussed within Section 11.3.5.2.	Please elaborate on how the impacts to rock barrens factor into the summary threat assessment.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
184.	Executive Summary; General – Wildlife  This comment may apply to other sections. Please review the Draft EA and update	<p>a) The Proposed Mitigation Measures During Construction and Operations in many sections uses the phrase “should” – e.g., “construction areas should leave breaks to allow for wildlife passage/movement”. This leaves uncertainty in whether the mitigation will be applied or not, which impacts the potential net effect designation.</p> <p>b) Similarly, sections state the following (or similar) “if adherence to the timing windows and restrictions is not possible, the contractor will develop site-specific mitigation and monitoring in consultation with appropriate agencies.” Generally, this kind of language suggests a lack of firm commitment to adhering to the timing windows. If this mitigation measure is used when evaluating potential impacts as part of the EA but not applied in practice, it would undermine the assessment of impacts. Furthermore, no detail is provided on what ‘alternative mitigation and monitoring’ would be implemented should adherence to timing windows not be possible.</p>	<p>In the Final EA, please:</p> <p>a) Revise wording to “will”/“must” or appropriate alternative wording if these mitigation measures are commitments. If there is no commitment to the mitigation measure listed, then they should be removed from consideration.</p> <p>b) Review whether mitigation measures (i.e., avoidance of sensitive timing windows) can be committed to, and adjust the wording accordingly (to state the commitments clearly).</p>	A	<p>a) 1. Item will be addressed in the Final EAR/IS submission</p> <p>b) 1. Item will be addressed in the Final EAR/IS</p>	B. Satisfied for now but will need to see final EA

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	similar instances.		If there are scenarios where they could not be committed to, describe those for consideration and assessment of alternatives. Alternatively, if the mitigation is not known because it requires detailed design and/or special site-specific considerations with appropriate agencies, specifying the goals of mitigation and monitoring (e.g., minimizing impacts to live fish or ensuring the work does not impact use of significant wildlife habitat) is recommended as this information helps to understand what the impacts will be, as well as an acknowledgement that detailed design may result in modified approaches to the described mitigation measures..		submissi on	
185.	ES 8.5 to ES 8.8  This comment may apply to other sections. Please	a) The mitigation measures outlined across all sections are general and not tailored to specific activities. However, certain ancillary activities—such as aggregate sites, camps, and laydown areas—may require unique mitigation strategies. For instance, there are no measures addressing waste management at camps, which could help reduce impacts on scavengers like wolverines or prevent attracting predators such as black bears and wolves (which are identified as threats in other sections). b) The Follow-up and Monitoring sections lack sufficient detail for proposed protocols and any response plans (for unanticipated adverse effects)	In the Final EA, please: a) Include mitigation measures for the construction and operation activities associated with aggregate sites, camps, and laydown areas. b) Please provide additional detail on how the effectiveness of mitigation measures will be monitored, and	A	A) 3. Item will be addressed outside of the EAR/IS review process (i.e.,	B. Satisfied for now but will need to see the final EA.  During the December 19 meeting with the WSR Project Team, the idea of including a commitment to consult with MNR once the EA components are finalized was discussed. It was noted that while

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	review the Draft EA and update similar instances.	according to species group. Note: the success of mitigation efforts will depend heavily on how well these approaches are designed and implemented.	outline the construction and operation response plans that will be implemented if unexpected adverse effects are observed.		taken on by the ultimate owner/operator) B) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	this is an option, it does not necessarily result in greater efficiency. The intent of the comment relates to achieving a higher level of certainty in determining potential impacts. It was also highlighted that several of MNR's wildlife-related comments share this underlying objective—seeking greater clarity and certainty regarding the level of impacts to strengthen those sections.  MNR understands that a commitment to work with the MNR in development of mitigation and monitoring plans will be included in the EA.
186.	Executive Summary; General – Wildlife	It may be more efficient and concise to present the general mitigation measures proposed for all subsections at the beginning of the section. For example, in the <i>Assessment of Effects on Wildlife and Wildlife Habitat</i> , several mitigation measures (such as: “clearly delineate the boundaries of the work zone to prevent habitat destruction beyond the established work limits”) are repeated across multiple subsections (e.g., moose, furbearers, bats, birds, reptiles, and amphibians). Consolidating these common measures into a general summary at	In the Final EA, please reconsider the outline formatting of these sections as suggested.	C	4. Item will not be addressed as considered out of the scope of the approved EA Terms of	

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		the start would reduce redundancy and allow each subsection to focus only on mitigation measures specific to each species group, improving clarity and readability.			Reference (ToR). The Project Team considered request and prefer to keep original formatting of content.	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
187.	8-62 to 8-63/ ES 8.7.3.1; 8-63 to 8-64/ ES 8.7.3.2; 8-65/ES 8.7.3.3; 8-65 to 8-66/ES 8.7.3.4; 8-66 to 8-67/ ES 8.7.3.5  This comment may apply to other sections.	<p>a) A mitigation measure listed within multiple sections is “maintain vegetation protection zones to reduce sensory impacts.” It is unclear what these are defined as (e.g., size, vegetation composition/selection, permanency).</p> <p>b) One of the Proposed Mitigation Measures During Operations listed within multiple sections is “removal of any roadkill that may act as an attractant.”; however, it is not clear what the disposal plan will be or whether there will be tracking/reporting of such roadkill. This mitigation measure is also not included in the list for SAR.</p> <p>c) The Proposed Mitigation Measures generally referred to within multiple species-grouping sections include the following wording (or similar): “temporary supportive infrastructure will be reclaimed at the end of construction (including access roads, aggregate pits/quarries, construction camps, waterbody crossings, and laydown areas)”. The effectiveness of the mitigation for each species will depend on the reclamation design.</p> <p>d) Mitigation measures include “avoid areas of critical habitat, where feasible”, but critical habitat for the species are not defined (denning, foraging, etc).</p>	In the Final EA, please: a) Include specific measures for proposed vegetation protection zones so that the effectiveness of these as mitigation can be evaluated. b) Provide more detail on what the disposal plan will be for roadkill and how these will be tracked/reported to support the effectiveness of the proposed mitigation. Furthermore, please consider including the tracking of SAR roadkill (e.g., caribou, wolverine), as road mortality can be a significant contribution to the local impact.	A	<p>A) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)</p> <p>B) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by</p>	<p>B. Satisfied for now but will need to see the final EA</p> <p>A) Mitigation measures—and the approach for achieving them—should be clearly defined and detailed to allow MNR to assess their effectiveness and provide recommendations for adjustments or enhancements. MNR recommends that this be clarified within the EA or its addendum (1 or 2).</p> <p>B &amp; C) MNR understands that a commitment will be made in the EA for the owner/operator to work with MNR on these items.</p>

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	Please review the Draft EA and update similar instances.	e) Mitigation measures include "Movement corridors for wildlife will be identified, signage and reduced speeds posted." However, the criteria for movement corridors are not defined (e.g., 30m riparian areas).	c) Provide a reclamation plan for review and consideration that details the proposed measures and design, including details such as tree stocking rates (stems/ha), species, and any effectiveness monitoring. d) Provide clear definitions on "critical habitat" that will be avoided (as mitigation) within each section. e) Provide clear definitions of "movement corridors" related to mitigation within each section.	A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA	the ultimate owner/operat or)  C) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	D&E) MNR recommends that these items be addressed in the final EA or addendum (1 or 2) for clarity.
188.	8-62 to 8-63/ES 8.7.3.1; Table 12-42  This comment may apply to other sections. Please review the Draft EA and update	a) The Proposed Mitigation Measures During Construction and Operations section states: "progressively reclaim areas in a timely manner with native vegetation using plantings and seeding" It is unclear what a "timely manner" is defined as. b) An additional listed mitigation measures is "reclamation/blockage of any temporarily disturbed areas and access roads." Reference to "reclamation" and/or "reclamation/blockage" is not consistent or descriptive to provide details on how this will be achieved. c) Proposed mitigation Measures During Construction and Operations discusses impacts to moose from blasting during certain sensitive periods, and states "vegetation clearing in such habitats should be avoided". It is unclear which periods and habitats this is referring to. d) The section states that movement corridors for moose will be identified as part of mitigation, but it is unclear how these will be identified.	In the Final EA: a) Please define and clarify the timeframe that reclamation activities would take place as mitigation of impacts to moose. b) Ensure consistency in what actions will be completed for temporarily disturbed areas or roads for mitigating impacts to wildlife. If additional mitigation is required for species-specific sensitive habitat, please describe it (within the specific section), including the benefit of the mitigation. Please include what actions will take place	A	A&B) a commitment will made in the EA/IA for the owner/operat or to work with MNR. C) The EAR/IS will be revised to clarify that the text refers to identified SWHs.	B) Satisfied for now but will need to see the Final EA

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	similar instances.		to achieve the future state, including (but not limited to) surface treatments, berming (blockage), crossing removal, seeding, etc. c) Provide the habitat types and corresponding sensitive periods that will be avoided. d) Clearly describe how movement corridors will be identified.		D) The EAR/IS will be revised to clarify that the text refers to moose crossing areas identified by wildlife and road mortality occurrence data. Details on identification will remain with the owner operator )	
189.	8-63 to 8-64/ ES 8.7.3.2  This comment may apply to other	a) The Proposed Mitigation Measures During Construction includes avoiding activities within the American Marten and beaver "breeding periods"; however, the information provided in support is unclear, making it difficult to understand what period is being referenced. Similarly, another point says, "Blasting will be conducted outside of these sensitive life-cycle periods", which is non-specific (i.e. the specific period being referenced).	In the Final EA, please: a) Include the actual dates of the sensitive timing window that activities will avoid, as mitigation. It is also recommended that the term "denning period" is used to describe parturition for mustelids, and "breeding season" is used to	A	4. Item will not be addressed as considered out of the scope of the approved EA Terms of	C. Not satisfied – would like to discuss comment/response with proponent.  It is unclear how the items are out of scope of the ToR. Ideally, general mitigation measures should be identified at the EA

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	sections. Please review the Draft EA and update similar instances.	<p>b) For the marten-focused mitigation, the measures appear to be different for “breeding/mating” (vegetation clearing near watercourses) in comparison to denning (general vegetation clearing).</p> <p>c) Mitigation for impacts to beavers should include details of proposed action if culverts and/or crossings are blocked due to beaver activity. If “nuisance” beavers and dams are to be removed in protection of infrastructure, there should also be mention of regulatory requirements (e.g., Authorization under Ontario’s <i>Fish &amp; Wildlife Conservation Act, 1997</i>; and reference to DFO’s <i>Code of Practice for Culvert Maintenance</i>). It is also unclear if beaver deterrents at water crossings have been considered to mitigate potential removal (mortality) of beavers along the roadways.</p>	<p>describe the time of year when animals mate.</p> <p>b) Please describe why these different timing windows were developed and why breeding/mating is scoped only to areas near watercourses.</p> <p>c) Please provide more fulsome detail on proposed mitigation for beavers and water crossing infrastructure, including “removal” of nuisance beavers, as well as beaver deterrents (if these are being considered).</p>		Reference (ToR)  Level of detail is beyond that committed in ToR and Study Plan and is not appropriate for Executive Summary.	<p>stage (e.g., timing windows, well-tested best management practices), and the intent of each measure should be clear. This enables reviewers to evaluate whether the proposed measures are appropriate and to understand the net impacts of the project after mitigation is applied.</p> <p>Where specific mitigation measures cannot be confirmed at this time, the EA should clearly state the intent of those measures and include a commitment for the owner/operator to work with MNR to develop the details. MNR recommends that this clarification be included within the EA or its addendum (1 or 2).</p>
190.	8-65/ ES 8.7.3.3; 12.7.4.3 page 12-377  This comment	<p>a) Proposed Mitigation Measures During Construction and Operations includes installing “bat crossings”. It is unclear what a bat crossing is and how it will provide effective mitigation as it is not a commonly referred to or recommended measure for bats.</p> <p>b) This section states that “blasting will be conducted outside sensitive timing windows” but does not define what windows are being considered, such as if this would only include maternity roosting period, and/or hibernation/overwintering and swarming as well.</p>	<p>In the Final EA, please:</p> <p>a) Define “bat crossing” and provide reference that this is an effective mitigation measure.</p> <p>b) Clarify the sensitive timing windows for bats when blasting will not occur.</p>	A	<p>a)1. Item will be addressed in the Final EAR/IS submission</p> <p>b) 1. Item will be</p>	<p>B. Satisfied for now but will need to see final EA.</p> <p>Regarding C), MNR understands that a commitment will be included in the EA for the owner/operator to work with MNR on this item.</p>

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	may apply to other sections. Please review the Draft EA and update similar instances.	c) A response plan outlining the steps to be taken if a hibernaculum is discovered during construction or operation was not included in the Draft EA.	c) Please provide a response plan outlining the steps to be taken if a hibernaculum is discovered. If this plan cannot be included in the Final EA, it will be required prior to the issuance of applicable permits from the MNR.		addressed in the Final EAR/IS submission c) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
191.	8-65 to 8-66/ES 8.7.3.4  This comment may apply to other sections. Please review the Draft EA and update similar instances.	a) This section states that there will be avoidance of areas of critical bird habitat, where feasible, but it is unclear how this is defined. b) It is stated that the Project will “use qualified project personnel to identify Significant Wildlife Habitat features during pre-construction and construction. If Significant Wildlife Habitat (SWH) is identified develop feature specific mitigation program”. This lacks detail on what qualifications these personnel will have as well as how/when this work will be done. c) This section suggests that “Blasting will be conducted outside sensitive windows (migratory bird nesting period)” but the timing window is not defined. There are also birds in the area that are not considered migratory that should be considered. Similarly, a mitigation measure is that “vegetation removal in suitable nesting habitat will be conducted outside of nesting periods. For migratory birds the nesting period is from May 1 to August 31.” According to the Government of Canada Nesting Calendar, Zone C6 ranges from April 25 <sup>th</sup> to August 29 <sup>th</sup> for migratory birds in all habitat types. Section	In the Final EA, please: a) Specify which critical bird habitats will be avoided as part of the mitigation strategy, and explain how these habitats will be identified and defined. b) Clarify what qualifications the project personnel will have (e.g., avian biologist) and when surveys will be completed (i.e. how long prior to construction). If these surveys are meant to inform whether candidate SWH are features for consideration or not, these surveys should be performed	A	a-g) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	C. Not satisfied – would like to discuss comment/response with proponent  A, E, & G) Clarification on how habitats will be identified and delineated, and how avoidance will be achieved, should be provided in the EA or its addendum (1 or 2). This aligns with the need for clear intent and detail on mitigation measures to allow MNR to assess effectiveness.  B & D) MNR recommends that the

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		<p>ES 8.8.3 refers to the April 25<sup>th</sup> to August 29<sup>th</sup> window. It is unclear if there will be other timing windows developed for non-migratory birds. Using Birds Canada's Nesting Calendar Query Tool, a number of birds found within the Project's ecodistrict begin nesting earlier than April 25<sup>th</sup> (e.g., owls, northern goshawk, red-tailed hawk).</p> <p>d) Proposed mitigation states that: "if birds within the work area are displaying breeding behaviour apply mitigation measures including stopping all activities and establishing buffers around nest." It is unclear if these are the only proposed mitigation measures and how the buffers would be determined.</p> <p>e) Proposed mitigation for raptor nests should not be limited to raptors but expanded to all birds with nesting habitat fidelity (e.g., great blue heron (protected under the federal <i>Migratory Birds Convention Act, 1994</i>)). These features (and other significant wildlife habitat relating to birds) should be retained with a setback distance. It is unclear what will be referred to when determining the setback distance, and how/when these features will be identified.</p> <p>f) There is reference to installing nest platforms to replace or enhance habitat during active or passive reclamation. If a nest needs to be removed, an authorization will likely be required by the federal or provincial government (depending on the species). This should be clarified.</p> <p>g) The section states that movement corridors for birds will be identified as part of mitigation, but it is unclear how these will be identified.</p>	<p>prior to issuance of MNR permits (to ensure the effectiveness of proposed mitigation); otherwise permit conditions may be applied to all candidate SWH.</p> <p>c) Provide accurate and clear sensitive timing windows for all potentially impacted bird species that will be avoided during blasting and vegetation removal activities.</p> <p>d) Provide more detail on proposed responses as mitigation for birds, as well as how buffers would be determined.</p> <p>e) Provide more detail on how nests of birds will be protected (not limited to raptors), references to appropriate setback distances, and when surveys for such features will occur, in order to support the statement of mitigative value.</p> <p>f) Provide reference to legislative requirements to remove nests/eggs.</p> <p>g) Provide detail on how movement corridors for birds will be identified.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)  B. Recommended for EA  C. Editorial  D. Permitting Related, Not Required for EA</p>	<p>A. Satisfied with response  B. Satisfied for now but will need to see final EA  C. Not satisfied – would like to discuss comment/ response with proponent</p>	
192.	8-66 to 8-67/ES 8.7.3.5	a) Proposed Mitigation Measures for reptiles include "installation of eco-passages in high potential wetland habitat." It is unclear if there is a	In the Final EA, please: a) Provide clarity on the approach/goals of eco-passages,	A	a) 3. Item will be addressed	B. Satisfied for now but will need to see final EA.

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	This comment may apply to other sections. Please review the Draft EA and update similar instances.	<p>proposed design for the eco-passages, and how the areas of high potential wetland habitat have been identified.</p> <p>b) This section states that "Blasting will be conducted outside of sensitive windows". Similarly, it states that "Vegetation removal will occur outside of the herpetile active period". It is unclear what sensitive windows will be considered for these activities (e.g., overwintering, reproductive).</p> <p>c) This section states that "Cross-culverts will be installed at regular intervals." as mitigation, however, these intervals are not defined.</p>	<p>and how areas of high potential wetland habitat have been identified. MNR recommends that the Final EA includes a commitment to design eco-passages at the detailed design phases, with opportunity for MNR to review and approve/endorse the potential effectiveness of the proposed mitigation.</p> <p>b) Clearly define the sensitive timing windows that blasting and vegetation removal activities will avoid.</p> <p>c) Describe the range of intervals for cross-culvert installation.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>	<p>d outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>b) 1. Item will be addressed in the Final EAR/IS submission</p> <p>c) 1. Item will be addressed in the Final EAR/IS submission</p>	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p> <p>A) Clarity should be provided within the EA or addendum (1 or 2) on how areas of high potential wetland habitats will be identified. For the development of eco-passages, MNR understands that a commitment will be made in the EA for the owner/operator to work with MNR on their development and design.</p>

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							<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
193.	12.2.2.4.1	The document states that the only snake species known to occur in the area is Eastern Gartersnake ( <i>Thamnophis sirtalis sirtalis</i> ); however, Red-sided Gartersnake ( <i>Thamnophis sirtalis parietalis</i> ) has occurred at similar latitudes. Both are subspecies of the Common Gartersnake ( <i>Thamnophis sirtalis</i> ). It is unclear if this has this been considered.	In the Final EA, please provide consideration for both subspecies of Common Gartersnake or provide rationale for why both have not been considered.	A	4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)	The Ontario reptile and amphibian atlas shows observations across northern Ontario, including ~85km south of the project and ~95km west of the Project in Nibinamik.	
194.	8-65/ES 8.7.3.3; 8-65 to 8-66/ES 8.7.3.4  This comment may apply to other sections. Please review the Draft EA and update	Fugitive dust emissions are identified as a potential concern, however, there is limited discussion on the potential implications to vegetation and wildlife and no consideration for mitigation of impacts to foraging habitat by birds and bats.	Please expand on potential implications to air quality and wildlife from dust deposition during the Project phases and what mitigation measures will be applied to reduce impacts, and how this may change over time.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA	

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	similar instances.					
195.	8-69 to 8-70/ES 8.7.6  This comment may apply to other sections. Please review the Draft EA and update similar instances.	a) This section specifically refers to monitoring for Ranavirus as a potential impact. Further beneficial monitoring (e.g., invasive aquatic species) should also co-occur. b) This section states that “bat and amphibian presence and species diversity will be surveyed during operations and compared to baseline data” but it is unclear how this will be done.	In the Final EA, please: a) Consider adding invasive aquatic species monitoring. b) Provide additional information on what methodologies will be used, what the threshold of significance will be, and if there is any proposed response if that threshold is met, with regards to bat and amphibian surveys.	A	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator or)	Regarding a): B. Satisfied for now but will need to see final EA  MNR understands that a commitment will be made in the EA for the owner/operator to work with MNR on invasive species monitoring plans.  Regarding b): C. Not satisfied – would like to discuss comment/response with proponent  Detailing the proposed methodologies and thresholds for significance is necessary to understand the efficacy of the effectiveness monitoring and whether MNR supports the mitigation as reasonable. MNR suggests that the intention be described within the EA or addendum (1 or 2).

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196.	8-71/ES 8.8.3  This comment may apply to other sections. Please review the Draft EA and update similar instances.	<p>a) This section states: “a Vegetation Management Plan, Wildlife Management Plan (WMP) and Site Restoration and Monitoring Plan will be developed as part of the CEMP and implemented during the construction phase.” These plans need to be completed for review and consideration to inform whether the proposed mitigation sufficiently reduces potential impacts.</p> <p>b) This section contains a suggestion that “if clearing or construction activities are required to take place within Category 1 Caribou habitat during sensitive periods that aerial caribou sweeps will be conducted prior to ensure there are no caribou within activity buffer areas.” Sensitive timing windows should be avoided to reduce potential impacts. If activities are expected to occur during these periods, the EA should include a clear rationale, along with an estimate of how frequently and how much habitat may be affected. This information is important to support the overall impact assessment.</p> <p>c) Proposed Mitigation Measures During Construction states: “if potential maternity bat roosting habitat is identified and clearance activities are scheduled to take place within the maternity roosting season (May 1 to August 31) exit surveys or acoustic monitoring may be required. Requirements will be determined in consultation with the Ministry of Environment, Conservation and Parks.” However, section ES 8.7.3.3 (Wildlife - Bats) commits that “vegetation clearing in suitable roosting habitat will be conducted outside of the maternity roosting period, which occurs between May 1 and August 31.” It is unlikely that maternity roosting habitat between SAR and non-SAR bats can be differentiated.</p>	<p>In the Final EA, please:</p> <p>a) Complete and include the referenced Management Plans. MNR would be happy to provide feedback to support their development and finalization, to help ensure that proposed mitigative measures are acceptable and appropriate.</p> <p>b) Provide an estimate of how often avoidance of sensitive timing windows may not be achieved, and with regards to what activities. Please also include details on how the “aerial caribou sweeps” are to be conducted and the proposed response if caribou are found within the activity buffer area.</p> <p>c) Confirm and clarify if the sensitive timing window for bats will be avoided.</p>	A	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p>	<p>Regarding a) and b):</p> <p>B. Satisfied for now but will need to see final EA.</p> <p>MNR understands that a commitment will be made in the EA for the owner/operator to work with MNR on these items, and that detailed methodology will be developed by owner/operator</p> <p>Regarding c): MNR understands that this will be addressed in the EA. Comment from proponent “For consistency all potential bat maternity habitat will be assumed as SAR bat habitat and section 8.7.3 will be revised to match 8.8.3”.</p> <p>B. Satisfied with response.</p>
197.	8-72//ES 8.8.3	This section states: “qualified project personnel will identify sensitive habitats that are important to SAR prior to and during construction (e.g., critical habitat, areas of high use). Should any be found, they will be assessed by a qualified biologist or resource specialist and an appropriate course of action will be	Please consider how assessments (sensitive habitats for SAR) should be conducted to inform assessment of impacts.	B	<p>3. Item will be addressed outside of the</p>	<p>C. Not satisfied – would like to discuss comment/response with proponent. The intention of these surveys – e.g., which species (e.g.,</p>

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	This comment may apply to other sections. Please review the Draft EA and update similar instances.	determined, in consultation with regulatory agencies (e.g., MECP, CWS-ECCC) as required." This work should be done prior to construction (as opposed to during construction) in order to develop appropriate mitigation measures which will inform the overall assessment of the Project.  As a reminder, the conservation, impact assessment, and mitigation for species designated as Special Concern remain within MNR's mandate.	Please ensure to include MNR in any discussions relating to special concern species or their habitats.		EAR/IS review process (i.e., taken on by the ultimate owner/operator)	all SAR or only threatened and endangered), timing and locations (e.g., species/habitat appropriate survey timing windows across the proposed road corridor or only in areas days before construction is to occur), should be clarified and scoped in the EA. The survey plans themselves can be developed at a later time by the operator, their QP, and regulatory agencies. MNR also would like to maintain the request for a commitment to include a reference to MNR for all special concern or their habitats.
198.	8-71/ES 8.8.1  This comment may apply to other sections. Please review the Draft EA and update	Bald Eagle is considered a Valued Component (VC) for SAR; however, Bald Eagle was removed from the Species at Risk in Ontario List as of January 31, 2024.	MNR recommends removing Bald Eagle from the SAR section and placing within a more appropriate section (e.g. the birds or wildlife section)..	B	4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)	

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	similar instances.					
199.	8-76/ES 8.8.6  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Within the Follow-up and Monitoring section, there is a reference to the wolverine denning period being February to May 1; however, the wolverine reproductive (denning) period in Ontario is January 15 <sup>th</sup> to May 31 <sup>st</sup> . Furthermore, a 2km radius is proposed for surveying for potential denning females. A 2km radius is likely not sufficient to mitigate potential disturbance and abandonment of kits from activities occurring within the denning period – 4km is typically the minimum standard.	Please correct the wolverine denning timing window and reconsider the survey coverage or provide references supporting the proposed 2km radius, in the Final EA.	A	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA
200.	Appendix E (5.14, page 38)  This comment may apply to other sections. Please review the Draft EA and update	Mitigation measure #10 states that "Trees containing large nests of sticks...shall be identified and left undisturbed". Stick nests of all sizes should be identified and left undisturbed until a species and occupation status can be confirmed, and appropriate mitigation applied (dependent on season/activity). If removal or destruction of a nest is required, additional authorizations may be required by provincial or federal agencies.	Please expand this mitigation to consider all sizes of stick nests.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
	similar instances.					
201.	Appendix E (5.1, page 23)  This comment may apply to other sections. Please review the Draft EA and update similar instances.	<p>a) Mitigation measure # 2 states: "clearing and grubbing shall only be undertaken between September 1 of any year and April 14 of the following year....If vegetation clearing is required between April 15 and August 31, an avian biologist will be retained to conduct a survey for nesting activities/behaviours to manage risks to active nests protected by the <i>Migratory Bird Convention Act</i>". Note, this does not provide impact mitigation to birds and their habitats that are protected under provincial legislation and policies, nor bats during the maternal roosting period. It also does not consider authorizations that may be required to conduct work during this period.</p> <p>b) Mitigation measure # 11 states that "Vegetation will be largely removed by mechanical means, except within 10m of a waterbody. In these areas, vegetation will be removed manually...." To mitigate potential impacts to water quality, fish habitat, soil quality, erosion, and vegetative communities, and for consistency with best management practices, machine travel should be restricted within 15m from the normal high-water mark. All riparian vegetation (i.e., the trees, shrubs and other vegetation that border watercourses that link water to land) should be removed by hand; in some areas this type of vegetation may exceed 15m from the waterbody itself. Additional consideration is required for steep slopes, large rivers, or waterbodies containing sensitive fish species.</p>	<p>In the Final EA, please:</p> <p>a) Consider and describe how impacts to birds not protected by the <i>Migratory Birds Convention Act, 1994</i>, and bats, shall be mitigated if vegetation clearing is required within sensitive timing windows, as well as any authorizations that may need to be requested to conduct work within this period.</p> <p>b) Reconsider the effectiveness of mitigation measure # 11 as described and modify the approach appropriately.</p>	A	<p>A) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>B) 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week</p>	<p>Regarding a): C. Not satisfied with response – would like to discuss with proponent</p> <p>The current language within the EA leaves out an integral commitment to mitigation to birds not protected under the <i>Migratory Bird Convention Act</i> as well as bats through the maternity roosting period. Clarification on intention of mitigation of impacts to these species should be addressed in the final EA or addendum (1 or 2).</p> <p>Regarding b), MNR understands that the Project Team will be revising the response to a 2 (item will be addressed through addenda to Final EAR/IS) – although not reflected in the column. With this understanding of an addendum, MNR's response is a B. Satisfied for now but will need to see final EA (addendum).</p>

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
					review period	The current direction in the EA relating to setbacks for machine travel around waterbodies does not meet the provincially-supported guidelines. MNR requested these be amended within the EA or addendum (1 or 2).
202.	13- 22/13.1.2.2. 1	The text reads: "there are two (2) distinct populations of Caribou in Ontario: the Boreal population (Threatened under the ESA), and Eastern Migratory population (Special Concern under the ESA)." While not incorrect, it may be clearer to differentiate each population's protection under the ESA and the corresponding agency responsible for conservation management.	In the Final EA, please consider clarification along the lines of: "There are two (2) distinct populations of Caribou in Ontario: the Boreal population (listed as Threatened on the Species at Risk in Ontario List), and Eastern Migratory population (listed as Special Concern on the Species at Risk in Ontario list). The former receives species and habitat protection under the ESA (administered by MECP), whereas the latter do not receive protection under the ESA and responsibility for species conservation and management resides with MNR".	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
203.	Appendix F (Sections 11.1, 11.2, pages 582-599);	The Regional Study Area (RSA) for caribou (Boreal and Eastern Migratory populations) is limited to the Missisa and Ozhiski ranges for Boreal Caribou only. Given that 26/29 of the caribou collared within the Local Study Area (LSA) are likely to belong to the Eastern Migratory population (as suggested in Section 11.2.3.3.1 and 13.2.3.1.3), the RSA is likely undersized for informing indirect	Please consider adding migratory Caribou as a VC, and creating a new RSA for the migratory caribou, to reflect the most appropriate scope for which impacts should be considered.	A	4. Item will not be addressed as they are considered out of the	As discussed in the December 19th meeting with the WSR Project Team, the scope of impacts to Eastern Migratory (EM) caribou

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		
	General – Wildlife	and cumulative effects of the Project to caribou, since members of the Eastern Migratory population conduct important life processes (e.g., migration, calving) in sensitive habitats outside of these Ranges. Furthermore, the analyses of habitat for caribou are generally based on guidance from the General Habitat Description for Boreal Caribou. While some guidance within this document may be appropriate to apply to the Eastern Migratory population, it is not likely to represent all habitat needs and sensitivities. For example, the 2017 COSSARO Evaluation Report proclaims that “Migratory Caribou show significantly greater site fidelity to overwintering habitat than do Boreal Caribou (Amec Foster Wheeler Environment & Infrastructure 2016)”. The use of Boreal caribou as a Valued Component may need to be reconsidered, with Eastern Migratory caribou as an addition.	This will help ensure that the assessment accurately captures the potential effects on both caribou ecotypes and their habitat needs.		scope of the approved EA Terms of Reference (ToR) VC was defined in TISG, no change is proposed. VC can be broadened to include all Caribou ecotypes; however, expanding RSA to account for Eastern Migratory Caribou is beyond the agreed extend of the assessment of this species.	were not well understood at the time of the ToR. As a result, the new information obtained through baseline data collection (e.g., collaring) should help inform whether the current VC selection remains appropriate.  Without incorporating this information, there is a risk that the assessment may not accurately reflect potential impacts to caribou.  The response notes that this “item will be addressed,” but it is not clear how this will occur given the stated limitation that a new VC cannot be added. Expanding the existing caribou VC to include both boreal and EM caribou may functionally result in an EMC-based VC, which could limit the ability to distinguish considerations for Boreal caribou despite their separate legislative protections as a threatened species.  Based on the limited detail

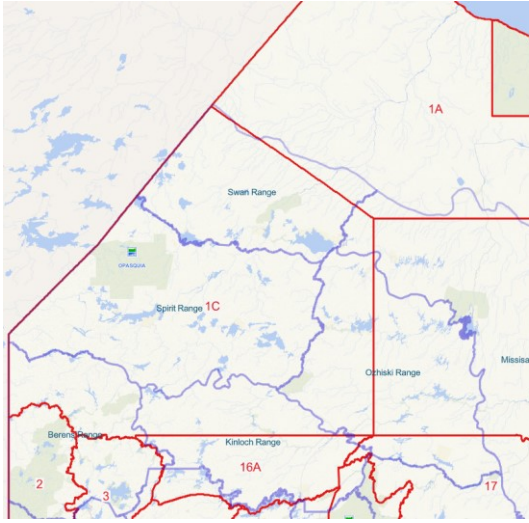
Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
						provided in the Draft and in the response, MNR does not have a clear understanding of the overall approach to assessing impacts on caribou or how mitigation will be addressed.
204.	General – Wildlife	It is unclear if mitigating some of the Project's potential impacts by providing wildlife habitat opportunities through the decommissioning of ancillary infrastructure and/or roads has been considered. Examples include: repurposing cleared trees to create mustelid denning habitat, gathering rocks for snake hibernacula, or creating suitable nesting substrate for turtles in areas away from the travelled portion of the right-of-way.	In the Final EA, please provide feedback on how wildlife habitat opportunities through the decommissioning of ancillary infrastructure may or may not have been considered, and what the feasibility and/or efficacy may be with respect to the Project.	A	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A- Satisfied with approach;  MNR would prefer that a commitment is included in the EA for the owner/operator to work with MNR on this item.
205.	General – Wildlife	The Draft EA states that the analysis of the collaring data has been paused and will be finalized for the EAR/IS report. In the interest of client services, MNR would appreciate the opportunity to discuss and provide feedback on the final approach at the Project Team's earliest convenience. MNR is supportive of sharing of data from government resources, through the appropriate means (e.g. data sharing agreements).	For the Final EA, please ensure that all current data sources for caribou are being used/analyzed.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		
					review period	
206.	General – Wildlife	<p>The EA process may benefit from additional moose data associated with other Far North surveys or Moose Aerial Inventories.</p> <p>For example, point data for moose (as well as wolf) from the winter distribution surveys in <i>Berglund et al. 2014. Woodland caribou (Rangifer tarandus caribou) in the Far North of Ontario: Background information in support of land use planning., Ont. Min. Nat. Resour., Biodiversity and Monitoring Section Tech. Rpt. TR-147, Thunder Bay, Ontario. 160 pp.</i> would likely be one source of readily available data.</p>	Please consider connecting with MNR to obtain and use additional moose data to support the Final EA.	B	<p>4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)</p> <p>Additional moose data will not be considered at this stage in the EA/IA process.</p>	
207.	General Comment – Baseline Characteriz ation Applicable to Vegetation and Wildlife	<p>Project is located within the transition zone between ecoregions and ecozones, straddling Ecodistricts 2W-3, 2W-2 and 2E-1.</p> <p>The transition zone between ecoregion 2W and ecoregion 2E in Ontario is important for biodiversity because it serves as a convergence zone for species and ecosystems. These zones often exhibit higher biodiversity than adjacent regions, especially when they include a variety of microhabitats.</p> <p>A dynamic environment is created in these areas by having these different ecosystems and ecological processes come together. These “hotspots” for biodiversity can support critical species adaptation to climate change. These areas can also be sensitive to human disturbance.</p>	In the Final EA, please discuss the biodiversity and environmental significance of this transition zone to the Far North of Ontario. Please discuss whether this transition zone between Ecoregion 2W and 2E has particular importance for species in the area and any previous examples of its sensitivity or tolerance to human activities. References are encouraged.	A	<p>1. Item will be addressed in the Final EAR/IS submission. Additional text has been added to Section 11.2.2.1 of the EAR/IS and 9.3.1.1</p>	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
					of the Baseline Characterizat ion report.	
208.	General Comment – Baseline Characteriz ation Applicable to Wildlife, Vegetation and Birds	<p>Significant wildlife habitat (SWH) for wildlife can include a broad range of habitat, including seasonal concentration areas, rare vegetation communities, specialized habitat for wildlife, habitat for species of conservation concern (not including endangered or threatened species) and animal movement corridors between key significant wildlife habitat features.</p> <p>Of the details provided for SWH, there was discussion of the different types considered and if initial baseline field work identified any features during the 2019/2020 field season. However, while likelihood of encountering SWH was considered for some features, identification of candidate habitat features was not necessarily completed for all SWH types.</p>	<p>As a baseline, MNR requests candidate features be identified or modeled at a minimum for all SWH types for the entire project area at the time of the EA/IS, to ensure all SWH feature types are being comprehensively considered (e.g. eastern migratory caribou).</p> <p>Documentation should incorporate details on how candidate SWH features were identified and outline which features are being considered, how they will be reviewed and more detailed discussion of mitigation or avoidance strategies intended to be applied during preconstruction.</p>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B) Satisfied for now but will need to see final EA
209.	General – Wildlife	<p>In general, mitigation measures related to wildlife are unclear and have limited detail. Comments such as #187 through to #192 above provide examples of where details of mitigation measures are lacking within the wildlife sections.</p>	<p>Please provide detailed information in the Final EA so that the effectiveness of proposed mitigation measures (for wildlife, fisheries and natural heritage – including significant wildlife habitat) can be evaluated and incorporated into the assessment of impacts, and determination of net effects.</p>	A	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by	<p>C. Not satisfied – would like to discuss comment/response with proponent</p> <p>This could be interpreted as a generalized statement - more detail has been provided within individual comments. To be</p>

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					the ultimate owner/operat or)	consistent with the responses for those comments, MNR recommends that these should be broadly included in EA or addendum (1 or 2).
210.	17-44, 17-84, & 17-98/Section 17  This comment may apply to other sections. Please review the Draft EA and update similar instances.	For <i>Diet, including consumption of traditional foods</i> under the operational phase, there is a statement that “Hopefully, Provincial regulations will ensure stable populations of wild game for Webequie First Nation community members wanting to practice traditional food gathering techniques. An expected neutral effect to wellness is anticipated if regulations are adhered to.”  This is not an appropriate assumption as provincial hunting regulations only apply to the harvest of game species and do not apply to subsistence-based or traditional harvest. Furthermore, federal legislation (not provincial) regulates harvest of migratory birds (waterfowl, geese). In addition, hunting regulations are based on a Wildlife Management Unit level, not a local level; therefore, the scope is not the same and there could be impacts within the LSA/RSA that are not addressed through provincial hunting regulations.	Please remove or revise this reference for accuracy and reconsider how regulatory requirements may or may not contribute to mitigation of impacts to harvest of game species, in the final EA.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
211.	Appendix F; Section 10.1, 10.1.3.1.3.1 ; Section 12, 12.3.3	a) The document does not reference the Wildlife Management Unit (WMU) in which the project is located, nor does it provide details on the Unit's estimated population status, trends, harvest allocations, success rates, or past survey efforts for large game	In the Final EA: a) Please include information on the provincial WMU <b>1D</b> , Cervid Ecological Zone <b>A</b> (where appropriate) and current population/harvest conditions for large game species within this WMU.	A	A) 1. Item will be addressed in the Final EAR/IS submission b) 4. Item will not be addressed as	Regarding a): B. Satisfied for now but will need to see final EA  Regarding b): C. Not satisfied – would like to discuss comment/response with

Comm ent #	Page/ Section #	GRT Comments			Type of Comment:	Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale		Proposed Action/Solution			Categorize Proponent's response as follows:
		<p>species (e.g., moose). These metrics are essential for establishing a comprehensive baseline of species condition and for assessing potential impacts, particularly those related to increased harvest pressure.</p> <p>For cervid species, the relevant Cervid Ecological Zone should be identified, and the management objectives within that Zone should be described to provide appropriate ecological and policy context.</p> <p>b) The RSA selected for moose (and wolves) is the boundary of the Ozhiski and Missisa caribou ranges, which is not the most appropriate choice despite their interactions with caribou. Limiting the RSA to these ranges means excluding a large portion of the Wildlife Management Unit that the project falls within (1D) – the scale at which moose populations are managed in the province. It also means expanding potential impacts into</p>	<p>b) Please reconsider the use of Boreal caribou ranges as the RSA for moose and wolves to reflect the most appropriate scope at which impacts should be considered, and how those should be determined according to the habitat needs of the populations present.</p> <p>Describe existing knowledge gaps for the moose population and consider whether additional information is required to provide a rationalized impacts assessment, given that the net effect on moose was suggested to be negligible. Please also include details on monitoring of the impacts to local populations.</p>		<p>A. Required for EA (per ministry mandate/policy /legislation)  B. Recommended for EA  C. Editorial  D. Permitting Related, Not Required for EA</p>	<p>considered out of the scope of the approved EA Terms of Reference (ToR)  c) 4. Item will not be addressed as considered out of the scope of the approved EA Terms of Reference (ToR)</p> <p>We have assessed with reference to Caribou ranges, as required in the TISG and ToR.</p>	<p>proponent</p> <p>It is unclear why this item is out of scope of the ToR. We cannot find limits of the RSA for moose/wolves (e.g., "with reference to caribou ranges") described in detail within the ToR. As per the ToR: <i>"The EA will further define the LSA and RSA boundaries for each environmental factor/criterion (e.g., surface water, fish, wildlife, air, socio-economic, etc.) depending on the nature of likely effects and the geographic extent and characteristics of each factor."</i> MNR recommends that the Wildlife Management Unit (WMU)—in this case, WMU 1D—be used as the RSA for moose and wolves. This scale aligns with current provincial management guidelines and data collection methods, and is the level at which measurable population effects can reasonably be detected. Using WMU 1D ensures consistency with established management practices and provides a more appropriate basis for assessing potential impacts</p>

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<p>portions of neighbouring WMUs (see below), which makes it very difficult to assess and compare through time. The rationale for the current selection (Boreal caribou ranges) relies on the fact that there is interactions with these species and caribou; however, considering the prevalence of Eastern Migratory caribou in the LSA and potential for reconsideration of the caribou VC (see comment X), this is likely not valid.</p>  <p>c) Further to above, the condition of the moose population within the</p>		<p><b>A. Required for EA (per ministry mandate/policy /legislation)</b>  <b>B. Recommended for EA</b>  <b>C. Editorial</b>  <b>D. Permitting Related, Not Required for EA</b></p>		<p>over time. Where the RSA is not changed to encompass WMU1D, MNR would expect caveats in the EA or Addendum surrounding the assessment of impacts, given that population-level impacts cannot be assessed.</p> <p>Regarding c): C. Not satisfied – would like to discuss comment/response with proponent</p> <p>It is unclear why this is out of scope of the ToR. The EA should be transparent and comprehensive in their assessment of impacts to moose. If no further assessments are to be undertaken, the limitations of the current assessment should be acknowledged.</p> <p><b>CORRECTION:</b> The last Moose Aerial Inventory (MAI) in WMU 1D was in 2008, not 1983.</p>

Comm ent #	Page/ Section #	GRT Comments			Type of Comment:	Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution				Categorize Proponent's response as follows:
		LSA and RSA was not effectively assessed. Given that the last inventory for WMU 1D was completed in 1983, and the Project's aerial surveys were not conducted using a standardized moose-specific methodology, there are likely gaps in knowledge that should be acknowledged and determined whether there should be greater efforts to assess potential impacts. Multiple references are made throughout numerous sections (e.g., Section 17, page 17-29) describing concerns from community members that the moose population is declining. It is unclear how the Project Team intends to monitor impacts on the moose population itself, beyond assessing changes to habitat only.					
212.	Section 22; 22-8 to 22-12; Wildlife and Wildlife Habitat; SAR	Several sections suggest consultation with agencies to develop monitoring methods. The reference to the appropriate agency is not always correct. For instance: <ul style="list-style-type: none"> <li>• Moose-related survey programs (e.g., collaring) should be developed in consultation with MNR, not solely with MECP, as currently stated.</li> <li>• Species at Risk (SAR) such as bats and wolverine fall under MNR's mandate, either exclusively or jointly with MECP:</li> </ul>	To ensure accuracy and appropriate oversight, the Final EA should reflect MNR's role in these areas and with reference to future consultation.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by	B. Satisfied for now but will need to see final EA	

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
		<ul style="list-style-type: none"> <li>• <i>Big Brown Bat</i> is not provincially listed as Threatened or Endangered and therefore remains within MNR's jurisdiction.</li> <li>• <i>Wolverine</i> is a furbearer and thus also falls under MNR's mandate.</li> <li>• Significant Wildlife Habitat for waterfowl is another example where MNR should be consulted. The current reference only mentions Environment and Climate Change Canada, which is incomplete.</li> </ul>			<p>the end of the twenty-three-week review period 1)</p> <p>MECP was typically the driver for the assessment of VCs and MNR was usually included as a background reviewer, yet never in direct consultation with the Project team.</p>	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
213.	Appendix E; Section 5.23, page 49 to 50	This section describes the prevention of invasive species; however, does not describe the response to discovery or introduction of invasive species, or how these will be addressed (e.g., removed, burned).	Please provide details on how invasive species discovered or introduced through the Project will be addressed.	A	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate	<p>C. Not satisfied – would like to discuss comment/response with proponent</p> <p>Knowing the intention of the operator to respond to invasive species detections provides mitigative certainty and would be</p>

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
					owner/operat or)	valuable for reference during permitting, construction, and operation phases. If this item cannot be included in the EA or addendum (1 or 2), then MNR would like to see a commitment to made in the EA for the owner/operator to provide details on how invasive species discovered or introduced will be addressed and work with MNR on invasive species monitoring plans.
214.	Executive Summary, page 8-55; 10-71/ 10.4.2.2.2  This comment may apply to other sections. Please review the Draft EA and update similar instances.	Mitigation for effects to fish populations include "Employees or visitors on-site in temporary construction camps or at the permanent maintenance and storage facility will be prohibited from hunting, fishing, or harvesting wildlife".  Hunting and fishing are regulated activities under the Fish and Wildlife Conservation Act; the federal Fisheries Act also regulates fishing. These activities are typically permitted for licensed individuals.  It is unclear how this mitigation measure will be achieved, as well as potential impacts to traditional rights for Indigenous people.	In the Final EA, please clarify if the intention is to have company policies that restrict these activities for employees or visitors, as well as what consideration there will be for those who are Indigenous and exercising rights-based harvesting.	A	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)  Note. restrictions to these activities are noted in Sections 10 and 12 and	C. Not satisfied – would like to discuss comment/response with proponent MNR recommends that these company policy statements be removed unless the Project Team can include a firm commitment within the EA or its addendum (1 or 2). While surrounding Indigenous communities may expect access or harvest restrictions as a mitigation measure, the feasibility of implementing such restrictions is highly uncertain. Given that the proposed road will be public and rights-based harvesting will

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
					not captured in Executive.	<p>continue to apply, it would be misleading and potentially irresponsible to present these restrictions as a guaranteed mitigation measure.</p> <p>NOTE: The following reference is made in the executive summary, page 8-55 as referenced in the original comment. "Employees or visitors on-site in temporary construction camps or at the permanent maintenance and storage facility will be prohibited from hunting, fishing, or harvesting wildlife".</p>
215.	8-76/ES 8.8.6	<p>This section describes, with regards to caribou: "data from GPS collars will be used to inform construction activities. Construction activities will not commence until collar data indicated the collared caribou has left the activity buffer."</p> <p>a) This statement makes it appear as though caribou with GPS collars will be monitored in real time to ensure construction activities do not commence until collar data indicate the collared caribou has left the activity buffer. It is unclear if: a) there is a plan to collar additional caribou to support the construction phase; or b) the commencement of construction activities will be based on pre-existing caribou GPS collar movement data.</p> <p>b) It is unclear what is meant by "activity buffer".</p>	<p>Within the Final EA, please:</p> <p>a) Confirm whether caribou with GPS collars will be monitored in real time, or (if not) how the timing of construction will consider pre-existing movement pattern data.</p> <p>b) Explain and define the term "activity buffer".</p>	B	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
216.	10- 12/10.1.2/ Table 10-2	Row 4 on page 10-12, describes a concern that the “proposed study areas are inadequate for considering ecological (e.g., caribou, wolverine, lake sturgeon, migratory birds, freshwater fish biodiversity, eskers, peatlands) and social (e.g., eskers, transportation, cultural and sacred sites, traditional land use) impacts.” However, only the fish and fish habitat comments are addressed in the table.	In addition to fish and fish habitat, please indicate in Table 10-2, how the proposed study areas are adequate for considering the other ecological and social impacts, or note the corresponding sections of the EA where this is addressed.	A/C	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA
217.	13-24 to 13- 25/13.1.2.2. 1	With regards to Section 13.2.2.1, regarding caribou, there is a suggestion that peak calving for caribou occurs around June 1 and calving season is between May 7 and July 14. However, supporting references are not provided.	Within the Final EA, in this section, please provide reference(s).	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
218.	13-59 to 13- 62/13.2.1.1. 3	With regards to Section 13.2.1.1 (Caribou Collaring Study): a) There is a description that mortality events are identified when a collar signals no movement after a pre-programmed period; however, the period is not specified. b) Under “seasonal patterns of habitat use”, there is reference to a report on general habitat description (Category 2 critical habitat) based on a Resource Selection Function. However, it is not clear what report is being referred to. c) Under “RSF modelling”, there is a suggestion that the Generalized Boosted Regression Model package is widely used; however, no reference provided to support this claim. d) There appears to be a typo, as stated: “To understand the model, and how it was making <u>predictions for probability of sue</u> , variable influence and response diagrams were created”	Within the Final EA, please: a) Specify the pre-programmed period for mortality events. b) Specify which report is being referred to. c) Provide a reference describing the utility of the Generalized Boosted Regression Model package. d) Edit to ensure clarity.	B/D	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response
219.	13- 77/13.2.3.1. 3	The bottom of page 13-77, regarding the seasonal patterns of habitat use for caribou, indicates that “probability of use for all seasons are given in Figure	Please provide a “probability of use” figure for the summer season, within the Final EA.	A	2. Item will be addressed	A. Satisfied with response  The EA indicates “probability of

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		13.2, Figure 13.3, Figure 13.4 and Figure 13.5.” However, there does not appear to be a figure for the summer season.			through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	<p>use for all seasons” will be provided. However, a figure is missing for the summer season. MNR requests the missing figure be provided.</p> <p>Assessment of the summer season falls within the scope of study outlined within the ToR. Nursery areas, wintering areas, seasonal ranges and remaining ranges to be impacted are listed as indicators for caribou habitat consideration in the ToR.</p> <p>In addition, Caribou collaring data should be available for the summer season from both the project team efforts and MNR collaring efforts.</p>
220.	13-97/13.3.3.2	With regards to habitat alteration or degradation (caribou), it states that “Caribou seasonal use was modelled with a presence/absence RSF based collaring data with MNR data.” However, this statement is not clear as it is currently written.	Please review and edit the sentence for clarity.	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
221.	13- 100/13.3.3. 3	With regards to section 13.3.3.3 (under 'Alteration in Movement due to Loss of Connectivity'), the following statement is noted: "The road corridor itself will extend approximately 70 km east-west across the Missisa Range, effectively reducing the width of the range by approximately 45% near the middle of the range and potentially causing Caribou to move large distances east (into the Ozhiski Range) or west around the full extent of the road..." The intent of the statement is unclear. In particular, it is unclear why movement north or south of the corridor is not considered/described.	Within the Final EA, please review this statement and clarify the message being described.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
222.	13- 101/13.3.3. 4	This section contains a suggestion that "Caribou increase energy expenditures to move to and from roosting and foraging habitats." However, it is unclear what "roosting habitat" is referring to.	Please explain or correct the statement, regarding "roosting habitat" for caribou, within the Final EA.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
223.	13- 227/13.4.3. 1.1; 13- 233/13.4.3. 4.1 / Table 13-37	With regards to Section 13.4.3.1.1, with regards to how permanent caribou habitat loss will be minimized during the construction phase: a) Recommendation #7 notes that: "...vegetation clearing in the vicinity of potential aquatic feeding or calving areas occur outside species-specific timing windows. For example, vegetation in suitable aquatic feeding areas will be removed in winter when Caribou are less likely to be using areas." However, earlier on the same page, it's stated that aquatic feeding and calving areas were <i>not</i> identified during baseline studies due to the difficulty in locating such habitats. This appears contradictory; if these areas were not identified, it's unclear how timing restrictions for vegetation clearing can be meaningfully applied. b) Recommendation #9 indicates: "having qualified project personnel search for aquatic feeding areas, calving areas, and areas of high use for Caribou prior during construction." It is currently not clear, as written.	Within the Final EA, please: a) Reconcile these two statements, such as by using a more appropriate example for vegetation clearing in close proximity to aquatic feeding and calving areas, or deleting the mitigation measure. b) Correct the statement. Perhaps "during" should be replaced with "to". c) Please consider providing clarity, within Section 13.4.3.1.1 and in Table 13-37, specifying permits that may be expected for removal	B	a) and b)  1. Item will be addressed in the Final EAR/IS submission  c) 4. Item will not be addressed as considered out of the scope of the	Regarding a) and b): A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		c) Recommendation #11 describes: "it may be necessary to apply for and receive permits, authorizations or approvals from the appropriate regulatory agencies prior to the removal of Caribou habitat". A similar statement is noted in Table 13-37. MECP will be the appropriate agency with regards to authorizations related to impacts to caribou habitat. However, MNR has an interest in beneficial actions related to eastern migratory caribou and their habitat.	of caribou habitat. Please contact MECP about relevant authorizations for boreal caribou and engage MNR in discussions related to beneficial actions/mitigation measures related to eastern migratory caribou.		approved EA Terms of Reference (ToR)  Further details on permitting will not be provided.	
224.	13-228/13.4.3.2.1; 13-231/13.4.3.4.1	Section 13.4.3.2.1 suggests that: "The creation of early successional habitat may benefit Caribou as this will create areas of browse..." However, areas of browse will attract moose and increase predation risk, presenting a negative effect to caribou and impacting predator-prey dynamics.	Please describe the tradeoff regarding moose attractant and predation risk, either in sections 13.4.3.2.1, 13.4.3.4.1, and/or in Section 13.5 (Characterization of Net Effects).	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	<p>B. Satisfied for now but will need to see final EA</p> <p>The ToR discusses the advantage of limiting moose and wolf dispersal and limiting risk of predation and spread of disease in their assessment of alternatives.</p> <p>Caribou species protection also touches on indirect mortality concerns due to increases in alternate prey sources (moose and deer) leading to increase predation (wolves, bears, etc.) and increased potential for spread of disease (e.g., brainworm).</p> <p>If such rationale can be utilized</p>

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						<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
						<p>within the ToR as a comparison factor and as indicators, greater discussion of the tradeoffs between creation of early successional habitat as a benefit to Caribou and the potential tradeoff for attracting moose and predation risk needs to be discussed and included within the EA.</p>
225.	13-232/13.4.3.4.1; 13-236/13.4.3.4.1 / Table 13-37	<p>Section 13.4.3.4.1 indicates: “During the growing season, the ROW will be maintained in a manner that reduces forage attractive to Caribou or other ungulates”.</p> <p>a) This seems inconsistent with the previous statement (on page 13-228) regarding that “the creation of early successional habitat may benefit Caribou as this will create areas of browse...”</p> <p>b) It is unclear how the ROW will be maintained to reduce forage attractive to caribou or other ungulates (such as by mechanical removal or another method). A similar statement is also made in Table 13-37.</p>	<p>a) Please reconcile the inconsistency between Sections 13.4.3.2.1 and 13.4.3.4.1 regarding forage habitat for caribou. This can also be noted within similar statements in Table 13-37.</p> <p>b) Please explain how the ROW be maintained to reduce forage attractive to caribou or other ungulates, within Section 13.4.3.2.1 and/or Table 13-37.</p>	B	<p>a) 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p> <p>b) 3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate</p>	<p>Regarding a) and b):</p> <p>B. Satisfied for now but will need to see final EA</p>

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
					owner/operat or)	
226.	13-233 to 236/ /13.4.3.4.1/ Table 13-37	With regards to Table 13-37 (Summary of Potential Effects, Mitigation Measures, and Predicted Net Effects for Species At Risk Sub VC – Caribou), it states that: “Qualified Project personnel will look for aquatic feeding areas, calving areas and other areas of high use for Caribou during construction.” It would be better to do this prior to construction, rather than during construction.	Within the Final EA, with regards to Table 13-37, please modify to indicate that Qualified Project personnel will look for aquatic feeding areas, calving areas and other areas of high use for Caribou <i>prior</i> to construction.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
227.	13-322/13.5.2.1.2/ Table 13-49; 13-323/13.5.2.1.2/ Table 13-50; 13-324/13.5.2.1.2/ Table 13-51; 13-325/13.5.2.1.2/ Table 13-52	Tables 13-49, 13-50, 13-51 and 13-52 present statements suggesting that caribou exhibit low resilience and limited capacity to adapt to habitat and movement alterations caused by sensory disturbances, indicating a high level of sensitivity. However, these statements are not supported by cited references.	Within the final EA, please provide a reference to support these statements, either within the tables and/or in the text.	A	4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)	C. Not satisfied – would like to discuss comment/response with proponent  MNR recommends that references be provided to support the noted statements. If references are provided in other sections of the EA, these sections should be noted within the tables and/or applicable text.
228.	13-325 /13.5.2.1.2/ Table 13-	With regards to sensory disturbance for caribou: a) Table 13-52 (Criteria Results for Alteration in Caribou Movement from Sensory Disturbance – Operations) describes a suggestion that “Sensory	Within the Final EA, please indicate how sensory disturbance can be mitigated/reversed during the	A	2. Item will be addressed	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	52; 13-335/ 13.5.2.1.4/ Table 13- 64; 13- 502/13.6.1. 3; 21-141 /21.4.8.1.5/ Table 21-53  May be present in other sections.	<p>disturbances are reversible when noise, movement and light cease to be generated in the Project Footprint." A similar suggestion is noted in Table 13-64, regarding the net negative effects of alterations in movement due to sensory disturbance during the operations phase being reversible.</p> <p>b) Section 13.6.1.3 (Habitat Alteration or Degradation), describes that: "overall, alteration in movement due to sensory disturbances from the construction and operations phases is not deemed significant."</p> <p>c) In Table 21-35, there is a suggestion that cumulative effects of habitat alteration or degradation due to sensory disturbance during both the construction and operations phases are reversible.</p> <p>References/evidence to support these suggestions have not been provided in the EA. The suggestions may be true when the construction phase is complete, but sensory disturbance is not likely to be reversed/mitigated during the operations phase and the effects will therefore remain significant during the operations phase.</p> <p>As noted previously and on page 21-132 (21.4.8.1.2), "Overall, sensory disturbance effects to caribou habitat in Ontario are poorly understood (ECCC, 2024a) and the caribou disturbance analysis used in the integrated risk assessment for the Missisa and Ozhiski Ranges (MNRF, 2014d) may underestimate the effects of sensory disturbances on habitat (MNRF, 2014a)." Therefore, caution is needed when assessing the effects of sensory disturbance.</p>	<p>operations phase and/or provide evidence/references within Table 13-52, 13-64, Table 21-53 (and/or in the associated text), and Section 13.6.1.3.</p> <p>Describe the continued significance of the effects during the operations phase, as it's currently unclear how the effects during operations differ from the effects during construction, as well as how mitigation will result in a different significance outcome. If evidence of successful mitigation approaches cannot be described, it is recommended that the significance rating be revised.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>	<p>through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period</p>	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
229.	13-330/13.5.2.1.4	This section describes a claim that "mitigation involving reclamation/blockage of any temporarily disturbed areas and access roads after construction will minimize the effect..." of wolf predation. However, references to support the claim are not provided.	Please provide reference(s) to substantiate this claim in Section 13.5.2.1.4, within the Final EA.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
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				<b>A. Required for EA (per ministry mandate/policy /legislation)</b> <b>B. Recommended for EA</b> <b>C. Editorial</b> <b>D. Permitting Related, Not Required for EA</b>		<b>A. Satisfied with response</b> <b>B. Satisfied for now but will need to see final EA</b> <b>C. Not satisfied – would like to discuss comment/ response with proponent</b>
230.	13-331 /13.5.2.1.4/ Table 13-59; 13-332 /13.5.2.1.4/ Table 13-60	Tables 13-59 and 13-60 provide a suggestion that “improved predator access is reversible with revegetation efforts in the ROW.” However, references to support the claim are not provided.	As above, please provide reference(s) to substantiate the claim (that improved predator access is reversible via revegetation), within Tables 13-59 and 13-60 and/or in the text, within the Final EA.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
231.	13-334/ /13.5.2.1.4/ Table 13-63; 13-335 /13.5.2.1.4/ Table 13-64; 13-503/13.6.1.4; 21-141/ 21.4.8.1.5/ Table 21-53	<p>With regards to predator-prey dynamics:</p> <p>a) Tables 13-63 and 13-64 provide a suggestion that net negative effects of predator-prey dynamics during the construction phase are reversible. However, references to support the claim are not provided.</p> <p>b) Section 13.6.1.4 indicates that “overall, caribou injury or death due to changes to predator-prey dynamics from the construction phase is considered significant.” However, the effects will continue to be significant during the operations phase, unless access by predators can be mitigated.</p> <p>c) Table 21-53 provides a suggestion that the cumulative effects of changes to predator-prey dynamics during the construction phase are reversible. However, the changes to predator-prey dynamics during the operations phase is not described. The changes to predator-prey dynamics during the operations phase are not reversible, due to predator access.</p>	<p>Within the Final EA, please:</p> <p>a) Provide reference(s) to substantiate this claim (regarding negative effects of predator-prey dynamics during construction being reversible), within Tables 13-63 and 13-64 and/or in the text.</p> <p>b) Provide evidence that access by predators can be reversed/mitigated during the operations phase, including reference(s), and describe the continued significance of the effects during the operations phase, as it's currently unclear how the effects during operations differ from the effects during construction, as well as how mitigation will result in a different significance outcome. If evidence of successful mitigation</p>	A/B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
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			approaches cannot be described, it is recommended that the significance rating be revised. c) Add a row to Table 21-53 indicating the cumulative effects of changes to predator-prey dynamics during the operations phase, including that they are irreversible.			
232.	13-504-506/Table 13-242/13.6.1.4	a) Based on several of the comments provided, the scores in Table 13-242 (Key Criteria and Scores for Determining the Significance of the Predicted Net Adverse Effects on Caribou) may need to be adjusted. b) There are 6 values in the Context column scored as 3 based on an assessment of predicted effects as "High". According to Table 13-241, predicted effects assessed as High should have received a score of 4. In 3 of the 6 cases, the correction will increase the total score to 16 (High), indicating a significant net effect on caribou.	a) Within the Final EA, please adjust the scores in Table 13-242, following response to the previous comments provided, regarding the predicted effects to caribou. b) The scores should be reviewed for accuracy and the overall significance of these net effects on caribou needs to be discussed (and possibly corrected) in the text of the relevant sections.	A/B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
233.	21-135/21.4.8.1.2/ Table 21-52	With regards to Table 21-52 (Summary of RFDs and Activities that Contribute to Cumulative Effects on Woodland Caribou), it would be useful to provide totals for Potential Habitat Loss (ha) and Relative Change in the RSA (%) from all Projects or Activities at the bottom of this table, prior to concluding that "...it is anticipated that the cumulative environmental effects will not severely impact caribou and caribou habitat in the RSA" as stated on page 21-240.	Provide totals for Potential Habitat Loss (ha) and Relative Change in the RSA (%) from all Projects or Activity at the bottom of Table 21-52..	B	2. Item will be addressed through addenda to Final EAR/IS	A. Satisfied with response

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					submission that will be completed by the end of the twenty- three-week review period	
234.	21- 140/21.4.8. 1.4	This section describes that “changes resulting from habitat loss and alteration or degradation will be irreversible, while alterations in movement will be reversible.” However, as noted in the comments provided, alterations in movement are likely to be irreversible in the operations phase.	Please provide justification for the claim that alterations in movement will be reversible, including reference(s), within the Final EA.	B	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty- three-week review period	B. Satisfied for now but will need to see final EA
235.	22-8 to 22- 9/ 22.7/ Table 22-1	Table 22-1 indicates: “Remote Camera Monitoring will take place along the Webequie Supply Road (WSR) right-of-way (ROW) and at reference sites to monitor the occurrence and distribution of wildlife.” It may be beneficial to also consider acoustic monitoring, in addition to remote camera monitoring.	For the Final EA, please consider the use of acoustic monitoring for wildlife, to supplement remote camera monitoring.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
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236.	8-67/ES 8.7.4  This comment may apply to other sections not identified here. Please review the Draft EA and update similar instances.	This section provides a suggestion that the effects of the project on moose are considered low and are not significant. This statement is not substantiated in this section. It is likely that during operations, effects may increase in magnitude due to predator access and increased hunting.	There is uncertainty with how predator access and increased hunting are to be mitigated to reduce the significance of impacts to moose.  In the Final EA, please justify the conclusion that the effects of the project on moose will be low and not significant throughout the life of the project.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA
237.	12- 55/12.2.2.1. 8; 12- 88/12.3.3.2; 12-205 /12.3.12.5/ Table 12-40	Within Section 12.2.2.1.8 (Significant Wildlife Habitat), With regards to “background information review” for Moose late winter cover habitat data, it states that “neither the LSA nor RSA for moose occurs within a provincial Management Unit, thus existing late winter habitat data for moose was not available from the MNR.”	In the Final EA, please clarify what is meant by “Management Unit” (i.e. Forest Management Unit versus Wildlife Management Unit) as the LSA and RSA occur within one or more Wildlife Management Units.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
238.	12- 55/12.2.2.1. 8; 12- 88/12.3.3.2; 12-205 /12.3.12.5/	With regards to identifying moose aquatic feeding areas: a) Within Section 12.2.2.1.8 (Significant Wildlife Habitat), attempts to identify moose late winter cover and calving areas are described. However, moose aquatic feeding areas are not described. Section 12.4.3.1.1 states that “Aquatic feeding and calving areas were not identified during baseline studies because of the complexity in finding such features”. Although calving	In the Final EA, please: a) Provide information about moose aquatic feeding areas. Moose aquatic feeding areas should be identified within the moose LSA (11 km), including a 120m of	A	a and b 4. Item will not be addressed as they are considered out of the	C. Not satisfied – would like to discuss comment/response with proponent  Moose Aquatic Feeding Areas (MAFAs) are considered

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	Table 12-40; 12-242/12.4.3.1.1; 12-243/12.4.3.1.1; 12-322/12.7.1.1	<p>areas can be difficult to identify, identification of candidate moose aquatic feeding areas is fairly straightforward and needs to be completed for the EA, in order to appropriately consider and identify the potential effects to moose habitat and to assist with mitigation.</p> <p>Throughout Section 12, potential changes and degradation to moose aquatic habitat are identified, such as in relation to accidental spills (Section 12.3.3.2), infilling riparian areas (Table 12-40), and changes in surface and/or groundwater (Section 12.4.3.1.1). However, the habitat has not been identified in the EA.</p> <p>b) Section 12.7.1.1 indicates “235.76 ha of high use moose habitat” will be lost “from the Moose LSA due to construction activities.” However, moose aquatic feeding areas have not been determined and accounted for in the calculation of “high use moose habitat.”</p>	<p>adjacent stands of mixed or conifer forest around high potential (Class 3) and very high potential (Class 4) moose aquatic feeding areas (see OMNR. 1998. Selected Wildlife and Habitat Features: Inventory Manual. Toronto: Queen’s Printer for Ontario). Feeding classes that are ranked as high and very high are considered candidate significant wildlife habitat areas.</p> <p>b) Identify moose aquatic feeding areas within the moose LSA (11 km), determine their area, and add it to the total area that will be lost due to construction activities (as stated in Section 12.7.1.1). If possible, these habitats should be avoided during construction.</p>		scope of the approved EA Terms of Reference (ToR).	<p>Significant Wildlife Habitat and to not have them identified leaves a gap in the project’s mitigation. Candidate MAFA’s can be identified through a desktop exercise, and field inspection would confirm if it is a MAFA; however, where field confirmation is unachievable the candidates should receive the same protections as confirmed SWH features.</p> <p>See MNR Comment # 59 on the Terms of reference. MNR requested that Significant Wildlife Habitat be considered and assessed as part of the EA.</p>
239.	12-90 to 12-91/12.3.3.4	<p>Regarding Section 12.3.3.4 (Injury or Death):</p> <p>a) With regards to changes to predator-prey dynamics during construction, the EA states that: “black bears will often prey on moose calves.” However, references to support the claim are not provided.</p> <p>b) Berger (2007) is cited to substantiate the claim that “the road may act as refuge for moose from predation as predators often avoid areas of high human activity (Berger, 2007)” , but Berger (2007) is not cited in the associated references.</p> <p>c) Also, with regards to Berger (2007) (as mentioned above), this study was conducted in Yellowstone National Park, where moose had their calves</p>	<p>Within the Final EA, please:</p> <p>a) Provide reference(s) that are relevant to northern Ontario, regarding black bears preying on moose calves.</p> <p>b) Provide citation for Berger (2007) in the reference section.</p> <p>c) Provide alternate reference(s) that demonstrates moose using roads</p>	B	a to c 2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
		closer to roads in order to avoid brown bears that are “traffic-averse”. It is not clear that this would apply in northern Ontario.	as a refuge from predators, or delete the sentence.		the end of the twenty-three-week review period	
240.	12-92/12.3.3.5	This section provides a statement that “moose can have large home ranges in northwestern Ontario 6-90 km2 in size” without a reference.	Please provide reference(s) to support the statement regarding the large home ranges of moose.	B	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
241.	12-93/12.3.3.5/ Table 12-12	Table 12-12 (Summary of Threat Assessment for Potential Effects on Moose) indicates that the effects of changes to predator-prey dynamics and increased access will be low. The following references seem to suggest otherwise: <ul style="list-style-type: none"> <li>- Loosen, A. E., Herfindal, I., Solberg, E. J., &amp; Heim, M. (2021). Roads, forestry, and wolves interact to drive moose browsing behavior. <i>Ecosphere</i>, 12(6), e03358. <a href="https://doi.org/10.1002/ecs2.3358">https://doi.org/10.1002/ecs2.3358</a></li> <li>- Memorial University of Newfoundland. (n.d.). Power line corridors and how they affect wolf-moose interactions. Retrieved from <a href="https://www.mun.ca/biology/news-articles/power-line-corridors-and-how-they-affect-wolf-moose-interactions.php">https://www.mun.ca/biology/news-articles/power-line-corridors-and-how-they-affect-wolf-moose-interactions.php</a></li> <li>- Wattles, D. W., DeStefano, S., &amp; McGarigal, K. (2018). Moose response to a high-density road network. <i>Journal of Wildlife Management</i>, 82(6), 1125–1136. <a href="https://doi.org/10.1002/jwmq.21456">https://doi.org/10.1002/jwmq.21456</a></li> <li>- Boucher, D., Serrouya, R., Mumma, M. A., &amp; McLoughlin, P. D. (2022). Cumulative effects of landscape change on predator–prey dynamics. <i>Scientific Reports</i>, 12, 10123. <a href="https://doi.org/10.1038/s41598-022-15001-3">https://doi.org/10.1038/s41598-022-15001-3</a></li> <li>- Zimmermann, B., Nelson, L., Wabakken, P., Sand, H., &amp; Liberg, O. (2014). Behavioral responses of wolves to roads: Scale-dependent ambivalence. <i>Behavioral Ecology</i>, 25(6), 1353–1364. <a href="https://doi.org/10.1093/beheco/aru134">https://doi.org/10.1093/beheco/aru134</a></li> </ul>	Please reassess the threats to moose from predators and increased access in light of the provided references and any others that may be applicable, for the Final EA.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
		Considering the above, moose numbers within the moose LSA (11 km) are likely to decrease substantially within 10 years of operations and the effects have the potential to be “moderate” to “high”.				
242.	12- 109/12.3.5. 2	This section indicates: “sensory disturbances resulting from road construction, including...may degrade habitat for <i>moose</i> adjacent to the Project Footprint.” However, this section is about beaver, not moose.	Please review page 12-109 and whether “moose” in the quoted sentence should be changed to “beaver.”	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
243.	12-206 /12.3.12.5/ Table 12-40	In the section on “Habitat Loss for American Marten, Effect Indicators”, changes to moose habitat availability are referenced. It appears that this should be changed to refer to marten habitat.	Please review page 12-206 and whether “moose” in the noted section should be changed to “marten.”	C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
244.	12- 242/12.4.3. 1.1	With regards to the loss of moose habitat during construction, Section 12.4.3.1.1 describes specifics related to clearing vegetation in/adjacent to moose aquatic feeding and calving areas. However, vegetation adjacent to aquatic feeding and calving areas should not be removed and require a 120m buffer, and vegetation in the aquatic feeding areas should not be removed (see OMNR. 1998. Selected Wildlife and Habitat Features: Inventory Manual. Toronto: Queen’s Printer for Ontario).	The Final EA should reflect not removing vegetation within or adjacent to aquatic feeding and calving areas as per the referenced manual.	A	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
245.	12- 326/12.7.1. 2; 12-327/ 12.7.1.2/ Table 12-53  And 12-327 /12.7.1.3	The following sections may require additional context or be misleading about the length of time an effect will be present.  With regards to sensory disturbance during operations, Section 12.7.1.2 describes: a) That the effect of sensory disturbance “is expected to occur while the road is in use and can be considered reversible as it would stop following the operations phase of the Project.”	In the Final EA, please consider rewording these sections to specify that the effect/alterations may end/last until “the operation phase ends and the road is no longer in use” and provide a section reference that points the reader to the anticipated project lifespan.	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	Table 12-54; 12-329/12.7.1.3/ Table 12-55; 12-330/12.7.1.3/ Table 12-57	<p>b) That: "any alteration of moose habitat due to sensory effects will be medium-term, continuing until the end of the operations phase." Section 12.7.1.3, regarding alteration in movement of moose (operations and construction)</p> <p>c) The effect of alteration in movement of moose due to loss of connectivity "should end once the operation phase ends" (Table 12-54 and 12-55).</p> <p>d) "Any alteration of moose movement will be medium-term, lasting until the end of the operations phase of the Project" (Tables 12-55 and 12-57).</p> <p>The Ministry's understanding is that the project is permanent. At this time decommissioning of the infrastructure is not being considered; however, the EA is using approximately a 75 year operations phase as a benchmark for evaluation.</p> <p>The above statements do not provide contextual reference to the project length information, do not take into account a decommissioning phase and do not adequately define "medium-term".</p>				
246.	12-327/12.7.1.2/ Table 12-53; 12-327/12.7.1.3; 12-330/12.7.1.3; 12-333/12.7.1.3; 12-330/12.7.1.3/ Table 12-57	<p>a) Table 12-53 indicates that: "a large body of research has shown moose avoid roads due to traffic." However, reference regarding this statement are not provided.</p> <p>b) Within Section 12.7.1.1.3:</p> <p>a) With regards to loss of connectivity, due to construction, there is a statement that: "construction activities themselves may alter moose movement as moose avoid areas of human activity."</p> <p>b) With regards to sensory disturbance during operations, there is a suggestion that "traffic levels are known to influence moose movement as multiple studies have found road avoidance increases with increased disturbance."</p> <p>c) With regards to changes to predator-prey dynamics during construction, there is a statement that: "While predators like grey wolves often avoid</p>	Please provide reference(s) to substantiate these statements.	A	4. Item will not be addressed as they are considered out of the scope of the approved EA Terms of Reference (ToR)	<p>C. Not satisfied – would like to discuss comment/response with proponent</p> <p>MNR recommends that references be provided to support the noted statements. If references are provided in other sections of the EA, these sections should be noted within the tables and/or applicable text.</p>


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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<p>areas of high human use like construction camps and industrial features..."</p> <p>c) With regards to Section 12.7.1.3 (regarding sensory disturbance during operations) there is a statement describing that "traffic levels are known to influence moose movement as multiple studies have found road avoidance increases with increased disturbance."</p> <p>However, references regarding these statements are not provided.</p>				
247.	12-328/ 12.7.1.3	States "A summary of the net effects relating to alteration of movement through <i>sensory disturbance</i> during the construction phase based on the Characterization Criteria is presented in <b>Table 12-55.</b> " However, Table 12-55 is referring to "loss of connectivity", not "sensory disturbance".	Please review the wording (with regards to "loss of connectivity" versus "sensory disturbance"), and reword if necessary, in the Final EA.	B/C	1. Item will be addressed in the Final EAR/IS submission	A. Satisfied with response
248.	12-333/12.7.1.3; 12-333/Table 12-61/12.7.1.3	<p>Section 12.7.1.3 (regarding increased access during operations), there are suggestions that:</p> <p>a) "Overall, there will be a moderate negative effect on moose survival in the LSA" due to increased hunting pressure.</p> <p>b) The effect of increased access "is predicted to be moderate, as the effect will cause a measurable change in moose injury and death and may locally affect moose populations" due to increased hunting pressure.</p> <p>Considering the references (below), moose numbers within the moose LSA (11 km) are likely to decrease substantially within 10 years of operations and the "Result" (for Moose Injury or Death Due to Increased Access – Operations) has the potential to be "high".</p> <p>Page 12-91, of the Draft EA describes: "creation of roads in previously inaccessible areas can often lead to increased use by hunters (Crichton et al., 2004; Boston 2016). For moose, the construction of new roads is linked to</p>	Please reassess the predicted effects to moose and associated "results" (from increased hunting pressure during operations) in light of the provided references and any others that may be applicable, for the Final EA.	A	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA.

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<p>increased hunting mortality (Timmerman and Gollat, 1982) as most hunting takes place within a few hundred meters of a road (Boer, 1990)." Page 21-66, also describes "For moose, the construction of new roads is linked to increased hunting mortality (Timmerman and Gollat, 1982) as most hunting takes place within a few hundred meters of a road (Boer, 1990). Increased browse along the ROW may act as an attractant for moose and correspondingly lead to higher moose harvest (Rempel et al., 1997)."</p> <p>Additional references that can be considered, include:</p> <ul style="list-style-type: none"> <li>- Bottan, B.J., Hunt, L.M., Haider, W., and Rodgers, A.R. 2001. Thunder Bay moose hunters: environmental characteristics and choice preferences. Ontario Ministry of Natural Resources, Thunder Bay, Ontario. CNFER Technical Report TR-007. 55pp</li> <li>- Bottan, B., L.M. Hunt, and W.Haider.2003. A choice modelling approach to moose management: a case study of Thunder Bay moose hunters. Alces 39:27-39.</li> </ul>				
249.	12-335 /12.7.1.3/ Table 12-63	Table 12-63 (Criteria Results for Moose Injury or Death Due to Changes in Predator-Prey Dynamics – Operations) provides a suggestion that changes in predator-prey dynamics are "predicted to be moderate, as the effect will cause a measurable change in moose injury and death but is unlikely to affect regional moose populations." While there may be a moderate effect on the regional moose population, moose numbers within the moose LSA (11 km) are likely to decrease substantially within 10 years of operations due to increased predator and hunter access. See comments and references provided above, related to Table 12-12.	<p>Please reassess the Results from increased predator access.</p> <p>In addition to the predicted impacts of moose from changes in predator-prey dynamics at the regional scale, please include the anticipated impacts to moose within the LSA (11km)</p>	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA.

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
250.	12-336 /12.7.1.3/ Table 12- 64; 12-337/ 12.7.1.3/ Table 12-65	The summary tables of predicted net effects during the construction and operations phases includes several net effects characterizations that should be revised based on comments provided regarding previous tables in this section.	Please revise this summary tables (12-64 and 12-65) based on comments made on previous tables in this section.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA.
251.	12-495/ 12.8.1; 12- 497/ 12.8.1.4	<p>With regards to Sections 12.8.1 (Moose) and 12.8.1.4 (Injury or Death) the EA suggests that:</p> <ul style="list-style-type: none"> <li>- The “project’s net effects are predicted to be not significant with negligible to moderate scores for significance”. However, there are likely to be significant effects over the long-term due to increased predator and hunting access (as described above, in previous comments).</li> <li>- “With effective implementation of mitigation measures, mortalities due to collisions with vehicles, increased access, and changes to predator-prey dynamics, are unlikely to be significant.” This may be true for the construction phase and collisions with vehicles, but there are likely to be significant effects over the long-term due to increased predator and hunting access (as described in previous comments).</li> </ul> <p>Based on the recommended reevaluation of results mentioned in the previous comments, with regards to hunting, access and predator-prey dynamics, it is recommended that the significance of the net effects to moose also be reevaluated.</p>	Please reassess the significance of increased predator and hunter access net adverse effects, based on the recommended reevaluation of results mentioned in the previous comments.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA.

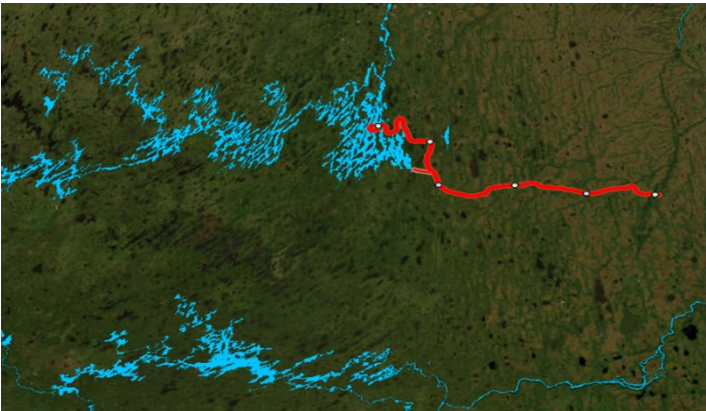
Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
252.	12-497/ 12.8.1.4; 12-497/ 12.8.1.4	<p>Section 12.8.1.4 (Injury or Death), with regards to moose, indicates:</p> <p>a) “the significance score for increased access is 4 and 10 for the construction phase and operations phase of the Project, respectively. These indicate a negligible effect resulting from the construction phase and a low effect resulting from the operations phase.” The score and effect for the operations phase seem inconsistent.</p> <p>b) “The significance score for changes to predator-prey dynamics is 8 and 9 for the construction phase and operations phase of the Project, respectively. These indicate a low effect resulting from both the construction phase and operations phase.” The score and effect for the operations phase seem inconsistent.</p> <p>The scoring system assigns values across 8 key criteria, but not all criteria are weighted equally. Some have more scoring categories, making them more influential in determining the total score. As a result, achieving a total score of 16 or higher (which indicates a significant net or cumulative effect) is highly unlikely.</p> <p>For example, to predict a significant net effect on moose, a score of 4 must be assigned in at least one of the following key criteria: Magnitude, Geographic Extent, or Context. Since moose did not receive a score of 4 in any of these areas, the overall effect on moose is rated as Moderate and Not Significant.</p> <p>However, Indigenous knowledge and scientific literature suggest that sensory disturbance, increased access, and changes to predator-prey dynamics are likely to have significant impacts on moose within the Local Study Area (LSA, 11 km) once the road is operational. The current scoring system does not adequately reflect this likely outcome.</p>	In the Final EA, MNR recommends revisiting the scoring system. For example, by reclassifying scores in the 11–15 range (Moderate) as indicating significant effects.	A	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the twenty-three-week review period	B. Satisfied for now but will need to see final EA.

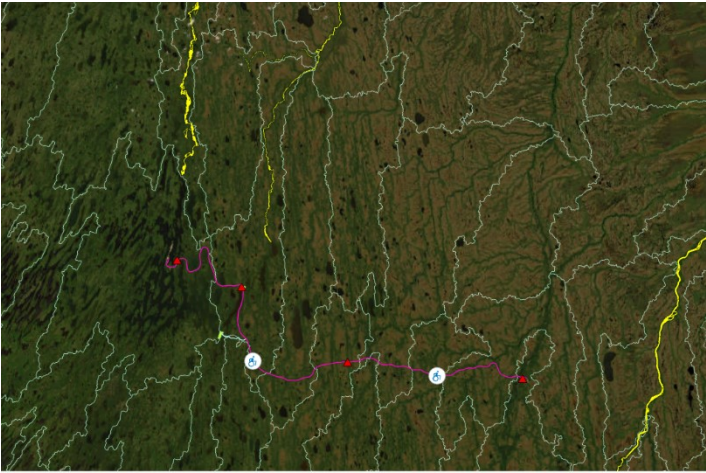
Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		Additionally, several sections unrelated to moose or caribou, the maximum possible score is less than 16, meaning those effects can never be classified as significant under the current framework. This brings into question how well the scoring system reflects the potential effects.				
253.	10-51/10.3	The section on 'Habitat Alteration Due to Changes in Hydrology or Groundwater' focuses on areas with culvert and bridge crossings but does not address hydrologic changes in peatlands away from water crossings, where cross drains will be installed. Although these areas may lack defined watercourses, road construction in peatlands is expected to indirectly affect fish habitat and populations over the long term within the Regional Study Area, and should be discussed.	In the final EA, please include consideration of how road construction may alter surface and groundwater in peatland areas without defined watercourses—particularly where cross drains are proposed—and the potential indirect effects on fish habitat quality, quantity, and populations over time. As well, please provide mitigation measures for these indirect impacts to fish in areas where road construction is taking place in predominantly peatland portions of the preferred road right-of-way.	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	
254.	10-38 to 10-39/10.22/Table 10-6	The Ontario Government's Aquatic Ecosystem Classification (AEC) provides a science-based framework for classifying streams based on physical and watershed characteristics, including thermal regime. An AEC-based query of watercourses in the Webequie Supply Road Regional Study Area identifies most as coldwater streams, whereas the classification in the draft EA designates the majority as cool or warmwater streams.  This recommendation is based on MNR's requirement to apply fisheries timing windows aligned with AEC-based thermal classifications and the associated fish habitat. For reference, MNR can provide additional information on the AEC methodology and relevant documents, including:	MNR recommends the discrepancy of thermal regime classifications be explained and justified as part of the Final EA. Please incorporate Ontario's AEC classifications into Table 10-6 (either alongside or in place of the current classification).  This recommendation is based on MNR's requirement to apply fisheries timing windows aligned with AEC-	A	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	For awareness, MNR will apply a precautionary approach at the permitting stage, and will rely on the thermal regimes and associated fisheries timing windows generated through the Ontario Aquatic Ecosystem Classification.  See comment 255 also.

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<p>Jones et al. (2025). Version 2: Measuring stream temperature using data loggers. OMNR, Technical Note TN-11.</p> <p>Sutton et al. (2024). Thermal habitat of flowing waters in Ontario: Updated models to predict current and future stream temperatures. OMNR, Technical Report TR-62.</p> <p>Jones &amp; Schmidt (2019). Thermal habitat: Understanding stream temperature and thermal classifications. OMNRF, Information Report IR-18.</p> <p>PDF copies of these reports are available upon request.</p>	<p>based thermal classifications and the associated fish habitat.</p> <p>Please see the image below regarding Ontario's Aquatic Ecosystem Classification of the thermal regime of watercourses located in proximity to the WSR Project Area. Purple colored watercourses are classified as coldwater while blue watercourses are classified as cold-coolwater, according to AEC baseline model.</p> 	<p>A. Required for EA (per ministry mandate/policy /legislation)  B. Recommended for EA  C. Editorial  D. Permitting Related, Not Required for EA</p>		<p>A. Satisfied with response  B. Satisfied for now but will need to see final EA  C. Not satisfied – would like to discuss comment/ response with proponent</p>
255.	10-40/10.22/Table 10-7; 10-	As currently presented, Table 8-14 in Appendix F of the Natural Environment Existing Conditions Report may be misleading, as it indicates that all but one watercourse crossing has a Fisheries Restricted Activity Timing Window (RATW) aligned with spring-spawning species (April to June). This assessment	Given the uncertainty regarding fish community composition (due to limited, absent, or non-comprehensive sampling) and the predominance of	A/D	1. Item will be addressed in the Final	B. Satisfied for now but will need to see final EA  The Dec 19 meeting, the Project

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	71/10.4.2.1.2; Table 10-5 Appendix F (page 287-298/8.3.2.7/ Table 8-14)  This comment may apply to other sections not identified here. Please review the Draft EA and update similar instances.	is also presented within the Draft EA as well (e.g. Section 10.22). This determination appears to be based on limited fish population and eDNA survey data, as well as general habitat assessments near crossing locations. As well, it is noted that both spawning survey and electrofishing/seine netting attempts to collect additional fish species presence information either did not produce the desired effect or were not completed due to various issues, further limiting sampling/survey effort.  In many cases in the EA, fish community data is either incomplete, uncertain, or derived from limited or constrained surveys. Where fish sampling was conducted for the Project, significant limitations prevented comprehensive assessment of fish communities at many sites. As a result, applying species-specific timing windows may not adequately protect all potentially present fish species. A less restrictive timing window should only be considered where comprehensive, site-specific fish community data is available and confirms its appropriateness.  As previously noted, Ontario's Aquatic Ecosystem Classification identifies the majority of these watercourses as having coldwater or cold-cool thermal regimes. This significantly increases the likelihood of suitable habitat for fall-spawning species such as lake whitefish, cisco, burbot, and brook trout.	coldwater classifications, MNR will apply a precautionary approach to applying RATWs. This approach accounts for the potential presence of fall and winter-spawning fish species, in addition to spring spawners, to effectively mitigate potential impacts from road construction and water crossing installations, within the Webequie Supply Road Project area.  MNR will apply RATWs to account for the potential presence of fall and winter spawning fish species, in addition to spring spawners, within watercourses crossed in the Project area. Specifically, RATW from September 1 to either June 15, June 20, or June 30, will apply depending on the specific crossing and local conditions, and will be applied at the permitting stage to all watercourse crossings within the Webequie Supply Road Project Area. This should also be reflected in the relevant sections of the Final EA. The alternative is to conduct additional fish presence survey work, at a level satisfactory to MNR, in each impacted watercourse	A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA	EAR/IS submission	<p>A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent</p> <p>Team described that they will look at the RATW table in the EA again and will try and insert text around “further confirmation with MNR and future discussion is required” and reiterating that the RATWs mentioned are preliminary, and to be defined further in consultation with MNR (bringing it from a #3 to a 1 or 2).</p> <p>MNR will apply a precautionary approach at the permitting stage, requiring adherence to the most restrictive fisheries timing windows due to uncertainty in species composition and the likelihood of both fall- and spring-spawning species. The Final EA should clearly acknowledge the strong likelihood of fall-spawning species within project-area watercourses and reflect this in relevant sections to ensure accuracy. Without this clarification, the document may not fully represent aquatic biodiversity.</p> <p>This is also applicable to</p>

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			<p>to reduce the level of uncertainty associated with current sampling.</p> <p>As currently presented, Table 8-14 in Appendix F of the Natural Environment Existing Conditions Report may be misleading, as it only reflects RATWs aligned with spring-spawning species. The report should be revised to incorporate RATWs that reflect the potential presence of both fall and spring spawning fish. This comment and associated recommendation also apply to Table 10-7 in Section 10.22 of the full WSR Draft EA Report.</p> <p>The Mitigation and Enhancement Measures for Fish should be revised in the Final EA, to reflect a precautionary approach to RATWs, with the most restrictive RATW applied to all watercourse crossings in the Project area (not only those without fish sampling or confirmed species presence).</p>			comments 254, 256, 257, and 273.
256.	10-40/10.22/Table 10-7	Winisk Lake has a known Lake Sturgeon population (as per the Ontario Lake Sturgeon Atlas); it is unclear if the Ontario Lake Sturgeon Atlas was accessed during desktop investigations.	It is MNR's recommendation that in Table 10-7, the Restricted Activity Timing Window Species column for	A	3. Item will be addressed outside of the	C. Not satisfied – would like to discuss comment/response with proponent

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		 <p>Above is a snippet of the known distribution of Lake Sturgeon around the Project Area (waterbodies with sturgeon presence are colored in aquamarine blue), taken from the Lake Sturgeon Atlas of Ontario.</p>	<p>watercrossings WB-1, WC-1A, and WC-1B, should include Lake Sturgeon as part of the species composition, despite not being detected during sampling. They are well known in this system from the Ontario Lake Sturgeon Atlas. As well, please extend the RATW September 1 through to June 30 (and not June 15) to account for potential spawning activity of Lake Sturgeon, regardless of whether specific spawning locations are known in the system.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA</p>	<p>EAR/IS review process (i.e., taken on by the ultimate owner/operat or)</p>	<p>MNR requests that Table 10-7 be revised to include Lake Sturgeon in the species composition for water crossings WB-1, WC-1A, and WC-1B, even though the species was not detected during field sampling. Lake Sturgeon are well documented in this system, as indicated by the Ontario Lake Sturgeon Atlas.</p> <p>Additionally, the Restricted Activity Timing Window should be extended from September 1 through June 30 (rather than June 15) to account for the potential spawning period of Lake Sturgeon, regardless of whether specific spawning locations have been identified.</p> <p>These clarification should be addressed within the EA (#'s 1 or 2) to ensure the document accurately represents aquatic biodiversity within the Project landscape.</p>

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		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
						See comment 255 also.
257.	Section 10.2; & Appendix F	<p>The Land Information Ontario (LIO) Aquatic Resource Area (AR) layer identifies brook trout in the species summaries for several watercourses within the Regional Study Area of the Webequie Supply Road (see map snippet below). However, the EA and Fisheries Assessment does not appear to reference this data source, nor does it incorporate it into the assessment of fish communities potentially present at watercourse crossings.</p>  <p>Streams in yellow (above map) have brook trout listed in the Ontario Aquatic Resource Area layer.</p> <p>There is also the potential for suitable brook trout habitat based on Ontario's Aquatic Ecosystem Classification thermal regimes, and hydrological connections of the watercourses within the Project Area to known brook trout streams.</p>	<p>Please incorporate a table or supporting content that explicitly acknowledges the potential for (and known) brook trout presence. In addition, please incorporate brook trout presence information from the AR layer into the fish community assessment for watercourses present within the Regional and Local Study Areas. This addition would also support the application of Restricted Activity Timing Windows that consider both spring- and fall-spawning fish species.</p>	A	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)</p>	See comment 255.

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258.	Appendix F (page 216)	Section 8.21 (Background Information Review) of the Natural Environment Existing Conditions Report does not include a clear and detailed list of the specific databases and data sources (e.g., references, publications) used to characterize baseline conditions for fish species presence within watercourses crossed by the Webequie Supply Road alternatives and within the Regional Study Area. Currently, readers are referred to Section 12, where they must search through an extensive reference list to identify the relevant sources.	MNR recommends revising Section 8.21 (Background Information Review) of the Natural Environment Existing Conditions Report to include a more comprehensive, detailed list of specific sources used to identify fish species presence within watercourses in the Local and Regional Study Areas of the Webequie Supply Road Project. This will provide clarity regarding all sources/references, and allow ease of comparison to other potential sources.	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response  Providing this information in a comprehensive fashion will support future permits and approvals.
259.	10-46/10.2.2.1.2	The text in this section states that “Additionally, more favourable spawning habitat for Lake Sturgeon may be elsewhere (notably downstream of the Winisk River Provincial Park boundary that was not accessible), or the population may have declined.”  Evidence to support the claim that the Lake Sturgeon population may have declined was not presented in the EA, and MNR is unaware of such evidence.	The statement suggesting a potential decline in the Lake Sturgeon population is speculative and not supported by evidence presented in the Report. As MNR is unaware of any such evidence, this claim should be removed to avoid an unfounded and potentially misleading justification for the absence of Lake Sturgeon eggs in the DNA analysis.	A	1. Item will be addressed in the Final EAR/IS submission. being removed.	A. Satisfied with response
260.	10-62 to 10-63/10.4.1.1.1	a) While best management practices and guidelines from MNR, DFO, and MTO (in all of the various documents noted in the EA) provide comprehensive measures to minimize, mitigate, and avoid impacts to fish and fish habitat during water crossing construction, it may not be operationally feasible to fully implement all recommendations at every crossing.	a) It is recommended that the mitigation measures, specifically following the first measure in Section 10.4.1.1.1 (General Avoidance Measures and Project Planning and Design), include a	A/B	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
		<p>b) The proposed mitigation for culverts, including infilling with natural substrate and creating low flow channels to maintain stream function and fish passage, requires close collaboration between the project team and MNR. MNR should have the opportunity to review and approve the specific design and operational details for each crossing prior to permitting, to ensure these measures effectively replicate natural stream conditions.</p> <p>c) This section states that channel realignment and infilling will be avoided "to the extent practicable" and only undertaken where specific conditions are met during detailed design. However, these activities are prohibited under the Federal Fisheries Act and are not consistent with MNR and DFO standards or guidance. Where such activities are proposed, appropriate legal authorization must be obtained—standard MNR permitting alone is not sufficient, and there is potential that authorization may not be granted.</p>	<p>statement recognizing that deviations from these guidelines may be necessary in some cases, and that authorization may need to be sought. The EA should also commit to anticipating such instances (deviations) where possible and where authorizations may be required (under relevant legislation) to address any deviations in a compliant manner.</p> <p>b) The EA should describe that the project team will collaborate closely with MNR to review and approve the detailed culvert design and operational plans for each crossing, ensuring proposed mitigation measures effectively maintain natural stream conditions before authorization is granted. Please outline this requirement within the mitigation measures under Section 10.4.1.1.1 (General Avoidance Measures and Project Planning and Design) of the EA.</p> <p>c) Please ensure the EA clearly distinguishes between standard permitting and the legal authorization requirements under</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>	

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
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			the <i>Lakes and Rivers Improvement Act</i> and <i>Fisheries Act</i> and reflects potential regulatory constraints accordingly. Please revise the EA to clearly differentiate between standard MNR permitting and the legal authorization requirements under the <i>Lakes and Rivers Improvement Act</i> and the federal <i>Fisheries Act</i> . Ensure that any reference to channel realignment or infilling acknowledges that these activities are prohibited unless proper federal authorization is obtained, which is not guaranteed. Align the assessment with DFO and MNR guidance to accurately reflect regulatory constraints and approval risks.			
261.	10-63/10.4	The preamble in Section 10.4 - Mitigation and Enhancement Measures - states that additional fish and fish habitat mitigation measures will be detailed in the Construction and Operation Environmental Management Plans (CEMP and OEMP), which have yet to be developed. Given the critical role of these plans in managing environmental risks, MNR must conduct a thorough review and provide endorsement of the CEMP, OEMP, and all associated sub-management plans relevant to fish and fish habitat (e.g., air quality and dust, blasting, erosion and sediment control, groundwater, noise and vibration, spill response, site restoration and monitoring, etc.) prior to their approval and implementation.	Draft versions of the Construction and Operation Environmental Management Plans (CEMP and OEMP), including all sub-management plans relevant to fish and fish habitat, should be developed and submitted for review alongside the Final EA. These plans must be reviewed and endorsed by MNR prior to approval and implementation to ensure	A/B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operat or)	C. Not satisfied – would like to discuss comment/response with proponent  MNR's recommendation is to address this as a #1 or #2, Draft versions of the Construction and Operation Environmental Management Plans (CEMP and OEMP), including fish and fish

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
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			<p>compliance with regulatory requirements and effective mitigation throughout the project lifecycle, and to ensure all environmental safeguards are clearly defined.</p> <p>If they are not provided in Final EA, MNR recommends that a commitment be provided in Final EA regarding the development of these plans, with opportunity for MNR to review and approve/endorse the potential effectiveness of the proposed mitigation.</p>			<p>habitat sub-plans should accompany the Final EA to allow technical review and ensure mitigation measures are clearly defined, effective, and compliant.</p> <p>At minimum, MNR would like to see a commitment made in the EA for the owner/operator to work with MNR on these Plans. MNR understands that the Final EA will contain this commitment.</p>
262.	10-64/10.4.1.2.1	Section 10.4.1.2.1 (Temporary Watercourse Crossings) describes the potential requirement (MNR licence) to relocate fish prior to construction, as well as best management practices for temporary crossings. However, the section does not acknowledge that temporary watercourse crossings require review and permitting by MNR similar to proposed permanent crossings (e.g. PLA and/or LRIA), and that all applicable MNR and DFO standards, guidelines, best management practices, codes of practice, and legislative requirements must still be followed. The comments and conditions made by MNR applicable to permanent water crossings also apply to temporary crossings. The MNR may require site-specific mitigation measures for temporary crossings beyond established guidance, based on the nature and sensitivity of the crossing location.	Please update the EA to explicitly acknowledge that temporary watercourse crossings require MNR review and permitting, and that all relevant MNR and DFO standards, guidelines, and legislative requirements apply. The EA should clarify that all applicable MNR and DFO standards, guidelines, best management practices, codes of practice, and legislative requirements for permanent crossings also apply to temporary ones, and that additional site-specific mitigation measures may	A and B	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied nor now but will need to see Final EA

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			be required at MNR's discretion based on the crossing's characteristics.			
263.	10-65/ 10.4.1.2.2	<p>With regards to Section 10.4.1.2.2 (Project Planning and Design Section), within Section 10.4.1.2 (Harmful Alteration and Disruption of Fish Habitat):</p> <p>a) The section states that culverts will be embedded by 10% to accommodate low flow conditions. However, the MNR/DFO Joint Protocol (Standard 2.5) indicates that culvert embedment should be based on local streambed conditions, and it is common practice in Ontario forest management planning to require up to 20% embedment where feasible.</p> <p>b) This section states that materials placed in-water will be erosion-resistant or covered to reduce erosion and sedimentation. Please note that infilling of watercourses below the high-water mark is prohibited under the federal Fisheries Act and requires DFO authorization, as well as potential PLA and/or LRIA authorizations. The EA should not present mitigation measures as solutions for prohibited activities but instead acknowledge that such activities may require formal authorization before proceeding.</p> <p>c) This section indicates that Environmental and/or Indigenous Monitors will be on-site during construction to observe and document mitigation measures related to fish habitat protection. However, the EA lacks clear information on the qualifications, roles, and responsibilities of these monitors, and how their involvement effectively contributes to mitigation.</p>	<p>a) To reflect current guidance and ensure proper fish passage, please revise the mitigation measure in Section 10.4.1.2.2 to state that culverts will be embedded a minimum of 10%, with additional embedment determined based on local streambed conditions. This aligns with the MNR/DFO Joint Protocol (Standard 2.5) and common forestry practices in Ontario, and will help reduce the risk of perched culverts and more effectively supports fish habitat protection and fish passage.</p> <p>b) The EA should be revised to clearly acknowledge that infilling below the high-water mark is a prohibited activity under the Federal Fisheries Act and requires DFO authorization as well as PLA and/or LRIA authorizations. The EA should avoid framing mitigation measures as remedies for prohibited activities and instead recognize the need for obtaining legal authorization where</p>	A/B	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied nor now but will need to see Final EA

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
			<p>applicable.</p> <p>c) The EA should clarify the qualifications, specific roles, and responsibilities of Environmental and Indigenous Monitors (by providing more information), to demonstrate the effectiveness of monitoring as a mitigation measure. The EA should provide sufficient detail to explain how the involvement of such monitors will ensure effective implementation and compliance with mitigation measures, thereby demonstrating the value of monitoring as a meaningful mitigation strategy.</p>			
264.	10-65/ 10.4.1.2.3	Section 10.4.1.2.3 (Vegetation Clearing), within Section 10.4.1.2 (Harmful Alteration and Disruption of Fish Habitat), states that a vegetation clearing standard will be established to limit impacts on riparian and aquatic vegetation important to fish habitat.	To strengthen this section, please consider referencing the MNR/DFO Joint Protocol for Forestry Water Crossings and other relevant MNR/DFO/MTO guidance and legislation, which provide established standards and best management practices for minimizing vegetation clearing impacts. It is also recommended that these recognized measures be incorporated into the mitigation framework for vegetation clearing. Please ensure that the	B	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)</p> <p>No further references are deemed</p>	A. Satisfied with response

Comm ent #	Page/ Section #	GRT Comments			Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up Categorize Proponent's response as follows:
		Comments & Rationale	Proposed Action/Solution	Type of Comment:		
			vegetation clearing mitigation measures described in the EA align with these established standards and best management practices, to effectively minimize impacts on fish and fish habitat from potential vegetation clearing.		warranted at this time, but will be considered in preparing CEMP and OEMP in future.	
265.	10-66/10.4.1.2.5 /10-66.	Section 10.4.1.2.5 (Erosion and Sediment Control), within Section 10.4.1.2 (Harmful Alteration and Disruption of Fish Habitat), states that an Erosion and Sediment Control (ESC) Plan will be developed prior to construction as part of the CEMP and OEMP, including site-specific ESC drawings and specifications. This plan is critical for managing environmental risks. MNR should have the opportunity to thoroughly review and formally endorse the ESC Plan before it is approved or implemented.	The Erosion and Sediment Control (ESC) Plan, including site-specific drawings and specifications, is recommended to be developed and submitted to MNR for review and endorsement prior to the Final EA. This will ensure that regulatory input is incorporated early and that erosion and sedimentation risks are effectively addressed before project approval and implementation.  If they are not provided in Final EA, MNR recommends that a commitment be provided in Final EA regarding the development of these plans, with opportunity for MNR to review and approve/endorse the potential effectiveness of the proposed mitigation.	B	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied nor now but will need to see Final EA  MNR understands that a commitment be provided in Final EA regarding the development of these plans, with opportunity for MNR to review and approve/endorse the potential effectiveness of the proposed mitigation.
266.	10-69/10.4.1.3.1	Section 10.4.1.3.1 (Project Planning and Design), within Section 10.4.1.3 (Change in Fish Access to Habitats), states that flow and migratory fish passage	Provide additional detail in Section 10.4.1.3.1 on the mitigation measure	B	1. Item will be	B. Satisfied nor now but will need to see Final EA

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		will be maintained at all crossings, including bridges and culverts. However, this section does not describe the specific steps, design features, or mitigation measures that will be used to achieve this outcome.	regarding how flow and migratory fish passage will be maintained at all crossings, including design considerations, construction practices, and reference to applicable guidelines. If this information is provided elsewhere in the EA (e.g., in other mitigation sections or appendices), include a clear cross-reference to those sections to ensure clarity, consistency, and traceability of mitigation actions.		addressed in the Final EAR/IS submission.	
267.	10-73/10.4.2.2. / 10-73.	<p>Section 10.4.2.2.3 (Public Access Restrictions), within Section 10.4.2.1 (Injury/Death of Fish), notes that increased access resulting from the project may require regulatory changes, such as restrictions on fishing or modifications to First Nation harvesting practices, to prevent additional fishing pressure. However, such changes are outside of the project's direct control.</p> <p>Throughout the EA process, strong concerns were raised about potential impacts from increased public access to remote fisheries. That said, MNR notes that the project is located in the Far North of Ontario, in a highly remote area, far from major population centres. Given this context, MNR is of the opinion that it is highly unlikely the Project will lead to increased public access or angling pressure from the broader public, particularly non-Indigenous anglers, due to the remoteness of the area and the abundance of high-quality fishing opportunities closer to larger communities in northwestern Ontario where these people already live.</p>	MNR recommends that public access to remote fisheries be retained in the EA as a potential effect requiring mitigation, with a focus on locally relevant access and use patterns rather than broader public fishing pressure. However, the assessment could be refined to reflect the remote location of the project and the low likelihood of increased fishing pressure from the general public. Mitigation considerations can be focused on the potential increase in local access and fishing by Indigenous community members and adjacent workers at newly accessible water crossings, and how potential impacts	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	<p>C. Not satisfied – would like to discuss comment/response with proponent.</p> <p>The EA describes potential impacts from added pressure to fisheries and respective mitigation such as restricting access by workers and visitors (see comment # 214 for example).</p> <p>MNR recommends that the noted potential effects and associated mitigation should therefore be explored in the Final EA or addendum (1 or 2).</p>

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	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:  A. Required for EA (per ministry mandate/policy /legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Not satisfied – would like to discuss comment/ response with proponent
		However, the potential for increased fishing pressure at newly accessible water crossings is more plausible, such as from local Indigenous community members and nearby workers associated with mineral exploration and/or future mineral development projects.	to fish populations may be monitored and managed in that context.			
268.	Section 10.4 – General	While the EA includes an extensive list of mitigation measures intended to minimize adverse effects to fish and fish habitat at water crossings, there is no clear acknowledgement that additional site-specific mitigation measures may be required by MNR as conditions of approval for work permits related to water crossing construction.  Given that all potential impacts cannot be fully anticipated at the EA stage, MNR may identify and require additional mitigation measures during the permitting process to address specific site conditions or unforeseen risks.	The EA should acknowledge that the mitigation framework may be refined through the permitting process and that final measures will be confirmed through MNR's review and permitting authority. Section 10.4 (Mitigation and Enhancement Measures) should be revised to acknowledge that, in addition to the mitigation measures identified, MNR may require additional site-specific mitigation measures as conditions of work permits for water crossing construction. This reflects the reality that not all impacts can be anticipated at the EA stage and ensures flexibility for regulatory authorities to address site-specific concerns during permitting stages.	B	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA
269.	Section 10.4 –  This comment may apply to other	The EA discusses the use of snowfill and ice bridge crossings, as temporary methods to cross watercourses or support heavy equipment. It is critical to emphasize that at any time of year, natural water flow and fish passage must not be blocked or impeded upstream or downstream of these crossings, except for very short, temporary disruptions strictly limited to construction or removal activities.	The EA should clearly state: <ul style="list-style-type: none"> <li>that snowfill and ice bridge crossings must not impede natural water flow or fish passage at any time, except for brief, controlled construction activities,</li> </ul>	A/B	1. Item will be addressed in the Final EAR/IS submission.	B. Satisfied for now but will need to see final EA

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	sections not identified here. Please review the Draft EA and update similar instances.	<p>Snowfills and ice crossings must not restrict natural water flow within the watercourse during winter conditions or completely obstruct fish passage at any time. In cases where water flow beneath the ice is assumed or confirmed, it is recommended that a culvert be installed on top of the frozen channel before constructing the snowfill. This culvert provides structural reinforcement while maintaining water and fish movement in the event of seasonal thaw or flow under the ice.</p> <p>This consideration is especially important for streams known or suspected to support fall-spawning species such as brook trout, lake whitefish, and lake trout. Depositing and packing snow into watercourses that naturally maintain free-flowing water beneath the ice risks blocking fish movement essential for spawning and overwintering survival. In such cases, installing culverts beneath the snowfill is necessary to maintain free passage.</p> <p>Additionally, culverts should be fitted with cables or other mechanisms to facilitate timely removal before spring freshet, ensuring natural flow resumes without obstruction. Ensuring these measures are implemented will protect fish habitat and maintain ecological connectivity during winter crossing activities.</p>	<ul style="list-style-type: none"> <li>where winter water flow under the ice is expected or confirmed, culverts will be installed beneath snowfills to maintain connectivity and fish movement, particularly in streams with fall-spawning species.</li> </ul> <p>All culverts installed for temporary winter watercourse crossings will include removal mechanisms to ensure timely extraction before the spring thaw.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>		<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
270.	Appendix S (page 90)	<p>The Cultural Heritage Report (Appendix S) identifies a fish spawning site along the access road to the ARA-4 aggregate site, based on community observations. However, MNR currently lacks detailed information regarding this site, including the specific fish species involved. Without this critical information, MNR is unable to provide targeted recommendations for appropriate mitigation measures related to temporary access road construction, water crossings, or aggregate pit activities in this area.</p> <p>To support effective mitigation and protection of this important fish habitat during project activities, MNR is prepared to offer specific guidance. However, detailed</p>	<p>Please provide MNR with detailed information on the fish spawning site, including the fish species present, location, and timing of spawning activities. This will allow MNR opportunity to offer site-specific mitigation measures to protect fish habitat during construction and aggregate use near the ARA-4 access road.</p>	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	A. Satisfied with response

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		information—including the fish species present at the spawning site—is necessary to enable MNR to provide informed and site-specific recommendations.				
271.	ES 7.4.2  This comment may apply to other sections not identified here. Please review the Draft EA and update similar instances.	In Section 7.4.2 (Operations Environmental Management Plan Framework), MNR notes that a “Fish and Fish Habitat Management Plan” is identified as a requirement within the Construction Environment Management Plan (CEMP) framework; however, this plan is not referenced within the Operations Environment Management Plan (OEMP) framework. Given that numerous fish and fish habitat considerations and potential impacts extend into the operations phase of the Webequie Supply Road project, the EA should clarify why a Fish and Fish Habitat Management Plan is deemed unnecessary during operations. For example, potential impacts to fish and fish habitat during the operational phase include blocked or semi-blocked culverts, unforeseen erosion and sedimentation, and culvert/bridge failures.  It is important that the EA address how fish and habitat concerns will be monitored, managed, and mitigated throughout both construction and operations phases to ensure ongoing protection of aquatic resources.	Within the EA, please clarify why a Fish and Fish Habitat Management Plan is required for construction but not for operations. However, as ongoing fish habitat protection is necessary during the operations phase, it is recommended that the EA includes provisions for such a plan within the OEMP or outline alternative measures to monitor and mitigate potential impacts throughout operations.	B	1. Item will be addressed in the Final EAR/IS submission	B. Satisfied for now but will need to see final EA
272.	Appendix E (pages 31 to 35)  This comment may apply to other sections not identified here.	In Appendix E (Mitigation Measures), Section 5.6 (Working Within or Near Fish-Bearing Watercourses) and Section 5.11 (Bridge and Culvert Installation) both state that, where work is conducted under a Fisheries and Oceans Canada (DFO) Authorization, all conditions outlined within the authorization will be adhered to.  However, there is no corresponding reference to adhering to MNR authorizations or permit conditions within these same sections. Several project activities will require authorizations, approvals, or work permits issued by MNR under applicable provincial legislation (e.g., <i>Public Lands Act, Lakes and Rivers Improvement Act</i> ).	The EA should ensure that both federal and provincial permitting requirements are equally reflected in mitigation language to reinforce compliance obligations.  Please revise Sections 5.6 and 5.11 of Appendix E to include statements confirming that, in addition to adhering to DFO authorization conditions, all conditions and requirements	A	1. Item will be addressed in the Final EAR/IS submission.	A. Satisfied with response

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	Please review the Draft EA and update similar instances.		associated with MNR-issued authorizations, permits, and approvals will also be followed, as appropriate. This ensures consistent recognition of both federal and provincial regulatory obligations within the mitigation framework of the EA.			
273.	Section 10.4 – General	<p>It appears that there are currently no site-specific mitigation measures for each proposed water crossing location. Including site-specific mitigations (such as timing windows, for example) will help ensure appropriate safeguards are in place to protect fish and fish habitat.</p> <p>In addition to resources mentioned in previous comments, the following resource could be used to help determine potential presence of brook trout (which could result in a narrow window for construction on the applicable watercourse(s)): <u>Browne, D.R. 2007. Freshwater fish in Ontario's boreal: Status, conservation, and potential impacts of development. Wildlife Conservation Society Canada Conservation Report No. 2. Toronto, Ontario, Canada.</u></p>	<p>MNR strongly recommends that the Final EA include a comprehensive, site-specific mitigation plan for each water crossing location, detailing measures to minimize impacts on fish habitat and populations. Early disclosure of these mitigation strategies, in advance of the permitting and approvals stages, will promote transparency and enable more effective input and consultation with MNR and other regulatory authorities. Where fish community data are limited or surveys were constrained, desktop analyses in collaboration with MNR could be used to inform mitigation design and ensure effective protection of aquatic resources.</p> <p>If they are not provided in Final EA, MNR recommends that a commitment</p>	B	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)	MNR recommends that a response of a 1 or 2 be considered. With the intention being that the EA demonstrate that potential effects on fish and fish habitat are adequately understood and feasible mitigation approaches are available. At a minimum, this could be provided through general mitigation approaches that can apply at site-specific scenarios, based on potential species presence (from MNR's recommendations on potential cold-water species and the precautionary principal, as described in comment #255), including associated timing windows for applicable scenarios. Providing this in the Final EA will help streamline and reduce timelines during

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			<p>be provided in Final EA regarding the development of these plans, with opportunity for MNR to review and approve/endorse the potential effectiveness of the proposed mitigation.</p> <p>In particular, MNR is seeking to understand (as closely as possible) potential fish species presence in the watercourses, to identify timing windows and commitment to those timing windows in the construction planning phase. As streams will have their own individual timing windows, it can feed into the detailed design plans of what can be accomplished for construction/timing. Detailed site-specific measures (like sedimentation and erosion etc) can be provided after detailed design.</p>			<p>implementation of the project.</p> <p>The Final EA should include a clear commitment to develop these plans with an opportunity for MNR review and endorse their effectiveness prior to construction</p>
274.	7-36/ES 7.0; 8-54/ES 8.5.3 ; 10-63/10.4.1.1.1; Shapefiles	a) Section 10.4.1.1.1 states "All temporary construction camps and temporary laydown areas and aggregate source areas (i.e., ARA-2 and ARA-4) and permanent supportive infrastructure (e.g., maintenance and storage facility, rest areas and maintenance turn-around areas) will be located a minimum of 100 m back from the ordinary high-water mark (HWM) of a waterbody through detailed planning." However, the current setback from the aggregate source delineations to watercourses shown within the shapefiles is as minimal as roughly 15m. High-impact development activities (such as the	a) Clarify the locations of the aggregate areas and whether a buffer (please define the buffer size) will be maintained. If not, remove reference as a mitigation measure and consider the impacts of aggregate operations and	A – a), b) C – c)	2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by	B. Satisfied for now but will need to see final EA

Comm ent #	GRT Comments				Proponent Response (Refer to Proponent Response Legend)	GRT Follow Up
	Page/ Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment:		Categorize Proponent's response as follows:
	This comment may apply to other sections. Please review the Draft EA and update similar instances.	<p>construction and operation of aggregate areas) should maintain a setback of 120 meters from fish habitat (i.e., the high-water mark of fish-bearing watercourses) where possible. A minimum 30m buffer of vegetation should also be retained around all watercourses in support of preserving water quality and all fish habitats. Additionally, the recommended aggregate/rock sources ARA-2 is located directly adjacent to potential spawning habitat within a system that supports brook trout and lake sturgeon (<i>Southern Hudson Bay-James Bay population</i>, listed as special concern on the Species at Risk in Ontario list). Fish and fish habitat with this level of significance (both ecologically and culturally) and sensitivity requires focused consideration. The habitat adjacent to ARA-4 is unclear from imagery but is also within the same waterbody where these species can be found.</p> <p>b) Executive Summary: Project Effects and Key Mitigation Measures for the Fish and Fish Habitat VC: Effects to Fish Habitat Quantity and Quality describes that the preferred route was selected with consideration to minimize the number of waterbody crossings for the road. There is no mention of the aggregate resources areas (or ancillary access roads) and what was considered with respect to mitigating impacts to fish habitat.</p> <p>c) Section 10.4.1.1.1 states: "Fish habitat delineation and mapping, and standards and specifications for protection of fish/fish habitat will be developed in the CEMP and OEMP for implementation to limit accidental disturbances (habitat loss) beyond the Project Footprint". The acronyms CEMP and OEMP are not defined within this Section.</p>	<p>construction to fish and fish habitat in detail as part of the assessment.</p> <p>b) Describe considerations for fish habitat when planning locations of aggregate areas.</p> <p>c) Explain the acronyms CEMP and OEMP within the noted section, and describe where these Plans may be found for reference to mitigation.</p>	<p>A. Required for EA (per ministry mandate/policy /legislation)</p> <p>B. Recommended for EA</p> <p>C. Editorial</p> <p>D. Permitting Related, Not Required for EA</p>	the end of the twenty-three-week review period	<p>A. Satisfied with response</p> <p>B. Satisfied for now but will need to see final EA</p> <p>C. Not satisfied – would like to discuss comment/ response with proponent</p>
275.	8-71 to 8-74//ES 8.8.3	There doesn't seem to be any mitigation specific to Lake Sturgeon. The <i>Southern Hudson Bay-James Bay population</i> (Lake Sturgeon) is listed as special concern on the Species at Risk in Ontario list. These fish can easily be impacted by human development, especially through increased access to fish stocks and habitat degradation from water crossing structures (that are often planned within waterbody narrowings that function as spawning habitat).	In the Final EA, please describe mitigation and potential impacts specific to Lake Sturgeon. For example, if no structures are going to be designed to have abutments within the watercourse, please state this.	A	2. Item will be addressed through addenda to Final EAR/IS submission	B. Satisfied for now but will need to see final EA

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				<ul style="list-style-type: none"> <li>A. Required for EA (per ministry mandate/policy /legislation)</li> <li>B. Recommended for EA</li> <li>C. Editorial</li> <li>D. Permitting Related, Not Required for EA</li> </ul>	that could be completed by the end of the twenty-three-week review period	<ul style="list-style-type: none"> <li>A. Satisfied with response</li> <li>B. Satisfied for now but will need to see final EA</li> <li>C. Not satisfied – would like to discuss comment/ response with proponent</li> </ul>

# Ministry of Transportation, Indigenous Relations and Environmental Policy Branch



**Comment Response Table**

**Proposal:** Webequie Supply Road – Draft Environmental Assessment  
**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Ramona Afante – Team Lead, Michael Capicotto – Policy Analyst, and Simon Zhao – Senior Policy Analyst  
**Ministry and Branch:** Ministry of Transportation, Indigenous Relations and Environmental Policy Branch

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1.	Through out the reports	Excess soil requirements (i.e., the regulation) are not specifically referenced in the report although the project’s soil management approach reflects its core requirements	The authors should indicate how the requirements will be met during project planning and implementation.	B	Table 6-1 in Section 6 identifies and describes the following legislation and guidance that regulates/guides soil management (including excess soil requirements): <ul style="list-style-type: none"> <li>Ontario Regulation 406/19: OnSite and Excess Soil Management and accompanying Rules for Soil Management and Excess Soil Quality Standards</li> <li>Management of Excess Soil – A Guide to Best Management Practices (MECP, January 2014)</li> <li>MTO - Ontario Provincial Standard Specification (OPSS 180) General Specification for the Management of Excess Materials.</li> </ul> <p>To clarify this requirement the following bullet conwas added to Section 2.1.17 Soil Management in Appendix E of the EAR/IS:</p> <ul style="list-style-type: none"> <li>Procedures and protocols for soil</li> </ul>	A

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					management activities that adhere to the requirements of Ontario Regulation 406/19	
2.	Throughout the reports	The report states that the Erosion and Sediment Control (ESC) plan will be developed as part of the CEMP and OEMP	ESC planning should start in earlier when sensitive/higher risk areas are identified along the proposed route	B	ESC plans will be prepared as part of the detail design phase of the Project for watercourse crossings, road grading and drainage and at supportive infrastructure sites (camps, pits/quarries, etc.). This will include design drawings showing the location of ESC measures, construction notes, typical details for ESC measures and supportive specifications and quantities of materials. A general overview of the ESC Plan will be described in the CEMP and OEMP that include approach and planning for ESC, areas of sensitivity along the route for consideration, and standard operating procedures for ESC, including routine inspections, ongoing maintenance activities and implementation of corrective actions, where applicable.	A/B – Given the route has been determined, has the proponent identified specific medium and high-risk locations (not general landscape types, e.g. peatlands and rivers) where non-standard ESC mitigation will be required. This would help focus efforts going forward.
3.	Throughout the reports	It is not clear if the MTO Highway Drainage Design Standards referenced in the report is the updated version.	The updated MTO Highway Drainage Design Standards (March 2024) shall be referenced in all documents where applicable.	B	The updated version of the MTO Highway Drainage Design Standards (March 2024) will be referenced in the EA documents where applicable.	A
4.	Appendix D-1 PEDR Sec 3.3.3	It was not clear on the design criteria that was used for the design year for future flows.	The draft Design Criteria needs correction regarding Design Year for Drainage. Whichever is the construction year should be the initiation of construction year while the Design Year for future flows shall be as	B	The design criteria have been updated to reflect the projected construction year as the design year for future flows. The WSR Project Team met with MTO Highway Standards Branch to review hydrology, hydraulics, drainage, and climate	A

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	Appendix E		per PEM-DCSO#2016-14 (found in the MTO technical publication website under Drainage – Provincial Engineering Memorandum – Design and Contract Standards Office #2016-14 – Implementation of the Ministry's Climate Change Consideration in the Design of Highway Drainage Infrastructure). According to this policy memo, designers shall ensure that the drainage infrastructure will accommodate future rainfall values for the year corresponding to the Design Service Life of the structure in the design for conveyance, erosion, scour, and stormwater management components.		change requirements, and agreed on the project approach adopted for purpose of the design and the EA/IA. Design flow rates have been determined across multiple return periods (2 to 100 year design storm return periods) to account for varying flood risks. Climate change impacts are also incorporated in the design to ensure that structures can withstand anticipated changes in precipitation intensity and frequency. Furthermore, Design Criteria includes guidance on flow analysis, climate change impacts, scour protection, freeboard and clearance requirements, and structural stability to ensure compliance with regulatory standards and best engineering practices. The drainage infrastructure is designed to accommodate future rainfall values.	
5.	WSR-EAR Sec 7.2.1.1 Sec 7.2.1.2.1  Appendix F Sec 1.1 Sec 1.3	The report states that Ontario Watershed Information Tool / Ontario Flow Assessment Tool (OWIT/OFAT) was used to calculate watershed characteristics.	OWIT (OFAT is OWIT now and should be corrected where applicable in the reports) is a helpful online tool for calculating a sub-watershed/drainage catchment's landuse/hydrologic parameters however, it has its own shortcomings and does have discrepancies as noted by our geomatics staff. It is recommended that the consultant also perform its due diligence to not solely rely on OWIT for watershed parameters and verify its	B	Correction from OFAT to OWIT will be made where applicable in future development and design stages of the Project. In the detailed design phase, flow values for all watersheds will be updated using alternative methods (comprehensive hydrologic assessment of the study area was conducted), as the previously applied OFAT values were no longer applicable or available. Watershed characteristics were derived from the OWIT; however, updates were incorporated where recent information was	A

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			values. This information should be included during preliminary design or at a stage when possible, as the basis for more refined details in detail design.		available, particularly for smaller water crossings using Bathymetric survey, LiDAR and field data. Whenever watershed characteristics are used as an input into hydrological models, these models are subsequently calibrated/ validated to confirm the validity of previous assumptions and used values.	
6.	Appendix D-1 PEDR Sec 3.3.3 Appendix F Sec 2.1	It is suggested that the Rational Method is suitable for small catchments without storage in ponds/wetlands i.e. <50 ha urban or <100 ha rural catchment areas.	MTO recommends utilizing Rational Method for small urban catchment areas, mostly highway/road drainage catchments. This information should be included during preliminary design or at a stage when possible, as the basis for more refined details in detail design.	B	The comprehensive hydrologic assessment of the study area was conducted focusing on key watershed characteristics and flow behaviour under both current and future climate conditions. The method adopted for peak flow calculations varied based on their drainage areas: - the Regional Flow Frequency Analysis was used for areas greater than 100 km <sup>2</sup> - the Hydrological Model was used for areas 1 km <sup>2</sup> to 100 km <sup>2</sup> - Rational Method was used for areas less than 1 km <sup>2</sup> (Where catchment areas are very small, it was assumed that the peak runoff event would result from a summer rainstorm).	A
7.	WSR-EAR Sec 7.2.1.1 Secs 7.2.1.2.1 7.2.2.1.1	The existing empirical methods such as Modified Index Flood Method (MIFM) and Northern Ontario Hydrology Method (NOHM), are still to be applied to identify if more conservative values form the range of values provided by UOFM method are more suitable for design in the manner	MTO recommends that for flow calculations, Unified Ontario Flood Method (UOFM) shall be used in the design of ministry water crossing infrastructure when accurate flow data are not available and when the watershed conditions meet the limitations of this method outlined in	B	The WSR Project Team met with MTO Highway Standards Branch to review hydrology, hydraulics, drainage, and climate change requirements, and agreed on the project approach for preliminary engineering design to support the EA/IA. As agreed, the WSR crossings are located near the Hudson Plain boundary which	A

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	Appendix D-1 PEDR Sec 3.3.3	outlined in PEM-DCSO#2016-03. If UOFM is not applicable then the order of applicability of empirical methods should be MIFM/NOHM and any other method if deemed necessary for flow comparison.	PEM-DCSO#2016-03 (found in the MTO technical publication website under Drainage – Provincial Engineering Memorandum – Design and Contract Standards Office #2016-03 – Implementing the New Unified Ontario Flood Method as the Method for Calculating the Design Flow Rates for Water Crossings). This information should be included during preliminary design or at a stage when possible, as the basis for more refined details in detail design.		consist of a high percentage of lake and wetland areas, which is not predicted well using UOFM. Alternative approaches (see Comment #6) were used.	
8.	WSR-EAR Section 7.2.2.1.2	It has been stated that due to access constraints, several of the roadway waterbody crossings were not visited and therefore physical parameters/measurements were taken from either upstream or downstream of the actual proposed crossing location or from an aerial view. Will actual physical parameters/measurements be taken in later stages?	It is recommended that where possible, these areas that were not visited be visited and taken physical parameters/measurements in the later stages such as in detail design.	B	Physical measurements will be undertaken during the detail design stage for the Project, where access is suitable and free of significant constraints.	A
9.	Throughout the reports	No discussion about erosion and scour analysis for crossings provided.	It is recommended to discuss the general aspects on erosion and scour analysis at this stage during preliminary design or at a stage when possible, as the basis for more refined details in detail design.	B	Additional wording on the proposed erosion and sediment control provisions for the highway has been added. Erosion and sediment control will be in accordance with appropriate MTO guidelines, policies. More detailed work and analysis of scour protection will be undertaken during the detailed design stage of the Project.	A

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10.	WSR-EAR Section 7.4.1	Any dewatering, temporary drainage facilities, and temporary flow passage system shall be as per Highway Drainage Design Standards (HDDS) TW-1 and TW-2 (TW-1 Temporary Flow Passage Systems and Temporary Drainage Facilities; TW-2 Highway Drainage Management for Temporary Works) and relevant OPSS/OPSD (Ontario Provincial Standard Specifications and Ontario Provincial Standard Drawings; found in the MTO technical publication website under Drainage).	This is for information at this stage only.	B	All dewatering, temporary drainage facilities and temporary flow passage systems will be in accordance with the standards mentions and the appropriate OPSS/OPSD. Details will be developed during detail design phase of the Project.	A
11.	WSR-EAR Section 7.5.2.1	No detailed discussion about stormwater management where needed as per MTO HDDS SW-1 and SW-2. (SW-1 Stormwater Management-Level of Control; SW-2 Stormwater Management Ponds; found in the MTO technical publication website under Drainage)	This is for information at this stage only.	B	Stormwater management provisions where required have been identified at preliminary design stage, and will be developed further during detail design phase of the Project.	A
12.	Throughout the reports	Will subdrains be provided or any sub drainage planned anywhere in the project?	This information should be in preliminary design or at a stage when possible, as the basis for more refined details in detail design.	B	Subdrains are not proposed as a standard feature in WSR project. The design approach prioritizes compliance with MOE 203, which requires maintaining peatland hydrology and avoiding excessive lowering of water tables. However, subdrains may be considered in localized areas where:  - Detailed geotechnical assessment	A

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					<p>confirms they are necessary for road stability (e.g., deep peat with high saturation or frost heave risk).</p> <ul style="list-style-type: none"> <li>- Design includes safeguards such as controlled outlet elevations, flow regulation, and post construction environmental monitoring.</li> <li>- If stormwater ponds, outlets, or access roads intersect areas with high groundwater or poor drainage, subdrains can help maintain structural stability and prevent frost-related issues.</li> </ul> <p>If required for any of the above scenarios, subdrains will be designed in accordance with OPSS 405, incorporating geotextile wrap, clear stone bedding, controlled outlet elevations, and measures to prevent large-scale dewatering, ensuring wetland function is preserved.</p>	
13.	Through out the reports Appendix D-1 PEDR Appendix E: Prelimin	MTO Gravity Pipe Design Guidelines (GPDG) has not been discussed anywhere in the report. GPDG and DCSO #2020_01 (Design and Contract Standards Office #2020-01 Implementing new Gravity Pipe Trenchless Technologies Design Guides for Gravity Pipe Design Approvals) define the policy and design procedures that designers	This information should be in preliminary design or at a stage when possible, as the basis for more refined details in detail design.	B	MTO Gravity Pipe Design Guidelines (GPDG) and the Gravity Pipe Trenchless Technologies Design Guides for Gravity Pipe Design Approvals) will be applied to the design for the Project and appropriate references have been inserted into the documents.	A

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	ary Design Criteria	shall follow to design and specify a complete list acceptable pipe materials for a given pipe culvert or stormsewer installation (found in the MTO technical publication website under Drainage).				
14.	General comment	The culverts in peat or soft soils; although higher annual exceedance probability (AEP) i.e. the design storms, have been selected for this project than the standard ones.	However, taking into consideration remote access constraints and materials availabilities, it is recommended that the proposed culvert sizes be compared with the design of culverts as per the PEM-DCSO #2020_01 'Section C New Pipe Installations' (found in the MTO technical publication website under Drainage). It states that Designers shall assess HDDS criteria in the following manner: 1. The new pipe culvert's and/or stormsewer's design shall be sized to meet all applicable HDDS criteria and enable a one-time pipe rehabilitation trenchless technology to be used in the future to extend the culvert's or stormsewer's service life without compromising any HDDS criteria set as of date of design.	B	WSR Project Team met with MTO Highway Standards Branch staff to discuss hydrology, hydraulic, drainage and climate change requirements for the Project. MTO and the Project Team agreed upon the approach and relevant culvert design criteria.  The culvert openings were determined through hydraulic modeling for multiple return periods (2–100 years) and integrated climate change projections to ensure adequate capacity under future conditions. Design criteria addressing flow analysis, scour protection, freeboard, clearance, and structural stability were applied to achieve compliance with regulatory standards and best engineering practices.  The AEP for flooding was increased based on the local hydrology but also in anticipation of warmer climate which is expected to have impact on the intensity of extreme rainfall events. As such, the increasing IDF rainfalls on which the AEP were based were determined based on recommendations of the CSA PUS 4013:19 guidelines.	A

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			<p>2. If one future rehabilitation cannot be achieved, the new pipe culvert's and/or stormsewer's design shall be sized to meet all applicable HDDS criteria and enable a one-time pipe replacement trenchless technology to be used in the future to replace the existing culvert or stormsewer without compromising any HDDS criteria set as of date of design.</p> <p>3. If replacement cannot be achieved, the new pipe culvert's and/or stormsewer's design shall be sized to meet all applicable HDDS criteria and enable a one-time new pipe placement trenchless technology to be used in the future to install a new culvert or stormsewer at a new location without compromising any HDDS criteria set as of date of design.</p>			

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			This information should be in preliminary design or at a stage when possible, as the basis for more refined details in detail design.			
15.	Throughout the reports	It was not clear if the information on embankment stability was covered in the reports.	The report should adequately address embankment stability, especially at the locations of the structures (bridges and culverts) at this stage of the project and then refined in detail design.	B	Embankment stability will be addressed in the updated geotechnical design report to be prepared during the future detail design phase of the Project.	A
16.	Executive Summary	It seems that within the executive summary, if you look at the combined mitigation measures (restricted timing windows) towards, Caribou, Moose, Fish, Furbearers, SAR, Bats and other environmental considerations there is very limited to no construction, vegetation removal or disturbance permitted.	It is recommended that detailed mapping of habitat use be provided to design appropriate mitigation. In addition, a consolidated timing window chart could help visualize potential overlaps in impacted areas and support better planning.	D	It is acknowledged that the combined restricted activity timing periods pose a significant challenge and constraint to construction (i.e., vegetation removals). During the detail design and permitting stage, there will be further analysis of the restricted activity periods and their constraints to construction, including identifying and seeking exemptions to select timing windows, where permitted, with implementation of enhanced mitigation.	A
17.	Executive Summary	The aggregate sources identified within the report have been investigated, drilled and broadly reviewed for environmental but they have not had full technical review satisfactorily for aggregate permit applications.	Provincial aggregate standards: OPSS 1001-1006, 1010 are applicable for projects following MTO standards.	D	Further geotechnical drilling is proposed during the detail design and permitting stage of the Project at aggregate source areas to fully characterize materials and meet the technical requirements for permit applications, including ability to meet provincial aggregate standards.	A
18.	Section 7, p. 61-70	Third last bullet within the "Key Mitigation Measures" column indicates that "No application of sand or salt is	It is our understanding that sand will only be applied in select locations. Suggest to reword the statement to	A	The following wording has been added to Section 4.4.3 of the EAR/IS: "Where safety concerns are identified by operation and	A

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		<i>proposed for de-icing of the WSR during the winter season based."</i>	reflect that sand will be applied in select locations.		maintenance crews, the road operator may consider applying sand in strategic locations to improve traction on slippery surfaces, especially in very cold temperatures within the study area where salt is not effective." Section 7 has also been updated to reflect sand application at select locations.	
19.	Section 8, p. 22	Section 8.2.1.2 includes " <i>organic compounds: benzene, toluene, ethylbenzene, xylenes</i> ", " <i>petroleum hydrocarbons (PHCs) fractions F1 to F4</i> ", and " <i>polycyclic aromatic hydrocarbons</i> " within the " <i>Metals</i> " subcategory for parameters.	These parameters are not metals and should be placed under a new subcategory (i.e., organics?)	C	A separate subcategory is not proposed. Category has been revised to read "Metals and Organics"	A
20.	Section 9.1.1 Page 12 of 130	The 'Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects under 'Key Regulation, Legislation, Policy Relevant to Air Quality' was not mentioned.	Recommend Including 'Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects' under 'Key Regulation, Legislation, Policy Relevant to Air Quality'	B	The "Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects (MTO, 2020)" has been added to Section 9.1.1.	A
21.	Section 9.3.1.2.3 , Page 69 of 130	Title for Table 9-20 is confusing.	Suggest removing '(without mitigation measures)' at the end	C	The phrase "(without mitigation measures)" at the end of the title for Table 9-20 has been removed.	A
22.	Section 10: Assessment of Effects	MTO Fisheries documents have been updated in 2025	Update in report	C	MTO Environment Guide Fisheries - Best Management Practices has been updated throughout Section 10.	B

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	on Fish and Fish Habitat					
23.	Section 23, p. 11.	Within the “ <i>Project Mitigation Measures</i> ” column, one bullet indicates that “ <i>storage of aboveground fuel storage tanks and other hazardous materials will be located at least 100 m from waterbody</i> ”. A subsequent bullet on the same page states “ <i>Petroleum product storage areas will be located at least 50 meters from any waterbody</i> ”.	Clarification required to indicate whether it is 50 or 100 metres. If the intent is that the storage area is to be 50 metres away, but any storage tanks within the area must be 100 metres away, this should be stated more clearly.	C	The first measure in the comment has been revised in Section 23 to read “ <i>All designated areas used for petroleum product storage shall be a minimum distance of 50 m from any waterbody.</i> ” as written in Appendix E – Mitigation Measures and consistent with the subsequent bullet point “ <i>Petroleum product storage areas will be located at least 50 m from any waterbody</i> ” in Section 23. The 50 m buffer distance is used which is conservative compared to the 30 m setback guideline described in the Webequie First Nation On-Reserve Land Use Plan.	A
24.	Section 23, p. 11	Within the “ <i>Project Mitigation Measures</i> ” column, one bullet indicates that “ <i>Fueling and storage areas will include appropriate drainage controls with secondary containment of at least 110% of the fuel tank capacity</i> ”. A subsequent bullet on the same page states “... <i>These areas will be dyked to contain leakage or spillage, retaining either 100% of the total container capacity or 110% of the largest container</i> ”.	Clarification required to indicate whether the containment should hold 100 or 110% of the container capacity.	C	The first measure in the comment has been revised in Section 23 as follows: “ <i>Fueling and storage areas will include appropriate drainage controls with secondary containment of at least 110% of the capacity of the total number of containers.</i> ” The subsequent bullet point has been revised as follows: “ <i>These areas will be dyked to contain leakage or spillage, retaining at least 110% of the capacity of the total number of containers.</i> ”	A
25.	Section 23, p. 14	For the “ <i>Project Mitigation Measures</i> ” column within the “ <i>Fires and Explosions</i> ” accident, should the use	Determine if discussion or decision is needed regarding the use of fire suppression products/techniques.	B	We have added the following wording under fire suppression mitigation. “At this time no PFAS-containing foams for fire suppression	A

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		Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
		of PFAS for fire suppression be discussed?			are proposed due to health and environmental concerns of these chemicals' persistence in the environment and potential links to various health problems".	
26.	Appendix D-1: Preliminary Engineering Design Report 5	The report states the WSR classification and design speed is per the "Ministry's practice in Northwestern Region on similar highways." Ministry practices are consistent across regions.	Refer to the ministry's practice (general) or the ministry's practice in Northern Ontario	C	Reference to design speed has been updated where applicable in the documents.	A
27.	Appendix D-1: Preliminary Engineering Design Report 6	The report states "engineering has been completed to a higher level of design, but detail design has not been completed."	Suggest to explain what is meant by completing the engineering to a higher level of design. Since the report also states that the project will be designed, constructed and operated according to design codes, standards and guidelines that are applicable to Ontario highway projects, it is suggested to stay consistent with MTO's Highway Planning and Design Process Guideline.	B	As only preliminary engineering design is relevant to support the EA for the project, these references will be updated appropriately. The enhanced engineering design will apply to subsequent stages of detail design work after the EA/IA process and rendering of a decision.	A
28.	Appendix D-2: Webequie Aggregate Sites	This area doesn't appear to have any potential, but is Figure 17 on page 22 supposed to be the location of TP-03 or TP-10?	It's labelled as TP-10, but I think it's supposed to be TP-03?	C	Figure 17 has been revised to reflect TP19-03.	A

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
	Page 21, Section 5, Observations at TP-19-03					
29.	Appendix E: Mitigation Measures 2.1.8, 2.1.9	The report outlines what the ESC Plan will include in very general terms, but it's best to start planning early and in conjunction with the preliminary design so that higher-risk areas can be avoided.	Start flagging sensitive/higher-risk areas so the design can be adapted as needed	B	Refer to response to Comment Item # 2. The Erosion and Sediment Control (ESC) Plan for the Webequie Supply Road will formally be integrated into the detail design phase to proactively manage erosion risks and minimize long-term maintenance challenges. Sensitive areas such as peatlands, lowlands, and permafrost zones will be identified refined using LiDAR, geotechnical investigations, and hydrological modeling. ESC measures - including sediment fences, berms, slope stabilization, drainage controls, and overtopping resilience strategy - will be incorporated into the detail design for the Project, particularly near water crossings and steep embankments. Hydrological and climate resilience considerations will guide the drainage design, ensuring systems can handle seasonal and extreme flows. Coordination with other environmental plans will ensure compliance and integrated mitigation strategies tailored to the corridor's unique conditions.	A, but see #2

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
30.	Appendix E: Mitigation Measures Section 4, p. 22	Bullet 7 within Section 4 (Designated Areas and Access) indicates <i>“Designated areas shall be located a minimum of 50 m from any waterbody...”</i>	Similar to the comment made in Section 23 regarding “project mitigation measures”, clarification is required to indicate whether it is 50 or 100 m. Ensure these do not contradict and revise as necessary.	C	Same edits described in the response to Comment #23 have been applied to Appendix E: Mitigation Measures. The 50 m buffer distance is used which is conservative compared to the 30 m setback guideline described in the Webequie First Nation On-Reserve Land Use Plan.	A
31.	Appendix E: Mitigation Measures Section 4, 25	Bullet 9 discusses the 50 m separation distance from waterbodies, and dykes designed to contain either 100% or 110% capacity.	Similar to the comments made in Section 23 regarding “project mitigation measures”, clarification is required to indicate whether it is 50 or 100 m, and if the containment should hold 100 or 110% of the container capacity. Ensure these are not contradictory and revise as necessary.	C	Same edits described in the responses to Comments #23 and #24 have been applied to Appendix E: Mitigation Measures.	A
32.	Appendix E: Mitigation Measures 5.4 Noise Control	Under List Item 1: “All vehicles and equipment supplied by the Contractor for use on the Project shall be effectively “sound-reduced” by means of proper silencers, mufflers, acoustic linings, acoustic shields or acoustic sheds”, suggest to add what is in the proposed action/solution.	Suggest adding wording to ensure that vehicles, equipment and noise control measures are maintained in proper working order.	C	Suggested wording “The Contractor will ensure that vehicles, equipment and noise control measures are maintained in proper working order.” has been added as a measure in Section 5.4 Noise Control of Appendix E: Mitigation Measures.	A
33.	Appendix F: Natural Environment Existing	Appendix F does not appear to have informed Appendix E. A lot of detailed information has been gathered but there is no analysis as to what it means for construction.	Suggest to use the findings/information from Appendix F and provide more information on the mitigation measures found in Appendix E, especially with regards to impacts and proposed mitigation measures for construction.	B	Appendix F is an existing natural conditions report that informs the effects assessment, including mitigation, and includes detailed information collected over several years prior to the completing the effects assessment. The mitigation in Appendix E is intended to	A

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
	Conditions General comment				address potential adverse changes to existing conditions documented in Appendix F that were analyzed in the various sections of the EAR/IS (e.g. Species at Risk, Fish and Fish Habitat). It is our opinion that the findings in Appendix F have informed and been used to identify appropriate mitigation as specified in Appendix E, and therefore no further modifications are proposed to Appendix E.	
34.	Appendix G: Air Quality Impact Assessment Page 25/Section 2.4 Table 2-2	Fine Particulate Matter CAAQS now has a 2030 value. Also dustfall has value with annual averaging in AAQC	Just for project team's consideration to include annual dustfall and updated CAAQS. It is understood for PM2.5 the report was prepared before this criterion was published	B	The new PM <sub>2.5</sub> CAAQS will be considered in the revised AQIA study. Likewise for the annual dustfall criteria.	B
35.	Appendix G: Air Quality Impact Assessment Page 25/Section 2.4 Table 2-2	Recommend explaining further on why Upper Risk Threshold (URT) value is appropriate as when URT is generally higher than standard value - 419/05 is something exceed, MECP notice is required.  Also MTO air guide recommend 0.00005 ug/m <sup>3</sup> vs the 0.005 URT value for B[a]P.	Provide justification or update the value.	B	As required by another commenter, the BaP daily standard of 0.00005 ug/m <sup>3</sup> will replace the URT in the revised AQIA study.	A

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
36.	Appendix G: Air Quality Impact Assessment Page 53/Table 3-18	Value for PM10 50m from road centerline is 750, which is inconsistent with Table 3-17, where the value is 740.	Review and update accordingly	C	New results from several modifications to the models will replace the current ones and will be reflected in the revised and final AQIA report.	B
37.	Appendix G: Air Quality Impact Assessment Page 91 Section 6.1.1	First bullet point: 24-hour B[a]P (111%) this appears to be annual	Review and update if needed	C	New results from several modifications to the models will replace the current ones and will be reflected in the revised and final AQIA report.	B
38.	Appendix I: Climate Change Resilience Review Page 55/Section 6	Some of MTO standards and Guidelines referred appears to be outdated. - Design Supplement for Transportation Association of Canada Geometric Design Guide for Canadian Roads, Ontario Ministry of Transportation, April 2020 - now have an Oct 2023 version - Roadside Design Manual, Ontario Ministry of	Update the reference to match the latest version on MTO tech hub	C	References to these standards will be adjusted in the revised and final CC Resilience report.	B

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
		Transportation, May 2020- the latest is July 2023 - Highway Drainage Design Standards, Ontario Ministry of Transportation, January 2008 – the latest is March 2024				
39.	Appendix J: Noise And Vibration Technical Report 11.2 Applicable Noise Guidelines (+ several other sections and tables of the report)	The MECP/MTO Joint Protocol was replaced by the MTO Noise Guide when it was first published in 2006. The MTO Noise Guide has since been updated (most recently in 2022). References to the Joint Protocol are not relevant and may be confusing to some readers.	It is recommended that references to the MECP/MTO Joint Protocol are removed from the assessment and report for simplicity.	A, B	The references to the MECP/MTO Joint Protocol have been removed from the Noise And Vibration Technical Report for simplicity.	A
40.	Appendix P: Human Health	Table 7-1 in Appendix Q states "Direct effect: According to the Human Health Risk Assessment (AtkinsRéalis, 2024e) for the construction phase, all	Review and revise to match the HHRA report or make clarification.	B	Appendix Q has been revised, where applicable, to align with the findings and statements in Appendix P.	B

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
	Risk Assessment and Appendix Q: Webequie Supply Road Health Impact Assessment Executive Summary Page 28  &Page 181 Section 6.2.1.3, Page 274 Table 7-1	contaminants of potential concern, except for carcinogenic risks associated with estimated chronic exposures to hexavalent chromium in baseline total suspended particulates, have risk levels below the Health Canada and Ontario MECP negligible risk levels.”  However, Human Health Risk Assessment Section 8.1 (page 56 of 72) states “When only predicted emissions from the Project were assessed, risks in excess of negligible risk levels were estimated for all COPCs for the construction phase, with the exception of for NO2 and iron. Finally, when cumulative exposures are considered, the potential for health risks exceeding regulatory agency negligible risk levels is predicted for all COPCs except iron, based on the conservative results of the AQIA, and the conservative approach used in the HHRA.”  These statements are not aligned.				
41.	Appendix P: Human Health Risk	Table states: “Webequie Supply Road’s emission sources, while remaining small for fossil-fuel combustion activities, cannot be seen	Recommend providing context for clarity	B	We acknowledge that the statement in Table 7-1 (Appendix Q) on the potential health effect of GHG emissions is misleading and lacking context. We have changed the statement as follows:	A

Comment #	GRT Comments				Proponent Response	GRT Follow Up
	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows: A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
	Assessment and Appendix Q: Webequie Supply Road Health Impact Assessment  Executive Summary Page 29 & Page 275 Table 7-1	as negligible when compared to the Canadian total."  Suggest include more context for clarification, as this comparison is made to "Canadian total regarding land converted into settlements like it is the case for the road project." It is negligible (0.0067%) for Canadian total emissions from National Inventory Report NIR.			"GHG releases in the atmosphere do not trigger direct health impacts on nearby population (being non acutely toxic to humans) but rather cause global warming which drives climate change that can have an indirect impact, especially on vulnerable people. According to the Assessment of GHG emissions (AtkinsRéalis, 2024b), the maximum annual GHG emissions to occur during construction activities (~45 kt CO <sub>2</sub> e) would represent 0.0067% of the Canadian total annual inventory (and 0.029% for Ontario). Being more of a global issue given that GHGs do not cause "localized" global warming, the Webequie Supply Road emissions would represent less than 0.0001% of worldwide emissions estimated 50,000 Mt CO <sub>2</sub> e annually. The Project will not add much to the global GHG emissions and so the indirect impact to health is not considered appreciable."	
42.	Appendix P: Human Health Risk Assessment Section 6.2.1.5	Operations Phase "even with mitigation measures, exceedance of AAQC remains a possibility at some culturally sensitive areas".  I believe this statement is for construction in the air report. NO <sub>2</sub> concentrations do not appear to exceed any air criteria at sensitive	Revise the sentence for NO <sub>2</sub> for operations phase.  Recommend adding "and future residence plot" after 'culturally sensitive area' for operations phase	B	The Air Quality Impact Assessment for the operation phase resulted in exceedances for the PM <sub>10</sub> AAQC only (at one culturally sensitive area and one future residence plot), that is when dust control measures were included into the air dispersion model. Without dust control measures, the TSP AAQC is also exceeded. NO <sub>2</sub> concentrations are not projected to be an issue. That said, due to	B

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	Page/Section #	Comments & Rationale	Proposed Action/Solution	Type of Comment: A. Required for EA (per ministry mandate/policy/legislation) B. Recommended for EA C. Editorial D. Permitting Related, Not Required for EA		Categorize Proponent's response as follows:  A. Satisfied with response B. Satisfied for now but will need to see final EA C. Priority/red flag items: Not satisfied – would like to discuss comment/ response with proponent. Provide brief follow up comment
	Page 186, and Section 7.1 Page 305	receptor during the operating phase based on the air report. -- Also, The Air Report also indicates a PM10 exceedance at the future residential plot, with slightly higher concentrations compared to the culturally sensitive area.			comments provided by the MECP on the Air Quality Impact Assessment, conclusions may change. Appendix P will be revised accordingly based on the new findings.	

# Appendix P2.M.3

## Comment Response Tables for Draft Ear/Is

- Comment Response Tables from Public and Other Stakeholders Review



# Climate Risk Institute



### Comment Response Table

**Proposal:** Webequie Supply Road Project – Draft Environmental Assessment Report/Impact Statement

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Suzanne Seiling, Project Manager, dated November 3, 2025

**Organization:** Climate Risk Institute

Comment #	Page/Section # or Topic in Draft EAR/IS	Comment	Proponent Response
1	General	<p>Hi Chief Wabasse,</p> <p>My name is Suzanne and I work with the Climate Risk Institute. We're currently working on a project that looks to understand what factors are helping to advancing planning for climate change impacts and what barriers are holding it back in the mining sector.</p> <p>I was interested to hear the news of Webequie First Nation's recent deal with the Ontario government to unlock economic development opportunities related to the Ring of Fire. We're interested to learn whether the community has plans to incorporate climate change considerations into any future planning or development, in particular of your transportation and road infrastructure.</p> <p><b>Would you be interested in a virtual meeting or a phone call to help us learn more?</b></p> <p>Thank you. Suzanne <b>Suzanne Seiling</b> <i>Project Manager</i> <i>Climate Risk Institute</i> <a href="mailto:suzanne.seiling@climateriskinstitute.ca">suzanne.seiling@climateriskinstitute.ca</a> <a href="http://www.climateriskinstitute.ca">www.climateriskinstitute.ca</a></p>	<p>One of the purposes of the Webequie First Nation's proposed Webequie Supply Road Project (WSR, the Project), a new 107-km two-lane all-season road, is to address the problem of unreliable community access due to the impacts of climate change for communities in northern Ontario that rely on seasonal winter roads such as Webequie First Nation.</p> <p>Design criteria were established for developing the preliminary engineering design for the WSR in context of the Ministry of Transportation (MTO) standards and guidelines, and in some cases design standards have been exceeded to include resiliency to address the effects of climate change. For example, all culvert and bridge structures are sized to convey a minimum 100-year design flow (probable rainfall event within 100-year period) after accommodating for increases in rainfall intensities due to climate change over a 75-year life cycle (2100), which from the review of Ontario and Canada specific climate models could result in an increase in precipitation of up to 40% beyond current metrological conditions.</p> <p>A climate change resilience assessment has been conducted for the WSR Project as part of the environmental assessment/impact assessment (EA/IA) pursuant to Ontario <i>Environmental Assessment Act</i> and Canada <i>Impact Assessment Act</i>. This climate change resilience assessment was based on the Public Infrastructure Engineering Vulnerability Committee (PIEVC) Protocol, formerly from Engineers Canada, which respects the requirements from the Strategic Assessment for Climate Change and Ontario's guidelines within the framework of environmental impact assessments. The PIEVC and guidelines in the assessment were used to identify all potential interactions between climate hazards and project components and their impact on the infrastructure but also on the health and safety of users of the proposed road and the natural environment.</p> <p>The detailed methodology for the climate change resilience assessment is provided in Appendix I (Climate Change Resilience Report) of the Draft Environmental Assessment Report/Impact Statement for the WSR.</p> <p>According to the climate risk analysis, there are no "moderate" and "high" risks associated with the proposed WSR. The overall risk level of climate change impact on the road integrity is considered "low" based on available information (final design criteria, construction standards, hydrological/geotechnical attributes, etc.) and the Project adopting, and in some cases exceeding provincial standards, guidelines and codes for the design and operation and maintenance of provincial highways. These standards were developed by the MTO in consultation with other regulatory agencies to ensure that provincial highway standards address environmental and engineering concerns. These standards ensure that the safety and integrity of the highway itself, its</p>

Comment #	Page/Section # or Topic in Draft EAR/IS	Comment	Proponent Response
			<p>users and the surrounding environment is protected today and in the future during the road's lifecycle. Standards for all aspects of the highways planning, design, construction, operation and maintenance have been developed and are updated on a regular basis. Key standards and guidelines include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ Design Supplement for Transportation Association of Canada Geometric Design Guide for Canadian Roads, Ontario Ministry of Transportation, October 2023;</li> <li>▪ Preliminary Design Report Guideline, Ontario Ministry of Transportation, September 2016;</li> <li>▪ Roadside Design Manual, Ontario Ministry of Transportation, July 2023;</li> <li>▪ Highway Drainage Design Standards, Ontario Ministry of Transportation, January 2024;</li> <li>▪ Pavement Design and Rehabilitation Manual, Ontario Ministry of Transportation, May 2013;</li> <li>▪ Road Safety Audit Guidelines, University of New Brunswick, 1999;</li> <li>▪ Structural Manual, Ontario Ministry of Transportation, August 2021;</li> <li>▪ Canadian Highway Bridge Design Code CSA S6:19, CSA Group, 2019; and</li> <li>▪ Maintenance Manual, Ontario Ministry of Transportation, August 2003.</li> </ul>

# Wildlife Conservation Society (WCS) Canada, Dated October 6, 2025



## Comment Response Table

**Proposal:** Webequie Supply Road Project – Draft Environmental Assessment Report/Impact Statement

**Proponent:** Webequie First Nation

**Commenter Name and Job Title:** Constance O’Connor, Director of the Ontario Northern Boreal Program

**Organization:** Wildlife Conservation Society (WCS) Canada, dated October 6, 2025

*Preamble with references cited (as footnotes) in commenter’s letter (see list of cited references below the following table):*

“Our experience in E/IA in the region includes our comments recommending a Regional Assessment for the Project<sup>1</sup> and Marten Falls Community Access Road, commenting on the Project Description<sup>2</sup> and draft Tailored Impact Statement Guidelines (TISG)<sup>3</sup>. In our previous submissions, we have consistently recommended a more integrated, forward-looking process to move beyond piecemeal project-by-project assessments.”

The following categorization of the proponent responses may appear in the comment response table for clarity.

### Proponent Response Legend

1. Item will be addressed in the Final EAR/IS submission
2. Item will be addressed through addenda to Final EAR/IS submission that will be completed by the end of the review period
3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator)
4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG)

Comment #	Page/Section # or Topic in Draft EAR/IS	Preamble	Comment	Proponent Response (Refer to Proponent Response Legend)
<b>1. Impacts to vegetation, hydrology, and soils, including forests, and peatlands, with related implications for long-term carbon storage and climate change</b>				
1.1	GHG Emissions	<p><i>Comprehensive assessment of GHG emissions:</i> The project area encompasses high ecological integrity boreal forests and peatlands that comprise globally significant carbon stores<sup>4</sup>. However, the EA/IS currently focuses only on greenhouse gas (GHG) emissions from vehicles associated with the construction, maintenance and operation of the proposed road. This narrow scope fails to account for GHG emissions resulting from direct disturbances to carbon-rich vegetation and soils, including emissions from the clearing, drainage and conversion of forests and peatlands.</p> <p>A complete assessment must include GHG emissions from disturbance and loss to total above-ground carbon (e.g., vegetation) and below-ground carbon (soils, roots), due to harvest and/or conversion of forests and peatlands to other land uses. Changes to GHG removals (carbon sequestration) due to disturbance should also be included in the assessment.</p>	Include GHG emissions from vegetation and peatland disturbance in the EA/IS, encompassing both above-ground (e.g., biomass loss) and below-ground (e.g., soil and peat carbon) carbon affected by land clearing, drainage, or conversion.	<p>The impact of vegetation and peatland disturbance on GHG releases was covered in the EAR/IS (Appendix H). The assessment did include the impact of land clearing and carbon conversion but not on drainage since the road design and construction strategy in lowlands will not involve substantive drainage change modifications. Fill materials, aggregates and geotextile to create the road will be added over peat allowing it to compress over time. The following source categories related to land-use change were included:</p> <ul style="list-style-type: none"> <li>- <b>Section 3.1.7.1 of Appendix H:</b> living biomass removal (carbon as CO<sub>2</sub> contained in trees that are felled) – it is expected, although not confirmed, that 25% of trees felled will be hauled to the Webequie community for their own use. The remaining vegetation (trees, branches, etc.) will be piled and burned on-site under controlled conditions, and chipped and reused as mulch as part of the site rehabilitation;</li> <li>- <b>Section 3.1.7.2 of Appendix H:</b> dead organic material (lying and standing dead trees and vegetation litter) removal – this material will be mostly piled and burned on-site under controlled conditions;</li> </ul>

Comment #	Page/Section # or Topic in Draft EAR/IS	Preamble	Comment	Proponent Response (Refer to Proponent Response Legend)
				<p>- <b>Section 3.2.3.1 of Appendix H:</b> disturbed mineral soil – estimated annual amount of CO<sub>2</sub> generated from the carbon-bearing material in mineral soil exposed to air after excavation;</p> <p>- <b>Section 3.2.3.2 of Appendix H:</b> annual loss in CO<sub>2</sub> uptake from the atmosphere by the living biomass that will be removed (known as carbon sink loss);</p> <p>- <b>Section 3.2.3.3 of Appendix H:</b> peatland’s net annual GHG emissions following the WSR construction (CH<sub>4</sub> emissions prevented minus the CO<sub>2</sub> uptake loss from disturbed peatlands).</p>
1.2	Peatlands	<p><i>Peatlands:</i> Given the importance of peatlands in the region, a peatland-specific summary should be included in the EA/IS and the Cumulative Effects Assessment (CEA). A large proportion of the Local and Regional Study Areas is covered by wetlands, and specifically peatlands, that are sensitive to changes in hydrology and compaction. The current CEA fails to capture larger-scale disturbances to peatlands caused by combined effects of changes to hydrology and vegetation as the assessment is limited to localized effects on each component separately.</p>	<p>Include a peatland-specific summary in the EA/IS and CEA.</p>	<p>As was noted in Section 11.2.1.3 of the EAR/IS, wetland unit identification was initially completed using information found in Land Information Ontario (LIO) data sets. The LIO data sets classified wetlands as marsh, fen, swamp, bog, or treed peatland (based on Section 1.1.2 of the Ontario Wetlands Evaluation System manual). However, it should be noted that a few of these types (e.g., fen, bog and treed peatland) correspond to the definitions of both peatlands and muskeg.</p> <p>Using data collected from the field survey programs, wetland typing was assigned using the boreal ELC protocol at the Community Series level. As such, the vegetation classifications of fen and bog can also be considered peatlands or muskeg. Any results or discussion about wetland species, communities, or functions associated with bogs or fens in Section 11 (Assessment of Effects on Vegetation and Wetlands) and 21.4.6 (Vegetation and Wetlands) would apply to peatlands. Hydrological change is one aspect that is considered in the analysis of wetland function.</p> <p>At this time no peatland-specific summary report is proposed to be included in the EAR/IS.</p>
1.3	Floating road methodology	<p><i>Lack of detail on floating road methodology:</i> We are also concerned about the floating road methodology presented throughout the EA/IS as an approach to mitigate the impacts of road construction on hydrology and carbon storage in peatlands with insufficient information or detail to assess its relevance or potential efficacy in this peatlands landscape. The methodology is inadequately described in the EA/IS report both in terms of construction design and how it will mitigate impacts. The Project Description notes the entire eastern half of</p>	<p>Provide more detail on the proposed floating road construction methodology using geotextiles under gravel/rock, and culverts, as well as case studies documenting successes and failures of floating roads in other areas, (including other countries where relevant), to adequately assess potential impacts of the WSR on hydrology and peatlands degradation. Case studies should include information on factors such as road length,</p>	<p>The floating road design approach described in the EAR/IS (Section 4) has been used successfully in other areas of Canada including a long section of the River Road in Manitoba constructed across similar terrain and latitude. These types of roadways, while called floating roads, do not actually float. The upper surface organics (i.e., vegetation, topsoil, not peat) are removed, geotextiles and membranes are laid down, and blast rock or other permeable material is placed on top. Sufficient material is encased within the geotextiles and geomembranes to address peat</p>

Comment #	Page/Section # or Topic in Draft EAR/IS	Preamble	Comment	Proponent Response (Refer to Proponent Response Legend)
		the WSR, with peat depths between 1-4 m, will require a floating road approach and states this will reduce impacts to hydrology and greenhouse gas emissions. However, no examples of where this approach has been undertaken successfully over similar distances and peat depths are cited. There is also insufficient information provided on what impacts might be expected using this approach.	peat type and depth, number and positioning of culverts to maintain water flows, typical vehicle weights for road use, and post-construction period, that contribute to peat compression and settlement with roads constructed using geotextiles under gravel/rock. As floating roads cannot be constructed over wetter peatlands, peatlands with floating mats of vegetation, and peatlands with large open water areas including pools, the assessment should also include locations where a cut road will be required.	compression to ensure that the road embankment is sufficiently raised above regular and seasonal flood waters. The permeable material is developed such that groundwater continues to flow from upstream to downstream maintaining existing conditions, allowing the peatlands to continue to function appropriately. Where peatlands are open waters, other measures including large culverts are planned to ensure surface water continues to flow.  3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator). The floating road approach will be further addressed during the future detail design phase of the Project by the ultimate owner/operator.
1.4			Provide more information on peat types and depths in the local study area and construction disturbance area. Specifically, use existing peat depth maps <sup>5</sup> supplemented with measured peat depths within the study area to understand the amount of organic material that may need to be excavated to reach subgrade for road construction, or depth of organic material that may be compacted if a floating road design is chosen.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  Peat depths range from 1 to 4 m based on the geotechnical testing conducted during the EA/IA phase to support the preliminary design for the road. Additional testing along the road right-of-way (RoW) is proposed to be undertaken during the future detail design phase of Project to ensure there is sufficient information to support the road embankment design in the peatlands. Note that peat material will not be excavated; and the organic upper surface material will be side-cast and then placed within the RoW to support revegetation with local seed sources.
<b>2. Barriers to wildlife and fish movement created by a road located at the ecotone between the Hudson Plains and Boreal Shield ecozones and within the headwaters of intact rivers</b>				
2.1		We have specific concerns related to the barriers to wildlife and fish movement created by a new road at the ecotone between the Boreal Shield and Hudson Plains ecozones and at the headwaters of the Winisk, Ekwan, and Attawapiskat Rivers, three free-flowing rivers, including two of the few remaining long free-flowing rivers <sup>6</sup> globally. Ecotones, or the transition zones	For caribou, incorporate a movement permeability analysis using telemetry data, habitat mapping, and known caribou movement behavior to evaluate how the road may fragment habitat or restrict seasonal migration, calving, or dispersal.	3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).  A movement permeability analysis may be considered by the ultimate owner/operator to address permitting requirements for species at risk, where applicable.
2.2		between ecozones, are particularly important habitat for fish and wildlife because they can offer diverse habitats for a range of species from both ecozones and can often serve as important connectivity and migratory corridors. We are concerned that the EA/IS as currently drafted	Evaluate indirect habitat loss from road avoidance, using scientifically supported buffer distances (e.g., 500 m to >1 km), to account for the functional loss of habitat that may remain physically intact but is no longer used by caribou. Assess the proposed road's	The buffer distance applied for habitat loss in the EAR/IS was provided under the direction of Environment and Climate Change Canada and is consistent with the expectations/requirements of the federal Tailored Impact Statement Guidelines (TISG) for the Project. Further assessment of functional caribou habitat

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		<p>inadequately considers the barriers to terrestrial and aquatic movement of species created by a new linear feature in this ecologically important area or how to minimize or mitigate these impacts.</p> <p>Intact forest and peatlands in the region are home to numerous species that are sensitive to disturbance, including Boreal and Eastern Migratory caribou populations for which the ecotone is particularly important<sup>7,8</sup>. Documented movements and intensive use by animals in this region requires that overall impacts for caribou at the landscape scale be considered, in addition to the local and range- specific effects that are discussed in the EA/IS.</p>	<p>potential as a movement barrier for caribou, including both physical and functional impacts (e.g., road avoidance, noise, vehicle presence), especially in areas identified as Category 1 travel corridors or high-use seasonal habitat.</p>	<p>alteration/degradation, and associated buffer distances for this aspect, will be considered by the ultimate owner/operator during the future detail design phase of the Project to address permitting requirements for species at risk where applicable.</p>
2.3		<p>The current draft EA/IS does not evaluate how the proposed road could affect future caribou movement, habitat connectivity, or avoidance behavior. Rather, it focuses on disturbance to currently available habitat and considers changes in caribou movement as reversible following construction. Road avoidance behaviour is well-documented for caribou<sup>9</sup>. The extent to which the new road will serve as a barrier and how associated infrastructure and traffic will further fragment the landscape and alter movement patterns beyond the direct habitat impacts is most relevant to sustaining caribou populations and should be assessed, especially for sensitive life stages and processes (e.g., calving, migration). The EA/IS should also specifically include modelling or scenario testing of how the road could fragment Category 1 travel corridors.</p>	<p>Mitigation and associated monitoring should focus on strategies that minimize traffic volume or provide breaks in traffic for caribou.</p>	<p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>Further mitigation and monitoring strategies and/or programs will be considered by the ultimate owner/operator during the future detail design phase of the Project, including a proposed detailed monitoring program to secure permits/approvals for species at risk, where applicable.</p>
2.4		<p>For freshwater habitat and fish, the current draft EA/IS only considers mitigation for invasive vegetation and does not adequately consider impacts or mitigation for other aquatic invasive species, including fish, despite it being a known and documented concern with increased road access<sup>10</sup>.</p>	<p>Consider the impacts of road construction and increased access for all aquatic invasive species including fish (e.g., smallmouth bass, brown bullhead, cyprinids), including developing mitigation approaches for invasive species.</p>	<p>The EAR/IS has been updated to include aquatic invasive species. Aquatic invasive species transfer prevention is included in Mitigation Measure - Appendix E, Section 5.23.1. It has been added to the CEMP as part of the Fish and Fish Habitat Management (Appendix E, Section 2.1.9).</p> <p>3. Item will be addressed outside of the EAR/IS review process (i.e., taken on by the ultimate owner/operator).</p> <p>The full aquatic invasive management plan will be included in the CEMP to be developed and implemented by the ultimate owner/operator for the Project.</p>

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<b>3. Growth-inducing effects that are missing from the cumulative-effects analysis</b>				
3.1	Cumulative Effects Assessment – Draft EAR/IS Section 21	<p>We have concerns that the Project, and other proposed roads and industrial development within the RoF area, will cause irreversible negative impacts to ecological integrity that will exceed direct impacts, and contend these impacts are reasonably foreseeable for this Project. Potential effects of the Project, including anticipated growth-inducing effects<sup>11</sup>, must therefore consider a reduction in ecological integrity of forest, peatland, and aquatic ecosystems that support biodiversity due to changes in ecosystem structure and function that exceed the natural range of variation.</p> <p>While it is not possible to predict which projects will be developed or when, a forward-looking approach is needed that develops a range of potential future cumulative effects scenarios to determine what might happen, given what is currently known, and to select the preferred scenarios with identified thresholds for VCs. As the WSR is intended to enable the development of the RoF mining area, the EA/IS must include a comprehensive assessment of plausible cumulative effects and growth-inducing impacts. The assessment must address the reality that the proposed WSR could reasonably enable future development in the broader region, including new mining activities and associated infrastructure in the RoF area, and potentially other exploration activity and mining proposals within the region, outside of those projects that are currently at the planning stages.</p>	The CEA should include scenario-based analysis of future development pathways, including subsequent road segments and industrial activities likely to be induced by the WSR. The Impact Assessment guidance on “reasonably foreseeable” developments should not be treated as a constraint on meaningful assessment. Rather, the assessment should explore a range of plausible scenarios to adequately inform decision-making and risk management in the future.	<p>4. Item will not be addressed as considered out of the scope of the approved provincial EA Terms of Reference (ToR) and federal Tailored Impact Statement Guidelines (TISG).</p> <p>The Project CEA was rigorously conducted to meet the federal regulatory requirements outlined in the IA Act and the associated TISG, as well as the provincial requirements set out in the EA Act and the Terms of Reference (ToR). In accordance with Section 22 of the federal TISG and Section 8.1 of the provincial ToR, the assessment comprehensively addressed cumulative effects, including those that may arise from both current and reasonably foreseeable future activities in the region.</p> <p>The assessment incorporated ATRI rights under Section 35 of the Constitution Act and adhered to Section 6(1)(m) of the IA Act, which requires the evaluation of cumulative effects of physical activities within a region and the integration of federal policies, plans, or programs into impact assessments. This approach ensures that the CEA assessment is not limited to projects already underway but also considers the broader context of potential future development, as recommended by the Wildlife Conservation Society.</p> <p>To address regulatory expectations and stakeholder concerns, the assessment utilized a VC-centered methodology aligned with the Impact Assessment Agency of Canada’s interim technical guidance on Assessing Cumulative Effects under CEAA 2012. This method, as directed by IAAC guidance and TISG, involved identifying relevant past, present, and reasonably foreseeable projects and activities, thereby providing a scenario-based analysis of development pathways and their potential impacts on ecological integrity, including forests, peatlands, and aquatic ecosystems.</p>
3.2	Cumulative Effects Assessment – Draft EAR/IS Section 21		The CEA should further specifically include: A) Potential hydropower projects and transmission line impacts on fish and fish habitat; and B) A separate section on peatlands, since the current approach of considering changes to hydrology and vegetation separately, larger-	A. The conceptual proposed hydropower are considered outside of the RSA for fish/fish habitat, and were therefore excluded from the CEA. In addition, we note that there is also insufficient information about these proposed hydropower projects to allow for evaluation of cumulative effects.

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			scale impacts to peatlands are underestimated in the CEA.	B. Refer to response to Comment # 1.2.

**References:**

- <sup>1</sup> Chetkiewicz et al. (2019). WCS Canada Comments - Formal Request for a Regional Assessment with respect to Marten Falls Community Access Road Project and Webequie Supply Road - November 2019. *WCS Canada*. <https://library.wcs.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?EntryId=37032&PortalId=96&DownloadMethod=attachment>
- <sup>2</sup> Chetkiewicz et al. (2019). WCS Canada Comments – Webequie Supply Road Project Description – August 2019. *WCS Canada*. <https://wcscanada.org/resources/wcs-canada-comments-webequie-supply-road-project-assessment-august-2019/>
- <sup>3</sup> Chetkiewicz et al. (2020). WCS Canada Comments – Webequie Supply Road Project: Tailored Impact Statement Guidelines and Public Participation Plan - January 2020. *WCS Canada*. <https://wcscanada.org/resources/wcs-canada-comments-webequie-supply-road-project-tailored-impact-statement-guidelines-and-public-participation-plan-january/>
- <sup>4</sup> Harris et al. (2021). The essential carbon service provided by northern peatlands. *Frontiers in Ecology and the Environment* 20: 222-230 <https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/fee.2437>
- <sup>5</sup> An example is: Li et al. (2025). Peat depth and carbon storage of the Hudson Bay Lowlands, Canada. *Geophysical Research Letters* 52: p.e2024GL110679 <https://doi.org/10.1029/2024GL110679>
- <sup>6</sup> Grill et al. (2019). Mapping the world’s free-flowing rivers. *Nature* 569: 215-221 <https://www.nature.com/articles/s41586-019-1111-9>
- <sup>7</sup> Poley et al. (2014). Occupancy patterns of large mammals in the Far North of Ontario under imperfect detection and spatial autocorrelation. *Journal of Biogeography* 41: 122-132. <https://library.wcs.org/doi/ctl/view/mid/33065/pubid/PUB14509.aspx>
- <sup>8</sup> Berglund et al. (2014). Woodland caribou (*Rangifer tarandus caribou*) in the Far North of Ontario: Background information in support of land use planning., Ont. Min. Nat. Resour., Biodiversity and Monitoring Section Tech. Rpt. TR-147, Thunder Bay, Ontario. 160 pp.
- <sup>9</sup> Leblond et al. (2012). Avoidance of roads by large herbivores and its relation to disturbance intensity. *Journal of Zoology* 289: 32-40. <https://doi.org/10.1111/j.1469-7998.2012.00959.x>
- <sup>10</sup> Kaufman S.D., Snucins E., Gunn J.M., and Selinger W. 2009. Impacts of road access on lake trout (*Salvelinus namaycush*) populations: regional scale effects of overexploitation and the introduction of smallmouth bass (*Micropterus dolomieu*). *Canadian Journal of Fisheries and Aquatic Sciences*. 66(2): 212-223.
- <sup>11</sup> Johnson et al. (2019). Growth-inducing infrastructure represents transformative yet ignored keystone environmental decisions. *Conservation Letters* 13 e12696 <https://conbio.onlinelibrary.wiley.com/doi/10.1111/conl.12696>