B2. Aroland First Nation

B2.1 Outgoing Community Specific Correspondence
B2.2 Incoming Community Specific Correspondence
B2.3 Community Specific Meeting Materials

B2.1 Outgoing Community Specific Correspondence

Zielbauer, Kyla <[redacted]>

Fwd: good afternoon,

Jara Moreno, Lucia <[redacted]> 1 August 2024 at 15:48
To: Jerry Shabogamik <[redacted]>
Cc: Kyla Zielbauer <[redacted]>

Hi Jerry,

Thank you for providing [redacted]'s information. We will coordinate accordingly.I am looping in Kyla Zielbauer.

Thanks

Lucia
[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

Aggregate Drilling Sites Flyover

Zielbauer, Kyla <[redacted]> 12 August 2024 at 15:45
To: Jerry Shabogamik <[redacted]>
Cc: "Price, Katelyn" <[redacted]>, Lucia Jara Moreno <[redacted]>, Andrew Peach <[redacted]>

Hi Jerry,

Thanks for participating in the helicopter flyover on July 19 and 20, 2024.

KGS is planning to pay you for your time and participation. Can you please send me your mailing address for the cheque?

Thank you,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Vacation Alert: September 2 - 6

Zielbauer, Kyla <[redacted]>

Aggregate Drilling Sites Flyover

Zielbauer, Kyla <[redacted]> 12 August 2024 at 16:42
To: Jerry Shabogamik <[redacted]>

Thanks Jerry!

I will send you an email to let you know once the cheque has been sent to you.

Have a good day,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Vacation Alert: September 2 - 6

[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 15 August 2024 at 16:32
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Jeremy Shute <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, Andrea Nokleby <[redacted]>

Good Afternoon,

I hope you are in good health and enjoying the summer.

I am reaching out today to provide some updates and information regarding the Marten Falls First Nation Community Access Road (MFFN CAR) Project. Please see the information provided below:

Aroland First Nation/MFFN CAR Project Meetings (June 19 & 20, July 15 & 16)
Thank you to everyone who attended the meetings held in June and July. A lot of great discussions were had and we appreciate the feedback and comments we received on the Project. We are currently preparing summaries of the meetings and will provide those to Aroland First Nation for review when they are ready.

MFFN CAR Stage 1 Archaeological Assessment Report
The Stage 1 Archaeological Assessment Report documents the archaeological and land use history, to determine whether there is potential for archaeological sites in the additional areas required for aggregate impacts. It incorporates a review of recent mapping, previous archaeological reports, and incorporation of any information collected from Indigenous communities.

The Stage 1 Archaeology Assessment Report was sent out to communities on June 3, 2024. The reports are available for download here: Draft Stage 1 Archaeological Assessment_May 2024 – Google Drive. Aroland First Nation's feedback and comments on the report were requested by **August 2, 2024.** Please let us know if Aroland First Nation intends on providing any feedback on the report and when we might expect to receive those comments.

Groundwater Program Monitoring Fieldwork
Representatives from the Project reached out on July 25 and 29 to inquire if Aroland First Nation had any interest in sending a participant to help assist with the Groundwater Program monitoring fieldwork. Jerry provided us with the name and phone number of an individual, however, we were not able to get in touch with that person before the deadline of noon on August 2.

Another opportunity to participate in the monitoring for the program is tentatively scheduled for early October. I am hoping to work with Andrew and Jerry to get a list of a few people's names in advance of the next fieldwork.

IK Program
The signed IK Funding Agreement was sent to Aroland First Nation on July 31, 2024. The IK Sharing Agreement is still with our team for review and will be sent back shortly. Please reach out once you have selected a payment option and let us know if you have any questions regarding the funding.

Community Coordinator Program
Updated information for the Community Coordinator Program as well as the contact information of two potential applicants was provided to Aroland First Nation on July 31, 2024. Please kindly inform us if there is an update on the selection of an applicant to fill the role and whether we can start working together on the next steps of the program.

Please let us know if you'd like to discuss any of these topics further.

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Zielbauer, Kyla <[redacted]> 19 August 2024 at 10:33
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "McCutchon, James" <[redacted]>, "Price, Katelyn" <[redacted]>, "Fisken, Avril" <[redacted]>, Ryan Dobson <[redacted]>, Cory Pyziak <[redacted]>, "Kuenstler, Dan" <[redacted]>, Lucia Jara Moreno <[redacted]>

Good Morning,

We wanted to provide some updates regarding the helicopter flyover that took place on July 19 and 20, 2024, as part of Phase 1 of the multiphase geotechnical study. This airborne reconnaissance work was conducted to support and inform the permitting required to install groundwater monitoring wells and geotechnical sampling at potential aggregate and major water crossing locations within and around the CAR.

Jerry Shabogamik attended the flyover with Bob Baxter of Marten Falls First Nation. It is our understanding that no specific concerns were raised during the flyover, however, Jerry did want to review the program information and drilling locations with other community members and provide additional information to the project if there were any concerns. Can you please confirm that you are able to access the documents at the link below and if any concerns have been identified once you are able to review the documents?

A summary of Aroland First Nation's participation in the fieldwork is currently being drafted and will be shared shortly. Detailed drilling locations and water crossing maps are located at the following link for your review:

[redacted]

Can you please provide some dates and times in the next two weeks that would work for Aroland First Nation representatives to attend a virtual meeting? We would like to meet to discuss the flyover and next steps of the program.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Vacation Alert: September 2 - 6

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Zielbauer, Kyla <[redacted]> 19 August 2024 at 16:33
To: Jerry Shabogamik <[redacted]>

Hi Jerry,

KGS just received approval to send out the payment so it should be sent any day.

I will send you an email once I receive confirmation that it is in the mail.

Thank you,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Vacation Alert: September 2 - 6

[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Zielbauer, Kyla <[redacted]> 23 August 2024 at 15:54
To: Jerry Shabogamik <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "McCutchon, James" <[redacted]>, "Price, Katelyn" <[redacted]>, "Fisken, Avril" <[redacted]>, Ryan Dobson <[redacted]>, Cory Pyziak <[redacted]>, "Kuenstler, Dan" <[redacted]>, Lucia Jara Moreno <[redacted]>

Hi Jerry,

I wanted to check in with you and see how the review of the drilling locations and mapping is going? Is there anything else you need to support this review?

We are interested in meeting with Aroland First Nation to discuss this work and any concerns your community may have. Could you please let us know of some dates and times that would work on your end?

A summary of Aroland First Nation's participation in the fieldwork is being reviewed internally and we will provide it to you for review soon.

Have a great weekend,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES CANADA
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Vacation Alert: September 2 - 6

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

AFN-MFFN CAR Indigenous Knowledge Funding Agreements

Zielbauer, Kyla <[redacted]> 27 August 2024 at 16:34
To: Andrew Peach <[redacted]>
Cc: Chief Gagnon <[redacted]>, Sonny Gagnon <[redacted]>, Jeremy Shute <[redacted]>, Ashley Childs <[redacted]>, "[redacted]" <[redacted]>, Mark Bell <[redacted]>, "[redacted]" <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Lucia Jara Moreno <[redacted]>, Valdine Walker <[redacted]>, MFFN Community Access Road Project Team <info@martenfallsaccessroad.ca>, "McCutchon, James" <J[redacted]>

Good Afternoon,

Please find the signed IK Sharing Agreement attached.

Are there any updates regarding the preferred payment method for the IK Funding Agreement? As mentioned before, cheque and direct deposit are both options.

Let us know if there are any further questions or comments regarding these agreements or the IK Program.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Vacation Alert: September 2 - 6

[Quoted text hidden]

MFFN CAR_Aroland FN_Confidential Indigenous Sharing Agreement 2024_CGsigned_AECOM signed_PT signed.pdf
429K

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Zielbauer, Kyla <[redacted]> 28 August 2024 at 15:29
To: Jerry Shabogamik <[redacted]>

Hi Jerry,

It is my understanding that the cheques for the flyover participation were issued by KGS last week.

If you do not receive the cheque in the next few weeks, please let me know and I will contact KGS.

Thank you,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Vacation Alert: September 2 - 6

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 10 September 2024 at 10:20
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Contardo, Selena" <[redacted]>, "Crew, Jean-Marc" <[redacted]>

Good Morning Andrew and Jerry,

I wanted to follow up on the opportunity for Aroland First Nation to send monitors to help participate in upcoming fieldwork, specifically groundwater monitoring that is tentatively scheduled for early October.

We are hoping to work with you to get a list of names in advance to help facilitate participation in the monitoring, as it does take some time to get monitors onboarded with the health and safety requirements to participate.

Please let me know if there is anything we can do to help with this effort.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 10 September 2024 at 14:34
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Contardo, Selena" <[redacted]>, "Crew, Jean-Marc" <[redacted]>

Hi Andrew,

Thanks for your quick response. We will look forward to receiving some names next week and getting that process started.

As always, if I can help in any way, please let me know.

Thanks,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Aroland First Nation IK Report

Qasim Saddique <[redacted]> 10 September 2024 at 16:10
To: Andrew Peach <[redacted]>
Cc: Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Kyla Zielbauer <[redacted]>, Sonny Gagnon <[redacted]>, Chief Gagnon <[redacted]>, Councillor Annamarie Makiskan <[redacted]>, Councillor Bernard Gagnon <[redacted]>, Councillor Chad Kashkeesh <[redacted]>, Councillor Eunice Magiskan <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Tyrell Gagnon <[redacted]>, Mark Bell <[redacted]>, Joe Baxter <[redacted]>, [redacted], Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>

Hello Andrew,

Thank you for sharing the IK study report for Aroland. It is received.

Best wishes,
Qasim

Qasim Saddique MSc, MBA
Principal Consultant
Suslop

[redacted]
[redacted]
[redacted]

suslop.com

SUSLOP

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Zielbauer, Kyla <[redacted]> 12 September 2024 at 08:19
To: Jerry Shabogamik <[redacted]>, Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "McCutchon, James" <[redacted]>, "Price, Katelyn" <[redacted], "Fisken, Avril" <[redacted]>, Ryan Dobson <[redacted]>, Cory Pyziak <[redacted]>, "Kuenstler, Dan" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Anderson, Victoria" <[redacted]>

Good Morning,

A summary of Aroland First Nation's participation in the geotechnical program flyover on July 19 and 20, 2024, is attached for your review.

Please provide any feedback on the memo and the detailed drilling locations and water crossing maps by **Friday September 20, 2024.**

Let us know if you have any immediate questions or concerns regarding any of the information provided in the memo or mapping, or if an extension to review the memo and provide feedback is required.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

Site Reconnaissance of Aggregate & Water Crossing Sites_Rev.2_V.03.01.pdf
311K

Memorandum

To:	James McCutchon, P.Eng. Project Manager	**Date:**	August 30, 2024
		Project No.:	[redacted]
From:	Cory Pyziak, P.Eng.	**Cc:**	Jennifer Bruin, Leah Deveaux, Ingrid Trimble, Katelyn Price, Dan Kuenstler, Bob Baxter, Jerry Shabogamik
Re:	CAR Phase 1 – Site Reconnaissance of Aggregate and Water Crossing Sites for Permitting Rev 2		

KGS Group completed a site reconnaissance on July 19th and 20th to visually inspect a total of 18 sites—7 aggregate sites and 11 water crossings—via helicopter along the CAR route. This inspection was conducted to obtain the necessary permits for completing geotechnical investigations in 2024/2025. Two representatives from nearby First Nation communities, Bob Baxter from Marten Falls and Jerry Shabogamik from Aroland First Nation, participated in the reconnaissance. Their involvement ensured that any traditional knowledge concerns were addressed and that the proposed investigation sites could be reviewed with the geotechnical team.

As part of our reconnaissance, the pilot flew to each location and proceeded to complete a 360^{o} fly over giving Bob and Jerry a perspective of the general area. Both Bob and Jerry observed each site from the air and asked questions which were all answered by KGS Group. Prior to leaving any of the sites, Mr. Dobson explained what would be completed at each site and pointed out relevant information we are looking for from a geotechnical perspective (Rock Quality, Water Table, Quarry/Pit Size, etc.). Prior to leaving any sites, KGS Group made sure Bob and Jerry expressed any concerns with the sites.

A daily log for each field day is provided below.

July 19, 2024

After a short weather delay, Mr. Ryan Dobson, P. Eng. and Mr. Cory Pyziak, P. Eng from KGS Group departed from Geraldton Airport at approximately 9:00 am to pick up Bob Baxter and Jerry Shabogamik at Nakina Airport. After arriving in Nakina and briefing Bob and Jerry on the geotechnical program and plan for that day, the team departed at 10:00 am. As we are flying out of Nakina, Mr. Dobson pointed out several existing quarry sites along the Provincial Highway to allow Bob and Jerry to understand what the pit/quarry sites for CAR may look like once the project is completed. The following sites were visited on July 19, 2024: BR-01, SG-19, BR-15, BR-16, WA-11, WA-15, W-31, W-35, NW-12, and NW-13.

July 20, 2024

The project team departed from Makokibatan Lodge at 8:30 am to complete the reconnaissance of the remaining sites: BR-04, WA-01, WA-04, WA-07, WA-10, and WA-17. Bob had expressed no concerns with the locations visited. Jerry also expressed no concerns, however, was most interested in WA-01 and WA-04 (North and South Ogoki Rivers) and had noted that he would be discussing these locations with Chief and Council at an upcoming meeting.

Action Items:

Action Items	Date Completed
Provide Bob and Jerry with figures showing the locations of where we will be drilling at each site.	The figures were sent via transmittal to AECOM on July 26th. *Follow up: On a meeting with Bob B and the AECOM team on August 12. Bob indicated that he would like the figures for the water crossing updated to include photos from the recon. KGS Group submitted the water crossing figures and Photo Log on August 15, 2024.*

Conclusion

Bob Baxter from Marten Falls First Nation and Jerry Shabogamik from Aroland First Nation, along with KGS Group, completed a site reconnaissance of eighteen (18) sites along the proposed CAR alignment. Overall, Bob and Jerry raised no concerns regarding the proposed drilling locations for the aggregate and water crossing investigations.

On August 12th, 2024, a debriefing was held with representatives from KGS Group, AECOM, and Bob Baxter of Marten Falls. The meeting focused on discussing the finalized test hole locations for the Aggregate Drilling Program. KGS Group reviewed each location in detail with Bob Baxter and AECOM, concluding that none of the proposed test hole locations raised any concerns at this time.

STATEMENT OF LIMITATIONS AND CONDITIONS

Limitations

This memorandum has been prepared for AECOM in accordance with the agreement between KGS Group and AECOM (the "Agreement"). This memorandum represents KGS Group's professional judgment and exercising due care consistent with the preparation of similar documents. The information, data, recommendations and conclusions in this memorandum are subject to the constraints and limitations in the Agreement and the qualifications in this memorandum. This memorandum must be read as a whole, and sections or parts should not be read out of context.

This memorandum is based on information made available to KGS Group by AECOM. Unless stated otherwise, KGS Group has not verified the accuracy, completeness or validity of such information, makes no representation regarding its accuracy and hereby disclaims any liability in connection therewith. KGS Group shall not be responsible for conditions/issues it was not authorized or able to investigate or which were beyond the scope of its work. The information and conclusions provided in this memorandum apply only as they existed at the time of KGS Group's work.

Third Party Use of Memorandum

Any use a third party makes of this memorandum or any reliance on or decisions made based on it, are the responsibility of such third parties. KGS Group accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions undertaken based on this memorandum.

Prepared By:

[redacted]

Cory Pyziak, P.Eng.
Geotechnical Engineer

Approved By:

[redacted]

Ryan Dobson, P.Eng.
Senior Geotechnical Engineer

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Cory Pyziak <[redacted]> 13 September 2024 at 15:32
To: "Zielbauer, Kyla" <[redacted]>
Cc: Jerry Shabogamik <[redacted]>

Good Afternoon Kyla,

We submitted a package on August 15, 2024 to AECOM and the team that had figures showing each water crossing and the associated photo log. Would you be able to forward this off to Jerry?

Thank you,

Cory Pyziak P.Eng.

GEOTECHNICAL ENGINEER

P [redacted]

C [redacted]

[redacted] | **kgsgroup.com**

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Cory Pyziak <[redacted]> 13 September 2024 at 15:33
To: Jerry Shabogamik <[redacted]>, "Zielbauer, Kyla" <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "McCutchon, James" <[redacted]>, "Price, Katelyn" <[redacted]>, "Fisken, Avril" <[redacted]>, Ryan Dobson <[redacted]>, "Kuenstler, Dan" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Anderson, Victoria" <[redacted]>

Hi Jerry,

I followed up with Kyla but KGS Group submitted a package with figures and photo log to the project team on August 15, 2024. I have asked for them to forward this information on.

Thank you and have a great weekend,

Cory Pyziak P.Eng.

GEOTECHNICAL ENGINEER

P [redacted]

C [redacted]

[redacted] | **kgsgroup.com**

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Zielbauer, Kyla <[redacted]> 16 September 2024 at 09:19
To: Jerry Shabogamik <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "McCutchon, James" <[redacted]>, "Price, Katelyn" <[redacted]>, "Fisken, Avril" <[redacted]>, Ryan Dobson <[redacted]>, Cory Pyziak <[redacted]>, "Kuenstler, Dan" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Anderson, Victoria" <[redacted]>

Good Morning Jerry,

Thank you for following up and for confirming your review of the summary memo.

The water crossings and aggregate site information/mapping was provided to Aroland First Nation in an email on August 19, 2024.

We have put all of the information (including the memo sent on Friday) into a google drive, which can be found here: [redacted]

Once you have a chance to review the mapping/information, let us know if you have any questions or comments.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 19 September 2024 at 09:01
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Contardo, Selena" <[redacted]>, "Crew, Jean-Marc" <[redacted]>

Good Morning Andrew and Jerry,

I wanted to check in regarding the list of names for fieldwork opportunities.

I've been informed that the upcoming groundwater monitoring work is tentatively scheduled for September 28 - October 5, so we would need to look at onboarding someone by mid next week.

If you have any information to pass along, we will work to hopefully get someone onboarded in time to participate.

Thank you,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Zielbauer, Kyla <[redacted]> 19 September 2024 at 16:51
To: Jerry Shabogamik <[redacted]>

Hi Jerry,

Following up to see if you've received your payment for the helicopter flyover.

Please let me know.

Thanks,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: October 11 - 14

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN Community Access Road - About the Draft EA / IS

Zielbauer, Kyla <[redacted]> 24 September 2024 at 09:27
To: Chief Sonny Gagnon <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Anna Marie Majiskon <[redacted]>, Councillor Bernard Gagnon <[redacted]>, Councillor Chad Kashkish <[redacted]>, Councillor Eunice Magiskan <[redacted]>, Councillor Tyrell Gagnon <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Bob Baxter <[redacted]>, Lawrence Baxter <[redacted]>, "MacInnis, Paul (MINES)" <paul.macinnis@ontario.ca>
Bcc: Lucia Jara Moreno <[redacted]>, MFFN Community Access Road Project Team <info@martenfallsaccessroad.ca>

Dear Chief Gagnon,

Please find attached a letter and frequently asked questions (FAQ) regarding the circulation of the **Draft Environmental Assessment / Impact Statement Report (Draft EA / IS)** for the Marten Falls First Nation Community Access Road for your community's review and comment.

The Draft EA / IS, and supporting documents, will describe how the preferred route was determined and identify how the proposed Community Access Road may affect the social, cultural, economic and natural environment.

As we prepare to submit the Draft EA / IS, we want to ensure your community has easy access to the documents and has identified a key community contact to help guide the review process.

Please fill out this questionnaire to identify a key contact and preferences related to the review process: [redacted]

We will be in touch in the Fall to discuss these matters with you but if you have any questions or concerns in the meantime, please do not hesitate to contact me.

Sincerely,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: Sept 26, Oct 11 - 14

2 attachments

2024-09-24 Draft EA IS Process Letter_Aroland First Nation.pdf
218K

FAQ - Draft EA IS - September 2024.pdf
1042K

September 24, 2024

Aroland First Nation
[redacted]
Sent via email

Subject: Draft Environmental Assessment / Impact Statement Report (EA / IS)

Dear Chief Sonny Gagnon,

This letter is to update you on the proposed Marten Falls First Nation (MFFN) Community Access Road and the circulation of the **Draft Environmental Assessment / Impact Statement Report (Draft EA / IS)** to Indigenous communities, the public and regulators for review and comment.

The Draft EA / IS, and supporting documents, will describe how the preferred route was determined and identify how the proposed Community Access Road may affect the social, cultural, economic and natural environment. Your input on the Draft EA / IS (e.g., on specific technical documents, proposed impact management and follow up measures, cumulative effects assessment, EA / IS conclusions, and on confirmation that input was captured appropriately) will help us prepare the Final EA / IS.

As we prepare to submit the Draft EA / IS, we want to ensure your community has easy access to the documents and has identified a key community contact to help guide the review process. We will be in touch in the Fall to discuss these matters with you.

Coming Soon for Your Review

Your input to these important planning documents is invaluable, and we want to ensure you have advance notice of when the Draft EA / IS will be circulated and what will be included in it. Some Indigenous communities have indicated that they would like time to review documents in advance of public release, so we're providing Indigenous communities early access to the Draft EA / IS this winter with a minimum review period of 120 days (additional time will be provided if the review period overlaps with the year-end holidays). **We will be in touch with the exact date of the release of the Draft EA / IS as soon as it is confirmed.**

The Draft EA / IS will be circulated to the public and regulators 60-days following the Indigenous communities review period. Individual members of an Indigenous community are welcome to

provide their own comments in addition to those provided on behalf of their community during the 60-day public review period. The exact review dates will be provided once confirmed.

We're Here to Help

The MFFN Community Access Road Project Team is available to support your community during the Draft EA / IS review process.

In addition to publishing plain language summaries to help guide you through the technical documents, we are planning activities to help prepare you for the review process. We will:

- Release a new webinars series on topics we've heard are of interest to you including: The Final Route for the Community Access Road and How the Road will be Constructed.
- Launch new videos to describe the final route for the Community Access Road and to provide an overview to the Draft EA / IS, including ways you can provide feedback.
- Host Public Information Center #6 to provide an update on the Community Access Road, share the Draft EA / IS report, answer questions and gather your feedback; and
- Three-Road Gathering & Expo #2.

We will also be available for—and encourage—meetings to review chapters and technical reports of interest to your community. If you have questions or if you would like to schedule a meeting to discuss, please contact us. We are happy to meet with you.

Be ready!

The Draft EA / IS will be a large document (approximately 500 - 1000 pages) and include thousands of pages of supporting documents (ranging from the technical documents to the Record of Consultation & Engagement).

We encourage you to book time with us before circulation of the Draft EA / IS to discuss how you would like to receive the Draft EA / IS from us and how best we can support you in your review.

Provincial Funding Support

The Province of Ontario continues to offer funding agreements with eligible communities to participate in the review of the Draft and Final EA / IS through the Participant Funding Initiative. They will be reaching out to you separately to discuss resources needed by the community to take part in the extended review period of the Draft EA / IS.

Funding for the Community Coordinator Program Is Still Available

We remind you that it is still possible to benefit from the help of a Community Coordinator. This person would be the primary point of contact between your community and the MFFN Community Access Road Project Team as we work through the environmental assessment process.

A Community Coordinator would provide advice, guidance and support for community engagement activities related to the proposed Community Access Road. At this stage in the process, a Community Coordinator could focus their time preparing the community for when the Draft EA / IS is circulated in November and help coordinate the review of this and associated documents.

If you would like a Community Coordinator in your community, we invite you to share the job poster attached to this letter with community members. This position will receive [redacted] per hour and is expected to require approximately 16 hours per week up to summer 2025. We are flexible with respect to payment terms (e.g., to an individual or to the band council) and are open to discussing what works best for your community. Please reach out for more information!

Don't hesitate to be in touch! We're happy to support you through this review.

We thank you for your continued participation and collaboration as we work towards building the Community Access Road.

Sincerely,

[redacted]

Qasim Saddique
Project Director

[redacted]

Lawrence Baxter
Senior Community Member Advisor

Cc:

- Qasim Sadique, Project Director, MFFN Community Access Road Project Team
- Lawrence Baxter, Senior Community Advisor, MFFN Community Access Road Project Team
- Bob Baxter, Senior Community Member Advisor, MFFN Community Access Road Project Team
- Jennifer Bruin, Technical Advisor, MFFN Community Access Road Project Team

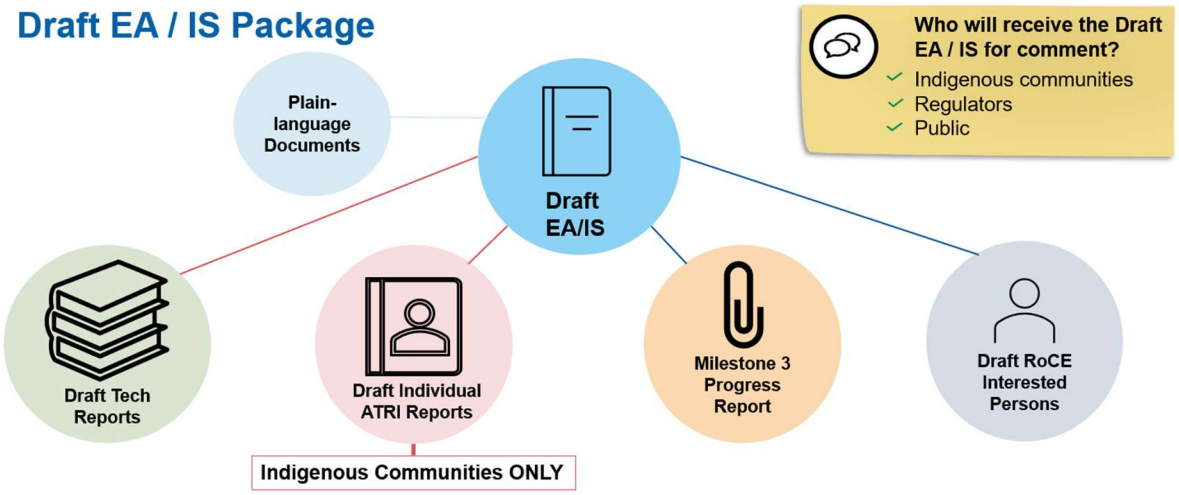
- Paul MacInnis, Senior Advisor, Ministry of Mines
- Councillor Joe Baxter, Aroland First Nation
- Councillor Mark Bell, Aroland First Nation
- Councillor Annamarie Makiskan, Aroland First Nation
- Councillor Bernard Gagnon, Aroland First Nation
- Councillor Chad Kashkish, Aroland First Nation
- Councillor Eunice Magiskan, Aroland First Nation
- Councillor Tyrell Gagnon, Aroland First Nation
- Jerry Shabogamik, Community Consultation Coordinator, Aroland First Nation
- Andrew Peach, Consultant, Aroland First Nation
- Ashley Childs, Consultant, Aroland First Nation
- Andrew Dieleman, Consultant, Aroland First Nation

Frequently Asked Questions – Draft EA / IS

Issued September 2024

What is included in the Draft Environmental Assessment / Impact Statement Report (EA / IS)?

The Draft EA / IS will be a large document (approximately 500 - 1000 pages) which includes thousands of pages of supporting documents. These range from technical documents on valued components (like noise, air quality, peatlands—see below question for a full list), individual Aboriginal and Treaty Rights and Interests (ATRI) reports, to the Records of Consultation & Engagement. We are here to help in your review—plain-language versions of select documents will be made available, and we encourage you to book time with us to discuss before we circulate the Draft EA / IS.



How have Indigenous communities influenced the Draft EA / IS?

Through consultation activities, the Marten Falls First Nation (MFFN) Community Access Road Project Team has collected feedback, information and Indigenous Knowledge to inform the final route selection and support the development of the Draft EA / IS. The ATRI / Three-Road Forums and Gatherings and Individual Community ATRI Existing Conditions Reports have facilitated the sharing of Indigenous Knowledge and provided a forum for open discussion around the proposed Community Access Road. The MFFN Community Access Road Project Team has engaged 22 Indigenous communities over the course of the environmental assessment process, working with key contacts and representatives of the communities who have provided their expertise, asked questions, and flagged concerns and issues that should be addressed and included in the Draft EA / IS.

Why is it important to provide your comments on the Draft Environmental Assessment / Impact Statement Report (Draft EA / IS)?

We are providing a Draft EA / IS to Indigenous communities, the public and regulators to allow for an early review of our information, approach and findings. Your input on the Draft EA / IS will inform the preparation of the Final EA / IS and allow us to incorporate your input and consider concerns related to the proposed Community Access Road.

How long do I have to review and provide comments on the Draft EA / IS?

Members of the Indigenous communities we are engaging will have access to the Draft EA / IS this winter via their community's key contact (identified by your Chief and Council). Indigenous communities have a minimum of 120 days to review and comment on the Draft EA / IS. If the 120 days overlap with year-end holidays; then additional time will be added to compensate. Access to the Draft EA / IS for Indigenous communities is 60-days in advance of the public and regulators' review period. The exact review dates will be provided once confirmed.

How and when will we get responses to the questions or comments that we provide on the Draft EA / IS?

Comments and questions received during the review process will be recorded and responses tracked and addressed, where possible, in the Final EA / IS. In addition, during the review period, we encourage you to contact us to schedule a meeting so that we can discuss with you directly any questions or concerns you might have. Our intent, where appropriate, is to provide you an opportunity to review or discuss your comments and our proposed response in advance of submitting the Final EA / IS.

What is the difference between the Draft EA / IS and the Final EA / IS version?

The Final EA / IS will incorporate comments, questions and feedback received on the Draft EA / IS from Indigenous communities, the public and regulators. Additional information from studies not completed before the release of the Draft EA / IS may also be included (if applicable). Because the Final EA / IS will be submitted by MFFN to the Ministry of the Environment, Conservation and Parks (MECP) and the Impact Assessment Agency of Canada (IAAC) for a decision by the Minister and Cabinet, it is important that communities participate in consultation on the Draft EA / IS, so that their input can be considered or addressed in the final version.

Where do we send our comments and feedback on the Draft EA / IS?

Once the key contact has compiled your community's feedback, the comments / edits / questions can be sent to your MFFN Community Access Road Project Team contact or to the Community Access Road general email address: info@martenfallsaccessroad.ca.

How will my feedback be received if I am not an official representative of my community (e.g., key contact)?

Individual members of an Indigenous community are welcome to provide their own comments in addition to those provided on behalf of their community during the public review period. This input will be addressed along with other comments received from the public and regulators.

What Technical Reports are included in the Draft EA / IS?

The technical documents will include information on valued components existing conditions, effects assessment and cumulative effects.

The following technical reports are included in the Draft EA / IS.

1. Noise and Vibrations	10. Ungulates
2. Groundwater and Geochemistry	11. Air Quality and Green House Gas
3. Surface Water	12. Land Use
4. Fish and Fish Habitat	13. Human Health
5. Physiography, Terrain and Soils	14. Social
6. Peatlands	15. Economics
7. Vegetation	16. Visual
8. Wildlife	17. Aboriginal and / or Treaty Rights Interests (ATRI) / Indigenous Knowledge
9. Birds	

What are Cumulative Effects and the Inclusions List?

Cumulative Effects are the potential effects of the Community Access Road combined with the

effects of other past, present and reasonably foreseeable future projects and activities. On their own, individual project effects may be minor, but when considered together with other project effects they may become significant.

As part of the provincial EA and federal Impact Assessment (IA) process for the Community Access Road, an assessment of the potential cumulative effects is being completed. The preliminary project Inclusion List identifies potential projects that will be considered for inclusion in the Cumulative Effects Assessment, which will be part of the Draft EA / IS.

How have Indigenous communities been consulted?

Indigenous Knowledge Program

The purpose of this program was to empower Indigenous communities to share information on their land and resource use, cultural practices and values, and rights and interests in the study area. Participation in the program enabled participating communities to either share existing Indigenous Knowledge (IK) and Indigenous Land and Resource Use (ILRU) information (previously collected by communities) or to complete project-specific IK and ILRU Studies.

Community Coordinator Program

The Community Coordinator Program supports the Community Access Road activities, meetings and events, helping to make sure input is collected and shared back with the MFFN Community Access Road Project Team.

Community Coordinators strengthen our collective efforts related to the EA / IA process and allow for a more open and responsive consultation and engagement between Indigenous communities and the MFFN Community Access Road Project Team.

Reports

Through the EA / IA process, the MFFN Community Access Road Project Team has worked with Indigenous communities to produce reports including: ATRI Existing Conditions Report, Milestone #1 and #2 Reports, Cultural Heritage Report, Stage 1 and Stage 2 Archaeological Assessment Reports, and the Interim Record of Consultation and Engagement (RoCE).

In-person & virtual consultation activities

To date, our consultation efforts have included:

- Five in-person Public Information Centres (PICs), including dedicated hours for Indigenous Community members;
- 31 in-person or virtual meetings with 11 communities, including 8 in-person or virtual meetings with MFFN;
- Two in-person ATRI forums;

- An in-person Three-road Project Gathering & Expo;
- Attendance at several conferences, including the Prospectors & Developers Association of Canada (PDAC) conference and the Matawa First Nations Management gathering.
- Fourteen virtual webinars; and
- Ongoing outreach including phone calls emails, virtual meetings, and in-person meetings with communities and tribal councils.

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 25 September 2024 at 16:17
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Jeremy Shute <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, Andrea Nokleby <[redacted]>, Valdine Walker <[redacted]>

Good Afternoon Andrew,

You mentioned that Aroland First Nation is observing Culture Week this week, but I was hoping to send over some Project updates in the meantime and connect with you next week if there are any items you would like to discuss.

IK Program
Thank you very much for sending Aroland First Nation's IK and Land Use Study on September 10, 2024. Now that both the IK Funding and Sharing Agreements have been signed and sent back to Aroland First Nation, could you please indicate if a lump sum payment would be preferred for the IK funding and if so, could you provide the details necessary for our team to send the payment? Valdine Walker (cc'd here) works with our team to coordinate any payments, should you have any questions.

Community Coordinator Program
Are there any updates regarding the selection of an applicant to fill the Community Coordinator position? You mentioned in an email on August 8, 2024, that yourself and Jerry were working with Aroland First Nation's HR staff to review the applicants. I've reattached the job posting to this email for convenience. Please let me know and we can work to initiate the next steps of the process.

MFFN CAR Stage 1 Archaeological Assessment Report
The Stage 1 Archaeological Assessment Report was sent to Aroland First Nation on June 3, 2024 and feedback was requested by August 2, 2024. Could you let me know if Aroland First Nation intends on providing any feedback or comments on the report? Our team is looking to move forward with finalizing the report.

Aroland First Nation/MFFN CAR Project Meetings (June 19 & 20, July 15 & 16)
Things have been very busy and I apologize for the delay in sending these over. We are currently preparing summaries of the meetings and will provide those to Aroland First Nation for review when they are ready.

Stay Up to Date!
To stay updated on ongoing activities for the MFFN CAR, sign up for our newsletter here: Contact Us - Marten Falls First Nation (martenfallsaccessroad.ca) or follow us on Facebook, LinkedIn and Instagram.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: Sept 26, Oct 11 - 14

MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD



WE'RE HIRING!

Marten Falls First Nation (MFFN) is undertaking a federal Impact Assessment (IA) and provincial environmental assessment (EA) for an all-season access road to our community. To support these studies, we are looking to hire **Community Coordinators**.

Are you a highly motivated person? Do you have strong organizational and relationship building skills? Would you like to work with a great project team and build experience in environmental management?

If so, this could be the role for you!

The Community Coordinator will be a primary point of contact between your community and the MFFN Project Team. We will work closely with you as you help to involve your community in the environmental assessment processes.

Responsibilities

- Coordinate between the MFFN Project Team and community members living in / outside ofyour community as per your local practices and in collaboration with Chief and Council;
- Provide advice, guidance and support for community engagement activities related to the

Project including:

  - Coordinate and organize logistics for meetings, workshops, events and / or school visits (e.g., book meeting spaces, order refreshments, help with truck / boat rentals and accommodations);
  - Help identify meeting participants and information providers (e.g., youth and / or elders); Assist with meeting facilitation, note taking and meeting minute preparation, and coordinate translation services, if needed; and
  - Organize distributing Project advertisements and notices in your community; either online (e.g., Facebook or posting in community);
- Assist in collecting data / information in your community (e.g., Indigenous Knowledge Aboriginal and / or Treaty Rights and Interests, community and socio-economic information);
- Assist in coordination of the review of the Draft Environmental Assessment / Impact Statement, and / or Aboriginal and / or Treaty Rights and Interests Reports.

This position will receive [redacted] per hour and is expected to be approximately 16 hours per week for up to 1 year (up to Summer 2025). If you or someone you know would like to learn more about the program, contact: Niki Angelis at info@martenfallsaccessroad.ca or 1-800-764-9114.

Zielbauer, Kyla <[redacted]>

Proposed Meetings with Aroland - October 16 and 18, 2024

Zielbauer, Kyla <[redacted]> 1 October 2024 at 16:08
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Councillor Mark Bell <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Fisken, Avril" <[redacted]>, "Angelis, Niki" <[redacted]>, Lucia Jara Moreno <[redacted]>

Hi Andrew,

I am following up on the proposed October meetings with Aroland First Nation. It is my understanding that Qasim had proposed the following meeting dates and times and that you would follow up with Jerry this week.

Meeting in Aroland	Meeting with Aroland in Thunder Bay
Wednesday October 16, 2024 Audience: Aroland Members Location: Aroland Time: 4pm-7pm	**Friday October 18, 2024** Audience: Aroland Members Location: Thunder Bay Time: 5pm-8pm

Given that the meeting dates are quickly approaching, I wanted to check in and see if you've had a chance to discuss these proposed meeting details with Jerry. Could you please let me know (by this Thursday, if possible) if there has been any discussion or confirmation on this topic?

Apologies if you've already responded to Qasim in a separate email; I was hoping to provide an update to the broader team.

Thanks very much,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: Oct 11 - 14

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Proposed Meetings with Aroland - October 16 and 18, 2024

Zielbauer, Kyla <[redacted]> 2 October 2024 at 11:43
To: Mark Bell <[redacted]>
Cc: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Fisken, Avril" <[redacted]>, "Angelis, Niki" <[redacted]>, Lucia Jara Moreno <[redacted]>

Hi Mark,

Thank you for letting us know. Please accept our condolences and well wishes for the community during this time.

We will wait to hear from you or Andrew once everyone has a chance to regroup on this.

Sincerely,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

CANADA BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: Oct 11 - 14

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN Community Access Road - About the Draft EA / IS

Zielbauer, Kyla <[redacted]> 7 October 2024 at 10:38
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>

Good Morning Andrew and Jerry,

Please see the email below regarding the Draft EA / IS for the MFFN CAR Project, as I just realized you were not cc'd on the original email I sent on September 24th.

I've reattached the letter and FAQ documents to this email for your convenience.

Let me know if you have any questions or concerns.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: Oct 11 - 14

[Quoted text hidden]

2 attachments

2024-09-24 Draft EA IS Process Letter_Aroland First Nation.pdf
218K

FAQ - Draft EA IS - September 2024.pdf
1042K

September 24, 2024

Aroland First Nation
[redacted]
Sent via email

Subject: Draft Environmental Assessment / Impact Statement Report (EA / IS)

Dear Chief Sonny Gagnon,

This letter is to update you on the proposed Marten Falls First Nation (MFFN) Community Access Road and the circulation of the **Draft Environmental Assessment / Impact Statement Report (Draft EA / IS)** to Indigenous communities, the public and regulators for review and comment.

The Draft EA / IS, and supporting documents, will describe how the preferred route was determined and identify how the proposed Community Access Road may affect the social, cultural, economic and natural environment. Your input on the Draft EA / IS (e.g., on specific technical documents, proposed impact management and follow up measures, cumulative effects assessment, EA / IS conclusions, and on confirmation that input was captured appropriately) will help us prepare the Final EA / IS.

As we prepare to submit the Draft EA / IS, we want to ensure your community has easy access to the documents and has identified a key community contact to help guide the review process. We will be in touch in the Fall to discuss these matters with you.

Coming Soon for Your Review

Your input to these important planning documents is invaluable, and we want to ensure you have advance notice of when the Draft EA / IS will be circulated and what will be included in it. Some Indigenous communities have indicated that they would like time to review documents in advance of public release, so we're providing Indigenous communities early access to the Draft EA / IS this winter with a minimum review period of 120 days (additional time will be provided if the review period overlaps with the year-end holidays). **We will be in touch with the exact date of the release of the Draft EA / IS as soon as it is confirmed.**

The Draft EA / IS will be circulated to the public and regulators 60-days following the Indigenous communities review period. Individual members of an Indigenous community are welcome to

provide their own comments in addition to those provided on behalf of their community during the 60-day public review period. The exact review dates will be provided once confirmed.

We're Here to Help

The MFFN Community Access Road Project Team is available to support your community during the Draft EA / IS review process.

In addition to publishing plain language summaries to help guide you through the technical documents, we are planning activities to help prepare you for the review process. We will:

- Release a new webinars series on topics we've heard are of interest to you including: The Final Route for the Community Access Road and How the Road will be Constructed.
- Launch new videos to describe the final route for the Community Access Road and to provide an overview to the Draft EA / IS, including ways you can provide feedback.
- Host Public Information Center #6 to provide an update on the Community Access Road, share the Draft EA / IS report, answer questions and gather your feedback; and
- Three-Road Gathering & Expo #2.

We will also be available for—and encourage—meetings to review chapters and technical reports of interest to your community. If you have questions or if you would like to schedule a meeting to discuss, please contact us. We are happy to meet with you.

Be ready!

The Draft EA / IS will be a large document (approximately 500 - 1000 pages) and include thousands of pages of supporting documents (ranging from the technical documents to the Record of Consultation & Engagement).

We encourage you to book time with us before circulation of the Draft EA / IS to discuss how you would like to receive the Draft EA / IS from us and how best we can support you in your review.

Provincial Funding Support

The Province of Ontario continues to offer funding agreements with eligible communities to participate in the review of the Draft and Final EA / IS through the Participant Funding Initiative. They will be reaching out to you separately to discuss resources needed by the community to take part in the extended review period of the Draft EA / IS.

Funding for the Community Coordinator Program Is Still Available

We remind you that it is still possible to benefit from the help of a Community Coordinator. This person would be the primary point of contact between your community and the MFFN Community Access Road Project Team as we work through the environmental assessment process.

A Community Coordinator would provide advice, guidance and support for community engagement activities related to the proposed Community Access Road. At this stage in the process, a Community Coordinator could focus their time preparing the community for when the Draft EA / IS is circulated in November and help coordinate the review of this and associated documents.

If you would like a Community Coordinator in your community, we invite you to share the job poster attached to this letter with community members. This position will receive [redacted] per hour and is expected to require approximately 16 hours per week up to summer 2025. We are flexible with respect to payment terms (e.g., to an individual or to the band council) and are open to discussing what works best for your community. Please reach out for more information!

Don't hesitate to be in touch! We're happy to support you through this review.

We thank you for your continued participation and collaboration as we work towards building the Community Access Road.

Sincerely,

[redacted]

Qasim Saddique
Project Director

[redacted]

Lawrence Baxter
Senior Community Member Advisor

Cc:

- Qasim Sadique, Project Director, MFFN Community Access Road Project Team
- Lawrence Baxter, Senior Community Advisor, MFFN Community Access Road Project Team
- Bob Baxter, Senior Community Member Advisor, MFFN Community Access Road Project Team
- Jennifer Bruin, Technical Advisor, MFFN Community Access Road Project Team

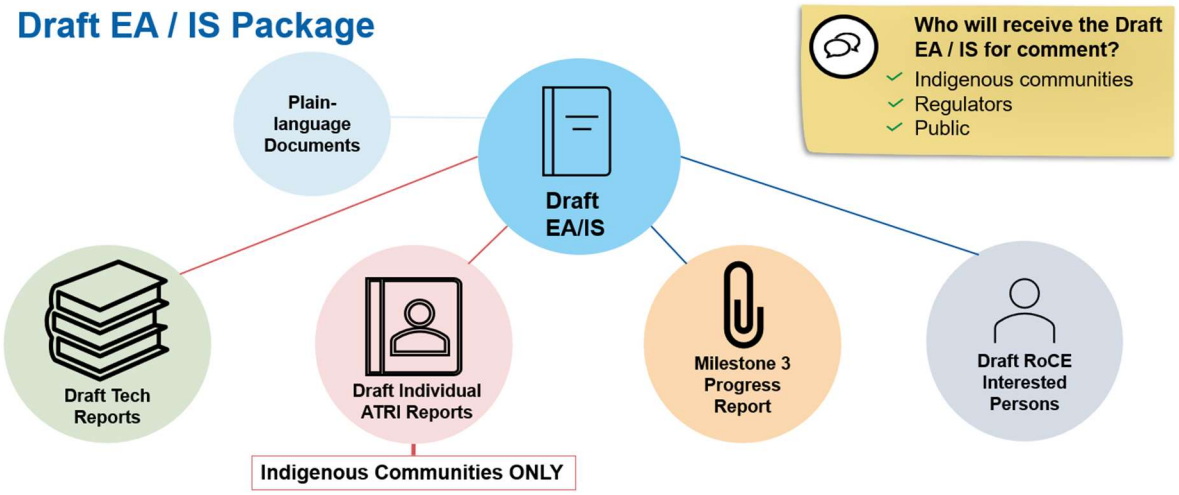
- Paul MacInnis, Senior Advisor, Ministry of Mines
- Councillor Joe Baxter, Aroland First Nation
- Councillor Mark Bell, Aroland First Nation
- Councillor Annamarie Makiskan, Aroland First Nation
- Councillor Bernard Gagnon, Aroland First Nation
- Councillor Chad Kashkish, Aroland First Nation
- Councillor Eunice Magiskan, Aroland First Nation
- Councillor Tyrell Gagnon, Aroland First Nation
- Jerry Shabogamik, Community Consultation Coordinator, Aroland First Nation
- Andrew Peach, Consultant, Aroland First Nation
- Ashley Childs, Consultant, Aroland First Nation
- Andrew Dieleman, Consultant, Aroland First Nation

Frequently Asked Questions – Draft EA / IS

Issued September 2024

What is included in the Draft Environmental Assessment / Impact Statement Report (EA / IS)?

The Draft EA / IS will be a large document (approximately 500 - 1000 pages) which includes thousands of pages of supporting documents. These range from technical documents on valued components (like noise, air quality, peatlands—see below question for a full list), individual Aboriginal and Treaty Rights and Interests (ATRI) reports, to the Records of Consultation & Engagement. We are here to help in your review—plain-language versions of select documents will be made available, and we encourage you to book time with us to discuss before we circulate the Draft EA / IS.



How have Indigenous communities influenced the Draft EA / IS?

Through consultation activities, the Marten Falls First Nation (MFFN) Community Access Road Project Team has collected feedback, information and Indigenous Knowledge to inform the final route selection and support the development of the Draft EA / IS. The ATRI / Three-Road Forums and Gatherings and Individual Community ATRI Existing Conditions Reports have facilitated the sharing of Indigenous Knowledge and provided a forum for open discussion around the proposed Community Access Road. The MFFN Community Access Road Project Team has engaged 22 Indigenous communities over the course of the environmental assessment process, working with key contacts and representatives of the communities who have provided their expertise, asked questions, and flagged concerns and issues that should be addressed and included in the Draft EA / IS.

Why is it important to provide your comments on the Draft Environmental Assessment / Impact Statement Report (Draft EA / IS)?

We are providing a Draft EA / IS to Indigenous communities, the public and regulators to allow for an early review of our information, approach and findings. Your input on the Draft EA / IS will inform the preparation of the Final EA / IS and allow us to incorporate your input and consider concerns related to the proposed Community Access Road.

How long do I have to review and provide comments on the Draft EA / IS?

Members of the Indigenous communities we are engaging will have access to the Draft EA / IS this winter via their community's key contact (identified by your Chief and Council). Indigenous communities have a minimum of 120 days to review and comment on the Draft EA / IS. If the 120 days overlap with year-end holidays; then additional time will be added to compensate. Access to the Draft EA / IS for Indigenous communities is 60-days in advance of the public and regulators' review period. The exact review dates will be provided once confirmed.

How and when will we get responses to the questions or comments that we provide on the Draft EA / IS?

Comments and questions received during the review process will be recorded and responses tracked and addressed, where possible, in the Final EA / IS. In addition, during the review period, we encourage you to contact us to schedule a meeting so that we can discuss with you directly any questions or concerns you might have. Our intent, where appropriate, is to provide you an opportunity to review or discuss your comments and our proposed response in advance of submitting the Final EA / IS.

What is the difference between the Draft EA / IS and the Final EA / IS version?

The Final EA / IS will incorporate comments, questions and feedback received on the Draft EA / IS from Indigenous communities, the public and regulators. Additional information from studies not completed before the release of the Draft EA / IS may also be included (if applicable). Because the Final EA / IS will be submitted by MFFN to the Ministry of the Environment, Conservation and Parks (MECP) and the Impact Assessment Agency of Canada (IAAC) for a decision by the Minister and Cabinet, it is important that communities participate in consultation on the Draft EA / IS, so that their input can be considered or addressed in the final version.

Where do we send our comments and feedback on the Draft EA / IS?

Once the key contact has compiled your community's feedback, the comments / edits / questions can be sent to your MFFN Community Access Road Project Team contact or to the Community Access Road general email address: info@martenfallsaccessroad.ca.

How will my feedback be received if I am not an official representative of my community (e.g., key contact)?

Individual members of an Indigenous community are welcome to provide their own comments in addition to those provided on behalf of their community during the public review period. This input will be addressed along with other comments received from the public and regulators.

What Technical Reports are included in the Draft EA / IS?

The technical documents will include information on valued components existing conditions, effects assessment and cumulative effects.

The following technical reports are included in the Draft EA / IS.

1. Noise and Vibrations	10. Ungulates
2. Groundwater and Geochemistry	11. Air Quality and Green House Gas
3. Surface Water	12. Land Use
4. Fish and Fish Habitat	13. Human Health
5. Physiography, Terrain and Soils	14. Social
6. Peatlands	15. Economics
7. Vegetation	16. Visual
8. Wildlife	17. Aboriginal and / or Treaty Rights Interests (ATRI) / Indigenous Knowledge
9. Birds	

What are Cumulative Effects and the Inclusions List?

Cumulative Effects are the potential effects of the Community Access Road combined with the

effects of other past, present and reasonably foreseeable future projects and activities. On their own, individual project effects may be minor, but when considered together with other project effects they may become significant.

As part of the provincial EA and federal Impact Assessment (IA) process for the Community Access Road, an assessment of the potential cumulative effects is being completed. The preliminary project Inclusion List identifies potential projects that will be considered for inclusion in the Cumulative Effects Assessment, which will be part of the Draft EA / IS.

How have Indigenous communities been consulted?

Indigenous Knowledge Program

The purpose of this program was to empower Indigenous communities to share information on their land and resource use, cultural practices and values, and rights and interests in the study area. Participation in the program enabled participating communities to either share existing Indigenous Knowledge (IK) and Indigenous Land and Resource Use (ILRU) information (previously collected by communities) or to complete project-specific IK and ILRU Studies.

Community Coordinator Program

The Community Coordinator Program supports the Community Access Road activities, meetings and events, helping to make sure input is collected and shared back with the MFFN Community Access Road Project Team.

Community Coordinators strengthen our collective efforts related to the EA / IA process and allow for a more open and responsive consultation and engagement between Indigenous communities and the MFFN Community Access Road Project Team.

Reports

Through the EA / IA process, the MFFN Community Access Road Project Team has worked with Indigenous communities to produce reports including: ATRI Existing Conditions Report, Milestone #1 and #2 Reports, Cultural Heritage Report, Stage 1 and Stage 2 Archaeological Assessment Reports, and the Interim Record of Consultation and Engagement (RoCE).

In-person & virtual consultation activities

To date, our consultation efforts have included:

- Five in-person Public Information Centres (PICs), including dedicated hours for Indigenous Community members;
- 31 in-person or virtual meetings with 11 communities, including 8 in-person or virtual meetings with MFFN;
- Two in-person ATRI forums;

- An in-person Three-road Project Gathering & Expo;
- Attendance at several conferences, including the Prospectors & Developers Association of Canada (PDAC) conference and the Matawa First Nations Management gathering.
- Fourteen virtual webinars; and
- Ongoing outreach including phone calls emails, virtual meetings, and in-person meetings with communities and tribal councils.

Zielbauer, Kyla <[redacted]>

good morning re community coordinator job for martin falls first nation

Zielbauer, Kyla <[redacted]> 10 October 2024 at 11:08
To: Jerry Shabogamik <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Joe Baxter <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Qasim Saddique <q[redacted]>, Jennifer Bruin <[redacted]>, "Fisken, Avril" <[redacted]>, "Angelis, Niki" <[redacted]>, Lucia Jara Moreno <[redacted]>
Bcc: MFFN Community Access Road Project Team <info@martenfallsaccessroad.ca>

Good morning Jerry,

Thanks very much for confirming that Aroland First Nation has selected Jeff Gagnon to fill the Community Coordinator Program position.

I will provide an update once I confirm the next steps with our team.

Have a great holiday weekend,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: Oct 11 - 14

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

Aroland First Nation IK Report

Zielbauer, Kyla <[redacted]> 10 October 2024 at 09:28
To: Andrew Peach <[redacted]>
Cc: Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Sonny Gagnon <[redacted]>, Chief Gagnon <[redacted]>, Councillor Annamarie Makiskan <[redacted]>, Councillor Bernard Gagnon <[redacted]>, Councillor Chad Kashkeesh <[redacted]>, Councillor Eunice Magiskan <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Tyrell Gagnon <[redacted]>, Mark Bell <[redacted]>, Joe Baxter <[redacted]>, "[redacted]" <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>

Good Morning Andrew,

Would it be possible to receive shapefiles for the information provided in Aroland First Nation's Indigenous Knowledge and Land Use Study Report? Ideally, we would be looking for shapefiles with point information, if possible.

We would like to use this information to overlay with the MFFN CAR ATRI local and regional study areas to determine the potential for impacts on Aroland First Nation's rights and interests.

Let us know if you have any questions or concerns.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: Oct 11 - 14

Zielbauer, Kyla <[redacted]>

Aroland First Nation IK Report

Zielbauer, Kyla <[redacted]> 23 October 2024 at 17:59
To: Andrew Peach <[redacted]>
Cc: Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Sonny Gagnon <[redacted]>, Chief Gagnon <[redacted]>, Councillor Annamarie Makiskan <[redacted]>, Councillor Bernard Gagnon <[redacted]>, Councillor Chad Kashkeesh <[redacted]>, Councillor Eunice Magiskan <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Tyrell Gagnon <[redacted]>, Mark Bell <[redacted]>, Joe Baxter <[redacted]>, "[redacted]" <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, "[redacted]" <[redacted]>

Hi Andrew,

Thanks very much for the response.

We appreciate Aroland First Nation sharing their report.

Have a great rest of your week,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 25 October 2024 at 09:05
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Jeremy Shute <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, Andrea Nokleby <[redacted]>, Valdine Walker <[redacted]>

Good Morning,

Please find some updates on the Marten Falls First Nation Community Access Road (MFFN CAR) Project below:

IK Program
Both the IK Program Sharing and Funding Agreements have been signed. Could you please indicate if a lump sum payment would be preferred for the IK funding and if so, could you provide the details necessary for our team to send the payment? Valdine Walker (cc'd here) is responsible for coordinating payments.

Community Coordinator Program
We received an email from Jerry Shabogamik on October 10, 2024, indicating that Aroland First Nation Chief and Council had selected Jeff Gagnon to fill the Community Coordinator position. I reached out to Jeff through the phone number Jerry provided me, however, there was no answer and I was unable to leave a voicemail as the mailbox was full. I will keep trying his number.

Draft EA / IS Report
On September 24, 2024, we sent you an email with a letter and FAQ in preparation for the release of the Draft Environmental Assessment (EA) / Impact Statement (IS) Report. As we prepare to submit the Draft EA / IS, we want to ensure your community has easy access to the documents and has identified a key community contact to help guide the review process. Please fill out this questionnaire to identify a key contact and preferences related to the review process: [redacted]

Please let me know if you would like to discuss any of the information mentioned above, or anything else related to the MFFN CAR Project, and I can give you a call.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

Re: IK Program funding

Walker, Valdine <[redacted]> 30 October 2024 at 14:17
To: Andrew Peach <[redacted]>
Cc: Kyla Zielbauer <[redacted]>, Andrea Nokleby <[redacted]>

Hi Andrew,

Thank you for the contact information.

I will reach out to Laine shortly.

Have a great day!

Valdine Walker
Associate
Dillon Consulting Limited
[redacted]
www.dillon.ca

Advance Notice Out of Office - Monday, November 4

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

IK Program Funding MFFN CAR Project

Walker, Valdine <[redacted]> 31 October 2024 at 15:36
To: [redacted]
Cc: Andrea Nokleby <[redacted]>, Kyla Zielbauer <[redacted]>, 188898 <1[redacted]>

Good afternoon Laine,

I am assisting with the IK program funding for the MFFN CAR Project and would like to confirm the preferred payment method of either a mailed cheque to the address below or a direct deposit payment.

Aroland First Nation
Address: [redacted],

If the direct deposit is preferred could you please send me a copy of a void cheque at your earliest convenience.

Thank you and have a great day!

Valdine Walker
Associate
Dillon Consulting Limited
[redacted]
www.dillon.ca

Advance Notice Out of Office - Monday, November 4

Zielbauer, Kyla <[redacted]>

Aroland First Nation review of Draft Preliminary Aboriginal and/or Treaty Rights and Interests Preliminary Existing Conditions Report

Zielbauer, Kyla <[redacted]> 6 November 2024 at 07:55
To: Andrew Peach <[redacted]>
Cc: "[redacted]" <[redacted]>, "[redacted]" <[redacted]>, Mark Bell <[redacted]>, "[redacted]" <[redacted]>, "c[redacted]" <[redacted]>, "[redacted]" <[redacted]>, Councillor Tyrell Gagnon <[redacted]>, "[redacted]" <c[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Chief Bruce Achneepineskum <[redacted]>, "[redacted]" <[redacted]>, "[redacted]" <[redacted]>, "[redacted]" <[redacted]>, "[redacted]" <[redacted]>, Bob Baxter <[redacted]>, "[redacted]" <[redacted]>, "[redacted]" <[redacted]>, Lawrence Baxter <[redacted]>, "Moszynski, Dorothy (MECP)" <[redacted]>, "[redacted]" <[redacted]>, "Cafaro, Caitlin (IAAC/AEIC)" <[redacted]>, "[redacted]" <[redacted]>, Qasim Saddique <[redacted]>, "[redacted]" <[redacted]>, Andrea Nokleby <[redacted]>, Lucia Jara Moreno <[redacted]>

Hello Andrew,

Please find a response to Aroland First Nation's comments on the Preliminary ATRI Existing Conditions Report attached here.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

MFFN CAR to Aroland - Response to ATRI Existing Conditions Report Comments - Nov 5, 2024.pdf
342K

November 5, 2024

Aroland First Nation
[redacted]
[redacted]
Sent via email

Subject: Aroland First Nation response to the Marten Falls First Nation Community Access Road Draft Preliminary Aboriginal and / or Treaty Rights and Interests Existing Conditions Report

Dear Chief Sonny Gagnon,

Thank you for your letter, received by email on February 16, 2024, in response to our request for feedback on the Draft Preliminary Aboriginal and / or Treaty Rights and Interests (ATRI) Existing Conditions Report (the Preliminary Existing Conditions Report) for the Marten Falls First Nation Community Access Road Project (MFFN CAR; the Community Access Road). Our response to your comments on the Preliminary Existing Conditions Report are provided below and have been organized using the same three points of discussion raised in your letter.

<u>1 – Inclusion of information provided by Aroland First Nation in the Environmental Assessment / Impact Statement process to date</u>

Many of the comments provided by Aroland First Nation relate to the absence of information in the Preliminary Existing Conditions Report in terms of potential impacts of the Community Access Road on Aroland First Nation's rights. The Preliminary Existing Conditions Report previously shared with communities were intended to support the collection of information in advance of the preparation of the ATRI Draft Existing Conditions and Assessment Report. We have since received Aroland First Nation's Indigenous Knowledge and Land Use Study. In addition to this study, as well as the information provided in the February 16, 2024, letter, we are currently revising the description of existing conditions to reflect the information received from both sources.

The revised description of existing conditions will be provided to Aroland First Nation for review in the forthcoming ATRI Draft Existing Conditions and Assessment Report. Indigenous communities and groups will be provided with an opportunity to review and provide feedback on the ATRI Draft Existing Conditions and Assessment Report, which will be used to inform the ATRI Final Existing Conditions and Assessment Report.

2 – Inclusion of Aroland First Nation's Indigenous Knowledge from forthcoming Project-specific Indigenous Knowledge, Land Use and Occupancy Study (IKLUOS)

We note and thank you for the information outlined in Appendix B regarding areas of interest in the Community Access Road area. Dusey Lake and Patience Lake were highlighted to Aroland First Nation community members during recent community meetings hosted by the MFFN CAR Project Team to receive additional feedback. These areas have also been identified as important areas by Marten Falls First Nation and were used to inform the route selection process. While the potential for impacts on trapping activities has been considered, we are currently reviewing the information provided in Aroland First Nation's Indigenous Knowledge and Land Use Study to inform revisions to the description of existing conditions and to the Draft ATRI impact assessment. As noted above, this information will be provided to Aroland First Nation through the forthcoming ATRI Draft Existing Conditions and Assessment Report. We welcome any additional information you may want to share to be incorporated into the report.

We acknowledge your expectations regarding the provision of IKLUOS information for the Community Access Road. The MFFN CAR Project Team and Marten Falls First Nation have expressed for several years our commitment to working with and supporting Aroland First Nation. We will continue to do so, as requested, while respecting your community protocols on the collection and sharing of IKLUOS information. Protocols outlined in the finalized IK Sharing Agreement between Aroland First Nation and Marten Falls First Nation will be followed.

3 – Inclusion of Aroland First Nation's ongoing requests for a deeper consultation process and for a distinctions-based approach to consultation for the Community Access Road

We thank Aroland First Nation in your attempts to engage with Marten Falls First Nation and understand that there have been challenges in aligning our schedules and priorities in the past. A communication protocol agreement was signed in September 2023 between Aroland First Nation and Marten Falls First Nation. A new joint community group was established earlier this year. Most recently, the MFFN CAR Project Team hosted several meetings with Aroland First Nation community members in Thunder Bay and in-community. We are happy to have had the chance to strengthen the relationship between Aroland First Nation and Marten Falls First Nation, and to mutually align our consultation and engagement processes for the Community Access Road. We look forward to continuing to build the relationship between the Nations and to continuing to receive Aroland First Nation's feedback and information.

Should Aroland First Nation have further questions or concerns regarding the ATRI Draft Existing Conditions and Assessment Report or related subject matter, please contact Bob Baxter at [redacted] and / or Andrea Nokleby at [redacted].

In the meantime, we look forward to continuing our conservations and working with your community. Kyla Zielbauer, at [redacted], can be contacted to organize meetings, but please do not hesitate

to reach out to either of us to further discuss the Community Access Road or answer any questions you may have.

Sincerely,



Qasim Saddique
Project Director



Lawrence Baxter
Senior Community Member Advisor

Cc:

- Councillor Joe Baxter, Aroland First Nation
- Councillor Mark Bell, Aroland First Nation
- Councillor Bernard Gagnon, Aroland First Nation
- Councillor Chad Kashkish, Aroland First Nation
- Councillor Eunice Magiskan, Aroland First Nation
- Councillor Anna Marie Majiskon, Aroland First Nation
- Councillor Tyrell Gagnon, Aroland First Nation
- Chief Bruce Achneepineskum, MFFN
- Councillor Linda Moonias, Marten Falls First Nation
- Councillor Shane Baxter, Marten Falls First Nation
- Councillor Maria Baxter, Marten Falls First Nation
- Councillor Paul Achneepineskum, Marten Falls First Nation
- Councillor Rob Moonias, Marten Falls First Nation
- Councillor Bob Baxter, Marten Falls First Nation
- Councillor Russell Achneepineskum, Marten Falls First Nation
- Councillor Yvonne Baxter, Marten Falls First Nation
- Andrew Peach, Aroland First Nation Consultant
- Jerry Shabogamik, Aroland First Nation Consultation Coordinator
- Ashley Childs, Aroland First Nation Consultant
- Andrew Dieleman, Aroland First Nation Consultant
- Kate Kempton, Aroland First Nation Legal Counsel
- Dorothy Moszynski, Environmental Assessment Branch, MECP

- Sasha McLeod, Environmental Assessment Branch, MECP
- Caitlin Cafaro, Impact Assessment Agency of Canada
- Jennifer Bruin, MFFN CAR Project Team
- Andrea Nokleby, MFFN CAR Project Consultant

Zielbauer, Kyla <[redacted]>

Community Coordinator Program Update

Zielbauer, Kyla <[redacted]> 8 November 2024 at 14:53
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, MFFN Community Access Road Project Team <info@martenfallsaccessroad.ca>

Hello,

This email is to update you on the proposed Marten Falls First Nation (MFFN) Community Access Road and the Community Coordinator Program (the Program).

The timing window for participation in the Program has passed and it is being discontinued and replaced with a one-time capacity funding payment to help support engagement in the Community Access Road in a manner that best suits your community.

The original objective of identifying a Community Coordinator was to have the individual support consultation efforts between the MFFN Community Access Road and your community with outreach, field work and Public Information Centres, among other engagement activities. As we approach the circulation of the Draft Environmental Assessment / Impact Statement (EA / IS), there are fewer tasks for a Community Coordinator to complete based on the original description of the role. Consultation and outreach activities will continue, however, as we approach the submission of the Draft EA / IS, the focus will change to its review and gathering of feedback.

To ensure your community is supported during the review of the Draft EA / IS, we would like to offer a **one-time lump sum capacity funding payment of** [redacted]. These funds are intended to support your engagement in the Community Access Road; we believe that this approach will provide your community with the flexibility to allocate the funds as you see fit and ensure that their use matches your needs.

If you chose to, these funds could support your review and comment gathering on the Draft EA / IS by Elders and / or youth, for example. If your community would like to have a Community Coordinator to support the review (e.g., by gathering and compiling feedback), you are able to use this funding to pay that position. However, please note that as our Community Coordinator Program is being discontinued, the responsibilities of managing this role will be the responsibility of your community. During the review period of the Draft EA / IS, the Project Team will continue to make themselves available to help support you upon request (e.g., with Project materials and information, and meetings as required).

If this capacity funding is of interest to you, please respond to this email before **February 28, 2025**, identifying which business entity the payment should be made to, and we will provide a funding agreement for your review.

Please let us know if you have any questions.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Zielbauer, Kyla <[redacted]>

Community Coordinator Program Update

Zielbauer, Kyla <[redacted]> 12 November 2024 at 18:06
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Lucia Jara Moreno <[redacted]>

Hi Andrew,

Thanks for making the time to speak with me yesterday regarding the discontinuation of the Community Coordinator Program and the potential next steps.

We discussed the change of the Program to a one-time lump sum capacity funding payment of [redacted] that can be used by the community for engagement on the MFFN CAR Project; how the money will be used is to be determined by Aroland First Nation. We discussed how this could change Jeff Gagnon's role, as he was previously identified as the person to fill the Community Coordinator role. We agreed that you would follow up with Chief and Council to confirm their preferences regarding Jeff's role and whether he would work with MFFN CAR going forward. I let you know that the funding agreement for the capacity funding is being finalized and would be provided ASAP. We also discussed some details regarding the upcoming review of the Draft EA / IS Report including the survey sent by the Project, preferences for the Report review and that the capacity funding could be used to help support the review of the Report. We briefly talked about the potential for a community meeting in the new year.

As mentioned, I'm sending a follow up email to highlight some action items from our call:

- Andrew to confirm the approach for Jeff's role with Chief and Council including communication preferences with MFFN CAR going forward
- Andrew to confirm if Aroland First Nation would like to move forward with the one-time lump sum capacity funding of [redacted]
- Kyla to confirm whether an electronic version of the Draft EA / IS Report will be available
- Kyla to send over the capacity funding agreement or provide update as soon as possible
- Andrew/Kyla to confirm whether a community meeting should be set up in the new year

Please let me know if I've missed anything.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR - Milestone #3 Progress Report

Zielbauer, Kyla <[redacted]> 2 December 2024 at 07:40
To: Chief Sonny Gagnon <c[redacted]>, Andrew Peach <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, MFFN Community Access Road Project Team <info@martenfallsaccessroad.ca>

Good Morning Chief Gagnon and Andrew,

I hope this email finds you well!

The Milestone #3 Progress Report for the Marten Falls First Nation Community Access Road has been drafted and is ready for review. The following link includes the Report and associated appendices to view or download, for Aroland First Nation. The Milestone #3 Progress Report covers June 1, 2023, to July 31, 2024.

[redacted]

We welcome any edits or comments to your community-specific section by **February 14, 2025,** before the reports are incorporated into the Draft Record of Consultation.

If you haven't already done so, please fill out this questionnaire to identify a key contact and preferences related to the review process: [redacted]. I have confirmed with our team that an online version of the Draft EA / IS Report will be available to your community through a password protected website.

If you have any questions or would like to schedule a meeting to discuss the reports and timeline, please let us know. We also kindly ask if you could let us know when you have received this email and can view/download the documents successfully.

Sincerely,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Zielbauer, Kyla <[redacted]>

Community Coordinator Program Update

Zielbauer, Kyla <[redacted]> 6 December 2024 at 16:36
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Lucia Jara Moreno <[redacted]>

Good Afternoon Andrew,

Please find the Community Capacity Funding Agreement attached for Aroland First Nation's review.

To execute the agreement, the following is required of the signatory of the agreement:

- Date agreement (page 1)
- Fill out name of community, mailing address, key contact name and email address (page 1)
- Signing authority (page 5), which must be signed by a person(s) with the authority to execute on behalf of the community

If you could please provide the following information at your convenience, it will help us to expedite the process:

- Community name or entity owned by the community (e.g., band office)
- Phone number
- Key point of contact
- Email address
- Mailing address

Please let us know if you have questions or concerns regarding the agreement.

Have a great weekend!
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
[redacted]
www.dillon.ca

[Quoted text hidden]

2024 12 03 - Community Capacity Funding Agreement.docx
54K

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 11 December 2024 at 08:16
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Valdine Walker <[redacted]>

Hello Andrew,

I'm emailing this morning to follow up on a few items for MFFN CAR, including the outstanding action items from our phone call on November 11.

IK Program Funding
Valdine emailed Laine Gagnon on October 31 to follow up on the details needed for the funding but we have not heard back. I will send a follow up email to Laine today and make sure you and Jerry are cc'd.

Community Coordinator Program / Community Capacity Funding
We sent an email to Aroland First Nation on November 8, 2024, to provide updates on the discontinuation of the Community Coordinator Program and the program replacement with a one-time community capacity funding payment to help support engagement in the MFFN CAR Project.

We discussed that direction was needed from Chief and Council to confirm Jeff Gagnon's role, communication preferences going forward, and whether Aroland First Nation was interested in the community capacity funding. You confirmed on December 9 that you had received the capacity funding agreement and would discuss those details with Jerry. Please let me know if you have any updates related to the discontinuation of the program that you can share at this time.

Draft EA / IS Report
On September 24, 2024, we sent you an email with a letter and FAQ in preparation for the release of the Draft Environmental Assessment (EA) / Impact Statement (IS) Report. A questionnaire to identify a key contact and preferences related to the review process is linked below. I did confirm with our team that an electronic version of the EA / IS will be made available on a password protected website and we will provide the password to Aroland First Nation once it's ready.

[redacted].

Meeting in January
In our phone call, we discussed rescheduling the community meeting that was postponed in October. You had mentioned there may be some interest in meeting in January. Can you please confirm whether Aroland First Nation is still interested in meeting and provide some potential dates for our team to review?

Let me know if you want to discuss any of these items further and we can set up a call.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of office: December 25 - January 1

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 11 December 2024 at 11:47
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>

Hi Andrew,

Thanks very much for the quick response and updates.

If you are able to get in touch with Jerry and are able to prioritize collecting the following information for the Community Capacity Funding Agreement, I've been told that if we could get the information below as soon as possible, it would help us to expedite the process and get the funding to Aroland First Nation sooner:

- Community name or entity owned by the community (e.g., band office)
- Phone number
- Key point of contact
- Email address
- Mailing address

I'll look forward to hearing from you if/when you have any further updates.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of office: December 25 - January 1

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 16 December 2024 at 10:29
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>

Hi Andrew,

Thank you for the updates!

For the EA / IS Report, if Aroland First Nation would like to receive the report in a few different formats, we can work with you to get that set up. If a hardcopy is requested, we do require some time to get that printed and sent and will require an address that is not a P.O. Box. In a previous email, I noted that our team is able to provide the report digitally through a password protected website, from which anyone with the password will be able to download the report. I will double check with our team where google drive / dropbox are options.

I will also make note to our team that both you and Jerry are to receive correspondence regarding the EA / IS.

I appreciate the update regarding your time off and will look forward to speaking more in the new year. I will be sending some Project updates this week but nothing is urgent / requires an immediate response.

Have a restful holiday!
Kyla
On behalf of the MFFN CAR Project Team

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of office: December 25 - January 1

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 18 December 2024 at 15:30
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>

Hello Andrew and Jerry,

Please find updates and information for the MFFN CAR Project below.

IK Program Funding and Community Capacity Funding
Thanks for the update letting us know that Jerry will contact the band administration and accounting department to get the required information.

Draft Environmental Assessment (EA) / Impact Statement (IS)
Based on your request, both Andrew and Jerry have been added as contacts for the review phase of the Draft EA / IS. A digital copy of the report will be available through a password protected website. Please advise if other report formats are required. The report preference survey is still available at the following link [redacted].

Milestone #3 Progress Report Feedback
On November 29, 2024, we distributed your community-specific Milestone #3 Progress Report. We welcome any edits or comments to your community-specific section which you may provide through email, telephone or by scheduling a meeting. Please provide your community's feedback by **February 14, 2025**.

Happy 2024 Year-end!
As we approach the new year, we'd like to acknowledge the milestones achieved for the MFFN Community Access Road in 2024. In particular, we celebrated the selection of the final route for the Community Access Road. On August 26, 2024, Marten Falls First Nation Chief and Council signed a Band Council Resolution confirming the proposed final route.

We took part in multiple events this year, including hosting in-community meetings with Marten Falls First Nation in July and October and in-community meetings with Aroland First Nation in June and July. We also attended the Three-Road Projects Gathering and Expo in June. We extend a great thank you to everyone who attended and took part in these gatherings. Your collaboration has helped shape the future of the road.

Coming up in 2025, we are preparing for the release of the Draft Environmental Assessment / Impact Assessment. We look forward to receiving your insights on this document and are enthusiastic about what 2025 will hold for the Community Access Road.

The Community Access Road is more than infrastructure; it's about securing a better future for our people... It is not just a path to progress; it is a testament to our resilience, our vision for the future and our commitment to the well-being of our people. - Chief Bruce Achneepineskum, Marten Falls First Nation

Have a safe and restful holiday season!

Sincerely,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 17 January 2025 at 08:40
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Valdine Walker <[redacted]>, Andrea Nokleby <[redacted]>

Good Morning Andrew and Jerry,

Happy New Year - I hope you both had a restful holiday!

I'm emailing to follow up on the details needed in order to finalize and send out the IK Program Funding and initiate the process for the Community Capacity Funding. I've re-shared some information below for convenience.

IK Program Funding
Our team is looking for confirmation of the preferred payment method for the funding, and the information needed to complete the payment. There are two options to receive the funding; a mailed cheque or direct deposit.

If a mailed cheque is preferred, please confirm the mailing address below is correct.
Aroland First Nation
Address: [redacted]

If direct deposit is preferred, please provide a copy of a void cheque.

Community Capacity Funding
To execute the agreement (reattached to this email), the following is required of the signatory of the agreement:

- Date agreement (page 1)
- Fill out name of community, mailing address, key contact name and email address (page 1)
- Signing authority (page 5), which must be signed by a person(s) with the authority to execute on behalf of the community

If you could please provide the following information, it will help us to expedite the process:

- Community name or entity owned by the community (e.g., band office)
- Phone number
- Key point of contact
- Email address
- Mailing address

Please let me know if you have any questions.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

[redacted]

[Quoted text hidden]

2024 12 03 - Community Capacity Funding Agreement (1).docx
54K

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 21 January 2025 at 14:13
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>

Good Afternoon Andrew and Jerry,

Please find updates on the MFFN CAR Project below for your review.

Prepare for the Release of the Draft EA / IS
As we approach the release of the Draft EA / IS, we would like to provide you with a few reminders and updates:

MFFN CAR Draft EA / IS Email
All information pertaining to the Draft EA / IS will come from a separate email account ([redacted]). Please ensure any questions and comments on the Draft EA / IS are sent to this email address.

Draft EA / IS Survey
We want to ensure your community has easy access to the documents and has identified a key community contact to help guide the review process. Although we have received feedback on the contacts to receive the report, as well as the request to receive an online copy, it would be helpful if you could please fill out the questionnaire [redacted] to identify any remaining preferences related to the review process. If you do not fill out the survey and identify a preferred method of receiving the document, we will send you a link to a website that hosts the Draft EA / IS document. Please note, the Draft EA / IS is expected to be ~20,000 pages.

Book a Meeting
We are here to assist you in the review process of the Draft EA / IS. We understand the size of the document can be overwhelming and are here to support you with review. The MFFN CAR Project Team will be attending the Three Road Projects Gathering and Expo in Thunder Bay (February 19 - 20) and Timmins (February 25 - 26). Aroland First Nation has received an invitation to this event with details on how to register and a link to book a time to speak one-on-one with the Project Team. If you wish to meet with the MFFN CAR Project Team outside of this event, we are happy to book in-person meetings during this timeframe. If an in-community meeting is still of interest, as we discussed prior to the holidays, we can look at that option as well.

Milestone #3 Progress Report Feedback
On December 2, 2024, we distributed your community-specific Milestone #3 Progress Report, which can be found at the following link: [redacted] We welcome any edits or comments on your community-specific section, which you may provide through email, telephone, or by scheduling a meeting. Please provide your community's feedback **by February 14, 2025.**

Additionally, we look forward to receiving the details needed to finalize the IK Program Funding and Community Capacity Funding Agreements and payments.

If you have any questions or concerns, please let me know and we can set up a phone call.

Thank you,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> 5 February 2025 at 15:36
To: Andrew Peach <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>

Hi Andrew,

Thank you for providing those revisions.

I've sent them to our team for review and will get back to you as soon as possible.

Have a good rest of your week,
Kyla
On behalf of the MFFN CAR Project Team

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: February 17, March 3 - 7

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> 11 February 2025 at 14:53
To: Ashley Childs <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>

Good Afternoon Ashley,

Below are some details to follow up to a phone call I had with Andrew on January 30th. I understand he is on vacation, but wanted to share these updates, particularly the Milestone #3 Report feedback and the Draft EA/IS Assessment Summary Package.

Milestone #3 Progress Report
Feedback received by February 14, 2025, will be incorporated into the report and posted on the project website, in addition to the other milestone reports and the Interim Record of Consultation and Engagement (RoCE). The deadline to provide feedback on the report is February 14, 2025, in order to make updates before the report is made available to the public, otherwise, we will still accept feedback after this date. Feedback received after February 14 will be incorporated into the Draft RoCE.

Later this year, a Draft RoCE will be produced, which will contain the Milestone #3 Report, in addition to the other milestone reports, the Interim RoCE and engagement since August 2024. Indigenous communities will be able to provide feedback for the time period covered by the Milestone #3 Report during their review of Draft RoCE.

Draft EA/IS Distribution
As requested, Ashley has been added to the list to receive any correspondence related to the Draft EA/IS.

An Assessment Summary Package is being sent to communities, and will include documents such as an Introduction to the Assessment Summary, a Draft EA/IS Executive Summary, Plain Language Summaries and a FAQ, in addition to a USB stick with the Draft EA/IS. Should anyone from your team like to receive this package, please send me an email with their address as soon as possible.

IK Program Funding
We will await further details in order to send the funding, as I believe Andrew had said he would follow up with Jerry and Laine to finalize that information.

Community Capacity Funding Agreement
We received Aroland's revisions for the agreement and they are with our team for review. We will provide a response as soon as possible.

Let me know if these updates should be passed on to someone else on your team. Otherwise, if you have any questions or concerns, please reach out.

Regards,
Kyla

DILLON CONSULTING

BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of Office: February 17, March 3 - 7

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Upcoming Release of the Draft Environmental Assessment / Impact Statement - February 18, 2025

[redacted] 13 February 2025 at 18:47
To: "[redacted]"
Cc: "[redacted]"

Dear Chief Sonny Gagnon,

We are pleased to announce that the Marten Falls First Nation Community Access Road Project Team will be making the Draft Environmental Assessment / Impact Statement available for review by Indigenous communities and groups on **February 18, 2025,** at [redacted]. The Draft Environmental Assessment / Impact Statement is approximately 1,100 pages long, and provides background on Marten Falls First Nation, why they need the Community Access Road, and the studies and activities they have completed to support the proposed development of a road to their Community.

In addition, Indigenous communities and groups can expect to receive a plain language summary of the Draft Environmental Assessment / Impact Statement and Technical Supporting Documents—the Assessment Summary—by registered mail over the coming days. This information package includes the following:

- Introduction to the Assessment Summary;
- Executive summary (of the Draft Environmental Assessment / Impact Statement);
- Letter from Chief Achneepineskum;
- Introduction to the plain language summaries and technical discipline reports (Tech Talk); and
- [redacted], including explanations of key definitions and common elements across all summaries.

Included with the Assessment Summary, to support your review, is a USB containing all documents related to the Draft Environmental Assessment / Impact Statement, including the plain language summaries described above. In addition, Indigenous communities who requested hard copies of the Draft Environmental Assessment / Impact Statement will receive these the week of February 24, 2025; approximately 5-6 banker boxes of information will be delivered to the address provided.

As a reminder, the Indigenous communities and groups we are engaging have early access to the Draft Environmental Assessment / Impact Statement; the public review period starts 60-days after the early release to Indigenous communities / groups and ends the same day. This means that Indigenous communities and groups have 120 calendar days to review and provide their comments to the Project Team on the Draft Environmental Assessment / Impact Statement. The review periods for Indigenous communities and groups, the public and regulators ends June 18, 2025.

Comments and feedback on the Draft Environmental Assessment / Impact Statement can be provided via the Project Website, email or by letter mail, **until June 18, 2025**, at the addresses provided below.

Website: [redacted]

Email: [redacted]

Mailing Address:
AECOM Canada ULC.
C/O Joanne Wang
[redacted]

If you are not able to provide us with your feedback through any of these addresses, please contact us at [redacted]. We will find a way to support your submission through other means.

Four additional support documents for the Environmental Assessment / Impact Assessment process will be released over the coming months. These are:

- **Milestone 3 Progress Report**—This summary of consultation activities was issued for review by Indigenous communities in November 2024, in advance of the release of the Draft Environmental Assessment / Impact Statement. This progress report provides a detailed account of engagement and communication activities conducted from June 1, 2023 to July 31, 2024. A final version of the report will be made available once feedback has been reviewed and addressed; feedback has been requested by February 14, 2025.

- **Draft Record of Consultation and Engagement with Indigenous Communities**—This Record of Consultation and Engagement will be available this summer in advance of the Final Environmental Assessment / Impact Statement. The Indigenous communities and groups we are engaging will have the opportunity to review and comment on the report prior to the release of the Final Environmental Assessment / Impact Statement. Communities will be provided 90 days to review the Draft Record of Consultation and Engagement with Indigenous Communities.

- **Aboriginal and / or Treaty Rights and Interests Reports (ATRI) Reports**—In the coming months, Indigenous communities will be provided with community-specific Aboriginal and / or Treaty Rights and Interest assessment results. In 2024, communities were provided with community-specific preliminary existing conditions ATRI reports for their review. Some feedback was received, and this information will be included, where applicable, in the soon-to-be released ATRI assessment results. This phased approach allows Indigenous communities time to consider their community-specific ATRI assessment in consideration of the information shared in the Draft Environmental Assessment / Impact Statement. Communities will be provided 90 days to review their ATRI assessment results and provide comment.

- **Community Well-Being Technical Report**— Community Well-Being examines three interconnected disciplines: economics, socio-community, and human health and community safety. The Community Well-Being Technical Report will describe changes that might result from the proposed Community Access Road; recognizing both opportunities and challenges. This report will be available for Indigenous communities and groups in April ahead of the release of the Draft Environmental Assessment / Impact Statement to the public and regulators. Communities will be provided 90 days to review the Community Well-Being Technical Report and provide comment. A plain language Community Well-Being summary has been prepared and included with the Assessment Summary. It is also available on the Draft Environmental / Impact Statement website.

Any concerns raised during the review period by Indigenous communities will be documented in the Final Environmental Assessment/Impact Statement Report.

We appreciate your time and effort to review the Draft Environmental Assessment / Impact Statement, and associated documents, and look forward to receiving your input. We encourage you to book time to meet with the Marten Falls First Nation Community Access Road Project Team to explore your interests, questions and insights.

Warm regards,

Marten Falls First Nation Community Access Road Project Team

Marten Falls First Nation Community Access Road - Draft Environmental Assessment / Impact Statement
Website: [redacted]
Email: [redacted]
Phone: [redacted]

Zielbauer, Kyla <[redacted]>

Draft MFCAR Environmental Assessment / Impact Statement Inquiry

Zielbauer, Kyla <[redacted]> 19 February 2025 at 11:51
To: Ashley Childs <[redacted]>
Cc: Andrew Peach <[redacted]>

Hi Ashley,

Thanks for reaching out.

All questions, and comments/feedback can be directed to the [redacted] email address.

If you'd like to cc me on the email for awareness, that would be great.

Have a good day,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]

Out of Office: March 3 - 7

[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> 20 February 2025 at 16:18
To: Ashley Childs <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>
Bcc: Nolan Lachance <[redacted]>

Good Afternoon Ashley,

Below are further updates on the MFFN CAR Project.

Draft Environmental Assessment / Impact Statement (EA / IS) Available for Indigenous Community Review

MFFN CAR Draft EA / IS Email

As you may already be aware, the Draft EA / IS is now available for Indigenous community review. All information pertaining to the Draft EA / IS will come from a separate email account [[redacted]]. Please ensure all questions and comments on the Draft EA / IS are sent to this email address.

Book a Meeting!

We are here to assist you in the review process of the Draft EA / IS. We understand the size of the document (~20,000 pages) can be overwhelming and are here to support you with review. We understand that Aroland First Nation would like to host an in-community meeting to discuss the Draft EA / IS in early April. Please let us know once you are ready to move forward with this meeting.

Community Capacity Funding Program

Andrew sent proposed revisions for the Community Capacity Funding Agreement on February 4, 2025. Please find an updated agreement attached with comments and feedback for consideration. Let us know when the agreement has been reviewed and if further discussion is required. We will send along further details for the payment once the agreement has been finalized.

Milestone #3 Progress Report

The deadline to provide feedback on the Milestone #3 Progress Report was February 14, 2025. Feedback was requested by this date in order to make updates to the Report before it is made available to the public on the project website. We will still accept feedback after this date. Any feedback received after February 14, 2025, will be incorporated into the Draft RoCE. Please let us know if we should expect to receive any feedback from Aroland First Nation.

Later this year, a Draft RoCE will be produced which will contain the Milestone #3 Report, as well as the other milestone reports, the Interim RoCE and engagement since August 2024. Indigenous communities will have an additional opportunity to provide feedback for the time period covered by the Milestone #3 Report during their review of the Draft RoCE.

Please note, I will be out of office March 3-7, returning on March 10. I will provide details for my coverage when we get closer to that date.

Sincerely,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]

Out of Office: March 3 - 7

[Quoted text hidden]

AFN_MFCAR_ Community Capacity Funding Agreement_2025 02 10 - MFFN CAR Review.docx
64K

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Wed, Feb 26, 2025 at 2:58 PM
To: Andrew Peach <[redacted]>
Cc: Nolan Lachance <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>

Good Afternoon Andrew,

Thanks for the updates. I hope you had a great vacation!

The questions regarding the Draft EA/IS have been received by our team and a response will be sent shortly.

Regarding the Community Capacity Funding Agreement; I have forwarded the comments on Sections 5.7 and 5.9 to our team and hope to have a response soon.

Additionally, I am on vacation February 28 - March 9, returning on March 10. I have cc'd my colleague Nolan Lachance to this email. He will be your main point of contact for anything related to MFFN CAR during my absence.

If there's anything you'd like to discuss between now and Friday, please let me know. Otherwise, I will look forward to connecting when I get back.

Sincerely,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]

Out of Office: Feb 28 - March 9

Lachance, Nolan <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> Wed, Mar 26, 2025 at 8:31 AM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Nolan Lachance <[redacted]>, Andrea Nokleby <[redacted]>, Valdine Walker <[redacted]>

Good Morning Andrew,

Below are some updates on the MFFN CAR Project.

Draft Environmental Assessment / Impact Statement (EA / IS)
We are here to assist you in the review process of the Draft EA / IS. In the last few months, we have discussed the possibility of an in-person meeting to review/discuss the Draft EA / IS with Aroland First Nation community members. Would a meeting in-community as well as a meeting in Thunder Bay be of interest? Could you please let us know if there is still interest in hosting any meetings and any potential dates, if possible?

Upcoming Webinars
In April and May, we will host webinars on identified project effects and proposed mitigation measures for Land, Water and People. Keep an eye out for a registration email from[redacted].

Community Capacity Funding Agreement
The proposed revisions to the Agreement provided by Aroland First Nation on February 25, 2025, are being reviewed and considered by the Project Team. A response will be provided soon.

IK Program Funding
We await banking details and contact information in order to send over the funding, specifically whether a direct payment or mailed cheque is preferred and an address for the cheque, should that method be requested. Were you able to connect with Jerry and/or Laine to get those details?

MFFN CAR - New Contact
Nolan Lachance, cc'd here, will be working with me on the project. Please include him on all correspondence going forward.

Please let me know if you would like to have a phone call to discuss any of these items further. A virtual meeting is also possible.

Have a good rest of your week,
Kyla

Kyla Zielbauer (She/Her)
Dillon Consulting Limited
[redacted]
www.dillon.ca

BEST MANAGED COMPANIES
Platinum member

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Mon, Apr 7, 2025 at 3:35 PM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Andrew,

Thanks for your patience as we worked through the review of the revised Community Capacity Funding Agreement.

The Agreement is attached with comments and tracked changes from AECOM's legal team, specifically in response to Sections 5.7 and 5.9. Let us know if the Agreement is acceptable and we will send over a clean version for signing. If further revisions are requested by Aroland First Nation, please let us know.

While waiting for the finalization of the Agreement, our team is able to set up the payment process. If you could please provide the following information and a void cheque, we will work on getting the community set up in the system.

- Community name or entity owned by the community (e.g., band office)
- Phone number
- Key point of contact
- Email address
- Mailing address

Thank you,
Kyla

DILLON CONSULTING
BEST MANAGED COMPANIES Platinum member
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of office April 18, 2025

2025 04 01 - AECOM Review - AFN_MFCAR_ Community Capacity Funding Agreement_LegalEdits_2025.02.04.docx
66K

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Fri, Apr 11, 2025 at 10:28 AM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>, Andrea Nokleby <[redacted]>, Valdine Walker <[redacted]>

Good Morning Andrew,

Thanks very much for providing that information.

I will pass along Aroland First Nation's comments/revisions on the Capacity Funding Agreement to the Project Team for consideration and get back to you as soon as possible.

The outstanding item we would need to complete the Community Capacity Program funding is a void cheque. Is that something you are able to provide?

In addition, could you advise if we can use the banking information you've provided to also complete the funding for the IK Program funding? We would need to use the void cheque for this funding, if direct deposit is chosen. A mailed cheque is also an option.

I was going to reach out to you today to advise that the Project Team will tentatively be in the Thunder Bay area the last week of May and would be available to meet with Aroland First Nation. Would Friday May 30 work for a meeting with the community? Please let us know if that date works or potentially other dates/times around the week of May 26-30 that work for the community.

Have a great weekend,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946
CANADA BEST MANAGED COMPANIES Platinum member

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of office April 18, 2025

[Quoted text hidden]

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Wed, Apr 16, 2025 at 8:45 AM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Good Morning Andrew,

I'm emailing to follow up on a potential meeting in May. The Project Team has suggested meeting in the late morning/early afternoon on Thursday May 29.

Please let us know if Chief and Council would be interested in meeting on that date.

Thank you,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946
CANADA BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Out of office April 18, 2025

[Quoted text hidden]

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Mon, Apr 21, 2025 at 3:38 PM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Andrew,

I will confirm the details about the proposed meetings and inquire about Project Team availability to meet with in-community and Thunder Bay members and get back to you ASAP.

Regarding the Community Capacity Funding Agreement, could you provide Aroland First Nation's legal counsel contact information? AECOM's legal representative would like to reach out directly to discuss the Agreement.

Thank you,
Kyla

DILLON CONSULTING
BEST MANAGED COMPANIES Platinum member
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Wed, Apr 30, 2025 at 10:36 AM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Good Morning Andrew,

Below are some updates regarding the MFFN CAR Project, including dates for a potential meeting.

Meetings and Events
The Project Team is available to meet with the community on the following dates. It is my understanding that the meetings we offered earlier this month were to be with the community to discuss the Draft EA / IS, however, we would be happy to look into scheduling a meeting with Aroland First Nation Chief and Council.

- May 28 5-8pm community meeting in Thunder Bay
- May 29 4-7pm community meeting in Aroland

We will also be hosting Public Information Centre (PIC) #6 on May 26 in Thunder Bay and on May 29 in Geraldton. The first hour of each PIC is dedicated to Indigenous community members. More information can be found here https://eais.martenfallsaccessroad.ca/get-involved/ and keep an eye out for emails from info@martenfallsaccessroad.ca.

IK Program and Community Capacity Funding
Thank you for providing contact information to execute the funding for the Community Capacity Funding Agreement on April 11. In order to move forward with setting up the funding and to distribute funds, we will require a void cheque.

Can you please confirm that we can use the information provided for the Community Capacity Funding Agreement to distribute the IK Program Funding?

Draft Environmental Assessment / Impact Statement (EA / IS) Updates
The Draft EA / IS is now available for public review. Comments and feedback can be provided via the Project website, email or by letter mail.

On April 16, 2025, the Community Well-Being Report was released for review by Indigenous communities and groups.

We are halfway through the review process of the Draft EA / IS. Please keep in mind that the review process concludes on June 23, 2025.

Upcoming Webinars
Our Draft EA / IS webinar series will start in May. The first in this series is Community Well-Being, to be held on May 6, 2025, at 4:00 pm EST. Registration for the webinar is located here: [redacted]

Keep an eye out for more information on the remaining webinars in the Draft EA / IS series:

- Land: Ungulates - May 8
- Water: Fish and Fish Habitat - May 22
- People: Land and Resource Use - June 5.

Let me know if you'd like to discuss any of these details further.

Thank you,
Kyla

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Wed, May 7, 2025 at 1:18 PM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Andrew,

Thank you for confirming those dates work for both a Thunder Bay and in-community meeting.

I will regroup with Jerry when he is back next week for any details we need to coordinate.

Please let us know if we should extend the meeting invite to representatives from the Province, as it is up to the community if they would like them to attend.

Thank you,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946
CANADA BEST MANAGED COMPANIES Platinum member

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Fri, May 9, 2025 at 12:39 PM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Andrew,

Checking in to see if you've been able to procure a void cheque from the community?

Once we get that information, we can get the community registered for payment and will be able to distribute the funds for the Community Capacity Funding and IK Program more easily.

Regarding the Community Capacity Funding Agreement; it is with the Project Team to review and we anticipate being able to send it to the community for signature shortly.

Have a great weekend,
Kyla

DILLON CONSULTING
BEST MANAGED COMPANIES Platinum member
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Thu, May 22, 2025 at 8:30 AM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Good Morning Andrew,

Please find a revised version of the Community Capacity Funding Agreement attached for Aroland First Nation's review.

It is my understanding that Kate Kempton and AECOM's legal counsel revised this version together but that Kate would like to see this version before it is signed, if you're able to pass this along to her. Once Kate has reviewed and if Aroland First Nation is okay with the agreement as is, please send back a signed version.

Can you please send a void cheque that we can use to set up and issue the payment for the Community Capacity Funding? We will also use this cheque to issue the IK Program Funding should that be agreeable with the community.

Thanks for your help,
Kyla

DILLON CONSULTING
BEST MANAGED COMPANIES Platinum member
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

[Quoted text hidden]

[redacted]

Lachance, Nolan <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> Mon, May 26, 2025 at 7:51 AM
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Nolan Lachance <[redacted]>

Good Morning Andrew and Jerry,

Below are some updates on the MFFN CAR Project:

Public Information Centre #6
We will be hosting our Public Information Centre (PIC) #6 on Monday, May 26, 2025, and Thursday, May 29, 2025, in Thunder Bay and Geraldton, respectively. The first hour of each PIC is dedicated to Indigenous community members. For more information, visit https://eais.martenfallsaccessroad.ca/get-involved/. See the attached meeting poster for more details.

Aroland/MFFN CAR Meetings and Country Foods Program
We are looking forward to meeting with Aroland First Nation on May 28 (in Thunder Bay) and May 29 (in Aroland).

As mentioned in a previous email, our team will be looking for community members living in Aroland to provide samples of foods that have been hunted, fished or gathered near the Community to provide baseline information to support the MFFN CAR Country Foods Program. We will be accepting samples on **Thursday, May 29, from 4:00 – 7:00 p.m.** at Johnny Therriault Memorial School Gymnasium, during the community meeting. More information and details are in the attached poster.

Draft Environmental Assessment / Impact Statement (EA / IS) - Reminder for Final Review
We are nearing the end of the review process of the Draft EA / IS. Please submit your comments and feedback via the Project website, [redacted] email or by letter mail by **June 23, 2025**.

Upcoming Webinar
Keep an eye out for more information on the remaining webinar in the Draft Environmental Assessment / Impact Statement Series:

- People: Land and Resource Use - Thursday, June 5

If you have any questions or concerns about any of the information above, please let me know.

Thanks and have a great week,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946
BEST MANAGED COMPANIES Platinum member

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

2 attachments

2025-05-06-MFFN-PIC6 poster.pdf
693K

MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

MARTEN FALLS FIRST NATION ALL-SEASON COMMUNITY ACCESS ROAD

PUBLIC INFORMATION CENTRE #6: DRAFT ENVIRONMENTAL ASSESSMENT / IMPACT STATEMENT

Join the Marten Falls First Nation Community Access Road Project Team to discuss updates on the Draft Environmental Assessment / Impact Statement Review.

Thunder Bay
Monday, May 26, 2025

Location:

Superior Inn and Conference Centre

555 Arthur St. W, Thunder Bay, Ontario

Time:

5:00 p.m. - 8:00 p.m. Public Session.

*Light refreshments will be served.

Geraldton
Thursday, May 29, 2025

Location:

Geraldton Community Centre

200 Wardrope Avenue, Geraldton, Ontario

Time:

4:00 p.m. - 7:00 p.m. Public Session

*Light refreshments will be served.

Learn about:

- What is the Draft Environmental Assessment / Impact Statement?;
- Understanding identified project effects and proposed impact management measures;
- Update on socio-economic studies and the Community Well-Being Report;
- Cumulative effects; and
- Next steps and future opportunities to get involved.

* The first hour is dedicated to Indigenous Community members only.

If you cannot make the in-person session, you can find the information posted on our website (www.martenfallsaccessroad.ca). Public Information Centres are wheelchair accessible; contact us if you require other accessibility accommodations.

Contact Information

Website: https://eais.martenfallsaccessroad.ca/get-involved/

Email: info@martenfallsaccessroad.ca

Phone: 1-800-764-9114

Scan the QR to learn more, and for other ways to Get Involved.

MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

COUNTRY FOODS STUDY

Purpose of the Country Foods Study

We are studying foods that are hunted, fished or gathered from the land and water, including fish, wild plants and animals. These samples will help us understand substances that may be present in local foods now, before the new road is built.

Metals, chemicals and fuel can be present in soil, air or water from natural sources like minerals or human activities like spills and leaks. Plants and animals can absorb these substances and over time they can accumulate in our bodies leading to health issues, especially for children, pregnant people and Elders.

Samples will be taken to Bureau Veritas Environmental Services Centre in Thunder Bay for testing.

How You Can Help

Share samples of country foods from your community to support the Community Access Road's Final Community Well-Being Report!

It doesn't matter when the food was harvested, as long as it has been kept in the freezer and is not spoiled.

*Please note, we are not asking you to hunt or harvest additional food. Simply bring what you already have on-hand.

What We Need

Please place samples in a plastic bag, directly from your fridge or freezer, cut to the approximate sizes listed below. You do not need to bring all types of food listed below.

Food Type	Approximate Size
Moose meat	70 grams of uncooked meat or fish, OR approximately the size of a deck of cards
Beaver meat	
Pickerel/walleye	
Goose meat	
Wild blueberries	½ cup

*Food may be frozen or thawed but cannot be cooked, smoked, or spoiled.

Required Sample Information

- Type of sample (e.g., moose muscle)
- Approximate date sample was harvested (e.g., January 2025)
- Approximate location the sample was harvested on a map
- How the sample was stored and for how long (e.g., in the freezer for 3 months)
- How you normally prepare this type of food (e.g., typically smoked before eating)

Please Note: Each sample must be from a different animal (i.e., do not bring two moose cuts from the same moose).

Collection Dates

Aroland First Nation

Location:

Johnny Therriault Memorial School Gymnasium

Time:

Thursday, May 29 from 4:00 – 7:00 p.m.

How You Will Be Thanked

We appreciate your participation and will thank you with:



A $100 gift card per sample for the No Frills grocery store.

Sign-Up Here

Please sign-up in advance if you are planning to bring country food samples:

[redacted]

Contact information

For questions or comments, contact the Project Team:

Lawrence Baxter, Senior Community Member Advisor, Marten Falls First Nation

Phone: 1-800-764-9114

Email: info@martenfallsaccessroad.ca

Website: www.martenfallsaccessroad.ca

Zielbauer, Kyla <[redacted]>

MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> 12 June 2025 at 10:04
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Good morning Andrew,

I'm checking in to see if there are any updates regarding the finalization of the revised Community Capacity Funding Agreement?

Could you also send the void cheque at your earliest convenience? We will use this cheque to distribute the Capacity Funding and the IK Program Funding.

Thank you,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Inclusiveness: Enabling belonging to draw strength from our differences.

[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR - Aboriginal and / or Treaty Rights and Interests: DRAFT Impact Assessment Report

Zielbauer, Kyla <[redacted]> 13 June 2025 at 14:00
To: Chief Sonny Gagnon <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Joe Baxter <[redacted]>, Jerry Shabogamik <[redacted]>, Andrew Peach <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>
Cc: Lawrence Baxter <[redacted]>, Bob Baxter <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, [redacted]
Bcc: Alana Vigna <[redacted]>, "Price, Katelyn" <[redacted]>

Dear Chief Sonny Gagnon,

As part of our ongoing collaboration on the Marten Falls First Nation Community Access Road, we're sharing your community specific Draft Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report (Draft Report) for your review and feedback.

This Draft Report includes information from publicly available sources, as well as any Indigenous Knowledge Reports we received before January 2025. It outlines the assessment process for Aboriginal and / or Treaty Rights and Interests related to the Community Access Road, and it focuses specifically on your community.

Please use the following link to access and download your Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report for the Community Access Road:

[redacted]

The review period for this report is 90 calendar days. If your community has comments, questions, additional Indigenous Knowledge or details about important sites, areas, or resources—and how often they're used— that could better inform this report we'd appreciate you sharing that with us. Your input will help us refine the potential effects to your Draft Report. A final version of this report will be provided to you.

If we don't hear back with new information by **September 11, 2025**, the Draft Report will be finalized.

We would be very pleased to meet with you to review the Draft Report, answer any questions you may have, or have a discussion on the assessment process.

Kind regards,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Inclusiveness: Enabling belonging to draw strength from our differences.

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Zielbauer, Kyla <[redacted]> Tue, Jun 24, 2025 at 9:01 AM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>, Valdine Walker <[redacted]>

Hi Andrew,

Thanks for sending that over. We send over a final version shortly.

I noticed there is no date under Chief Gagnon's signature - let us know if we can apply the date of your email or if you have another suggestion.

As well, please send us a void cheque as soon as you are able and we will distribute the Community Capacity Funding and IK Program Funding.

Thank you,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Inclusiveness: Enabling belonging to draw strength from our differences.
[redacted]

Lachance, Nolan <[redacted]>

MFFN CAR Project Updates

1 message

Zielbauer, Kyla <[redacted]> Thu, Jun 26, 2025 at 2:30 PM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Nolan Lachance <[redacted]>

Good Afternoon Andrew,

Below are some updates for the MFFN CAR Project

Draft Environmental Assessment / Impact Statement Review Period Complete
Thank you for providing feedback on the Draft Environmental Assessment / Impact Statement (EA / IS). As of June 23, 2025, the review period for the Draft EA / IS has officially closed. We sincerely value all the feedback provided. Input on the Draft EA / IS is important to us and will help inform the preparation of the Final EA / IS that will be submitted to the federal and provincial governments for review in mid to late 2026. If you would like to meet to discuss Draft EA / IS and / or feedback provided by Aroland First Nation, please let us know.

Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report
Aroland First Nation's Draft Aboriginal and / or Treaty Rights and Interests (ATRI) Draft Impact Assessment Report was sent to your community on June 13, 2025. The review period for this report is 90 calendar days. If Aroland First Nation has comments, questions, or additional information to share, we'd appreciate you sharing that with us. Aroland First Nation's input will help us refine the potential effects to your Draft Report. If we don't hear back with new information by **September 11, 2025**, the Draft Report will be finalized. If you could confirm that the ATRI Draft Impact Assessment Report has been received and you are able to access it, that would be greatly appreciated.

Public Information Centre #6
Public Information Centre (PIC) #6 was held on May 26 and 29, 2025, in Thunder Bay and Geraldton, respectively. Thank you to those who were able to attend the meetings in person. Materials from the PIC are available here: https://www.martenfallsaccessroad.ca/get-involved/#pic6

Community Meetings
Thank you to all of the community members who were able to attend the Aroland First Nation meeting in Thunder Bay on May 28 and in Aroland on May 29, 2025. We appreciated all of the feedback received and perspectives shared. We also wanted to thank those who participated in the Country Foods Sampling Program, as we were grateful to receive so many samples to help inform the project.

Coming Up
The Draft Record of Consultation and Engagement for Indigenous communities will be released in Fall 2025. Keep an eye out for the report to be sent to Aroland First Nation, including ways to provide feedback.

Please let us know if you have any questions or concerns, or if you would like us to set up a meeting.

Thank you,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

Lachance, Nolan <[redacted]>

MFFN CAR Project Updates

Zielbauer, Kyla <[redacted]> Tue, Jul 22, 2025 at 5:12 PM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Nolan Lachance <[redacted]>, Lucia Jara Moreno <[redacted]>

Good Afternoon Andrew,

Please see the following for updates on the MFFN CAR Project:

IK Program Funding
I've been advised that the IK Program Funding payment of [redacted] will be released to Aroland First Nation on July 25, 2025, via e-transfer. Should the payment not be received by the end of July, please let us know.

Community Capacity Funding
A final version of the Community Capacity Funding Agreement and the program funding will be distributed shortly.

Aboriginal and/or Treaty Rights and Interests Draft Impact Assessment Report
The ATRI Draft Impact Assessment Report was sent to Chief Gagnon on June 13, 2025. If Aroland First Nation has comments, questions, additional Indigenous Knowledge or details about important sites, areas, or resources that could better inform this report, we'd appreciate receiving that information. Feedback from the community will be used to update the report and a final version will be shared with Aroland First Nation. We would be happy to meet to discuss the report. If we do not hear back by **September 11, 2025**, the Draft Report will be finalized.

Draft Record of Consultation and Engagement for Indigenous Communities
The Draft Record of Consultation and Engagement for Indigenous communities will be released in Fall 2025. Keep an eye out for the report to be sent to your community. Ways to provide feedback will be included.

Ongoing Field Studies
Field programs will be continuing into the 2025 summer and fall seasons to support the Preliminary Design and future permitting for the MFFN CAR. The following three field programs are included in the Summer 2025 Field Notice: Stage 2 Archaeological Assessment, Groundwater Well Decommissioning and Geotechnical Investigation. For more information, the field notice is attached to this email or available at the following link https://www.martenfallsaccessroad.ca/wp-content/uploads/2025/07/2025-07-09-MFFN-Summer-2025-Field-Notice.pdf

Please note that I will be taking a short-term leave and all communications should be directed to Nolan Lachance (cc'd) in the meantime. I hope the rest of your summer is enjoyable, and I will reach out upon my return.

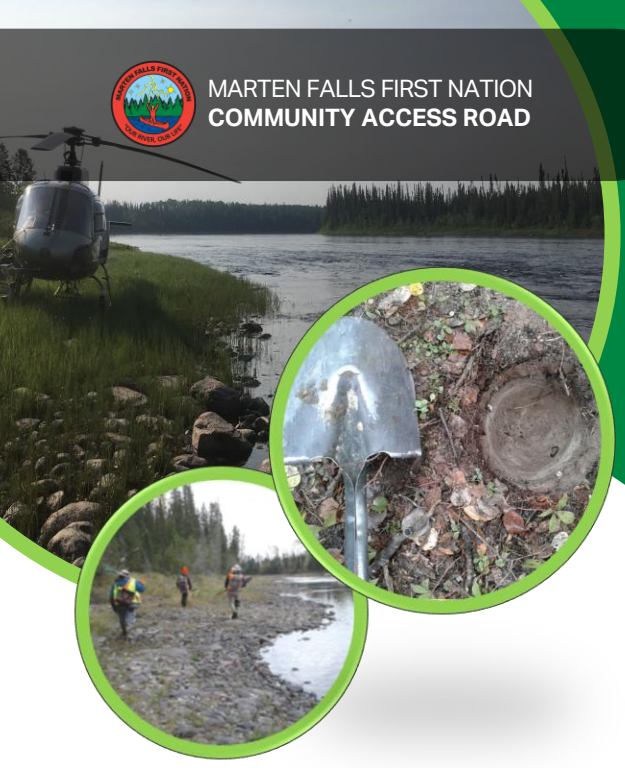
Thank you,
Kyla

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946
CANADA BEST MANAGED COMPANIES
Platinum member

Kyla Zielbauer
Dillon Consulting Limited
[redacted]
www.dillon.ca

2025-07-09-MFFN-SummerFall2025Field Notice_Final.pdf
1950K

MARTEN FALLS FIRST NATION
COMMUNITY ACCESS ROAD



Field Notice

Summer / Fall 2025 Field Notice

Issued: July 2025

What's Happening?

Field programs will be continuing into the 2025 summer and fall seasons to support the Preliminary Design and future permitting for the Marten Falls First Nation Community Access Road.

The following three field programs are outlined in this notice:

- Stage 2 Archaeological Assessment
- Groundwater Well Decommissioning
- Geotechnical Investigation

Stage 2 Archaeological Assessment

Archaeological assessments are crucial for determining the potential presence of archaeological sites and artifacts and are mandated through the Ontario Heritage Act. For the Marten Falls First Nation Community Access Road, background archaeological research (Stage 1) began in 2019 to look into archaeological potential for possible unknown sites, and some initial field surveys were conducted in 2019.

Now that the preferred route has now been chosen for the Community Access Road, archaeologists will conduct Stage 2 field surveys in the following locations in advance of geotechnical investigations:

- where the road is planned to cross waterbodies;
- at sites where bridges may be built; and
- at one potential aggregate location.

The investigations will focus on the area where geotechnical drilling will be required, and where helicopter landing sites may be created.

The archaeology team will complete the work **during the summer or fall season**. Dates have yet to be determined, though the work is expected to take approximately two weeks to complete. An update will be provided once dates are confirmed.

The stages of an Archaeological Assessment in Ontario

1. **Stage 1** – Background Study: A background study is first conducted to determine archaeological potential, which means areas where people liked to live.

2. **Stage 2** – Field Survey: Archaeologists go out and look for sites that may be impacted by construction. In Northern Ontario, this is typically completed using a test pit survey. This means a team of archaeologists dig small holes in areas of high archaeological potential and sift the soil to search for artifacts.

   If the team finds artifacts, we have a site!

3. **Stage 3** – Find Site Limits: The next step is finding the site limits. When looking for site limits the team of archaeologists digs larger 1 m by 1 m excavation units and collect the artifacts. These units are dug every 5 m until we find the site edge.

4. **Stage 4** – Excavation or Avoidance: In the final step, the site is either excavated or the development is moved to avoid and protect the site. Depending on the size and nature of the site, it might be easy to move the purposed impacts than remove the site. Some projects are easier to move around archaeological sites than others.

Geotechnical Investigation

Field crews are proposing to conduct geotechnical investigations to support preliminary exploration of potential aggregate sites and water crossing locations along the route for the Community Access Road. Geotechnical investigations will focus on aggregate sites and water crossings to assess material quantity, quality, soil suitability and groundwater monitoring.

Advance notice was initially provided for the Geotechnical Investigation in the Fall 2024 Field Notice, however, work was unable to commence at that time. Instead, it is expected that this work will be conducted **during the fall 2025 season**. An update will be provided once dates are confirmed.

Groundwater Well Decommissioning

Field crews will be decommissioning selected monitoring wells this fall as part of the Groundwater and Geochemistry program. This program has been essential for checking the health of groundwater along the proposed route for the Community Access Road. The program has tested for things like minerals, dissolved metals (such as mercury), and volatile organic compounds. By understanding current groundwater conditions, we can better predict how the road might affect the natural environment.

The wells are being decommissioned are in a location that will not support future long term monitoring of the proposed roadway. Future wells within the final right of way may be installed in accordance with the mitigations outlined in Section 9.3.4 of the Draft Environmental Assessment / Impact Statement. The report is available here: https://eais.martenfallsaccessroad.ca/

Since 2022, field crews have collected samples from the same monitoring wells each spring, summer, and fall to track seasonal changes. With the sampling now complete, field crews will proceed with decommissioning selected wells **during the fall season**. An update will be provided once dates are confirmed.

What to expect

Field crews will be accessing sites across the study area by helicopter—you may see helicopters in the area. An update will be provided if the above schedule changes due to weather or other conditions.

To learn more about our studies, view our past webinar recordings, valued component videos, Groundwater and Geochemistry Discussion Guide, and the Draft Environmental Assessment / Impact Statement on our website.

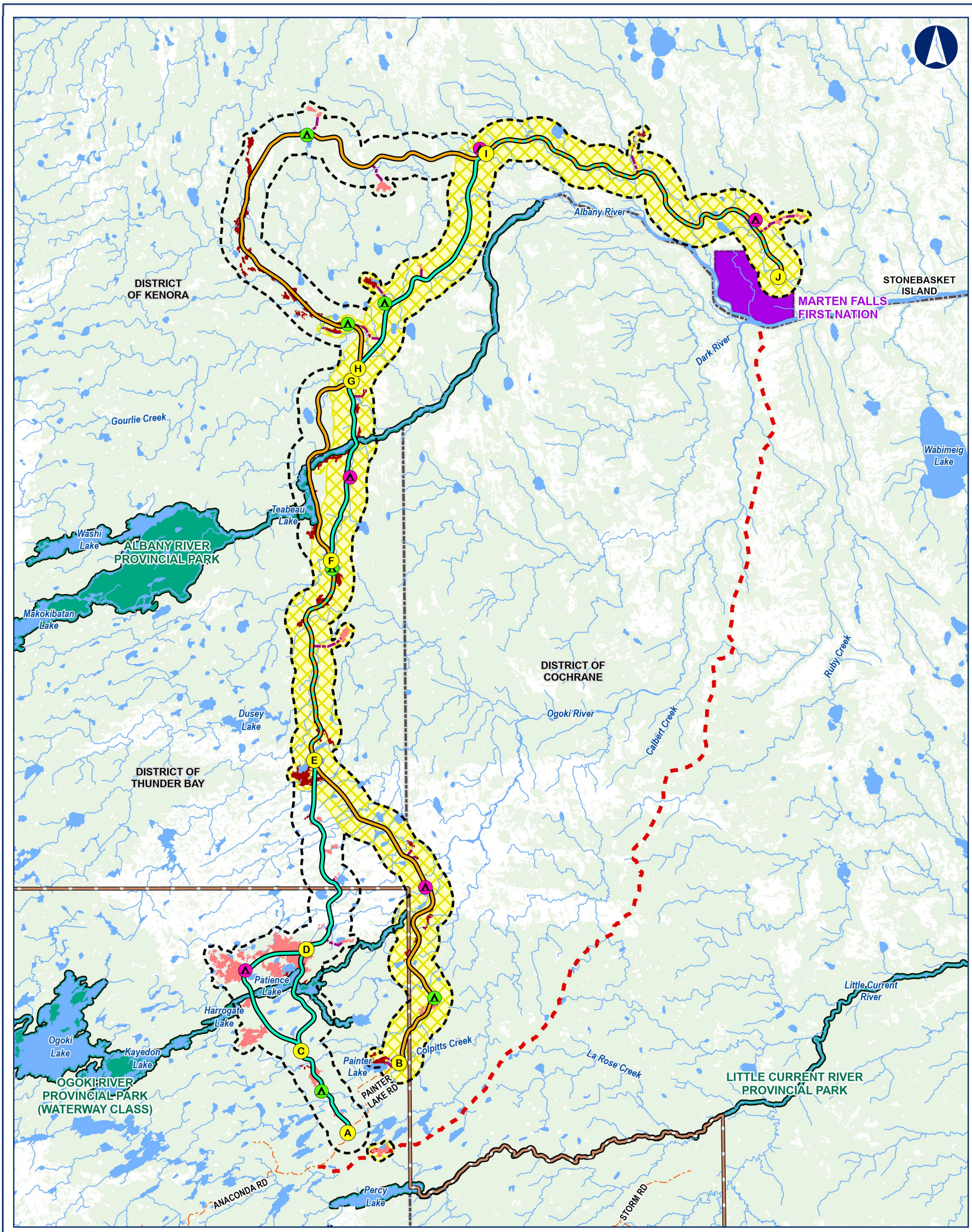
Where?

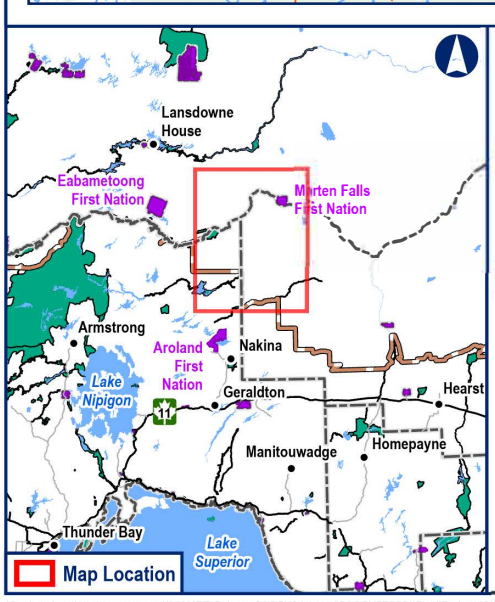
See the next page for a map of the study area.

Contact Information

You are welcome to contact the MFFN Community Access Road Project Team at any time with questions or comments.

Lawrence Baxter
Senior Community Member Advisor
Marten Falls First Nation
1-800-764-9114 | info@martenfallsaccessroad.ca
www.martenfallsaccessroad.ca





Legend

- Segment Node
- Project Study Area
- Preferred Route

Construction Disturbance Area

Route Alternatives (100 m Right-of-Way)
- Alternative 1
- Alternative 4

Potential Camp Site
- 50 Persons (108 m x 150 m)
- 200 Persons (108 m x 150 m)
- Approximate Access Road to Potential Construction Camp (10 m Width)

Potential Aggregate Source
- Bedrock
- Sand and gravel
- Approximate Access Road to Potential Aggregate Site (10 m Width)

General Features
- Resource / Recreation Road
- MFFN Existing Winter Access Road
- Watercourse
- Waterbody
- First Nation Reserve
- District Municipal Boundary
- Far North Boundary
- Provincial Park

Data Source:
Base Data: Provided by MNRF 2023; Route Infrastructure - Provided by AECOM 2021. Contains Information licensed under the Open Government Licence Ontario
Service Layer Credits:

MARTEN FALLS FIRST NATION COMMUNITY ACCESS ROAD

Summer / Fall 2025 Field Programs

0 5 10 20
Kilometres

Datum: NAD 1983 CSRS UTM Zone 16N

November 2024 | 1:450,000 * when printed 11"x17"

Rev 00

Figure 1

Contains information provided by Ontario Ministry of the Environment, Conservation and Parks or by Ontario Ministry of Natural Resources and Forestry (Copyright: Queen's Printer of Ontario 2020), through a Sensitive Data License Agreement. This drawing has been prepared for use of AECOM client and may not be reproduced or relied upon by third parties, except as agreed by AECOM and its client, as required by law or for use by governmental reviewing agencies. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that modifies this drawing without AECOM express written consent. The use of Sensitive Data in this drawing does not constitute an endorsement by the Ministry for this drawing or by AECOM of the Sensitive Data.

Map location: \\na.aecomnet.com\ifs\AMER\Calgary-CACGY3\Legacy\CACGY5FS001\Prod\Projects\60593122\171 PRJ\172 GIS\Graphics\Design\01_Reports_2024\EA-IS\PRJ_MFCAR_EA-IS_60593122.aprx Figure: MAP_Fig4-7_MFCAR_FinalRoute_60593122
Date Saved: 2024-11-13 11:07 AM User Name: Stephanie.Clark

Lachance, Nolan <[redacted]>

MFFN CAR Project Updates

Lachance, Nolan <[redacted]> Wed, Jul 23, 2025 at 1:47 PM
To: [redacted]
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Lucia Jara Moreno <[redacted]>, Kyla Zielbauer <[redacted]>

Hello Andrew,

As Kyla previously indicated, please direct all communications to me for the time being. I am here to provide support in any way possible and will ensure a seamless transition in this process.

I would also like to remind you that the review period for the Draft Aboriginal and / or Treaty Rights and Interest: Impacts Assessment Report is currently ongoing. On June 13, 2025, Aroland First Nation's community-specific Draft Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report was distributed. The review period for this report is 90 days. Please submit any comments, questions, additional Indigenous Knowledge or details about important sites, areas or resources through email by **September 11, 2025**. Please use the following link to access and download Aroland First Nation's community-specific report: [redacted]

Should you have any questions or wish to discuss the Project further, please do not hesitate to contact me.

Best regards,
Nolan Lachance
[Quoted text hidden]
--

DILLON CONSULTING
CANADA BEST MANAGED COMPANIES
Platinum member
PROUDLY CANADIAN SINCE 1946

Nolan Lachance (M.E.S)
Dillon Consulting Limited
[redacted]
www.dillon.ca

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Invitation to Participate in Upcoming Archaeological Investigations

1 message

Lachance, Nolan <[redacted]> Thu, Jul 24, 2025 at 9:03 AM
To: Jerry Shabogamik <[redacted]>
Cc: [redacted], Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Chief Sonny Gagnon <[redacted]>, Lucia Jara Moreno <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Angelis, Niki" <[redacted]>
Bcc: "Price, Katelyn" <[redacted]>

Hello Jerry,

I hope this email finds you well. I am reaching out to let you know about an upcoming opportunity to participate in archaeological investigations that we are coordinating in advance of the KGS borehole drilling scheduled for this fall.

The archaeological investigations will focus on the water crossing locations and the aggregate site [redacted]. While the exact date is yet to be confirmed, we are aiming to commence the fieldwork shortly after the August long weekend. The fieldwork is expected to last approximately four weeks.

Please let us know if you would like to participate in these surveys as a community monitor for Aroland.

Please note that this phase of archaeological fieldwork will be limited to small targeted areas where boreholes are planned. A more comprehensive Stage 2 archaeological assessment for the full corridor will be conducted at a later stage, offering further opportunities for participation.

Regarding payment, AECOM will register you as a one-time vendor in their internal procurement system, COUPA. Should you decide to participate, you will receive a link to the COUPA Supplier Portal and will be asked to provide direct deposit information to facilitate payment.

Could you please let us know if you are interested in participating? If you have any questions or need further information, feel free to reach out.

Best regards,
Nolan Lachance

--

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946
CANADA BEST MANAGED COMPANIES
Platinum member

Nolan Lachance (M.E.S)
Dillon Consulting Limited
[redacted]
www.dillon.ca

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Invitation to Participate in Upcoming Archaeological Investigations

Lachance, Nolan <[redacted]> Wed, Jul 30, 2025 at 9:11 AM
To: Jerry Shabogamik <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Chief Sonny Gagnon <[redacted]>, Lucia Jara Moreno <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Angelis, Niki" <[redacted]>, [redacted], "Price, Katelyn" <[redacted]>, "[redacted]" <[redacted]>
Bcc: Jodi Miles <[redacted]>

Hello Jerry,

Thank you for your interest in participating in the upcoming archaeological surveys.

The archaeology crew will be in the field for 16 days, starting August 7, 2025, on a 6-day workweek schedule. The team will be led by Field Director Josh Keddy (cc'd in this email), who can be reached at [redacted] or [redacted].

The team will meet at 9:00am on August 7, 2025, at the Geraldton Airport. Specific fieldwork locations will be finalized with the pilot the morning of August 7, 2025. The crew will fly in and out of Geraldton Airport each morning and evening. Accommodations in Geraldton will be available if needed.

To ensure you are set up in AECOM's payment system (COUPA), please provide your direct deposit information. If a different monitor will be attending, we will arrange payment through Archtech and will need their name, email address, and phone number to set them up before fieldwork begins. Please let me know who will be attending as soon as possible.

Please let me know if you have any questions or need further information.

Best regards,
Nolan Lachance
[Quoted text hidden]

Lachance, Nolan <[redacted]>

Signed Community Capacity Funding Agreement

1 message

Lachance, Nolan <[redacted]> Wed, Jul 30, 2025 at 11:56 AM
To: Chief Sonny Gagnon <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, [redacted], Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Lucia Jara Moreno <[redacted]>, "[redacted]" <[redacted]>, "Angelis, Niki" <[redacted]>
Bcc: Jodi Miles <[redacted]>

Good morning,

I am pleased to provide you with the finalized Community Capacity Funding Agreement for your records. The associated funding was disbursed on July 17, 2025. Can you please confirm that you have received this payment?

I want to acknowledge all of the hard work provided by your team in finalizing this agreement. We look forward to continued engagement.

Best regards,
Nolan Lachance

--

DILLON CONSULTING

CANADA BEST MANAGED COMPANIES Platinum member

PROUDLY CANADIAN SINCE 1946

Nolan Lachance (M.E.S)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Aroland_Community Capacity Funding Agreement_SIGNED.pdf
3129K

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Invitation to Participate in Upcoming Archaeological Investigations

Lachance, Nolan <[redacted]> Fri, Aug 1, 2025 at 10:49 AM
To: Jerry Shabogamik <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Chief Sonny Gagnon <[redacted]>, Lucia Jara Moreno <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Angelis, Niki" <[redacted]>, [redacted], "Price, Katelyn" <[redacted]>, "[redacted]" <[redacted]>, "Markham, Samantha" <[redacted]>
Bcc: Jodi Miles <[redacted]>

Good morning Jerry,

I'm following up on my previous email. Could you please confirm if you or another Aroland First Nation representative will be able to meet the crew at the Geraldton airport, or if you will require additional assistance with transportation? The field crew is hoping to meet everyone on August 7, 2025, to discuss sites of interest and finalize the plan for the investigations.

With August 7, 2025, approaching quickly and the long weekend coming up, we're hoping to finalize these logistical details as soon as possible.

Looking forward to hearing from you,
Nolan Lachance

[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Invitation to Participate in Upcoming Archaeological Investigations

Lachance, Nolan <[redacted]> Tue, Aug 5, 2025 at 3:59 PM
To: Jerry Shabogamik <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Chief Sonny Gagnon <[redacted]>, Lucia Jara Moreno <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Angelis, Niki" <[redacted]>, [redacted], "Price, Katelyn" <[redacted]>, "[redacted]" <[redacted]>, "Markham, Samantha" <[redacted]>
Bcc: Jodi Miles <[redacted]>

Good afternoon Jerry,

I wanted to follow up on my previous email regarding the arrangements for meeting the crew at Geraldton airport.

Could you please confirm whether it will be you or another representative from Aroland First Nation meeting the crew, and if additional assistance with transportation is required? As you know, the field crew is planning to meet on August 7, 2025, to discuss sites of interest and finalize the investigation plans. Ensuring a representative from Aroland First Nation is present for these discussions will allow the team to try and organize sites of interest accordingly.

With the anticipated start date just two days away, it's important that we finalize the remaining details as soon as possible to ensure everything goes smoothly.

As a reminder, if someone other than yourself will be attending, we will need to onboard them through Artech before the start date. This process requires their email, phone number and would need to be provided by no later than 12:00 pm EST tomorrow in order to be finalized on time and in the system for Thursday's start date.

Looking forward to hearing back from you.

Best,
Nolan Lachance

[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Invitation to Participate in Upcoming Archaeological Investigations

Lachance, Nolan <[redacted]> Thu, Aug 7, 2025 at 8:44 AM
To: Andrew Peach <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Chief Sonny Gagnon <[redacted]>, Lucia Jara Moreno <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Angelis, Niki" <[redacted]>, "Price, Katelyn" <[redacted]>, "[redacted]" <[redacted]>, "Markham, Samantha" <[redacted]>, [redacted]
Bcc: Jodi Miles <[redacted]>

Good morning Andrew,

Thank you for the update. I've discussed with the team, and we are prepared to accommodate Jerry's participation in the fieldwork upon his return next week.

Just as a reminder, Jerry will need to be set up in the Artech Payment System before he can join the fieldwork. Kate Holt will be reaching out to Jerry to complete this process. I've included her contact information below for your reference:

Catherine (Kate) Holt

Account Manager

ARTECH
INTELLIGENCE IS HUMAN

Artech Technology Canada Limited

[redacted]

Website: www.artech.com

Additionally, here is the contact information for the field lead, Josh Keddy, to facilitate any necessary arrangements:

Josh Keddy
Email: [redacted]
Phone: [redacted]

Please feel free to coordinate directly with Josh to organize the fieldwork logistics.

Best regards,
Nolan Lachance

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Aroland - Community Updates

Lachance, Nolan <[redacted]> Wed, Aug 13, 2025 at 1:56 PM
To: Andrew Peach <[redacted]>
Cc: Lucia Jara Moreno <[redacted]>, Ashley Childs <[redacted]>

Hi Andrew,

That sounds great! I'm in a meeting until 2:30 PM that might run a bit over, but I'll call you right after.

For your reference, my number is [redacted].

Talk to you soon,
Nolan Lachance
[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Aroland - Community Updates

Lachance, Nolan <[redacted]> Wed, Aug 13, 2025 at 10:39 AM
To: Andrew Peach <[redacted]>
Cc: Lucia Jara Moreno <[redacted]>, Ashley Childs <[redacted]>

Good morning Andrew,

I would like to schedule a quick phone call sometime this week to discuss a few outstanding topics. Please let me know your availability for the coming days.

Could you please confirm if this is the best number to reach you: [redacted]

I look forward to hearing from you.

Best,
Nolan Lachance
--

DILLON CONSULTING

PROUDLY CANADIAN SINCE 1946

CANADA BEST MANAGED COMPANIES
Platinum member

Nolan Lachance (M.E.S)
Dillon Consulting Limited
[redacted]
www.dillon.ca

Lachance, Nolan <[redacted]>

Fwd: Invoice: AFN Community Meeting

Lachance, Nolan <[redacted]> Thu, Aug 14, 2025 at 9:19 AM
To: Andrew Peach <[redacted]>
Cc: Lucia Jara Moreno <[redacted]>, Ashley Childs <[redacted]>, "Angelis, Niki" <[redacted]>
Bcc: Jodi Miles <[redacted]>

Good morning Andrew,

As discussed in our call yesterday, if you could please provide an updated invoice for the Community Meeting that took place on May 28, 2025, at the JTS School, so that we can distribute the payment to Aroland.

Please update the invoice to be made out to the following:
Niki Angelis
AECOM Canada ULC
[redacted]

Robinson Meshake or Anna Magiskan (cc'd in this thread) should be able to provide additional support here if needed.

I appreciate your support here and wanted to thank you again for your time yesterday.

Enjoy your time off,
Nolan Lachance

--

DILLON CONSULTING
PROUDLY CANADIAN SINCE 1946
CANADA BEST MANAGED COMPANIES
Platinum member

Nolan Lachance (M.E.S)
Dillon Consulting Limited
[redacted]
www.dillon.ca

DILLON CONSULTING

Lachance, Nolan <[redacted]>

UPDATE REQUESTED: Invitation to Participate in Upcoming Archaeological Investigations - Artech Onboarding

1 message

Catherine Holt <[redacted]> Fri, Aug 15, 2025 at 4:49 PM
To: "[redacted]" <[redacted]>
Cc: Simirpreet Singh <[redacted]>, "[redacted]" <[redacted]>, "[redacted]" <[redacted]>

Good afternoon, Jerry,

I hope this email finds you well. I understand you've been away for personal reasons, and I hope everything is going as smoothly as possible. Our onboarding team has been trying to connect with you this week regarding the Aroland fieldwork with AECOM.

When you have a moment, could you please confirm if you are still interested in moving forward with this project? If so, there are a few documents that need to be completed so we can set you up on Artech payroll. Please let me know if there's anything I can do to make the process easier for you.

I look forward to hearing from you.

Regards,

Catherine (Kate) Holt

Service Delivery Manager

ARTECH
INTELLIGENCE IS HUMAN

Artech Technology Canada Limited

[redacted]

[redacted]

[redacted]

[redacted]

Website: www.artech.com

DILLON CONSULTING

Lachance, Nolan <[redacted]>

UPDATE REQUESTED: Invitation to Participate in Upcoming Archaeological Investigations - Artech Onboarding

Catherine Holt <[redacted]> Tue, Aug 19, 2025 at 5:21 PM
To: "[redacted]" <[redacted]>
Cc: Simirpreet Singh <[redacted]>, "[redacted]" <[redacted]>, "[redacted]" <[redacted]>

Good Afternoon, Jerry,

I hope this email finds you well. Simirpreet was kind enough to forward your message regarding the start date of the upcoming work. Please see the update below.

The crew is scheduled to be in the field until August 25th. If there's a day between now and then that you are available to join them —once you have completed onboarding with us —they are happy to adjust the schedule to accommodate your availability and focus on areas of interest to you.

Please expect a message from either Nolan Lachance (cc'd here) or the field liaison, Josh Keddy, regarding specific dates. If you have any preferred dates in mind, please let me know, and I can pass those along as well.

Thank you, and I look forward to hearing from you.

[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Archaeological Investigation Opportunities

1 message

Lachance, Nolan <[redacted]> Thu, Aug 21, 2025 at 9:01 AM
To: Jerry Shabogamik <[redacted]>
Cc: Ashley Childs <[redacted]>, Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Jennifer Bruin <[redacted]>, Qasim Saddique <[redacted]>, "Angelis, Niki" <[redacted]>, "Price, Katelyn" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Keddy, Joshua" <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Markham, Samantha" <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>
Bcc: Jodi Miles <[redacted]>

Good morning Jerry,

I am reaching out to inquire if you know what days you would like to participate in the archaeological investigations. The archaeology team has a few more days remaining for survey sites of potential interest to Aroland First Nation. As a reminder, you will need to complete the onboarding prior to joining field investigations.

To complete the onboarding process, please continue to coordinate with **Kate Holt**:

Catherine (Kate) Holt

Service Delivery Manager

ARTECH
INTELLIGENCE IS HUMAN

Artech Technology Canada Limited

[redacted]

[redacted]

Please let me know when you would like to participate so we can begin coordinating logistical details to get you started.

Best regards,

Nolan Lachance

--

DILLON CONSULTING

PROUDLY CANADIAN SINCE 1946

CANADA BEST MANAGED COMPANIES
Platinum member

Nolan Lachance (M.E.S)
Dillon Consulting Limited
[redacted]
www.dillon.ca

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Archaeological Investigation Opportunities

Lachance, Nolan <[redacted]> Fri, Aug 22, 2025 at 11:30 AM
To: Ashley Childs <[redacted]>
Cc: Andrew Peach <[redacted]>, Lucia Jara Moreno <[redacted]>

Hi Ashley,

Thanks for the update. I'll hold off on sharing this with the team until we hear back from you and Jerry regarding Jeff's availability.

Thanks again for your help.

Best,
Nolan Lachance
[Quoted text hidden]

Lachance, Nolan <[redacted]>

August 2025 - MFFN CAR Project Updates

1 message

Lachance, Nolan <[redacted]> Thu, Aug 28, 2025 at 10:58 AM
To: Andrew Peach <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Lucia Jara Moreno <[redacted]>
Bcc: Jodi Miles <[redacted]>

Good morning,

I hope all is well. Below are some updates in relation to the Marten Falls First Nation Community Access Road (MFFN CAR) Project:

Draft Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report
On June 13, 2025, your community-specific Draft Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report was distributed. The review period closes on **September 11, 2025**. Please submit any comments, questions, additional Indigenous Knowledge or details about important sites, areas or resources through email. Please use the following link to access and download your community-specific report: [redacted]

New video: Understanding Cumulative Effects
As part of the Environmental Assessment / Impact Assessment for the Community Access Road, we are looking closely at how different activities - past, present, and future - may combine to affect the land, water, animals, and people. This includes considering how the Community Access Road might interact with other projects happening in the same area or at the same time. By looking at the bigger picture, we aim to better understand the full impact of the Project on the environment and the Community. To watch the latest video, click here: https://vimeo.com/1096031872/90de3c9f05?fl=pl&fe=vl

Should you have any questions or concerns, please feel free to reach out.

Best,
Nolan Lachance
--

DILLON CONSULTING
CANADA BEST MANAGED COMPANIES Platinum member
PROUDLY CANADIAN SINCE 1946

Nolan Lachance (M.E.S)
Dillon Consulting Limited
[redacted]
www.dillon.ca

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Fwd: Invoice: AFN Community Meeting

Lachance, Nolan <[redacted]> Thu, Aug 28, 2025 at 11:05 AM
To: Andrew Peach <[redacted]>
Cc: Lucia Jara Moreno <[redacted]>, Ashley Childs <[redacted]>, "Angelis, Niki" <[redacted]>
Bcc: Jodi Miles <[redacted]>

Good morning Andrew,

I'm following up on the invoice for the Community Meeting that took place on May 28, 2025, at the JTS School. Were you able to make progress on changing the invoice to be made out to AECOM so that payment can be issued to Aroland First Nation?

Thanks,
Nolan Lachance
[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Fwd: Invoice: AFN Community Meeting

Lachance, Nolan <[redacted]> Thu, Aug 28, 2025 at 11:12 AM
To: Andrew Peach <[redacted]>
Cc: Lucia Jara Moreno <[redacted]>, Ashley Childs <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Andrew,

Thanks for the update. I appreciate your continued efforts in getting this resolved.

Best,
Nolan Lachance
[Quoted text hidden]

B2.2 Incoming Community Specific Correspondence

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Fwd: good afternoon,

[redacted]

[redacted]

---------- Forwarded message ---------
From: **Jerry Shabogamik** <[redacted]>
Date: Thu, Aug 1, 2024 at 2:40 PM
Subject: good afternoon,
To: Lucia Jara Moreno <[redacted]>

re. ground water sampling ,
here is the name that is willing to do this work.

[redacted]
ph, [redacted]
no email.
hope this helps

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 8 August 2024 at 12:19
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Lucia Jara Moreno <[redacted]>, MFFN Community Access Road Project Team <info@martenfallsaccessroad.ca>

Hi Kyla,

My turn for apologies in a delayed response. I forwarded this information to Jerry Shabogamik to make sure that the applicants are reviewed by the appropriate HR staff on Aroland's end. I've followed up today to see if there's any progress and will let you know once I've heard back from Aroland.

Just a note that I'll be away on vacation starting tomorrow and back in the office on Tuesday, August 20th. While I'm away, please reach out to Jerry about any questions or updates regarding the Community Coordinator Position.

Thanks very much!

Andrew Peach, MSc | **Planning Consultant**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

Zielbauer, Kyla <[redacted]>

Aggregate Drilling Sites Flyover

Jerry Shabogamik <[redacted]> 12 August 2024 at 16:12
To: Kyla Zielbauer <[redacted]>

re address , jerry shabogamik ,[redacted],
have good day and thanks
[Quoted text hidden]

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Aggregate Drilling Sites Flyover

Jerry Shabogamik <[redacted]> 12 August 2024 at 16:49
To: "Zielbauer, Kyla" <[redacted]>

Sounds good, thank you.
[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Jerry Shabogamik <[redacted]> 15 August 2024 at 16:48
To: "Zielbauer, Kyla" <[redacted]>
Cc: Andrew Peach <[redacted]>, Jeremy Shute <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, Andrea Nokleby <[redacted]>

Thank you for the update.

[Quoted text hidden]

> [Quoted text hidden]
> This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.
>
> Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Jerry Shabogamik <[redacted]> 19 August 2024 at 11:01
To: "Zielbauer, Kyla" <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "McCutchon, James" <[redacted]>, "Price, Katelyn" <[redacted]>, "Fisken, Avril" <[redacted]>, Ryan Dobson <[redacted]>, Cory Pyziak <[redacted]>, "Kuenstler, Dan" <[redacted]>, Lucia Jara Moreno <[redacted]>

Thanks, I'll take a look.

[Quoted text hidden]

> [Quoted text hidden]
> This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.
>
> Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Jerry Shabogamik <[redacted]> 19 August 2024 at 14:11
To: "Zielbauer, Kyla" <[redacted]>

re honorarium hows that coming along
[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Jerry Shabogamik <[redacted]> 20 August 2024 at 09:58
To: "Zielbauer, Kyla" <[redacted]>

Thanks for the update.
[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Jerry Shabogamik <[redacted]> 4 September 2024 at 10:13
To: "Zielbauer, Kyla" <[redacted]>

Thanks, I will let you know.
[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 10 September 2024 at 13:34
To: "Zielbauer, Kyla" <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Contardo, Selena" <[redacted]>, "Crew, Jean-Marc" <[redacted]>

Hello Kyla,

Thanks for reaching out about this. I'll connect with Jerry to draft a list of names of monitors that could be available for that time. We'll aim to have identified potential participants by early next week.

Thanks,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[Quoted text hidden]

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Jerry Shabogamik <[redacted]> 10 September 2024 at 13:53
To: Andrew Peach <[redacted]>
Cc: "Zielbauer, Kyla" <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Contardo, Selena" <[redacted]>, "Crew, Jean-Marc" <[redacted]>

Sounds great, thanks for the update!
[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Aroland First Nation IK Report

Andrew Peach <[redacted]> 10 September 2024 at 14:56
To: Qasim Saddique <[redacted]>
Cc: Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Kyla Zielbauer <[redacted]>, Sonny Gagnon <[redacted]>, Chief Gagnon <[redacted]>, Councillor Annamarie Makiskan <[redacted]>, Councillor Bernard Gagnon <[redacted]>, Councillor Chad Kashkeesh <[redacted]>, Councillor Eunice Magiskan <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Tyrell Gagnon <[redacted]>, Mark Bell <[redacted]>, Joe Baxter <[redacted]>, "[redacted]" <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>

Hello Qasim,

I hope that you're doing well. Please find attached Aroland First Nation's Indigenous Knowledge and Land Use Study for the Marten Falls Community Access Road.

Thanks very much,

Andrew Peach, MSc | Senior Planning Consultant and Project Director

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender immediately via email. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

AFN_MFCAR_IK Report_FINAL_2024.09.03.pdf
5899K

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Geotechnical Program Helicopter Flyover - July 19 and 20 2024

Jerry Shabogamik <[redacted]> 13 September 2024 at 14:56
To: "Zielbauer, Kyla" <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]> "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "McCutchon, James" <[redacted]>, "Price, Katelyn" <[redacted]>, "Fisken, Avril" <[redacted]>, Ryan Dobson <[redacted]>, Cory Pyziak <[redacted]>, "Kuenstler, Dan" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Anderson, Victoria" <[redacted]>

Looks good to me. also ryan and corey said they going to send some picture of the river crossings and some other sites .

have good day
[Quoted text hidden]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 20 September 2024 at 12:17
To: "Zielbauer, Kyla" <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, "Contardo, Selena" <[redacted]>, "Crew, Jean-Marc" <[redacted]>

Good Morning Kyla,

Jerry has been working to identify potential monitors for fieldwork opportunities and I have sent him a reminder to provide a list of names before the end of day today.

Also, please note that Aroland is observing a Culture Week next week (September 23rd to 27th) and the band office will be closed.

Thanks for reaching out about this,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 26 September 2024 at 18:14
To: "Zielbauer, Kyla" <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Jeremy Shute <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, Lucia Jara Moreno <[redacted]>, Andrea Nokleby <[redacted]>, Valdine Walker <[redacted]>

Good Afternoon Kyla,

Thanks for following up on these items. Aroland's offices are closed this week, but I will follow up with Jerry about each of the items once he's back in the office next week. We'll get back to you about these topics as soon as we are able to next week.

Thanks,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Proposed Meetings with Aroland - October 16 and 18, 2024

Andrew Peach <[redacted]> 1 October 2024 at 16:39
To: "Zielbauer, Kyla" <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Councillor Mark Bell <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Fisken, Avril" <[redacted]>, "Angelis, Niki" <[redacted]>, Lucia Jara Moreno <[redacted]>

Hi Kyla,

Aroland's offices were closed last week and yesterday and I have not been able to reach Jerry today to look into the proposed dates that have been recommended. I will continue reaching out to Jerry, and will try and get back to you about the dates as soon as possible.

Thanks for your patience,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

Zielbauer, Kyla <[redacted]>

Proposed Meetings with Aroland - October 16 and 18, 2024

Mark Bell <[redacted]> 1 October 2024 at 16:43
To: Andrew Peach <[redacted]>, "Zielbauer, Kyla" <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Fisken, Avril" <[redacted]>, "Angelis, Niki" <[redacted]>, Lucia Jara Moreno <[redacted]>

We have a funeral tomorrow and just had another passing today, not sure what the direction will be. I'll let you know Thursday

Sent from Outlook for iOS

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Proposed Meetings with Aroland - October 16 and 18, 2024

Andrew Peach <[redacted]> 1 October 2024 at 17:26
To: Mark Bell <[redacted]>, "Zielbauer, Kyla" <[redacted]>
Cc: Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Trimble Exner, Ingrid" <[redacted]>, "Fisken, Avril" <[redacted]>, "Angelis, Niki" <[redacted]>, Lucia Jara Moreno <[redacted]>

Thanks for the update Mark. So sorry to hear about the passings in the community. I hope the community is able to take as much time as you need to mourn. Please reach out to me when you're getting back into the swing of things and we can discuss the potential schedule and next steps.

Take care,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[Quoted text hidden]
[Quoted text hidden]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

good morning re community coordinator job for martin falls first nation

Jerry Shabogamik <[redacted]> 10 October 2024 at 10:38
To: Kyla Zielbauer <[redacted]>

.aroland has selected [redacted] and can you call him on his cell phone
[redacted]
thanks have a good day

Zielbauer, Kyla <[redacted]>

good morning re community coordinator job for martin falls first nation

Jerry Shabogamik <[redacted]> 10 October 2024 at 14:57
To: "Zielbauer, Kyla" <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Joe Baxter <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, "Fisken, Avril" <[redacted]>, "Angelis, Niki" <[redacted]>, Lucia Jara Moreno <[redacted]>

Have a great weekend too!

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Aroland First Nation IK Report

Andrew Peach <[redacted]> 23 October 2024 at 11:20
To: "Zielbauer, Kyla" <[redacted]>
Cc: Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Sonny Gagnon <[redacted]>, Chief Gagnon <[redacted]>, Councillor Annamarie Makiskan <[redacted]>, Councillor Bernard Gagnon <[redacted]>, Councillor Chad Kashkeesh <[redacted]>, Councillor Eunice Magiskan <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Councillor Tyrell Gagnon <[redacted]>, Mark Bell <[redacted]>, Joe Baxter <[redacted]>, "[redacted]" <[redacted]>, Ashley Childs <[redacted]>, Andrew Dieleman <[redacted]>, "[redacted]" <[redacted]>

Hello Kyla,

Sorry for the delayed response, I've been out of the office and am just catching up now.

In accordance with data sovereignty principles, Aroland reserves the right to share their data in the format and manner that they choose. Aroland will not share shapefiles or associated attribute data presented in the Indigenous Knowledge and Land Use and Occupancy Study (IKLUOS) with groups external to the First Nation. This data includes sensitive information and community knowledge shared with Aroland by community members, who have entrusted the First Nation to safeguard this information on their behalf. As such, Aroland is not comfortable with the community's information being used or interpreted by those external to the First Nation (i.e. to determine the potential for impacts to our First Nation's rights and interests).

Aroland believes that the IKLUOS completed and circulated in September provides an appropriate overview of the data requested, presented at a level that Aroland is comfortable sharing externally. Further, the report provided included an analysis and discussion of potential impacts to Aroland's rights and interests in the local and regional study areas. If specific mapped features or elements of the IKLUOS require further discussion or clarification, Aroland is open to these discussions

Kind regards,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Re: IK Program funding

Andrew Peach <[redacted]> 29 October 2024 at 13:51
To: Valdine Walker <[redacted]>
Cc: Kyla Zielbauer <[redacted]>, Ashley Childs <[redacted]>,
"[redacted]" <[redacted]>, Laine Gagnon <[redacted]>

Hello Valdine,

I have been asked to connect you to Aroland's Financial Coordinator Laine Gagnon (Cc'd) to coordinate the payment for the IK Program funding. My understanding is that they prefer a lump sum payment.

I hope that you're able to coordinate the necessary logistics, but don't hesitate to reach out if you have any questions for our Project Team.

Thanks very much,

Andrew Peach, MSc | Senior Planning Consultant and Project Director

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender immediately via email. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Community Coordinator Program Update

Andrew Peach <[redacted]> 9 December 2024 at 17:22
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Lucia Jara Moreno <[redacted]>

Hi Kyla,

Thanks for passing this along. I will try and connect with Jerry this week to sort out the details for the agreement.

Take care,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[Quoted text hidden]

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender immediately via email. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 11 December 2024 at 09:59
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Andrea Nokleby <[redacted]>, Valdine Walker <[redacted]>

Good morning Kyla,

Thanks for following up on these items. Responses to each below:

IK Program Funding – I will follow up with Jerry about this and have him confirm that Laine is receiving and responding to your emails.

Community Coordinator Program – I have not yet had the opportunity to connect with Jerry about this but have been working to get in contact with him and will support him in finalizing the agreement as soon as possible.

Draft EA/IS Report – I have asked Jerry to review and complete this form for Aroland and will follow up about it when I have the opportunity to connect with him.

Meeting in January – We will likely be shifting our proposed meeting time into February as the main purpose of the meeting is to provide an opportunity for band members to learn about and provide comments on the draft EA IS documents. I will be discussing this with Jerry when I have the opportunity to connect with him.

I am hoping to speak with Jerry this week- if we're unable to connect by Friday these items will likely have to wait until the New Year.

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 13 December 2024 at 16:30
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>

Hi Kyla,

Jerry and I have connected and he is going to follow up with the band administration and accounting department to get the necessary information to your team for the IK funding and Community Coordinator program.

Regarding the EA IS report, we're asked about the format we'd like to receive documents in. Is it possible to receive the documents digitally through dropbox or google drive or is it required that a USB be mailed to the main contact? And is it possible to have two main contacts, as Jerry and I would both like to be identified as the key contacts for the review phase.

As for the meeting in January, I can confirm that we'll be postponing that until at least February, but perhaps into March depending on the release dates for the EA IS documents.

Finally, I wanted to provide a quick heads up that I am going to be out of the office from December 16th to January 6th, but I will be checking my emails occasionally next week in case anything urgent comes up. I hope that you have a great holiday! We're looking forward to reviewing the draft EA IS documents in the New Year!

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Re: Proposed Marten Falls Community Access Road Investigative Geotechnical Drill Program (2024-2025)

Joseph, Alain (He/Him) (MNR) <[redacted]> 13 January 2025 at 15:31
To: [redacted]
Cc: "Brunner, Evelyn (MNR)" <[redacted]>, "Brunner, Dorothy (MNR)" <[redacted]>, "Hakim, Azizul (MNR)" <[redacted]>, "MacInnis, Paul (MINES)" <[redacted]>, "Frechette, Jason (MINES)" <[redacted]>, Ryan Dobson <[redacted]>, Jennifer Bruin <[redacted]>, "McCutchon, James" <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Deveaux, Leah" <[redacted]>, "Wang, Joanne" <[redacted]>, Cory Pyziak <[redacted]>, "[redacted]" <[redacted]>

Boozhoo and good afternoon,

I hope you are doing well. Please find the MNR's response to your letter from November 15th, 2024.

Please don't hesitate to reach out to me if you have any questions.

Cheers,

Alain

Alain Joseph, M.Sc.Ag.F., M.Sc., H.B.E.S.,

District Resource Liaison Specialist | Far North District

Ministry of Natural Resources | Ontario Public Service

[redacted] | [redacted]

Ontario

Taking pride in strengthening Ontario, its places and its people

As part of providing accessible customer service, please let me know if you have any accommodation needs or require communication supports or alternate formats.

2 attachments

2025-01-13_MFCAR_ArolandResponseLetter.pdf
139K

2024-09-25_MFCAR_GeotechMap.pdf
1881K

Ontario

[redacted]

Ministry of Natural Resources
Ministère des Richesses Naturelles

January 13, 2025

Chief Sonny Gagnon
Aroland First Nation
[redacted]
Email: [redacted]

Sent Via Email

SUBJECT: Response to Proposed Marten Falls Community Access Road Investigative Geotechnical Drill Program (2024 – 2025)

Dear Chief Gagnon,

Boozhoo and good day. The Ministry of Natural Resources (MNR) would like to thank you for your November 15th letter outlining Aroland First Nation's concerns with the Marten Falls Community Access Road (MFCAR) Investigative Geotechnical Drilling Program (2024-2025). We have taken some time to review Aroland First Nation's concerns, met with the project proponent, and would like to share the following details with you.

Wildlife and harvesting concerns

In your letter, you raised concerns regarding impacts to wildlife and subsequent impacts to hunting and trapping. In our consultation letter sent on September 26th, 2024, we indicated that the proponent has committed to mitigation measures and to avoid sensitive habitats. To provide additional assurance, the proponent's commitments to mitigate potential impacts to wildlife and harvesting are described below:

- Prior to field work, a 2-week field mobilization notice will be sent to communities which will identify the exact dates and locations of the drilling program. Providing an opportunity for your community to request adjusted flight paths to minimize disturbance to traditional activities, as appropriate.
- The field team will maintain suitable altitude when flying to, from and between sampling sites. When safe and feasible to do so, the field team will be over 400 meters above ground level.
- Efforts will be made to not circle sites more than is necessary for safe landing.
- Helicopters will shut down once they have landed on site and is safe to do so and will remain off until departure from site.
- Given the conditions of the site (e.g., number of trees, size of trees), the field team will use chainsaws for clearing of shrubs and trees as this will greatly reduce the amount of time of the disturbance reducing the overall effect on wildlife in the area.

- Should any caribou be observed from the air within 500 m of a proposed drill site, field crew will not land on the site and instead proceed to a different site for the day.
- No work will occur within the restricted timing windows for species at risk. Should work be required during a restricted timing period, a qualified biologist will draft a mitigation strategy and all necessary permits and approvals, including species at risk authorizations, for this work will be obtained by the proponent.

We also acknowledge your concerns around the potential future impacts of aggregate pit or quarry development; however, the current permitting process cannot address these future concerns. We encourage Aroland First Nation to raise these concerns with the proponents directly, for consideration in the environmental assessment process for the broader project.

Sites of historical and archaeological significance and potential for inadvertent disturbance

In your letter, you identified that proposed geotechnical drill locations [redacted] are within Aroland First Nation's traditional territory and are likely to contain sites of historical and archaeological significance, and that your community has concerns related to traditional harvest (see response above) and the potential for disturbance to cultural heritage resources that may be present.

MNR understands that two Stage 1 archaeological assessments have been carried out within the project area: one for the MFCAR project in 2020 (PIF P438-0207-2020), and another for MFCAR additional aggregate resources in 2024 (PIF P438-0323-2024), which is still in draft form; the reports have yet to be entered into the Ontario Public Register of Archaeological Reports. The 2020 Stage 1 assessment describes participation of two Aroland First Nation representatives (Sheldon Atlookan and John Atlookan) in the field review. MNR understands that Aroland First Nation provided feedback that informed the 2020 assessment and Aroland First Nation was also provided the draft 2024 assessment for review but did not provide comment.

The project team has also shared that Aroland Fist Nation has been invited to participate in the Indigenous Knowledge (IK) collection program (related to the environmental assessment for the MFCAR), and information related to that program was received after the most recent Stage 1 assessment had been completed and circulated for review. The project team described that it was not available for inclusion in the Stage 1 assessment, but that information from the IK program will be considered in future Stage 2 archaeological assessments which are required for much of the study area.

Aroland First Nation is encouraged to continue participating in opportunities to share information with the project team, to help ensure that cultural heritage and archaeological resources are appropriately considered and accommodated.

Opportunity to review archaeological protocols

Your letter also requests to review and provide feedback on archaeological protocols that the MFCAR project team will adhere to prior to initiating any work at these sites. In the 2024 drill program application submitted to MNR, the following in-field protocols related to archaeological resources are included:

> *Each test hole location was determined with consideration for archaeological potential and were sited to avoid locations of known archaeological finds as documented in Stage 1 Archaeological Reporting completed by AECOM in 2020 and 2024. The following mitigations will be employed with regards to archaeological resources:*
>
> - *Prior to any work commencing, a community member from Aroland First Nation and Marten Falls First Nation will be invited to join the program, if safe to do so. The community members will be integral in identifying archaeology potential.*
> - *Should the drilling locations as identified in the permit application need to be changed or expanded, further review of archaeological potential and any necessary archaeological assessments will be completed as required.*
> - *Should previously undocumented resources be discovered, there may be a new archaeological site that is subject to Section 48 (1) of the Ontario Heritage Act. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed archaeologist to carry out archaeological field work in compliance with Section 48 (1) of the Ontario Heritage Act. The Heritage Operations unit of the Ministry of Citizenship and Multiculturalism must be immediate notified; and,*
> - *The Cemeteries Act, R.S.P. 1990 c.C.4 and the Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33 requires that any person discovering human remains must notify the police or coroner and the Registrar of Cemeteries at the Ministry of Consumer Services.*

Aroland First Nation Participation

The letter provided also requests an opportunity for Aroland First Nation to have environmental monitors participate in initial flyovers of the sites, and to observe all on-the-ground activities, with adequate capacity funding to support these activities.

Based on the geotechnical drill program application and information from the project team, MNR understands that as per the Marten Falls First Nation-Aroland First Nation Agreement, a representative from Aroland First Nation (Jerry Shabogamik) participated in the July 2024 aggregate geotechnical reconnaissance flight as well as the previous flights to support the 2021 groundwater drill program. It is MNR's understanding that the aggregate locations and proposed geotechnical drill locations were shifted to address concerns identified as part of the flight. The project team noted that they worked with Aroland to develop a monitoring plan for sites of concern as part of the 2021 groundwater drill program, and that they would also be open to doing the same for the geotechnical drill program if requested. As noted

above, the application to MNR described an invitation to Aroland First Nation to join the drill program, if safe to do so, prior to work commencing.

With regards to funding to support participation the MNR understands that the proponent has provided direct support for Aroland First Nation for consultation and engagement, support of community monitors/field staff, as well as training to participate in reconnaissance flights, site inspections and monitoring. In addition, MNR understands that Aroland First Nation receives funding from the Ministry of Mines via the Participant Funding Initiative to support participation in the environmental assessment process, including implementation of an Indigenous Knowledge data collection and assessment program specific to the proposed MFCAR. We encourage you to make full use of these funds and, should you have any questions regarding this funding stream, please feel free to reach out to Jason Frechette, Indigenous Liaison Officer with the Ministry of Mines at [redacted] or by phone at [redacted]

MNR anticipates that potential approvals may be granted to the geotechnical drilling application in 2025, The activities will be completed as outlined in the original September 26, 2024 letter provided to your community, and in areas where there are additional efforts required from the proponent, MNR may provide batch approvals until reasonable efforts are made to address other concerns.

Should you have any questions regarding the information in this letter, or feedback relating to the archaeological protocols, you are encouraged to connect with the MFCAR Project Team by contacting Kyla Zielbauer by email at [redacted]. You can also reach out to MNR directly by reaching out to myself Alain Joseph, Resource Liaison Specialist by email at: [redacted] or phone: [redacted](text or call).

In unity,

[redacted]

Alain Joseph, M.Sc.Ag.F., M.Sc., H.B.E.S.
Resource Liaison Specialist, Far North District

Cc:

Aroland First Nation
Aroland Council
Jerry Shabogamik, Community Consultation Coordinator, AFN
Andrew Peach, AFN Consultant, Shared Value Solutions
Ashley Childs, AFN Consultant, Shared Value Solutions

Cc:

Ministry of Mines

Indigenous Liaison Officer, Paul MacInnis, [redacted]
Indigenous Liaison Officer, Jason Frechette, [redacted]

Proponent

Ryan Dobson, KGS Group Winnipeg, [redacted]
Qasim Saddique (MFFN CAR Project Team), [redacted]
Bob Baxter (MFFN CAR Project Team), [redacted]
Lawrence Baxter (MFFN CAR Project Team), [redacted]
Jennifer Bruin (MFFN CAR Project Team), [redacted]
James McCutchon (AECOM), [redacted]
Ingrid Trimble (AECOM), [redacted]
Leah Deveaux (AECOM), [redacted]
Joanne Wang (AECOM), [redacted]
Cory Pyziak (KGS), [redacted]

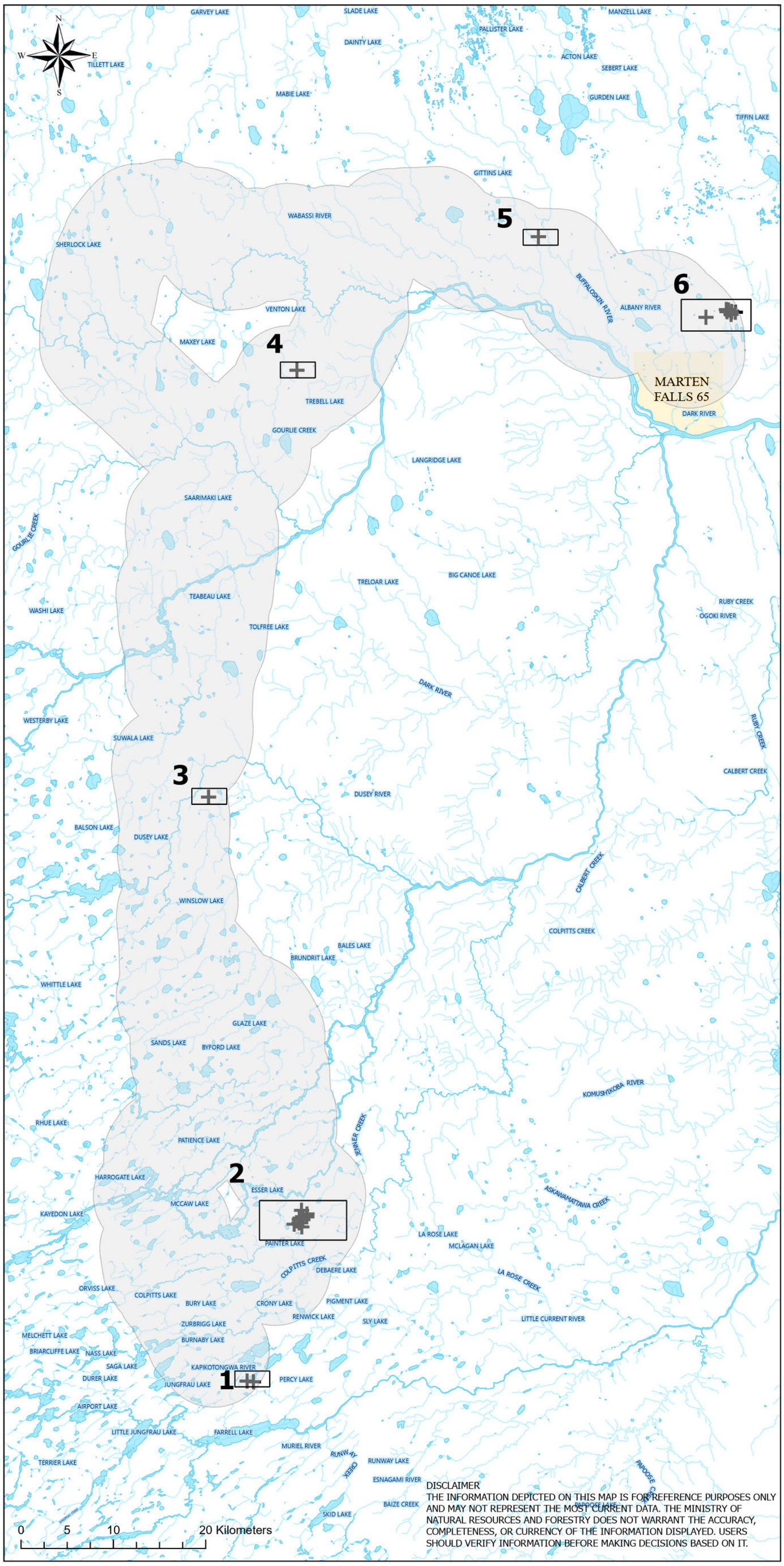
Attached: *Map, 2024-09-25_MFCAR_GeotechMap*

ONTARIO MINISTRY OF NATURAL RESOURCES

2024 - 2025 GEOTECHNICAL SUBMISSION / APPLICATION

TO SUPPORT THE PROPOSED MARTEN FALLS COMMUNITY ACCESS ROAD

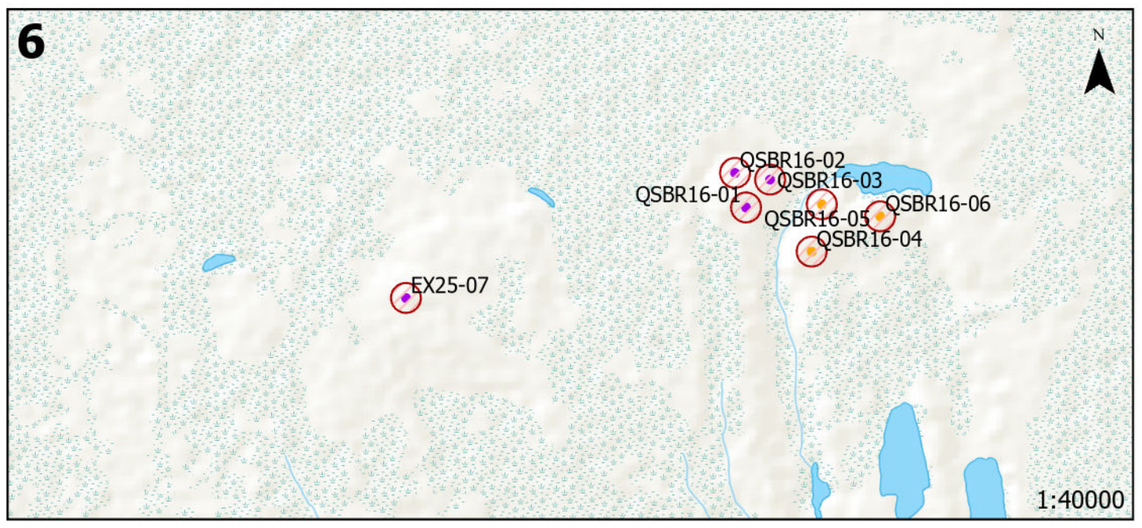
FAR NORTH DISTRICT

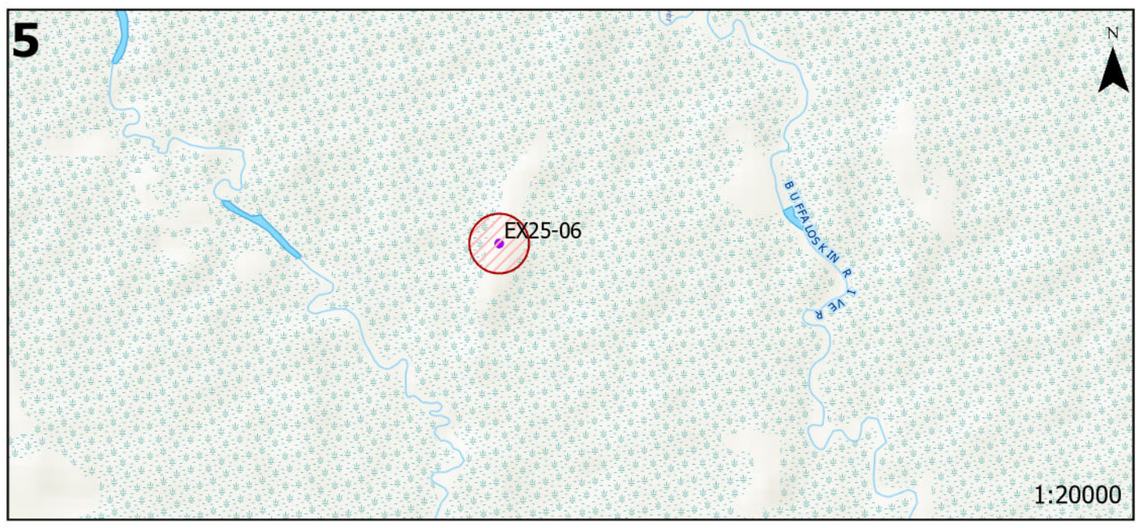


DISCLAIMER
THE INFORMATION DEPICTED ON THIS MAP IS FOR REFERENCE PURPOSES ONLY AND MAY NOT REPRESENT THE MOST CURRENT DATA. THE MINISTRY OF NATURAL RESOURCES AND FORESTRY DOES NOT WARRANT THE ACCURACY, COMPLETENESS, OR CURRENCY OF THE INFORMATION DISPLAYED. USERS SHOULD VERIFY INFORMATION BEFORE MAKING DECISIONS BASED ON IT.

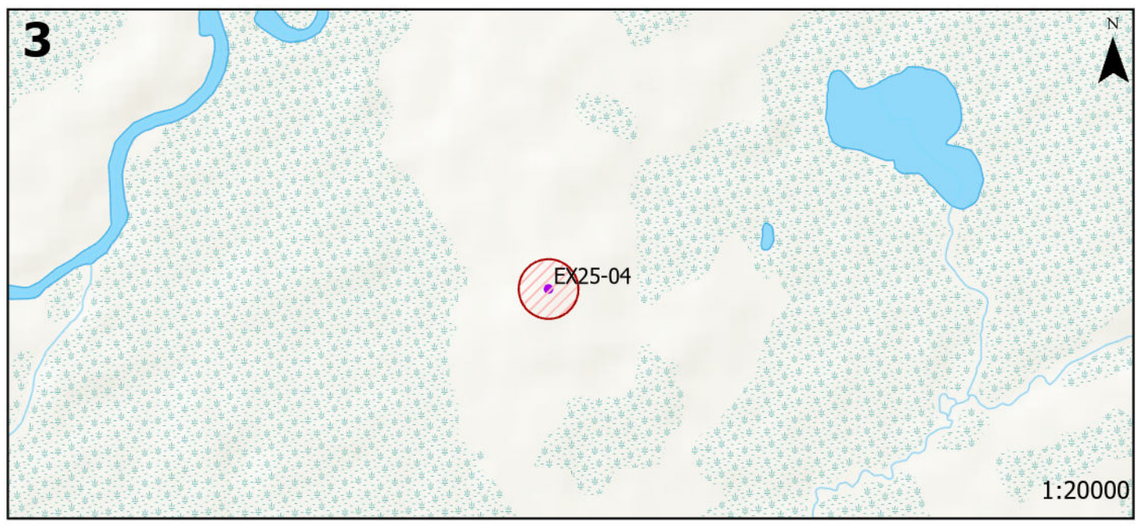
Map Legend

- Proposed Geotechnical Site Locations
- Marten Falls Community Access Road Study Area
- Limits of Work
- 2024 Proposed Drilling and Monitoring Well Locations
- 2025 Proposed Drilling and Monitoring Well Locations
- <all other values>









DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 17 January 2025 at 11:03
To: "Zielbauer, Kyla" <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Valdine Walker <[redacted]>, Andrea Nokleby <[redacted]>

Hello Kyla,

Happy New Year to you as well!

I'll follow up with Jerry about the funding agreements and get back to you as soon as possible.

Thanks very much!

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

good morning re. three roads project meeting.

Jerry Shabogamik <[redacted]> 3 February 2025 at 10:14
To: Kyla Zielbauer <[redacted]>

here are the names of our people that will be attending
JOE BAXTER AND JEFFREY GAGNON,JERRY SHABOGAMIK.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR Project Updates

Andrew Peach <[redacted]> 4 February 2025 at 13:16
To: "Zielbauer, Kyla" <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <j[redacted]>, Valdine Walker <[redacted]>, Andrea Nokleby <[redacted]>

Good afternoon Kyla,

Aroland's legal council has reviewed the Community Capacity Funding Agreement and has made some edits for the Marten Falls Project Team to review. If your team is OK with the edits, please let us know and we'll return a signed copy. If you have any questions or concerns about the edits, please let me know and we can review.

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[redacted]>

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

AFN_MFCAR_ Community Capacity Funding Agreement_LegalEdits_2025.02.04.docx
71K

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR - Phone Call Follow Up

Ashley Childs <[redacted]> 14 February 2025 at 14:34
To: "Zielbauer, Kyla" <[redacted]>
Cc: Andrew Peach <[redacted]>, Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Jeremy Shute <[redacted]>

Hi Kyla,

Thank you for sending this information along.

Milestone #3 Progress Report

We have done an initial review of the documents, however, Andrew Peach is most familiar with the details of the consultation process and is currently out of the office. He will be able to get back to you during the week of February 24-28, 2025 with more detailed feedback.

Draft EA/IS Distribution

Thank you for this update. We do not have anyone additional to add at this time.

IK Funding Program

We have followed-up with Aroland on preferred payment method. We will reach out with this information once we have it.

Community Capacity Funding Agreement

Once we have received the agreement, we will ensure Aroland receives a copy to review for signature.

Thank you,

Ashley

Ashley Childs, BMgmt | Lands Manager & Client Liaison

(She/her – why is this here?)

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Draft MFCAR Environmental Assessment / Impact Statement Inquiry

Ashley Childs <[redacted]> 19 February 2025 at 11:15
To: Kyla Zielbauer <[redacted]>
Cc: Andrew Peach <[redacted]>

Hi Kyla,

We had a few questions as we are starting our review process. Should we reach out to you with those questions, or the email identified in the notification?

Thank you,

Ashley

Ashley Childs, BMgmt | **Lands Manager & Client Liaison**

(She/her – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

Mobile [redacted]

[redacted]

[redacted]

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender immediately via email. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

Draft MFCAR Environmental Assessment / Impact Statement Inquiry

Ashley Childs <[redacted]> 21 February 2025 at 12:35
To: "Zielbauer, Kyla" <[redacted]>
Cc: Andrew Peach <[redacted]>

Hi Kyla,

Thank you for this. We have reached out to the email provided with our questions and cc'ed you to keep you in the loop.

Have a great weekend.

Ashley

Ashley Childs, BMgmt | Lands Manager & Client Liaison

(She/her – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

Mobile [redacted]

[redacted]

[redacted]

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[Quoted text hidden]

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

DILLON CONSULTING

Zielbauer, Kyla <[redacted]>

MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> 25 February 2025 at 11:58
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>

Good morning Kyla,

We've accessed the draft EA/IS documents and have directed some questions to the separate email account that you've shared. I will work to connect with Chief and Council about their interest in a meeting and get their input on prospective dates for a meeting. I'll circle back to you

Thanks for circulating MFFN CAR's edits to the draft Community Capacity Funding Agreement. AFN's legal counsel has reviewed the edits and made the following comment: Please have your team review and let me know if there are any comments

[redacted]

Please let us know if the above changes are acceptable or if there is any further review necessary before we are able to finalize and execute the agreement.

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

Office [redacted]

[redacted]

[redacted]

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> Fri, Apr 11, 2025 at 9:55 AM
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hello Kyla,

Sorry for the delayed response. I've been travelling this week and away from my computer. Aroland's legal counsel has reviewed the Community Capacity Funding Agreement and provided their feedback here:

[redacted]

[redacted]

Jerry has identified that Aroland's financial coordinator, Laine Gagnon will be the point of contact for the funding agreement and their information is below:

- Aroland First Nation Band Office
- [redacted]
- Laine Gagnon [redacted]
- Mailing address:

[redacted]

[redacted]

[redacted]

Please let us know if you require more information or have further questions about the proposed edits to the agreement.

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> Wed, Apr 16, 2025 at 5:31 PM
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Kyla,

Thanks for reaching out about this. I am reaching out to Chief and Council with a few asks re: meeting with Marten Falls Project Team. Are you able to confirm that your team is inquiring about the following:

- Thursday May 29th – meeting with Aroland Chief and Council in late morning/early afternoon
- Week of May 26-30- meeting with Aroland band members

Would you also be able to confirm if the MFCAR Project Team would be able to conduct two meetings with Aroland band members? One in Aroland and the other in Thunder Bay? Both would need to be evening meetings to accommodate AFN band members' schedules.

Once we've confirmed these details I can work with Jerry and Chief and Council to determine if these work for their schedules.

[Quoted text hidden]
[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> Wed, Apr 23, 2025 at 2:20 PM
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Kyla,

That sounds good. Once you've shared those with me I can check in with Chief and Council to understand their availability and interest in a meeting.

Aroland's legal counsel is [redacted] and their main contact is [redacted]. She can be reached at [redacted]

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[Quoted text hidden]
[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> Wed, Apr 30, 2025 at 12:01 PM
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hi Kyla,

Thanks for the update on potential meetings. I will put those dates in front of Chief and Council to see if they work for them, and will get back to you as soon as I hear from them.

Regarding the funding agreements, I believe that it would be fine to use the same contact for both funding streams. I will follow up with Aroland about getting a blank cheque.

And thanks for the information on webinars. We'll pass that info on to AFN band members who may be interested in joining them.

Thanks again,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> Wed, May 7, 2025 at 11:45 AM
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hello Kyla,

I have confirmed with Chief and Council that the meeting dates of May 28th and May 29th are good for Aroland. I can connect with Jerry to help coordinate the logistics. He's out of the office this week, but should be available next week to help coordinate logistics and distribute advertisements.

Kind regards,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

[redacted]

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

Zielbauer, Kyla <[redacted]>

MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> 12 June 2025 at 11:14
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Good Morning Kyla,

I will follow up with Jerry about the agreement and the void cheque and we'll get back to you as soon as possible.

Thanks,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

[redacted]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Re: MFFN CAR - Phone Call Follow Up

Andrew Peach <[redacted]> Thu, Jun 19, 2025 at 10:19 AM
To: "Zielbauer, Kyla" <[redacted]>
Cc: Chief Sonny Gagnon <[redacted]>, Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Jerry Shabogamik <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Sonny Gagnon <[redacted]>, Joe Baxter <[redacted]>, Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Nolan Lachance <[redacted]>, "Angelis, Niki" <[redacted]>

Hello Kyla,

Please find attached the Community Capacity Funding Agreement, finalized and signed by Chief Gagnon.

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

[redacted]

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

Subject: Aroland First Nation Technical Review Report for the Marten Falls
Sent: 2025-06-23, 2:20:42 PM
From: Andrew Peach [redacted]
To: MFFN CAR
Cc: Chief Gagnon; Councillor Annamarie Makiskan; Councillor Bernard Gagnon; Councillor Chad Kashkeesh; Councillor Eunice Magiskan; Councillor Joe Baxter; Councillor Mark Bell; Councillor Tyrell Gagnon; Qasim Saddique; Chief Bruce Achneepineskum; Kate Kempton; Cafaro, Caitlin (IAAC/AEIC); Moszynski, Dorothy
Attachments: AFN_MFCAR Technical Review Report for EA_2025.06.23.pdf

---

Hello Joanne Wang,

Please accept the attached report, the Technical Review Report for the Marten Falls Community Access Road Draft Environmental Assessment Impact Statement, on behalf of Chief Gagnon and Aroland First Nation.

Kind regards,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**
(He/him – why is this here?)

SHARED VALUE SOLUTIONS
[redacted]
www.sharedvaluesolutions.com
SVS is a certified B Corporation using the power of business
to solve social and environmental problems.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender immediately via email. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

AROLAND FIRST NATION

[redacted]

Email: eaisinput@martenfallsaccessroad.ca
C/O Joanne Wang,
[redacted]

Monday, June 23, 2025

Dear Joanne Wang,

Aroland First Nation (AFN) has reviewed the draft EA/IS prepared by the Marten Falls Project Team for the proposed Marten Falls Community Access Road Project. Our comments, questions, recommendations and requirements for approval on the draft EA/IS can be found in the attached report, which was prepared by AFN with the support of Shared Value Solutions Ltd. (SVS).

AFN is supportive of the development and approval of the MFCAR project ***for the purpose of community access.*** Our Band members confirmed this support through a vote in September 2024 and we reaffirmed this support with the Shared Prosperity Agreement that AFN signed with Ontario in February 2025. However, it is important to recognize that this support is limited to the MFCAR and the community access that it will provide. AFN ***has not*** confirmed any support for industrial developments, including but not limited to mining and any proposed developments in the Ring of Fire. We assert that any proposed future developments must be contemplated through meaningful consultation at the deepest level with AFN, and only advanced following comprehensive and coordinated assessment and with AFN's free, prior, and informed consent pursuant to our decision-making governance authority over our lands.

While AFN supports the MFCAR, we believe the coordinated environment and impact assessments serve an important purpose in understanding potential adverse impacts as well as benefits. Our report highlights a number of significant concerns that we have identified within the draft EA/IS report and technical documents that significantly limit our ability to understand the potential impacts to our rights and interests. Within the report, we have also proposed several reasonable opportunities to allow us to work together with the Marten Falls Project Team, and Crown in addressing our concerns collaboratively. This collaborative approach is essential to proactively identify and implement measures to avoid or otherwise mitigate adverse impacts to AFN's Aboriginal and Treaty Rights and interests, while also working to maximize the benefits to both of our First Nations on the road to all-season road access for Marten Falls First Nation.

We look forward to your response to our report and to continuing to work with Marten Falls First Nation and the Project Team.



Chief Sonny Gagnon

Cc:
Aroland Chief and Council
Chief Bruce Achneepineskum
Qasim Saddique, Suslop Inc.
Kate Kempton, Woodward and Associates LLP
Andrew Peach, Shared Value Solutions Ltd.
Caitlin Cafaro, Impact Assessment Agency of Canada
Dorothy Moszynski, Ministry of Environment, Conservation and Parks

SHARED VALUE SOLUTIONS



TECHNICAL REVIEW REPORT FOR THE MARTEN FALLS COMMUNITY ACCESS ROAD DRAFT ENVIRONMENTAL ASSESSMENT IMPACT STATEMENT

Prepared for: Aroland First Nation

June 23, 2025

Andrew Peach, MSc

226 706 8888 ext. 150
andrew.peach@sharedvaluesolutions.com
sharedvaluesolutions.com

62 Baker Street
Guelph Ontario Canada
N1H 4G1

PROSPERITY.
STEWARDSHIP.
JURISDICTION.

Aroland First Nation

Chief Sonny Gagnon
P.O. Box 10
Aroland, ON P0T 1B0

June 10, 2025

Dear Chief Gagnon,

It is our pleasure to provide you with the Technical Review Report on the Environmental Assessment Impact Statement (Draft EA/IS) for the Marten Falls Community Access Road. This review was completed by Andrew Peach, Mark MacDougall, Alison Curran, Leah Culver, Robin Heavens, Jessica Batson, Emily Stairs, Ashley Childs and Marnie Benson of Shared Value Solutions, with assistance from Woodland Heritage Northwest.

We look forward to continuing to serve you in consultation and lands and resources protection matters. Please do not hesitate to get in touch with us if you have any questions or concerns with the enclosed report.

With best regards,

Andrew Peach

Senior Planning Consultant & Project Director, Shared Value Solutions

CONTENTS

1.0 Introduction **1**
1.1 Aroland First Nation 1
1.2 Aroland First Nation Indigenous Knowledge and Land Use Contributions 2
1.3 Aroland First Nation Values and Expectations 4
1.4 Technical Review Objectives 6

2.0 Summary of Review Findings **8**
2.1 Overarching Concerns and Consequences for AFN 8
2.2 AFN Requirement for Approval and Next Steps 12

3.0 Project Description **13**
3.1 Summary of Aroland First Nation's Perspective 13
3.2 Aroland First Nation's Recommendations and Conditions for Approval 13
3.3 Specific Comments and Recommendations 14

4.0 Acoustic & Vibrations **16**
4.1 Summary of Aroland First Nation's Perspective 16
4.2 Evaluation of Impacts to Aroland First Nation 16
4.3 Aroland First Nation's Recommendations and Conditons for Approval 18
4.4 Specific Comments and Recommendations 19

5.0 Groundwater & Geochemistry **20**
5.1 Summary of Aroland First Nation's Perspective 20
5.2 Evaluation of Impacts on Aroland First Nation 20
5.3 Aroland First Nation's Recommendations and Conditions for Approval 21
5.4 Specific Comments and Recommendations 23

6.0 Surface Water **25**
6.1 Summary of Aroland First Nation's Perspective 25
6.2 Evaluation of Impacts on Aroland First Nation 25
6.3 Aroland First Nation's Recommendations and Conditions for Approval 27
6.4 Specific Comments and Recommendations 28

7.0 Fish & Fish Habitat **31**
7.1 Summary of Aroland First Nation's Perspective 31
7.2 Evaluation of Impacts to Aroland First NAtion 31
7.3 Aroland First Nation's Recommendations and Conditons for Approval 34
7.4 Specific Comments and Recommendations 36

8.0 Physiography, Terrain, & Soil **41**
8.1 Summary of Aroland First Nation's Perspective 41
8.2 Evaluation of Impacts to Aroland First Nation 41

8.3 Aroland First Nation's Recommendations and Conditions for Approval 42
8.4 Specific Comments and Recommendations 43

9.0 Peatlands 46
9.1 Summary of Aroland First Nation's Perspective 46
9.2 Evaluation of Impacts to Aroland First Nation 46
9.3 Aroland First Nation's Recommendations and Conditions for Approval 49
9.4 Specific Comments and Recommendations 50

10.0 Vegetation 54
10.1 Summary of Aroland First Nation's Perspective 54
10.2 Evaluation of Impacts to Aroland First Nation 55
10.3 Aroland First Nation's Recommendations and Conditions for Approval 57
10.4 Specific Comments and Recommendations 60

11.0 Wildlife 67
11.1 Summary of Aroland First Nation's Perspective 67
11.2 Evaluation of Impacts to Aroland First Nation 67
11.3 Aroland First Nation's Recommendations and Conditons for Approval 70
11.4 Specific Comments and Recommendations 73

12.0 Birds 79
12.1 Summary of Aroland First Nation's Perspective 79
12.2 Evaluation of Impacts to Aroland First Nation 79
12.3 Aroland First Nation's Recommendations and Conditions for Approval 81
12.4 Specific Comments and Recommendations 83

13.0 Ungulates 87
13.1 Summary of Aroland First Nation's Perspective 87
13.2 Evaluation of Impacts to Aroland First Nation 88
13.3 Aroland First Nation's Recommendations and Conditons for Approval 90
13.4 Specific Comments and Recommendations 93

14.0 Air Quality & Greenhouse Gas 97
14.1 Summary of Aroland First Nation's Perspective 97
14.2 Evaluation of Impacts to Aroland First Nation 97
14.3 Aroland First Nation's Recommendations and Conditions for Approval 97
14.4 Specific Comments and Recommendations 98

15.0 Land Use 99
15.1 Summary of Aroland First Nation's Perspective 99
15.2 Evaluation of Impacts to Aroland First NAtion 99
15.3 Aroland First Nation's Recommendations and Conditions for Approval 100
15.4 Specific Comments and Recommendations 101

16.0 Human Health 103

16.1 Summary of Aroland First Nation's Perspective 103
16.2 Evaluation of Impacts to Aroland First Nation 103
16.3 Aroland First Nation's Recommendations and Conditions for Approval 105
16.4 Specific Comments and Recommendations 107

17.0 Visual 109
17.1 Summary of Aroland First Nation's Perspective 109
17.2 Evaluation of Impacts on Aroland First Nation 109
17.3 Aroland First Nation's Recommendations and Conditions for Approval 110
17.4 Specific Comments and Recommendations 111

18.0 Aboriginal Treaty Rights and Interests & Indigenous Knowledge 112
18.1 Summary of Aroland First Nation's Perspective 112

19.0 Archaeological Assessments 113
19.1 Summary of Aroland First Nation's Perspective 113
19.2 Evaluation of Impacts on Aroland First Nation 113
19.3 Aroland First Nation's Recommendations and ConditIons for Approval 113
19.4 Specific Comments and Recommendations 114

20.0 Climate Change & Resiliency 116
20.1 Summary of Aroland First Nation's Perspective 116
20.2 Evaluation of Impacts On Aroland First Nation 116
20.3 Aroland First Nation's Recommendations and Conditions for Approval 117
20.4 Specific Comments and Recommendations 119

1.0 INTRODUCTION

The Marten Falls Community Access Road (MFCAR; the Project) is a proposed all-season roadway intended to connect the remote First Nation community of Marten Falls in northern Ontario to the provincial highway system. The MFCAR is significant as it aims to improve year-round access, support economic development, and enhance the delivery of essential goods and services. The proposed route would link Marten Falls to the existing highway network near Aroland First Nation (AFN), creating new opportunities for trade, travel, and emergency response.

The project is undergoing a coordinated Environmental Assessment (EA)/Impact Assessment (IA) process that combines both provincial and federal requirements. This joint approach streamlines regulatory oversight while ensuring that environmental, cultural, and social impacts are thoroughly considered. The Impact Assessment Agency of Canada and the Ontario Ministry of the Environment, Conservation and Parks are collaborating to evaluate potential effects on local ecosystems, Indigenous Rights and land use, wildlife, and water systems. Community engagement, particularly with Indigenous communities, is a central component of the assessment, allowing for Traditional Knowledge to inform planning and mitigation strategies. This combined assessment ensures that the Project aligns with environmental protection standards and reflects the values and concerns of affected communities.

AFN has retained Shared Value Solutions Ltd (SVS) to undertake a technical review of the MFCAR IS as part of the dual provincial and federal EA/IS process. AFN has been actively involved in the EA/IA process with the Proponent.

Aroland First Nation understands MFFN's desire and motivation for all-season road access to their community and supports the Project for these purposes. AFN understands the importance of the EA and IA processes in ensuring that all potential environmental, economic and social impacts, as well as potential impacts to First Nations' Aboriginal and Treaty Rights, are understood and mitigated through responsible and proper design. Considering this perspective, AFN has reviewed the draft EA/IS, relevant technical reports, and other supporting appendices, and has prepared comments and recommendations within this technical review report that focus on the accommodation, resolution, and protection of AFN's Aboriginal and Treaty Rights and interests within their Traditional Territory.

1.1 AROLAND FIRST NATION

Aroland First Nation is an Anishinaabe First Nation located 60 km north of Geraldton and 20 km west of Nakina on Hwy 643 in Northern Ontario. AFN has over 700 members, approximately 400 of which live in the community, with the majority of off-reserve members living in Thunder Bay, Geraldton, Nakina, and the surrounding area. AFN has a deep and embedded connection to the lands and waters of its Traditional Territory and strong reliance on traditional activities such as hunting, fishing, trapping, and gathering.

AFN's Traditional Territory extends from the shores of Lake Superior in the south to beyond the north bank of the Albany River. AFN defines its territory based on historical and current land use as well as

band members' traplines and asserts that they must be an active party in governance and decision-making for all activities within their territory.

At present, the lands north of AFN's reserve are generally undeveloped. However, due to AFN's position at the southern intersection of the proposed roads to the Ring of Fire mineral deposits and the provincial highway system, AFN's territory is likely to experience unprecedented levels of development in the coming years, including significant mineral exploration, both within the Ring of Fire and along the entire road network.

AFN supports responsible resource development within its Traditional Territory and is involved in forestry, mineral exploration, aggregate development, and mining—most notably as an active partner in the Greenstone Gold Mine outside of Geraldton. The goals of AFN's participation in and review of the EA/IA process for the access road are to ensure minimal impacts to the lands, waters, plants and animals in AFN's Traditional Territory and to ensure understanding and concerns of potential impacts to the Nation's Aboriginal and Treaty Rights and the mitigation and accommodation measures required to off-set these impacts.

1.2 AROLAND FIRST NATION INDIGENOUS KNOWLEDGE AND LAND USE CONTRIBUTIONS

Between 2021 and 2024, AFN hired Shared Value Solutions Ltd. (SVS) to conduct an Indigenous Knowledge and Land Use Study (IKLUS; the Study) as a part of AFN's ongoing consultations with the province of Ontario and Marten Falls First Nation, the project Proponent, about the proposed MFCAR, as well as the wider network of proposed all-season roads. This includes the Webequie Supply Road (WSR) and Northern Road Link (NRL). The overall goal of these roads is to allow for all-season road access to remote First Nations, as well as road access to the Ring of Fire mineral deposits in the James Bay Lowlands.

As part of this plan, the province has engaged with AFN about two proposed all-season road projects. The MFCAR proposes to connect the remote community of Marten Falls to Ontario's provincial highway network via the Anaconda and Painter Lake forestry roads. The proposed route passes through AFN Traditional Territory, and traffic using the proposed route would pass directly through the community (Shared Value Solutions, 2024). The WSR and NRL would eventually also connect to the provincial highway system through the MFCAR.

AFN also completed a similar study between 2019 and 2020 with support from SVS, as part of proposed upgrades to the Anaconda and Painter Lake roads (Shared Value Solutions, 2020).

Participants in this Study expressed having a deep understanding of and connection to the lands and waters within AFN's Traditional Territory where the MFCAR is proposed. Many participants shared stories about growing up on the land, learning from their Elders about important historical and cultural sites, harvesting techniques, and the importance of contributing to the work at camp. Families have strong connections to particular areas of the territory, with generation after generation returning to the same places.

Members regularly use the Anaconda and Painter Lake forestry roads to access family camps and important harvesting, hunting, gathering and cultural areas. As these existing roads would provide the key link between a proposed MFCAR and the provincial highway system, many AFN members are concerned about the impacts of an increase in traffic on these roads. Members want to be certain that they can continue to use these roads safely and that the increase in heavy vehicle traffic will not put community members at risk, or impact their ability to exercise their harvesting, hunting, gathering and cultural rights on the land.

Study participants mapped 78 land use and occupancy features within 5 km of the proposed MFCAR route (Figure 1). These features are concentrated around three areas: the Anaconda and Painter Lake roads, and the area where the proposed MFCAR would cross the Albany and Ogoki Rivers.

Participants and the project team worked together to map hundreds of harvesting areas, cultural sites, cabins and camping areas, access routes, and areas of ecological knowledge within a few kilometres of the Anaconda and Painter Lake Roads. Continued safe and undisturbed access to these areas is essential to maintain in the planning and execution of the proposed MFCAR.

The Ogoki River and surrounding area is an important place where AFN members have practised commercial fishing, trapping, and harvesting with family members for generations. Participants stated that, today, they use the same trails that their ancestors did many years ago. Routes along the river, its different channels, and the surrounding lakes and creeks have been described by AFN members as historic family settlement areas, with numerous cultural sites, important habitats for fish and waterfowl, and many areas where fish are known to spawn.

Of particular concern to AFN members is the species-at-risk lake sturgeon that live in this river. Many members expressed concerns about the impacts that a new road—crossing this river in two places—could have on this species, which is highly sensitive to disturbance. Special care must be taken during road construction and maintenance to ensure that this species is not further threatened.

Members all described another species at risk, the boreal population of woodland caribou, as being present in the Regional Study Area (Figure 1). Within it, participants marked locations known to be caribou migration routes, as well as areas where they have seen caribou tracks crossing the road. Guidelines for developing road corridors in the known range for this species will have to be followed to ensure that this species is not further threatened by proposed MFCAR activities.

Dusey Lake and surrounding area, including the proposed crossing over the Dusey River, is also an important cultural place. AFN members have lived and practised fishing, hunting, and harvesting in this area for generations. AFN members have often discussed the importance of the Dusey Lake area to AFN's culture and history as a historic family settlement area. It contains numerous cultural sites and important habitats for fish and waterfowl.

Another proposed road crossing, of the Albany River, requires particular care to avoid disturbance of key harvesting and cultural areas. AFN members shared stories of several locations along the river in the Study Area where they practised commercial fishing, guiding, and harvesting, and return regularly to their traditional family camp areas.

AFN provided this Study to the Proponent in September 2024 with the express intent that it would be used to facilitate ongoing dialogue regarding AFN's rights, interests, and values related to AFN Traditional Knowledge, land use, and occupancy. AFN maintains an expectation that (while ensuring sensitive AFN information is protected from public disclosure) it will be used to inform the development of the Draft EA/IS and ultimately influence the design and execution of Project construction and operation. It is therefore AFN's expectation that the Proponent will demonstrate how this information was considered and used to inform the Draft EA/IS. AFN also expects that the Proponent will ensure that impact assessment and subsequent mitigation development include concrete measures that safeguard AFN rights, interests, and values from adverse Project effects.



Figure 1. Marten Falls Community Access Road Indigenous Knowledge and Land Use Study Areas.

1.3 AROLAND FIRST NATION VALUES AND EXPECTATIONS

AFN is supportive of the development and approval of the MFCAR project. Band members confirmed this support through a vote in September 2024. This support was reaffirmed by the Shared Prosperity Agreement that AFN signed with Ontario in February 2025. However, it is important to recognize that this support is limited to the MFCAR and the community access that it will provide, and further that AFN ***has not*** confirmed any support for industrial developments, including but not limited to mining and any proposed developments in the Ring of Fire. Future developments must only

be contemplated through meaningful consultation at the deepest level with AFN, and only advanced following comprehensive and coordinated assessment and with AFN's consent pursuant to our decision-making governance authority over our lands.

AFN also believes that any decisions about potential industrial developments related to the proposed Ring of Fire, including industrial use roads like the WSR and NRL must be guided by the results of the ongoing Regional Assessment (RA), and should not be approved before the RA is completed. AFN is concerned about the potential for significant cumulative effects spreading throughout their Traditional Territory as a result of concentrated industrial development in the Ring of Fire area, and in general throughout the region due to increased access as a result of the road, and believes that the RA will provide more clarity on these potential impacts.

While AFN supports the MFCAR, we believe the coordinated environment and impact assessments serve an important purpose in understanding potential adverse impacts as well as benefits. It is essential that the Proponent work collaboratively with AFN to proactively identify and implement measures to avoid or otherwise mitigate adverse impacts to AFN's rights, interests, and values, while also working to maximize benefits and accommodations to AFN and MFFN as a result of the road's development.

To this end, AFN has identified several priorities that have been applied in considering the substance of the Draft EA/IS, which guide the development of comments, questions, and recommendations for the Proponent. It is AFN's expectation that the Proponent will continue to collaborate in meaningfully addressing these concerns. Further, we expect that full consideration for AFN's rights, interests, and values will be reflected in the final EA/IS report.

In review of the Draft EA/IS AFN seeks:

1. To protect AFN's Aboriginal and Treaty Rights and interests within our Traditional Territory (up to the north bank of the Albany River). AFN wants to ensure that:

    a. Potential impacts from contamination, pollution, and noise along the roadway are minimized during construction and operation

    b. Wildlife and fisheries are protected, particularly moose, caribou, walleye, and sturgeon

    c. The health and wellbeing of members is protected, and where possible enhanced

    d. Access controls are implemented to prevent too many outsiders from using the roadways to access territory for hunting, fishing, recreation, etc.

    e. The Proponent provides opportunities for participation in ongoing monitoring and enforcement.

2. To ensure that AFN is a deciding party in all decision-making processes related to the MFCAR and more generally to the Ring of Fire:

    a. AFN must maintain its voice in guiding the construction and operational phases (as well as closure and post-closure if applicable)

b. The free, prior and informed consent of AFN shall be a requirement for any decisions made during the construction and operations phases.

3. To maintain and improve the way of life in AFN's community, the Proponent must:

    a. Ensure safeguards for road safety for drivers, land users, and pedestrians

    b. Ensure that AFN maximizes economic benefits from the Project

    c. Identify and maximize opportunities related to employment, training and business development for the Band and members

    d. Advance community development opportunities in AFN, including housing, grocery, health clinic, hospitality services, etc.

AFN expects that the Proponent will work with AFN to fully identify, understand, consider, and reflect Traditional Knowledge, traditional or cultural use, as well as interests and values unique to AFN into the Draft EA/IS and ultimately the final Project, if approved.

1.4 TECHNICAL REVIEW OBJECTIVES

AFN conducted this review of the Project's Environmental Impact Statement (EA/IS) with the following objectives:

- To compile AFN's comments and recommendations related to the draft EA/IS and supporting documents and appendices for the Crown and the Proponent in advance of the development of the final Project IS.
- To present measures and recommendations to manage potential impacts through mitigation and accommodation, and request further studies or information.
- To identify areas where AFN would like further representation and participation, and offer potential conditions of approval to ensure the Project is held to the highest standard of environmental protection, if approved.
- To ensure that AFN's Aboriginal and Treaty Rights and interests within their Traditional Territory are not impacted, and, where impacts are unavoidable, ensure adequate mitigations and accommodations in the EA/IA process and throughout Project permitting, construction, and operational phases.
- To ensure that the Proponent conducts studies in accordance with the Project's Terms of Reference (TOR) and Tailored Impact Statement Guidelines (TISG) as well as accepted best practices, and to provide feedback about how the final EA/IS can ensure that environmental and socio-economic impacts are reduced and/or mitigated appropriately.
- To understand where in the process AFN can be deciding party in decision-making and play a role in the permitting and construction, environmental monitoring, and operational phases.

- To develop recommendations for approval to ensure the final EA/IS aligns with AFN's environmental, economic, and social goals while minimizing impacts to AFN Aboriginal and Treaty Rights and maximizing benefit to AFN.

2.0 SUMMARY OF REVIEW FINDINGS

2.1 OVERARCHING CONCERNS AND CONSEQUENCES FOR AFN

As outlined in Section 1.4 of this document, AFN's focus is on identifying potential risks to AFN's Aboriginal and Treaty rights, and opportunities for the Project to be modified or improved to maximize benefits and minimize impacts. It is also with these goals in mind that AFN contributed Traditional Knowledge and Land Use Occupancy information and expressed views on valued components (VCs), with the collective intention to share AFN's views on rights, interests, and values of highest community importance.

It is AFN's expectation that, the Proponent's Draft EA/IS would reflect this information, demonstrating how it was considered, examined, and utilized to influence the Project and the EA/IA. Additionally, it is AFN's expectation that the Proponent make intentional effort to present a Draft EA/IS that speaks to all aspects of both the TISG and TOR for the joint assessment process. By providing an assessment that reflects AFN submissions, and follows the guidance of the TISG and TOR, the Proponent will be positioned to demonstrate a comprehensive understanding the potential impacts of this project on the rights, interests, and values of AFN.

The sections that follow focus on concerns that the project team identified in review of the Draft EA/IS, including both overarching and targeted recommendations aimed at closing knowledge gaps, identifying meaningful mitigations or monitoring programs, and ultimately reducing or avoiding adverse impacts to AFN. Though concerns and recommendations are provided in detail (sections 3.0–21.0 of this report) based on the thematic sections outlined in the draft EA/IS, the following Section 2.0 subsections outline concerns and issues identified as cross-cutting or otherwise recurring throughout the Draft EA/IS. AFN raises these overarching concerns as substantial challenges or barriers to a comprehensive assessment of impacts from the perspective of AFN. Additionally, these overarching concerns — if not properly addressed—will prevent the Proponent from advancing Project plans and programming to effectively predict, observe, and respond to a range of environmental effects, with the result of having adverse and potentially consequential impacts on the rights, interests, and values of AFN. It is therefore essential that, in working to address targeted thematic comments and recommendations, the Proponent consider the intersection they have with these overarching concerns, which in many instances serve as the root cause.

2.1.1 OVERARCHING CONCERN 1: INCOMPLETE AND/OR FLAWED BASELINE ASSESSMENT

Issue: The Proponent has not completed a comprehensive baseline assessment on several VCs of interest to AFN. This includes fish and fish habitat, groundwater (natural springs), peatlands, vegetation, cultural heritage resources (archaeology), as well as several wildlife, ungulate, and bird species/assemblages.

Potential Consequence: Areas, locations, environments, or species which should be considered sensitive to disturbance may not be appropriately protected by site-specific mitigations, monitoring, or planning, as the potential for impacts is not appropriately captured within the Draft EA/IS. Further, where baseline information is not complete, the Proponent may not identify areas, locations, environments, or species for monitoring. Or, if monitoring does occur, the Proponent may not be in a position to detect meaningful change due to limited or flawed baseline comparisons. Baseline characterization for a range of VCs throughout AFN territory is poor.

2.1.2 OVERARCHING CONCERN 2: INCONSISTENT USE OF BEST PRACTICE

Issue: The Proponent outlines Project activities, including in-water, terrestrial clearing, and earthwork activities that may adversely impact a wide range of terrestrial and aquatic habitats and the species which inhabit them. While some of these activities may be unavoidable, the Proponent is inconsistent in their proposed use of best practices to minimize impacts. One example is the development of protection buffers around sensitive features, proposed to range from 30 m to 100 m, rather than consistently employing the more conservative 100 m for all buffers where possible.

AFN expects that, wherever possible, the Proponent will employ best practices, going above and beyond legal minimums to aim to be conservative in their efforts to protect sensitive features and VCs. Where best practice is not possible or practical, effort must be employed to fully characterize baseline conditions and implement a monitoring and adaptive management program to ensure Project-related activities are observed and corrected where impacts exist.

Potential Consequence: Failure to conservatively follow Project best practice and design in protecting sensitive features and VCs has the potential consequence of increasing Project impacts, causing the loss or alteration of sensitive features or VCs.

2.1.3 OVERARCHING CONCERN 3: POOR CONSIDERATION AND INCORPORATION OF AFN-IDENTIFIED VALUED COMPONENTS

Issue: The Proponent has failed to fully capture a baseline characterization and subsequent assessment of impacts to AFN VCs. This is evidenced in a number of areas: the cultural importance of natural springs; failure to incorporate AFN Indigenous Knowledge of ungulates, fish, and plants/medicines; poor characterization of impacts on the biophysical environment in AFN Traditional Territory; and limited consideration of the human health and wellness implications of the Project specifically along Anaconda/Painter Lake roads and the southern sections of the MFCAR.

While much of the Indigenous Knowledge sections of the draft EA/IS are not available as of the time of this review, it is highly concerning that the Proponent has not demonstrated that the incorporation of extensive AFN Indigenous Knowledge into other sections of the Draft EA/IS has occurred.

Potential Consequence: The consequence of this approach is that the Proponent does not have a firm understanding of how the Project may affect VCs important to AFN, and therefore may disproportionately impact members, due to a lack of specific efforts to develop a baseline understanding, including the use of design measures to protect values and monitor potential changes.

As a result, road activities will occur without consideration for and the resulting required mitigation and accommodation of these values.

2.1.4 OVERARCHING CONCERN 4A: INCONSISTENT INCLUSION, CHARACTERIZATION, AND ASSESSMENT OF VALUED COMPONENTS

Issue: In several instances, the Proponent either fails to consider or makes unjustified decisions about the inclusion of VCs and/or how effects on VCs are to be characterized and assessed.

It is recognized that the environmental/impact assessment process involves important decision points that influence the assessment's scope and extent. AFN emphasizes that the Proponent consider the direction of the TISG, TOR, and Traditional Knowledge and Land Use Occupancy information (and other information) provided by AFN to identify VCs and priorities. It is essential that, in instances where information is not included or other decision points in the assessment are reached, the Proponent must illustrate the rationale for decisions in a manner that is consistent and aligns with the TISG, TOR, AFN rights and interests, and best practice.

Potential Consequence: AFN has worked to document and share Traditional Knowledge and Land Use Occupancy information, specifying VCs and their cultural context. In many instances, VCs are inherently tied to AFN's Aboriginal or Treaty Rights or other community-held interests and values. Failure to contemplate these VCs within the scope of the Draft EA/IS will result in an incomplete understanding of potential impacts on VCs and in turn, AFN rights and interests, which will result in the Proponent's failure to effectively inform development of mitigation, monitoring, accommodation or management plans to minimize impacts.

2.1.5 OVERARCHING CONCERN 4B: INCOMPLETE CONSIDERATION OF THE IMPACT OF CUMULATIVE EFFECTS ON AFN-IDENTIFIED VALUED COMPONENTS

Issue: Cumulative effects as a result of this Project and other previous and foreseeable projects are not well understood, especially as they may impact several VCs identified by AFN. This is a fundamental challenge with the regulatory approach that has been used to advance Ring of Fire projects (e.g., the mines and roads): there is no overarching or consistent methodology and agreed-upon approach to contemplate the cumulative effects of all plausible or foreseeable projects. This issue is further compounded by the MFCAR being effectively the first project, which when taken in isolation, is likely to have relatively few effects when compared to the entirety of the fully built Ring of Fire group of projects. The RA on the Ring of Fire will provide information on potential cumulative effects and AFN continues to assert that it must be completed before further decisions about development in the region are made. The Project does not consider inclusion of the information that will be collected through the RA process in its consideration of cumulative effects.

Potential Consequence: This issue presents a specific challenge to AFN rights and interests in considering both the construction and operation of the road, which will interact with other future projects. The VCs that AFN has identified must be considered through a cumulative effects lens to allow for understanding of how both isolated Project impacts as well as interactive or synergistic

impacts from all foreseeable projects can be minimized, resulting in cumulative impacts to VCs which AFN considers acceptable.

Without appropriate and robust cumulative effects analysis, the Proponent relies on future projects to bear the burden of decisions made today, failing to fully capture the Project's future interactive or synergistic effects, which may only be realized with the advancement of future, yet foreseeable projects.

2.1.6 OVERARCHING CONCERN 5: UNCERTAINTY REGARDING IMPACTS OF UN-SITED PROJECT INFRASTRUCTURE

Issue: While AFN recognizes that significant additional effort is required to complete the final design of the road and associated ancillary infrastructure, the information provided regarding the potential impacts of siting ancillary infrastructure outside of the identified right-of-way (ROW) is insufficient. Further, where impacts cannot be anticipated due to a lack of information available to inform siting decisions, the Proponent has failed to provide appropriate information regarding the decision-making framework for determining siting of additional ancillary infrastructure, including how sites may be selected on the basis of avoiding impacts.

Potential Consequence: Without a complete understanding of the siting of ancillary infrastructure outside of the ROW, nor an indication of the factors that may influence siting decisions, the draft EA/IS fails to contemplate the potential implications of the construction or operation of this infrastructure. This results in an incomplete accounting of Project impacts, which impairs AFN's ability to recommend meaningful avoidance or mitigation measures.

2.1.7 OVERARCHING CONCERN 6: FAILURE TO CONNECT CUMULATIVE PROJECT IMPACTS WITH BEHAVIOUR, HUMAN HEALTH, AND COMMUNITY WELLNESS

Issue: The Proponent fails to effectively connect the cumulative impacts of the proposed Project with potential impacts on human health and wellness, from both a biophysical health perspective as well as a behavioural or psycho-social perspective. Specifically, this gap is evidenced by both a lack of consideration of the full range of likely human receptors for noise, vibration, dust, and air, as well as a failure to contemplate more indirect or abstract impacts on human health such as threats to country food availability and the potential implications of shifting diets, cultural/spiritual connectedness to the land, physical and/or spiritual impacts due to a lack of access or changing access to medicinal plants or sites, and behavioural changes associated with road construction and operation.

Potential Consequence: The impacts of this Project need to be considered through a holistic lens. For AFN, while the community is supportive of the road project, the community access it will provide and the benefits it will provide to the MFFN community, AFN will face significant impacts. Project effects on the biophysical environment when viewed independently may be minor or otherwise manageable. However, it is necessary to examine the weight of all Project effects and subsequent impacts on the biophysical *and* the psycho and social environment, to address overall—cumulative—community well-

being. Failure to contemplate the Project and its impacts through this lens maintains the potential consequence of altering AFN's community fabric and way of life.

2.2 AFN REQUIREMENT FOR APPROVAL AND NEXT STEPS

While AFN has several overarching concerns (Section 2.1) about the contents of the draft EA/IS and their implications for potential impacts to AFN's Aboriginal and Treaty rights, AFN remains in support of the Project and believes that there is a pathway forward to address these concerns without significantly impacting timelines for approval and the subsequent permitting and construction phases of the project.

While AFN does not support industrial access along the road corridor, AFN is supportive of the Project and the community access and benefit it will provide MFFN and does not want the approvals and construction of the road delayed. However, AFN has significant concerns, which are laid out in Section 2.0 and in further detail in Sections 3.0 through Section 21.0. AFN maintains the expectation for the Project Team to consider and resolve all concerns and recommendations identified through this review, and in future interventions to the EA/IA processes AFN understands that to address all of AFN's concerns, especially those regarding the inclusion of AFN identified valued components and IK, revising inadequate baseline assessment collection and following best practices, prior to drafting and submitting a final EA/IS for approval, a significant investment of additional time would be required, potentially increasing project risk leading to delays. ,

Requirement for approval: To ensure that AFN's overarching concerns, comments and recommendations, and recommended conditions for approval are addressed, AFN requires that the Project Team commit to developing an advisory task force with AFN and MFFN with a mandate to address and resolve the issues laid out in this report throughout the permitting and construction and operations phase. The advisory task force must include members from AFN and must be provided with adequate capacity funding, time and decision-making powers to properly address AFN's concerns and recommendations for the Project.

AFN believes that with the Proponent's support and cooperation on an advisory task force they will be able to address the concerns and conditions for approval made throughout this report on an ongoing timeline that does not lead to significant disruptions for advancing the Project.

3.0 PROJECT DESCRIPTION

3.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN supports the construction and operation of the MFCAR provided it is appropriately planned and developed, considering the potential impact it will have on AFN's rights, interests, and values. We understand that, regardless of which road alternative is ultimately selected, the construction and operation of this road will be a substantial undertaking and will have both significant impacts and benefits.

3.1.1 IMPACTS TO LAND USE AND OCCUPANCY

The construction and operation of this road will impact sites identified by AFN. To date, AFN has provided the Proponent with a copy of our Traditional Knowledge and Land Use Occupancy report that outlines areas of cultural importance as well as provides context for how our members use the land. AFN maintains an expectation that the Proponent will work with AFN to fully identify, understand, consider, and reflect AFN's knowledge contributions, rights, interests, and values within the final EA/IS and ultimately Project design and execution.

The impacts of this road to AFN's land use and occupancy are outlined in detail in each of the following thematically based sections. Generally, these impacts can be grouped by Project effects which include but are not limited to: clearing of the land and subsequent habitat/loss of use, direct and indirect release or mobilization of contaminants or other harmful constituents, and changes to human health and wellness associated with the road's development and operation.

3.2 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

Recommendations and conditions for approval based on each of the identified effects themes are outlined in the following section of this report. AFN, while in support of this Project overall, believes that structured approval conditions are important in guiding successful Project execution. In advancing our recommendations for Project conditions, we seek to ensure that they are firmly rooted in working together with the Proponent to ensure AFN's rights, interests, and values are safeguarded throughout the life of this Project and that AFN's right to decision-making is reflected.

3.3 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 1: Comment and Recommendations Table for Draft EA Section.

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
1	Draft EA-IS Document Appendix W Traffic Data Review	ES 6	**Comment:** Cumulative impacts to AFN as a result of increased traffic from the MFCAR and additional proposed road segments are not adequately understood, evaluated, or considered. The Traffic Data Review estimates an AADT of 700 vehicles by 2046, 64% of which would be heavy trucks, which will inevitably create impacts throughout AFN's Traditional Territory, and within AFN's reserve community. However, the impacts that this increased traffic will have on the existing road network is not adequately contemplated in the draft EA/IS	**Context:** Sections 3.2.2, 8.1, 11, 17.1, 17.5 and 18.4 of the TISG all outline requirements to contemplate the direct impacts increased traffic will have on the existing road network connecting to the MFCAR, however, traffic flow is reasonably expected to increase if other elements of the Ring of Fire are advanced. This may include up to an expected 700 additional vehicles per day moving through AFN whose impacts are not adequately assessed, considered, or understood. **Recommendation:** Based on the direction provided in Section 22 of the TISG, additional road segments (e.g., NRL, WSR), and mining development, must be considered in the assessment of cumulative effects.
2	Draft EA-IS Document	ES 14	**Comment:** Data, impacts, limits, and other assumptions appear to be based on comparison to other developments occurring in parts of Ontario, but without justification of why these comparisons are appropriate. The Project is proposed for a very unique environment. As such, comparisons should be made to other projects in similarly undeveloped areas.	**Context:** When making comparisons to existing developments for the purposes of identifying baseline circumstance or predicted effects, the Proponent should not utilize the standards and regulations geared towards areas with existing development. Comparisons should only be made to other examples of remote greenfield development in northern settings in order to capture the unique state and challenges of this development. **Recommendation:** We recommend that the applicant review standards related to similar projects, such as the Tlicho All Season Road and other northern road development programs and develop site specific standards that are more appropriate to the unique environment of the James Bay Lowlands than the general provincial and federal requirements.
3	Draft EA/IS Document	Section 7.1.1 Overview	**Comments:** AFN is concerned that while the road may be constructed for a designed speed of 100 km/h, with a posted speed of 80 km/h, the nature of this road which includes a remote setting, within known wildlife corridors, and constructed amongst soils which are dynamic and subject to flooding, isostatic rebound, and erosion/deposition, such a high posted speed may not support safe operation.	**Recommendation:** AFN recommends that whatever speed limit is ultimately posted, it be informed by a range of factors including public safety and efforts to protect wildlife.
4	Draft EA/IS Document	Section 7.1.1 Overview	**Comment:** AFN notes that in the construction of the road, significant aggregate and other building materials will be required. These materials may be difficult to source locally, and in sourcing them, the project may create other yet unforeseen adverse impacts or benefits.	**Recommendation:** AFN is interested in working with the Proponent in identifying the location of aggregate materials as well as developing opportunities to benefit from the provision of building materials, including aggregates.
5	Draft EA/IS Document	Section 7.1.1 Overview	**Comment:** It is anticipated that the road will contain approximately 70 watercourse crossings, approximately 47 will be designed as bridges and	**Recommendation:** AFN requests that where possible open-bottom box culverts be used in place of corrugated culverts, and that in all instances

			the remainder as culverts. AFN seeks to ensure that all watercourse crossings are designed in a manner that promotes fish habitat and passage, while minimizing risks of flooding.	watercourse crossings be designed to maintain natural flows and substrate conditions
6	Draft EA/IS Document	Section 7.2 Our Road Activities	**Comment:** Figure 7-1 outlines the general phases of the project including 75 years of operational life. Within the scope of Operations the Proponent doesn't identify major reconstruction due to use or environmental conditions, additionally routine activities such as culvert replacement are not described.	**Question:** Does the Proponent contemplate long-term maintenance activities beyond what is listed within the scope of this assessment? **Recommendation:** If the Proponent has not contemplated the potential impacts associated with activities such as culvert replacement, or replacement of sections of the road which, although they may not constitute routine maintenance, are likely foreseeable over the lifespan of the project, it is requested that these activities be contemplated within the scope of the assessment.

4.0 ACOUSTIC & VIBRATIONS

4.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

From AFN's perspective, one of the greatest potential impacts to our community is the significant increase in traffic through our community en route to Marten Falls. Traffic will increase dramatically because of future development associated with the Northern Road Link, Webequie Supply Road, and/or other projects related to the Ring of Fire. AFN is concerned that there is no consideration or evaluation of the impacts to AFN from the additional noise and vibration due to construction and operational traffic. Noise and vibration are two key factors in determining impacts to quality of life, as increased traffic poses a significant risk of altering the peace and tranquility of living in AFN.

4.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

AFN is concerned by the lack of consideration within the Draft EA/IS of the potential impacts of noise and vibration in areas identified by AFN as important. This includes but is not limited to the community of AFN, cabin and overnighting sites, harvest sites, and locations of cultural or spiritual importance.

- Noise and vibration cannot simply be assessed at receptors associated with permanent occupation, such as a dwelling. Rather, the Proponent must contemplate the effects and impacts noise and vibration may have on the use of habitat in proximity to the road and associated infrastructure, as well as transient use (by AFN members) who may preferentially use lands or waters in proximity to the roadway to exercise rights. Failure to contemplate the impacts of noise and vibration on areas may result in undetected or unmitigated impairment to wellness or the acoustic/aesthetic environment.

- In contemplating impacts of noise and vibration on structures, the Proponent must consider the realities of construction quality in developing comparisons. Because of the use of natural building materials (e.g., logs) or inferior build quality, comparing buildings in the Study Area to buildings in southern Ontario may result in improper estimations of impacts from noise or vibrations.

- The Proponent sets acceptable noise and vibration levels based on a degraded soundscape rather than consideration of how noise and vibration may alter a pristine or natural soundscape. The potential implication is that Project thresholds for noise and vibrations may be set higher than they should for the purpose of preventing impacts.

- By not considering interactions between the Project and sites or areas of importance as identified by AFN members, the Proponent will not be positioned to establish mitigation

measures or monitor noise and vibration levels effectively for the purpose of minimizing avoidable impacts to AFN rights, interest, and values.

4.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.1 ATMOSPHERIC, ACOUSTIC, AND VISUAL ENVIRONMENT

- *provide current ambient noise levels at key receptor points to traditional land users and sensitive human receptors, including the results of a baseline ambient noise survey and permissible sound levels for each receptor. Information on typical sound sources (both natural and anthropogenic), geographic extent and temporal variations will be included. When collecting baseline ambient noise survey data at human receptor locations, consider the following recommended questions:*
    - *Does the community or land users value certain non-anthropogenic (i.e., natural) sounds?*
    - *Is there an expectation of quiet at any specific locations or times?*
    - *What are typical sleep hours (10pm to 7am being the default assumption)?*
    - *What is the baseline prevalence of noise annoyance toward existing noise sources (e.g., road traffic, aircraft, and other industrial sounds)?*

IMPACT ASSESSMENT TISG – SECTION 12.2 CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES

- *the experience of the practice (e.g., connection to the landscape without artificial noise and sensory disturbances, air quality, visual landscape, perceived or real contamination, etc.);*

IMPACT ASSESSMENT TISG – SECTION 12.4 CONDITIONS RELATED TO THE RIGHTS OF INDIGENOUS PEOPLES

- *the experience associated with the exercise of rights (e.g., noise and sensory disturbances, air quality, visual landscape);*

IMPACT ASSESSMENT TISG – SECTION 14.1 CHANGES TO THE ATMOSPHERIC, ACOUSTIC, AND VISUAL ENVIRONMENT

- *consider the expectation of peace and quiet at receptors (e.g., in a quiet rural area or during Indigenous land use) and the applicable community-based policies concerning noise (e.g., complaints resolution processes);*

4.2.2 IMPACTS TO LAND USE AND OCCUPANCY

AFN believes that effects from noise and vibration could have a number of impacts on members' land use and occupancy. The Proponent has not incorporated AFN's Indigenous Knowledge into analysis of how noise and vibration may impact sites identified and used by AFN members, but AFN does anticipate that members could be displaced, both temporarily during the construction phase, and more long term during the operational phase of the Project. AFN members have a strong psycho-spiritual connection to the land, and have identified the importance of the peace, quiet, and stillness of being in the bush to their well-being. Noise and vibration will likely impact this sense of well-being and lead AFN members to a reduction in the quality of their psycho-spiritual connection within the LSA, or may choose to avoid the area altogether as a result.

4.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITONS FOR APPROVAL

AFN has the following recommendations for adequately understanding of potential impacts from noise and vibration:

- The Proponent must incorporate AFN's Indigenous Knowledge into the analysis of how noise and vibrations may lead to impacts on AFN's Aboriginal and Treaty rights and land use and occupancy.

4.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 2: Comment and Recommendations Table for Acoustic and Vibration Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
7	Draft Acoustic and Vibration Environment Technical Support Document	Appendix P, iii	**Comment:** Utilized City of Toronto for vibrations and potential damage to buildings and human disturbance.	**Context:** Buildings in Toronto are extremely different than those in Northern Ontario. This is not a proper comparison as the building methodologies are extremely different. **Recommendation:** A study to understand the construction methodology of northern communities and vibration damage should be done to ensure damage does not occur
8	Draft Acoustic and Vibration Environment Technical Support Document	Appendix P	**Comment:** Limits are based on anthropological effects for an area with little to no anthropological influence. Further, it does not adequately contemplate impacts to wildlife or the aesthetic quality or psycho-spiritual relationship with the land that the LSA's inhabitants experience.	**Recommendation:** Limits should be reviewed to determine what level of noise and vibration impact the environment around the Project can sustain, including an understanding of the unique relationship that inhabitants of the region have with their environment. The Proponent should clarify how it measures and understands the impacts of noise and vibration on wildlife. Mitigations for noise and vibration should be in place for construction activities, including blasting and aggregate resource development to minimize impacts to wildlife, including taxa-related timing restrictions and activity-specific pre-construction wildlife sweeps. AFN should be included in discussions about specific accommodations and monitoring especially during the permitting and construction phases.
9	Draft EA-IS Document	9.5.3.3	**Comment:** Magnitude levels utilizing provincial limits is potentially inappropriate.	**Context:** The regulatory limits for noise and vibration may not be acceptable for a development in an area with little to no preexisting development, as they have been developed with the intention to be applied in less-than-pristine environments. **Recommendation:** As a result, the project should employ site-specific standards for more sensitive receivers (River crossings, ceremonial sites, etc.).

5.0 GROUNDWATER & GEOCHEMISTRY

5.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

Overall, AFN seeks to ensure that all water is protected throughout Project construction and operation phases. Water protection within AFN Traditional Territory is of the greatest importance to the Nation. All water is connected. Groundwater and surface water flow into each other. Healthy groundwater supports healthy rivers, lakes, and springs. Healthy water is essential for traditional food sources, medicines, and the well-being of AFN members.

5.2 EVALUATION OF IMPACTS ON AROLAND FIRST NATION

AFN is concerned that the construction and operation of the MFCAR may lead to impacts to groundwater quantity and quality. Many of the construction activities could impact groundwater. Of particular concern is quarry blasting and dewatering. These activities could have a significant impact on groundwater. Additionally, acid rock drainage and metal leaching due to aggregate mining, road materials, and stockpiles are of major concern. Water is immeasurably important to AFN. Some specific impacts to AFN rights that were not captured in the EA/IS include:

- AFN identified the spiritual importance of springs during engagement sessions, and their concern that the Project may impact springs. Despite AFN's concerns, and the requirements set out in the TISG, the Proponent has not engaged AFN to identify springs of spiritual importance, nor have they established baseline conditions for springs or investigated potential changes to groundwater quality for springs.

- Acid rock drainage and metal leaching could be the most significant risk to water quality that this Project poses. All information regarding a geochemical testing and monitoring program has been left out of the Draft EA/IS to be completed at another time. Without this information, it is not possible to fully evaluate potential impacts to groundwater and surface water quality.

- Results of the geochemical characterization include sulphate leachate concentrations within the "Goldilocks zone" for optimal methylation of naturally occurring mercury. It is unclear whether sulphate leachate has been adequately evaluated for the risk it poses through methylation of naturally occurring mercury in nearby wetlands and waterways. Elevated mercury methylation within adjacent wetlands/waterbodies and subsequent bioaccumulation in fish tissues could be devastating for AFN members who rely on fish as a traditional food source.

5.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.6 GROUNDWATER AND SURFACE WATER

- *"Identify all springs and any other potable surface water resources within the local and regional project areas and describe their current use, potential for future use, and whether their consumption has Indigenous cultural importance;"*
- *"Provide a delineation and characterization of groundwater–surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge and recharge areas;"*

BEST PRACTICES OR AFN EXPECTATIONS

- Despite AFN's concerns regarding the preservation of springs and their spiritual value, the potential impacts were not investigated. In fact, the only mentions of springs in the EA and Appendix H indicate their importance to AFN as identified during engagement.
- The Proponent must identify and quantify potential water quality impacts to springs. This process should include:
    - Targeted engagement with AFN to identify springs with significant spiritual importance
    - A baseline characterization of all springs identified by AFN including baseline water quality sampling and flow rate measurements

5.2.2 IMPACTS TO LAND USE AND OCCUPANCY

The main threat to land and occupancy as it relates to groundwater and geochemistry are potential impacts to water quality and subsequently fish. Water quality impacts could occur from acid rock drainage, metal leaching, and an increase in the methylation of naturally occurring mercury.

5.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

AFN has the following recommendations for adequately understanding of potential impacts to groundwater:

- The Proponent must identify and quantify potential water quality impacts to springs. This process should include:
    - Targeted engagement with AFN to identify springs with significant spiritual importance

- An evaluation of potential changes to groundwater quality at spring locations due to the Project.

- To properly quantify and evaluate potential impacts from acid rock drainage and metal leaching, AFN recommends that the Proponent update the Draft EA/IS to include the technical information outlined in Section 14.2, p. 88 of the TISG. In particular, the Proponent should:

    - *identify potential risks to surface and seepage water quality from the aggregate and overburden stockpiles and project infrastructure during construction, and operation, decommissioning and abandonment;*

    - *provide aggregate sources, volumes and tonnage, and extraction construction methods;*

    - *provide an acid rock drainage assessment and mitigation plan that describes the confirmatory monitoring of construction materials and potential mitigation strategies to prevent or control acid rock drainage and metal leaching during construction, operation, decommissioning and abandonment; and*

    - *describe contingency plans, monitoring during operation, decommissioning and abandonment, and maintenance plans.*

- To further understand the potential impacts from acid rock drainage and metal leaching, AFN recommends that the Proponent provide the methodology for ensuring that appropriate and sufficient sampling to identify acid generating potential occurred at each proposed construction disturbance and aggregate area

- AFN requests that the Proponent fully investigate, evaluate, and provide details regarding the risk of increased methylation of naturally occurring mercury due to the Project, including:

    - Evidence-supported prediction of potential increased sulphate loading causing sulphate concentrations within the "Goldilocks zone" in adjacent wetlands and waterways
    - Identification of wetlands and waterways at higher risk (e.g., those adjacent to aggregate stockpiles and disturbance areas)
    - A monitoring plan to capture any increase in methylation of naturally occurring mercury due to sulphate leachate

5.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 3: Comment and Recommendations Table for Groundwater and Geochemistry Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
10	Draft EA/IS – MFCAR	Draft EA/IS 8.1.1 Indigenous Knowledge of Water, Table 8-2: Indigenous Knowledge of Water, p. 99	**Comment:** AFN identified the spiritual importance of springs during engagement sessions, and their concern that springs may be impacted throughout the Project. Despite AFN's concerns and requirements set out in the TISG, the Proponent has not engaged AFN to identify springs of spiritual importance, nor have they investigated potential changes to groundwater quality for springs. Furthermore, the TISG, Section 8.6 requires the Proponent: 1. "identify all springs and any other potable surface water resources within the local and regional project areas and describe their current use, potential for future use, and whether their consumption has Indigenous cultural importance;" Section 14.2 of the TISG requires the Proponent to: 2. "describe spatial and temporal (i.e., all project life cycle) changes to groundwater quality at potential receptor locations (e.g., existing or future drinking water wells and spring water sources), including traditional land users, due to effluents from the Project including changes to physicochemical parameters (temperature, pH, salinity, dissolved oxygen, dissolved organic carbon), chemical constituents (major and minor ions, trace metals, nutrients, organic compounds);" Despite AFN's concerns regarding the preservation of springs and their spiritual value, the potential impacts were not investigated. In fact, the only mention of springs in the Draft EA/IS and Appendix H is to indicate their importance to AFN as identified during engagement.	**Recommendation:** The Proponent must identify and quantify potential water quality impacts to springs. This process should include: a) Targeted engagement with AFN to identify springs with significant spiritual importance b) A baseline characterization of all springs identified by AFN including baseline water quality sampling and flowrate measurements Analysis and description of potential changes to groundwater quality at identified spring locations due to the Project, including changes to physicochemical parameters (temperature, pH, salinity, dissolved oxygen, dissolved organic carbon) and chemical constituents (major and minor ions, trace metals, nutrients, organic compounds).
11	Draft EA/IS – MFCAR	14.4.2.5 Physiography, Terrain, and Soils. p. 975	**Comment:** The Proponent states that they will, "develop and implement a geochemical testing and monitoring program to assess the potential for acid rock drainage from any soils, or bedrock, which will be exposed during aggregate extraction;" Acid rock drainage and metal leaching could be the most significant risk to water quality that this Project poses. It is highly surprising that a	**Recommendation:** AFN recommends that the Proponent update the Draft EA to include the technical information outlined in Section 14.2, pg. 88 in the TISG, as quoted below. It is important to provide AFN with this information now so that the scope and magnitude of potential impacts associated with acid rock drainage and metal leaching can be properly evaluated.

			geochemical testing and monitoring program has been left out of the Draft EA to be completed at another time. Without this information, it is not possible to fully evaluate potential impacts to groundwater and surface water quality.	• "identify potential risks to surface and seepage water quality from the aggregate and overburden stockpiles and project infrastructure during construction, and operation, decommissioning and abandonment; • provide aggregate sources, volumes and tonnage, and extraction construction methods; • provide an acid rock drainage assessment and mitigation plan that describes the confirmatory monitoring of construction materials and potential mitigation strategies to prevent or control acid rock drainage and metal leaching during construction, operation, decommissioning and abandonment; and • describe contingency plans, monitoring during operation, decommissioning and abandonment, and maintenance plans."
12	Appendix H – Draft Groundwater Technical Support Document, Attachment B - Geochemical Characterization Technical Support Document	Section 4.3 – Sample Collection, p. 13	**Comment:** The Proponent references Figure 4-1 for the location of soil sampling locations but the sampling locations are not present on the Figure. It is unclear if sample locations are in suitable proximity to the proposed construction disturbance and aggregate areas, to confirm that the samples with noted acid-generating potential will not be disturbed. Furthermore, it is unclear whether all proposed construction disturbance areas and proposed aggregates sites had appropriate and sufficient sampling and analysis to confirm acid generating potential at those locations.	**Information Request:** AFN requests that the Proponent provides the following: a) An updated Figure 4-1 with sampling locations added b) Methodology for selection of sample locations c) Methodology for ensuring that appropriate and sufficient sampling to identify acid-generating potential occurred at each proposed construction disturbance and aggregate area (i.e. was a model created? Are sampling locations strategic to evenly calibrate the model?)
13	Appendix H – Draft Groundwater Technical Support Document, Attachment B - Geochemical Characterization Technical Support Document	6. Results. p. 21-39	**Comment:** Results of the geochemical characterization include sulphate leachate concentrations within the "Goldilocks zone" for optimal methylation of naturally occurring mercury (sulphate concentrations in the range of 20-50 mg/L). It is unclear whether sulphate leachate has been adequately evaluated for the risk it poses to methylation of naturally occurring mercury in nearby environments. It is also unclear if samples with sulphate leachate concentrations in the Goldilocks Zone coincide with aggregates stockpiling sites adjacent to wetlands, and/or if any adjacent wetlands have been analyzed for natural sulphate concentrations. Elevated mercury methylation within adjacent wetlands/waterbodies and subsequent bioaccumulation in fish tissues could be devastating for AFN members who rely on fish as a traditional food source.	**Recommendation:** AFN requests that the Proponent fully investigate, evaluate, and provide details regarding the risk of increased methylation of naturally occurring mercury due to this project including: a) Evidence supported prediction of potential increased sulphate loading causing sulphate concentrations within the "Goldilocks zone" in adjacent wetlands and waterways b) Identification of wetlands and waterways at higher risk (e.g., those adjacent to aggregate stockpiles and disturbance areas) c) Monitoring plan to capture any increase in methylation of naturally occurring mercury due to sulphate leachate

6.0 SURFACE WATER

6.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN wants to ensure that all water is protected throughout the construction and operation phases. AFN puts a high importance on protecting water within their Traditional Territory. All water is connected. Surface water and groundwater flow into each other. Healthy surface water means healthy rivers, lakes, and fish. Healthy water is essential for traditional food sources, medicines, and the well-being of AFN's members.

6.2 EVALUATION OF IMPACTS ON AROLAND FIRST NATION

AFN is concerned that the construction and operation of the MFCAR may lead to impacts to surface water quantity and quality.

It appears that only a subset of proposed water crossing locations were sampled over 2020–2022 with the intent to extrapolate the results over entire catchments. The methodology used to verify that this approach was indeed representative is missing (it seems no analysis or verification sampling was completed). The rationale to ensure that this approach captured seasonal and inter-annual variability is also missing. For example, it is unclear if the same location was sampled more than once over every season.

Without proper characterization at each watercourse crossing that captures inter-annual and seasonal variability, the baseline water quality sampling results are essentially unusable in any future water quality monitoring program identified in Section 14 of the Draft EA to identify impacts to water quality. As a standalone, it is inadequate for characterizing baseline water quality at the crossing locations.

Many of the construction and operation activities could impact surface water. Of particular concern are road accidents occurring on and around water crossings, acid rock drainage, metal leaching, and lack of proper monitoring. Water is immeasurably important to AFN. Issues of particular concern include:

- Inadequate baseline sampling and characterization of existing surface water quality conditions. It appears that only one round of baseline water quality sampling took place at the proposed water crossing locations. The baseline water quality sampling results are essentially unusable in any future water quality monitoring program identified in Section 14 of the Draft EA/IS to identify impacts to water quality. As a standalone, it is inadequate for characterizing baseline water quality seasonal trends.

- Acid rock drainage and metal leaching issues identified in the Groundwater and Geochemistry section would impact surface water quality.
- The surface water monitoring plans proposed in the Draft EA/IS are severely lacking in detail and will not provide enough evidence for adaptive management if necessary.

6.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.6 GROUNDWATER AND SURFACE WATER

- *describe the surface water quality baseline characterization program, including sampling site selection, monitoring duration and frequency, sampling protocol, and analytical protocol, including quality assurance and quality control measures;*
- *provide baseline surface water quality data, for a minimum of two years, for physicochemical parameters (temperature, pH, electrical conductivity, dissolved oxygen, turbidity, suspended solids) and relevant chemical constituents (major and minor ions, trace metals, radionuclides, nutrients, and organic compounds, including those of potential concern); the data should illustrate the seasonal and inter-annual variability in baseline surface water quality, including possible changes due to groundwater–surface water interactions;*

BEST PRACTICES OR AFN EXPECTATIONS

- To adequately characterize the baseline seasonal and inter-annual variability, sampling should take place over two years on a quarterly basis at the same location.
- Uncertainties regarding the indefinite operation of the road will be imposed on rights holders. AFN maintains a minimum expectation that the Proponent will develop a robust baseline so that impacts and subsequent adaptive management actions can be identified and implemented if needed.

6.2.2 IMPACTS TO LAND USE AND OCCUPANCY

The main threat to land and occupancy as it relates to surface water is potential impacts to water quality and subsequently fish. Water quality impacts could occur from acid rock drainage, metal leaching, and an increase in the methylation of naturally occurring mercury. The current surface water monitoring plans proposed in the Draft EA/IS are severely lacking and will not provide enough evidence for adaptive management.

6.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

In addition to the recommendations provided above for the Groundwater and Geochemistry sections, which will also be protective of surface water, AFN has the following recommendations:

- AFN recommends that, before construction begins, the Proponent design and implement a surface water quality baseline characterization program, including sampling site selection, monitoring duration and frequency, sampling protocol, and analytical protocol, including quality assurance and quality control measures. The Proponent at a minimum should provide baseline surface water quality data, for two years on a quarterly basis, to ensure the data illustrates the seasonal and inter-annual variability in baseline surface water quality.
- AFN recommends that the Proponent provide quantifiable information to support their assertion that the magnitude of water taking will be negligible. This information should include:
    - Water balances for larger construction activities such as large quarries/aggregate extraction/stockpiles
    - Rough estimates of total water volumes and diversion rates for larger water takings, along with information regarding how estimates adhere to the definition of "negligible" provided in the Draft EA/IS
    - AFN recommends that Section 14.3.1.1 Surface Water should include a commitment to continue surface water monitoring at sites where water quantity or quality has been impacted until a return to baseline is observed. For example, in cases where water taking is intermittent, every water taking must be accompanied with monitoring as if it was the instance of water taking.

6.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 4: Comment and Recommendations Table for Surface Water Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
14	Draft EA/IS – MFCAR	General Comment	**Comment:** It appears that only a subset of proposed water crossing locations were sampled over 2020-2022 with the intent to extrapolate the results over entire catchments. The methodology used to verify that this approach was indeed representative is missing (it seems no analysis or verification sampling was completed). The rationale to ensure that this approach captured seasonal and inter-annual variability is also missing. For example, it is unclear if the same location was sampled more than once over every season. Without proper characterization at each watercourse crossing that captures inter-annual and seasonal variability, the baseline water quality sampling results are essentially unusable in any future water quality monitoring program identified in Section 14 of the Draft EA/IS to identify impacts to water quality. As a standalone, it is inadequate for characterizing baseline water quality at the crossing locations. AFN has identified protection of water as one of their highest priorities. The protection of water begins with a complete baseline sampling program.	**Recommendation a:** AFN requests that, before construction begins, the Proponent design, describe, and implement a surface water quality baseline characterization program, including sampling site selection, monitoring duration and frequency, sampling protocol, and analytical protocol, including quality assurance and quality control measures. **Recommendation b:** Prior to Project construction, the Proponent, at a minimum, should provide baseline surface water quality data for every proposed water crossing location over two years on a quarterly basis to ensure the data illustrates the seasonal and inter-annual variability in baseline surface water quality. The Proponent should provide water quality results for the following physicochemical parameters and chemical constituents: • Temperature • pH • Electrical conductivity • Dissolved oxygen • Turbidity • Suspended solids • Major and minor ions • Trace metals (including dissolved) • Nutrients • Organic compounds (e.g. VOCs and PAHs) Uncertainties regarding indefinite operation of the road will be imposed on rights holders. The least that can be done is to establish a proper baseline so that impacts and subsequent adaptive management actions can be identified and implemented if needed.
15	Draft EA/IS – MFCAR	General Comment	**Comment:** Overall, the methodology for the Surface Water Effects Assessment is lacking structure and meaningful evaluation of potential impacts.	**Information Request:** AFN requests that the Proponent provide the information identified in the following comments and revise the surface water subsections to include the requested information.

			A significant amount of information is missing and the information that is provided does not quantify potential impacts. The following comments will identify the missing information.	
16	Draft EA/IS – MFCAR	General Comment	**Comment:** In general, there is very little information about how climate change may increase the scale and magnitude of the project's potential impacts. For example, water taking during drought conditions, and extreme weather events during construction and operation.	**Recommendation:** AFN requests that the Proponent identify and evaluate how the impacts to surface water from this project may be exacerbated by climate change during the construction and operation phases. In particular: a) Extreme precipitation events and flooding b) Droughts c) Rapid snow/ice melt events
17	Draft EA/IS – MFCAR	Table 9-6: Summary of Residual Effects for Surface Water, p. 387	**Comment:** There are no quantifiable details regarding the scope and magnitude of water takings during the construction phase. Table 9-6, Summary of Residual Effects for Surface Water, presents the magnitude of water taking to be "negligible" but there is no quantifiable evidence to support this.	**Information Request:** AFN requests that the Proponent provide quantifiable information to support their assertion that the magnitude of water taking will be negligible. This information should include: a) Water balances for larger construction activities such as large quarry/aggregate extraction/stockpiles b) Rough estimates for total water volumes and diversion rates for larger water takings and how this adheres to the definition of "negligible" provided in the Draft EA
18	Draft EA/IS – MFCAR	8.1.5.3 Surface Water and Sediment Quality, p. 121	**Comment:** The water quality results from the field sampling are not summarized in this section. Only the results from the desktop study are provided. This is surprising and gives the sense that this report section was rushed and not thought through with the care and attention that it deserves. The Draft EA/IS is an important document that should bring together information to provide a summary, not perpetuate the fragmentation of information.	**Information Request:** The Proponent should summarize all available surface water quality baseline information in this section. Exceedances and trends should be summarized by watershed. Section 8.1.7.2 Groundwater Quality does a much better job at summarizing baseline water quality data. AFN suggests that the Proponent follow this format for presenting surface water baseline results.
19	Draft EA/IS – MFCAR	9.3.2.4 Summary of Residual Effects, Table 9-6: Summary of Residual Effects for Surface Water, p. 387	**Comment:** AFN is concerned about road accidents occurring on and around water crossings impacting water quality. The Proponent is estimating 700 vehicles a day using the access road. It is assumed that many of these vehicles will be transporting fuel. Given the large number of water crossings and all-season operation of the road, traffic controls should be used to mitigate spill risks. While it is encouraging that the Proponent has many mitigation measures in place for accidental spills, traffic controls are not discussed.	**Recommendation:** AFN suggests the Proponent implement the following traffic controls: • Slowdown signage along the road 100 m before and after all watercourse and wetland crossings • Posted speed limit should be reduced from 80 km/h to 50 km/h to ensure safe travel across bridge decks in all seasons • All industrial vehicles and industry staff vehicles should be equipped with GPS to enforce adherence to the posted speed limit of 80 km/h and posted slow down zones around watercourse crossings and wetland areas
20	Draft EA/IS – MFCAR	14. Monitoring Programs and Future Commitments, p. 945-978	**Comment:** The surface water monitoring plans proposed in this section are severely lacking in detail and are lumped together with fish and fish habitat monitoring. The groundwater monitoring commitments are significantly more detailed and systematic.	**Recommendation:** AFN suggests that the Proponent create a separate sub section in Section 14.1.1 Water, for surface water. AFN requests that the Proponent revise every surface water sub section of Section 14, Monitoring Programs and Future Commitments and add the following information: a) A baseline monitoring program with similar elements to the groundwater baseline monitoring program (i.e. identifying strategic monitoring locations, monitoring frequency prior to a

				water taking, etc.). The baseline monitoring program should include locations identified by AFN as culturally significant. b) Section 14.3.1.1 Surface Water should include a commitment to continue surface water monitoring at sites where water quantity or quality has been impacted until a return to baseline is observed. It should also include a commitment to continue monitoring along with project activities. For example, in cases where water taking is intermittent, every water taking must be accompanied with monitoring as if it was the first time.
21	Appendix F - Draft Surface Water Technical Support Document, Attachment A - Surface Water Study Plan	7.2.3 – Surface Water and Sediment Quality, p. 26	**Comment:** The Proponent states, "dissolved Metals will not be included in the parameter list as total metals are used for direct assessment against water quality guidelines." Many water quality guidelines are specifically for dissolved metals as they relate to the protection of aquatic life. For example, zinc. AFN relies on fish as a traditional food source. To properly determine impacts, if any, to water quality and subsequently, aquatic life, the appropriate parameters must be evaluated. This begins with proper baseline sampling of parameters relevant to the protection of aquatic life (i.e. dissolved metals).	**Recommendation a:** AFN suggests the Proponent conduct a thorough review of water quality criteria identified Section 9.3.2.3, Discipline-Specific Characteristics of the Draft EA/IS. The review should identify metals that are required to be sampled as dissolved metals according to the most stringent criteria to ensure relevant, comparable water quality results. **Recommendation b:** AFN suggests that the Proponent conduct more baseline water quality sampling. This expanded baseline water quality sampling program should include the applicable dissolved metals identified in the review as parameters.

7.0 FISH & FISH HABITAT

7.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN looks forward to the access and connection the Project will foster, allowing AFN families and harvesters to navigate their territory safely, to visit family and friends in MFFN, and providing access to fishing, hunting, and camping areas, along with the economic benefits it will bring. However, AFN has understandable concerns with the implications of road construction, maintenance, operation, and increased traffic on AFN members, fish, wildlife, and water in their community and wider territory.

7.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

AFN is concerned about the MFCAR causing impacts to fish health and populations in their Traditional Territory. Fish are a critical sustenance resource for AFN members and fishing is an essential cultural practice for all generations. Fish populations in AFN's territory have been declining due to development of road networks and the forestry industry, which have altered fish habitat and impaired water quality with harmful chemicals. Water is known by members to have already been impacted by equipment fuels, pesticides, and herbicides used in forestry practices for harvesting and planting forestry blocks.

The development of the MFCAR will bring more industrial and public traffic close to and across waterways, and the construction of the MFCAR increases the chances of harmful additions to the water including dust, gravel, and chemicals with the potential to further impact fish and the aquatic ecosystems in the territory. Some specific impacts to AFN rights that were not captured in the EA/IS include:

- An incomplete fish habitat use data set. Not having a comprehensive fish habitat use data set will result in a lack of information for use in the assessment of effects once construction and operations begin to alter the environment. There is no quantitative data to trigger adaptive management to ensure the impacts to fish and fish habitat remain consistent with the findings of this predicted impact assessment.
- A limited protection area for waterways and all aquatic ecosystems. Widening the riparian zone setback to 30 m from the high-water mark will provide a stronger buffer to protect fish and fish habitat from impacts of the road, construction work areas, and quarries.
- The lack of management suggestions for protecting fisheries resources from increased public access will undoubtably put significant pressure on lakes and rivers in the territory. Additional public fishing pressure from increased access to fishing areas may reduce available valued fish species that are a critical part of AFN's traditional diet, essential for their physical, mental, and spiritual health and wellness.

7.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.6 GROUNDWATER AND SURFACE WATER

- *provide baseline sediment quality and characteristic data for key surface water sites likely to be effected by the road (i.e., from runoff, spills, erosion and sedimentation, etc.);*

IMPACT ASSESSMENT TISG – SECTION 15.1 FISH AND FISH HABITAT

- *describe any direct, incidental or cumulative predicted positive and/or adverse effects to fish (all developmental stages) and fish habitat as defined in subsection 2(1) of the Fisheries Act, including the calculations of any potential habitat loss (temporary or permanent) including spawning grounds, nursery, rearing, food supply, and migration areas, or death of fish. . The assessment must include a consideration of:*
    - *the geomorphological changes and their effects to hydrodynamic conditions and fish habitats (e.g., modification of substrates, dynamic imbalance, silting of spawning beds);*
    - *changes to water quality due to runoff from any temporary and permanent project components*
    - *potential for direct effects of contamination downstream of the Project on fish and bioaccumulation of contaminants (e.g., selenium, mercury, chromium, arsenic) in fish that may be consumed by Indigenous groups;*
- *describe the effects of changes to the aquatic environment on fish and fish habitat, including:*
    - *the anticipated changes in the composition and characteristics of the populations of various fish species, especially those of cultural significance to Indigenous communities with traditional land use practices in the area and provincially or federally listed aquatic species at risk;*

IMPACT ASSESSMENT TISG – SECTION 15.5 CLIMATE CHANGE

- *provide a qualitative description of the Project's positive or negative effects on carbon sinks, including from the removal and alteration of wetlands;*

IMPACT ASSESSMENT TISG – SECTION 17.6 CULTURE

- *The Impact Statement must assess potential impacts to surrounding communities, including local Indigenous communities. The spatial and temporal boundaries for the assessment should be determined with the input from the community based on pre-contact in consideration of aspects that are relevant to the community's understanding of their culture. The Impact Statement must assess changes to:*

- *culturally significant plants or wildlife.*

IMPACT ASSESSMENT TISG – SECTION 18.4 INFRASTRUCTURE

- *whether the Project will result in, or facilitate the construction of other infrastructure (such as railways, airports, power plants, transmission lines, pipelines, dams, water mains, sewage lines, etc.);*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 7.2 POTENTIAL ENVIRONMENTAL EFFECTS

- *Changes in the availability and quality of lands and resources used for traditional activities*
- *Changes in the sufficiency of lands and resources for cultural tradition*
- *Disruption of cultural heritage resources by the introduction of physical, visual, audible or atmospheric elements that are not in keeping with the character and setting of cultural heritage resources*

BEST PRACTICES OR AFN EXPECTATIONS

- The Proponent set the riparian zone buffer at an arbitrary setback of 30 m, disregarding the high-water mark for each individual watercourse/waterbody. This setback should be different at each waterbody depending on its unique characteristics and habitat value. At the very least, AFN expects that a "blanket setback" would be a lot more protective and be considerate of the *highest* value or largest riparian area to ensure water and fish habitat protections from the road/construction
- The Proponent did not include any specific mitigations relating to avoiding spills or mishandling/storage of harmful chemicals like fuels. Best practice is to include specific mitigation measures.
- Where SAR are present or may be present, the DFO's Code of Practice should not be referenced. The COP focuses on methods to follow for "light projects" like removing beaver dam debris or temporary watercourse crossings and give the Proponent permission to do the Project without a fisheries act authorization (FAA). But these expressly state you cannot just follow a COP without a FAA if there are SAR present or there *may* be SAR present. Where sturgeon or other SAR may be present proper methods must be adhered to.
- Erosion and sediment control mitigations did not include prescribed monitoring to ensure that controls are properly installed, maintained, and working during/after heavy rainfall or snowmelt. Best practice is to monitor control mitigations.

7.2.2 IMPACTS TO LAND USE AND OCCUPANCY

The development of the MFCAR will provide safe and easy access to AFN and MFFN members to travel between communities, and to access camping, fishing, and hunting areas in their shared territory. However these areas will also become more easily accessible to non-rights-bearing members of the public. Potential impacts include:

- Increased pressure on fish populations and waterbodies with public road use and easier access to waters. Increased access will have negative impacts to fish available for harvesting by AFN members if no management is put in place with the construction of the road.

- AFN suggests that fishing and hunting be prohibited for construction crew staff unless they are rights-holding members in the territory.
- AFN also suggests that permits be required in the territory for non-rights-bearing members of the public to access boat launch sites, fishing, and hunting.
- Any monetary compensation for permits for land, water, and resource use and taking by non-rights-bearing members should become economic benefits for AFN, MFFN, and other rights-bearing Nations that share territory.

7.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITONS FOR APPROVAL

The following recommendations are critical for fish and fish habitat inventory and protection in AFN territory, especially those habitats that the MFCAR will intersect and impact. Below are recommendations for baseline data collection, road construction and operation, fish and water resource management, and ongoing monitoring of fish and fish habitat to verify the impact assessment and adapt changes as necessary for the protection of fish and AFN's rights to fish.

- Strong concerns about spills and , especially at waterways, should be addressed by placing conditions on the Project including: mandatory slow downs at crossings to 50 km/h, mandatory GPS units in industrial vehicles using the road that monitor and enforce speed limits, and consideration in the road plan for narrowing the road at watercourse crossings to encourage slower traffic and avoid speeding traffic stirring up dust, sand, and gravel at sensitive fish habitat locations.
- All fish species of cultural importance need to be included in the impact assessment and fish habitat use monitoring, not just those that overlap with other Nations.
- Sediment quality monitoring must occur at all watercourse crossings before construction activities commence. Limited sediment quality monitoring has been done to date and there are no plans for follow-up monitoring of sediment to confirm the EA/IS assessment for the operational years of the road.
- Stronger fish community monitoring and habitat use data is essential to compare and evaluate the predicted impacts to fish after construction and during operation.
- Fish habitat assessments must be done in all open water seasons with multiple sampling events to quantitively capture the fish habitat use and fish community assemblages at all watercourse crossings so that future monitoring events can more accurately capture changes to fish habitat use and any impacts the road may have on fish to trigger adaptive management.
- The Proponent should use a wider range of sampling gear to monitor fish than they have so far to ensure large-bodied fish are not excluded from habitat assessments in deeper waters.
- Absence of a comprehensive fish habitat use data set will not provide enough information for the assessment of effects once construction and operations begin to alter the environment.
- Quantitative data triggers must be created to lead to any necessary adaptive management to ensure the impacts to fish and fish habitat remain consistent with the findings of this predicted impact assessment.
- Increase the riparian buffer zone to 30 m from the high-water mark, or minimum of 60 m from the water's edge for temporary set back until the high-water mark can be identified, verified, and flagged by an aquatic specialist and AFN monitors to ensure protection of these filtering and protective zones for fish and fish habitat.
- Pits and quarries that are developed for road materials must only occur above the water table to ensure that such areas can be fully decommissioned, reclaimed, revegetated, and closed without creating a permanent scar on the landscape and AFN's territory.

- Quarterly surface water quality monitoring must be done at water crossings for the first three years after construction to ensure the impact assessment remains comprehensive and accurate. It is also necessary that this surface water quality monitoring regime continue in perpetuity as the connector to the Ring of Fire will increase the traffic on the road and the potential for road associated contaminants such as dust, spills, or sediments increases with it.
- Permits for land and resource use should be required for boat launching and fishing for the non-rights-holding members of the public using the roads. Proceeds raised from such permit sales should be given to Nations who share the territory and its resources.

7.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 5: Comment and Recommendations Table for Fish and Fish Habitat Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
22	Draft EA/IS – MFCAR (2025)	8.1.6.3 Species of Cultural and Conservation Concern	**Comment:** The list of important fish species for AFN in this section is not fulsome. The Proponent listed brook trout, lake sturgeon, northern pike, sucker, walleye, and lake whitefish.	**Recommendation:** The environmental impact assessment should also include assessment of impacts to AFN's rights and interests related to all species of cultural importance, not just those that overlap with MFFN. AFN presented a list of valued species of cultural importance including sustenance fish species that also includes lingcod (burbot), suckers/redhorse, lake trout, and sauger. These species must also be included in the impact assessment and monitoring commitments, in order to appropriately assess potential impacts to AFN's rights.
23	Draft EA/IS – MFCAR (2025)	Table 9-9: Fish and Fish Habitat Magnitude Definition	**Comment:** The Proponent lists near identical rationale for Negligible and Low Magnitude level impacts to fish related to the death of fish. Negligible "Potential incidental death of individual fish to a degree that is not likely to disrupt overall population dynamics or affect local productivity." Low: "Potential incidental death of fish to a degree that is not likely to disrupt overall population dynamics or affect local productivity."	**Recommendation:** AFN does not recognize a difference between these statements and believes there needs to be differentiating factors in the definitions in order to identify low-level effects. AFN suggests the Proponent edit the rationale for negligible to exclude the death of fish altogether. Any death of fish related to project activities should at minimum be seen as a low-level effect. The IA should take this into account.
24	Draft EA/IS – MFCAR (2025)	Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	**Context:** Mitigation Measures for the Construction phase included actions if an unidentified watercourse was encountered during construction activities. The instruction reads "if new waterbodies are identified during construction, clearly flag the waterbody and suspend activity within 30 metres of the location until an Aquatic Specialist has assessed the waterbody and determined a suitable course of action, which may include contacting Fisheries and Oceans Canada and the Ministry of Natural Resources." **Comment:** AFN would prefer that activities should be suspended for a wider distance from the waterbody than the prescribed 30 m in order to protect the integrity of the water and its riparian area.	**Recommendation a:** AFN suggests that the activity be suspended within 30 m of the high-water mark of the water body or at minimum 60 m from the water's edge on either side if the high-water mark cannot be identified by personnel on-site during the discovery of the waterbody or watercourse. As the Project lies within mapped critical habitat for both terrestrial and aquatic SAR, buffer zones around waterbodies and watercourses must provide sufficient protections from construction activities, while allowing access and egress for these species throughout critical life stages, in all seasons. **Recommendation b:** AFN requests the Proponent to commit to site-specific protection or management plans for construction, operation and maintenance phases, at (minimum) the large watercourse crossings (e.g., Ogoki and Albany rivers). This will include protections beyond 30 m from the high-water mark, due to the documented wildlife and traditional use of these areas (see comments below under Peatlands, and Wildlife sections). **Recommendation c:** AFN further requests involvement in the development and implementation of the plan(s).

25	Draft EA/IS – MFCAR (2025)	Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	**Comment:** Mitigation measures for reducing changes to fish habitat through changes to riparian vegetation include clearing and revegetating the riparian zone following specific guidance from a number of referenced documents but does not explicitly state what the riparian zone will be revegetated with.	**Recommendation:** AFN would prefer to see changes to the riparian zone be mitigated with the planting of native species specific to the ecosystem in the ROW. The specific plants that are meant to grow in this area surrounding watercourses are key to supporting fish habitat and the wider ecosystem. Efforts should also be made to source plants and seeds from local populations to ensure their compatibility with the ecosystem for this mitigation measure to be successful in avoiding changes to fish habitat.
26	Draft EA/IS – MFCAR (2025)	Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	**Comment:** In the table the description of the potential effect was "changes to fish survival and reproduction from improved public access to recreational angling areas. For construction and operations/maintenance phase activities related to this potential effect, AFN is concerned with added angling pressure on the waterbodies and lakes that will be more accessible to road crews and public traffic and doesn't feel that the listed mitigations are strong enough to address this concern.	**Recommendation a:** To mitigate the additional harvesting pressure on fish populations during the construction phase crew members should be prohibited from fishing in the project area unless they have Aboriginal Rights to harvest in their territory that overlaps the project area. **Recommendation b:** To mitigate the additional harvesting pressure during the operations and maintenance phase fishing adjacent to the road should be limited to rights holding members exclusively. Permits for non-rights holding water users like boaters and anglers could be sold to the public for launching or fishing on particular days within the territory with proceeds from the permits to be dispersed to impacted Nations throughout the lifetime of the public road. **Recommendation c:** AFN would also be interested in opportunities to train and employ their members as enforcement officers to issue permits, check permits, and patrolling water-use areas to ensure road users are complying with fish protection regulations issued as a result of the public access road being built.
27	Draft EA/IS – MFCAR (2025)	Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	**Comment:** The Proponent suggests mitigations to prevent changes to fish survival and reproduction from spills of fuel or other materials, but the mitigation list is incomplete. Specifically, this mitigation is missing information "Store fuel and other materials for the machinery in *[missing information]* to prevent any deleterious substances from entering a waterbody (DFO, 2023).	**Recommendation:** Please complete the mitigation in the final EA to include any refueling activities or storing of fuel or other deleterious substances 50 m from the high-water mark of any waterbody in level and signed/flagged areas that make them obvious to crew members. Fuels and other deleterious substances should be stored in protective containers that are locked and stored on flat ground with spill prevention and clean up equipment/kits next to them. Inside of fuel storage containers, a copy of the Proponent's Spill Prevention and Adaptive Management Plan and Actions should be laminated and accessible for quick reference. Equipment that is not in active use should be parked at minimum 30 m away from a water body's high-water mark.
28	Draft EA/IS – MFCAR (2025)	14.3.1.2 Fish and Fish Habitat – Operations and	**Comment:** The Proponent suggests that DFO's Codes of Practice for debris removal will be followed for maintaining bridges and culverts to prevent blockages. Codes of practice cannot be used in place of a *Fisheries Act* authorization for	**Recommendation:** This section should be modified to indicate that fisheries authorizations will be applied for any debris removal activities in the project area to ensure protection for SAR sturgeon and mussels. Otherwise the predicted effects to these species must be increased to account for potentially harmful interactions with the project in the impact assessment.

		Maintenance Monitoring	activities in and around fish habitat when SAR habitat is present at the work site. Since sturgeon is found throughout the waterway and unidentified mussels were found during site assessments for fish community, there is a high risk of project activities interacting with SAR.	
29	Draft EA/IS – MFCAR (2025)	14.3.1.2 Fish and Fish Habitat – Operations and Maintenance Monitoring	**Comment:** The Proponent reports that any changes to the morphology of a water body channel affecting fish habitat quality or quantity will be identified and addressed, as needed. AFN is concerned that channel changes will be made without sharing knowledge of those changes with members of AFN, which could impacts members' access to harvesting sites and fish.	**Recommendation:** The Proponent should notify AFN of any channel morphology changes as a result of project activities so that membership is aware of changes.
30	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions and Effects Assessment (2024)	General Comment	**Comment:** Sediment chemistry was not evaluated as part of the watercourse crossing fish community assessments. Impacts to fish and fish habitat cannot be fully evaluated without a comprehensive baseline sediment quality assessment.	**Recommendation:** AFN requests that the Proponent evaluate sediment chemistry at all watercourse crossings to establish baseline sediment chemistry to allow for comparisons with future sediment chemistry monitoring as an avenue to understand potential changes to fish habitat and impacts to fish.
31	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions and Effects Assessment (2024)	General Comment – Operational Mitigation Measures	**Comment:** The proposed speed limit (80 km/h) is not protective enough of watercourse crossings and water quality in ditches that lead to other waterbodies surrounding the road. This speed is likely to cause dust issues and deposit fine particulates and loose gravel into waterways, impacting their water quality and fish habitat quality.	**Recommendation:** AFN suggests the Proponent reduce speed limits near all watercourse crossings to be protective of habitat, especially those supporting sensitive life stages such as spawning or nursery of eggs or young fishes. The Proponent should implement slowdown signage along the road 100 m before and after all watercourse crossings. The posted speed limit should be reduced from 80 km/h to 50 km/h to reduce impacts on fish health, water quality, and fish habitat quality from high-speed traffic raising dust and causing roadway erosion at watercourse crossings.
32	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions and Effects Assessment (2024)	General Comment – Construction and Operational Mitigation Measures	See issue above.	**Recommendation:** To improve traffic abidance of slowdown zones, the road should be narrowed on either side of all bridges at watercourse crossings to encourage traffic slow downs and reduce the crossing's impacts on fish habitat and riparian area impacts for watercourses.
33	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions and Effects Assessment (2024)	General Comment – Construction and Operational Mitigation Measures	See issue above.	**Recommendation:** AFN suggests that any industrial traffic, construction equipment, and construction staff vehicles be equipped with GPS to track the speed of vehicles utilizing the roads to ensure that they abide by the posted speed limit of 80 km/h and posted slow down zones around watercourse crossings and wetland areas.
34	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions	General Comment – Fish Habitat and Community Monitoring	**Comment:** Fish habitat use was not well assessed at the majority of water course crossings. A subset of watercourse crossings were assessed for fish community and a rapid habitat assessment, but no fish were caught at many of the crossings that had single sampling events. AFN is concerned that single unsuccessful fish community sampling events will not be sufficient to compare fish habitat use after the road is constructed and in use. Fish	**Recommendation a:** AFN requests that fish community and habitat use assessments are done at each watercourse crossing that has potential to be fish bearing, including collected wetlands, upstream and downstream of the watercourse to gather this quantitative data before construction. **Recommendation b:** AFN also requests that fish habitat monitoring is

	and Effects Assessment (2024)		habitat use may change as a result of the project and insufficient quantitative baseline data has been collected to allow for future assessments of whether effects/impacts have occurred and how severely.	executed annually in the spring and fall to capture any fish spawning habitat use, however, AFN recognizes that MFFN may have limited capacity for conducting an ongoing annual aquatic monitoring program. Therefore AFN requests that the Proponent commit to monitoring at all water course crossings in the years 1, 2, 3, 5, 7, and 10 of operations. AFN also suggests that Ontario be responsible for monitoring every three years at all crossings starting after year 10 of operation in perpetuity , similar to the environmental effects monitoring for fish used to ensure mining development compliance with surface water and fish habitat regulations. The Ring of Fire connector will bring about increased traffic associated with mine creation that will have cumulative impacts on fish and fish habitat.
35	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions and Effects Assessment (2024)	2. Project Description, 2.1.1 Community Access Road pg. 6., PDF page 22	**Comment:** AFN is concerned that the predicted traffic utilizing the road may increase to 700 vehicles per day. This increase in traffic through AFN's community is concerning for member safety.	**Context:** A bypass road will likely be necessary to meet AFN's safety needs and alleviate concerns considering an increase of 100 vehicles a day (the expectation of the MFCAR) is a significant increase to AFN's current traffic volume. **Recommendation:** AFN suggests that fish habitat baseline data is collected around AFN during the baseline data collection fish monitoring program for the construction of the MFCAR. This is needed in the case that a community bypass road is constructed in the future.
36	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions and Effects Assessment (2024) Draft EA/IS – MFCAR (2025) Appendix I – Peatlands Technical Support Document (2025) Appendix N – Physiography, Terrain and Soils Technical Support Document (2025)	2.1.4 Temporary Infrastructure for Construction pg. 8, PDF pg. 24 General comment 2.1.3; 7.3 General comment	**Comment:** Potential pits and quarries have been identified for development in support of construction and operational maintenance. There is insufficient information presented in the Draft EA/IS to understand if any or all of these aggregate sites are planned for extraction below the water table. Extracting aggregate below the groundwater table comes with significant risks and potential impacts to groundwater and surface water quality. The TISG presents ten requirements for the Draft EA/IS if the Proponent is planning on quarrying below the water table to reflect the increase in risk for potential impacts. The Proponent suggests that all pits and quarries will be decommissioned using backfilling, levelling, recompacting, and redistributing organic materials to encourage natural revegetation but does not include information regarding the class of pits and quarries that will be developed. AFN is concerned with the potential impact of the pits and quarries on water quality so close to important fish habitat and the change in water regimes in those habitats should pits and quarries be extracted below the water table. AFN is further concerned with the potential impact from groundwater drawdown on the surrounding habitats (e.g., Peatlands, SAR habitats) within the Zone of Influence of groundwater drawdown for pits and quarries, should it be determined any of these are required below the water table.	**Question:** AFN requests that the Proponent clarify if they are committed to only extraction above the water table to ensure impacts are adequately captured in this Draft EA/IS and mitigated with the required reclamation under permitted activities (e.g., ARA, MECP), so that the Project may verify the stated predictions. **Recommendation:** If the Proponent plans on extracting below the groundwater table, AFN requests that the Proponent follow the requirements for the Draft EA/IS outlined in the TISG on pg. 87-88. AFN is in alignment with these technical requirements for quarrying below the groundwater table.
37		Table 4-7 Fish Community	**Comment:** The Proponent reports that two methods of fish community sampling occurred using backpack electrofishing in waters 70 cm or	**Recommendation:** AFN requests that fish habitat assessments are done in spring and summer. Sampling should be done over multiple days as

		Sampling Methods Employed pg. 46	shallower (safe for wading) and minnow trapping in water deeper than 30 cm in streams, rivers, lakes, and ponds. AFN is concerned that this would not adequately capture fisheries data for waterbodies that contain valued components but have water deeper than 70 cm. Minnow traps can only capture juvenile large-bodied species, which would require the habitat be suitable for juvenile fish and may underrepresent habitat use and fish populations at baseline at watercourse crossings or watercourses in close proximity to the ROW.	necessary to quantitively capture the habitat use and fish community assemblages at all watercourse crossings. This data is critical to determine if there are changes to fish habitat use and the impacts the road may have had on fish. This quantitative data analysis is needed to determine when adaptive management is required to protect fish and fish habitat in the ROW. AFN also requests that the Proponent utilize a wider range of sampling gear to monitor fish, so as to not exclude large, bodied fish habitat in deeper waters.
38	Appendix G – Draft Fish and Fish Habitat Technical Support Document: Existing Conditions and Effects Assessment (2024)	PDF page 156 Section 7.3.1.1.2 Mitigation and Engagement Measures pg. 140, PDF pg. 156	**Comment:** AFN is concerned with the lack of detail in the mitigations around monitoring erosion and sediment controls during the construction phase and believe the Proponent should commit to more specific actions.	**Recommendation:** To help protect water and fish habitat, AFN requests that the Proponent include erosion and sediment control monitoring and checks at regular intervals during construction. This should include monitoring at all temporary crossings, as well as additional checks during/after precipitation events to maintain or replace any damaged or dysfunctional erosion and sediment controls.
39		9.1 Pre-construction Monitoring Program / 9.2 Construction Monitoring Program pg. 210/211, PDF pg. 226/227	**Comment:** The Proponent reports that any new water bodies identified prior to construction will be assessed by an aquatic specialist.	**Recommendation:** AFN requests that the Proponent include instructions that if water bodies are found prior to or during construction, activities will halt and an aquatics specialist **and a monitor from AFN** will assess the water body as a team to ensure proper mitigations and enhancement measures are implemented to reduce or avoid effects on habitat quantity and quality. Any fish rescues or relocations should also be done in the presence or with the assistance of AFN Monitors.
40		9.3 Operation and Maintenance Monitoring Program pg. 211, PDF pg. 227	**Comment:** The Proponent suggests that erosion and sediment control measures and the water crossing infrastructure will be monitored during operations. AFN is concerned that there are no written commitments for habitat quality monitoring to ensure the road is not causing ongoing impacts to fish and fish habitat.	**Recommendation a:** AFN requests that quarterly water quality monitoring be done at the crossings for the first three years after construction. **Recommendation b:** AFN would also like quarterly water quality monitoring to continue in perpetuity as traffic increases with the connector to the Ring of Fire and the potential for road-associated contaminants such as dust, spills, or sediments increases with it. To ensure the impact assessment remains comprehensive and accurate.
41		Attachment A - pg. 25 of Draft Study Plan, 7.2.1.4.1 Biological Sampling - Fish Communities, PDF pg. 279	**Comment:** Table 7-2 in the Fish and Fish Habitat Study Plan suggests that a variety of methods were proposed to be used in fish community assessments but in the Fish and Fish Habitat technical support document only backpack electrofishing and minnow trapping were reported, which would have excluded the majority of harvested and culturally important large-bodied fish from the assessments.	**Recommendation:** AFN requests that the Proponent utilize a wider range of sampling gear to monitor fish, so as to not exclude large-, bodied fish habitat in deeper waters.

8.0 PHYSIOGRAPHY, TERRAIN, & SOIL

8.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

While generally supportive of the preferred route for the MFCAR (e.g., Segment 1 using Alternative 1; Segments 2 and 3 using Alternative 4) AFN maintains concerns around community and road safety. Given the permanent nature of the Project, robust mitigation measures and strategies that prevent or minimize impacts to AFN and address uncertainty and potential long-term effects are critical to its safe development and operation.

8.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

In relation to the Physiography, Terrain, and Soil VC, AFN maintains concerns around intermittent permafrost in the region, which may pose a risk to permanent infrastructure (e.g., localized subsidence resulting from thaw) or delays/changes to planned restoration and rehabilitation measures (e.g., soil enhancements). Additional information is required to fully understand potential impacts relating to permafrost, groundwater, and surface water interactions at the Project. Consistency between protection, management, and offsetting/rehabilitation plans for all VCs that interact with the Physiography, Terrain & Soil VC is essential to ensure projected impacts and effects to AFN rights and interests are minimized, and restoration/rehabilitation measures are determined to be successful.

8.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.3 GEOLOGY, GEOCHEMISTRY AND GEOLOGICAL HAZARDS

- *identify any geological hazards that exist in the areas planned for the project facilities and infrastructure, including:*
    - *isostatic rise or subsidence; and*
    - *history of landslides, slope erosion and the potential for ground and rock instability/landslides, and subsidence during and following project activities.*

IMPACT ASSESSMENT TISG – SECTION 23.2 EFFECTS OF THE ENVIRONMENT ON THE PROJECT

- *identify any areas of potential wind or water erosion, slumps and slope instability, geologic hazards, including but not limited to those caused by geologic movements;*

8.2.2 IMPACTS TO LAND USE AND OCCUPANCY

For the Physiography, Terrain & Soil VC, baseline information was used primarily as ecological and social context to assist in evaluating potential impacts to associated interacting VCs. Please refer to the Impacts to Land Use and Occupancy sections under Peatlands, Vegetation, Wildlife, Birds, and Ungulates.

8.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

For the Physiography, Terrain & Soil VC, baseline information was used primarily as ecological and social context to assist in evaluating potential impacts to associated interacting VCs. However, AFN requests several commitments that align with the Project objectives and technical recommendations outlined for the Physiography, Terrain & Soil VC. Please also refer to AFN'S Recommendations and Conditions for Approval sections under Peatlands, Vegetation, Wildlife, Birds, and Ungulates.

AFN concerns relating to safety, climate change, and cumulative effects must be addressed through the Permafrost Management Plan to be developed for the Project. We request fulsome collaboration between the MFCAR project team, Indigenous partners such as AFN, and other foreseeable future project teams, to develop a coordinated approach to assessing permafrost in the region prior to construction that aligns with the TOR for the Ring of Fire area. The Permafrost Management Plan must further be reviewed, informed, and verified by a geotechnical engineer and hydrogeologist in advance of implementation, and must be consistent with/adhere to the recommendations and commitments in related protection, management, offsetting, and rehabilitation plans.

AFN concerns relating to uncertainty and timelines for rehabilitation must be addressed through a Reclamation Suitability Assessment within the CDA during detailed design and ongoing field investigations (e.g., to support siting of infrastructure in the Project ROW). This is especially important to AFN, as the long-term viability and resilience of habitats in the Traditional Territory are inherently linked to AFN's way of life, and an overall objective of the Project.

8.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 6: Comment and Recommendations Table for Physiography, Terrain and Soils Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
42	Draft EA/IS – MFCAR (2025) Appendix N – Physiography, Terrain and Soils Technical Support Document (2025)	7.1.2.1; 8.2.8.5.4; 9.4.6.1 General comment	**Comment:** Potential cryosolic soils have been identified west of the Regional Study Area (RSA); predictive surficial geology mapping also identified palsas in the northern portions of the RSA. Isolated patches of permafrost were identified during the supporting baseline helicopter survey, with five potential instances of permafrost identified mainly in the northeastern portion of the LSA, and two locations documented within the CDA. Excavation in permafrost areas "will be avoided whenever possible, as cutting into surface vegetation can disturb the permafrost regime resulting in thaw and unstable ground." (page 78; PDF pp. 126); as a precaution, the design will follow recommendations in the Permafrost Management Plan. The Technical Support Document (Appendix N) recommends additional permafrost studies be completed to determine the potential extent and depth of permafrost, and potential for thaw settlement/terrain instability associated with thawing, especially around proposed pit areas SG-12 and SG-19.	**Context:** There are noted concerns by AFN members around community and road safety. Localized subsidence and potential infrastructure failure is a risk in permafrost areas at local and regional levels, caused by thaw. Section 14.3 of the TISG requires the IS to describe changes to permafrost conditions as a result of the Project, but this is not limited to general degradation as currently described in the Draft EA/IS. Although no frozen ground was found during field investigations in 2022, field investigations for permafrost have been recommended to be completed in advance of detailed design and construction. AFN requests the Proponent commit to: - **Recommendation a:** Collaboration with MTO, A/PL Roads Upgrades, NRL, Rapid Lynx Broadband, and WSR Project Teams to develop a coordinated approach to the Permafrost Assessment prior to construction (for comparison post-construction and during operations/maintenance phases, to assess the effectiveness of mitigation measures and accuracy of assessment predictions, or inform adaptive management measures) - **Recommendation b:** The Permafrost Management Plan must be reviewed, informed, and verified by a geotechnical engineer and hydrogeologist in advance of implementation. The specialists' response must include recommendations and contingency measures for construction and operations/maintenance phases. This must include reference to potential effects relating to climate change and the cumulative effects of other foreseeable future developments in the Ring of Fire Area. - **Recommendation c:** The Soils Management Plan must include appropriate mitigation measures and measurable indicators for cryosolic soils identified through the Permafrost Assessment, in addition to appropriate monitoring/testing to ensure rehabilitation and restoration measures consider cumulative degradation of permafrost soils from soil enhancements/modifications to improve suitability, installation and eventual decommissioning or abandonment of temporary ancillary facilities, and/or permanent infrastructure - **Recommendation d:** The Environmental Protection Plan, Revegetation Plan, Terrestrial Biodiversity Offsetting Plan, Wetland Offsetting Plan, and site-specific rehabilitation plans (required under the ARA for pits/quarries), must adhere to

				recommendations of, and maintain consistency with, the requirements outlined in the Permafrost Management Plan (e.g., demonstrate overall net benefit for SAR wildlife or plant species that use habitat within intermittent permafrost areas).
43	Draft EA/IS – MFCAR (2025) Appendix N – Physiography, Terrain, and Soils Technical Support Document (2025)	8.2.8.7.3; 9.4.6.4	**Comment:** Over 60% of soil samples tested against the Northern Forest Region suitability criteria were rated poor for reclamation suitability. "Poor or unsuitable ratings don't mean the soil can't be used for reclamation, but it might need careful planning, good management, and possibly soil amendments to improve its suitability." (Page 297; PDF pp. 345). "The resilience and adaptive capacity of reclaimed soils are high." (Page 66; PDF pp. 714). There are 6.7% soils available in the CDA rated "good" or "fair" for reclamation suitability, and therefore readily available for use in progressive rehabilitation efforts (e.g., for borrow areas, laydowns, storage areas, work camps, aggregate areas, associated temporary access used for construction). There are no residual effects anticipated for changes to soil quality from project construction activities (as it relates to compaction and admixing). It does not appear the assessment for the Physiography, Terrain & Soils VC considers the potential requirement for soil amendments that may be needed for progressive/final reclamation. There is little evidence to support the Draft EA/IS conclusions of no residual effects to soil quality, due to the inherent uncertainty for reclamation suitability in the CDA.	**Context:** Concerns and uncertainty remain that there is insufficient information provided regarding reclamation material suitability and resilience, to justify the conclusions presented in the Draft EA/IS regarding final soil quality. If soil sample testing can reliably be inferred to suggest less than 10% of soils are even marginally suitable for reclamation, AFN is concerned by a potential deficit in available soils required for rehabilitation of temporary facilities used for construction. This is a total area of at least 700 ha, which may be unfeasible to import suitable material to achieve successful reclamation. Delays in reestablishing material suitability will likely extend the timeline required for successful progressive/final rehabilitation of temporary infrastructure. This factor carries significant weight and requires careful evaluation, due to its profound implications to AFN Traditional Territory, related practices, and spiritual connection to the lands and waters. **Recommendation a:** A reclamation suitability assessment must be undertaken in the CDA during detailed design and ongoing field investigations (e.g., completed to support siting of infrastructure within the ROW), and inform the Environmental Protection Plan, Erosion and Sediment Control Plan, Soil Management Plan, Revegetation Plan, Terrestrial Biodiversity Offsetting Plan, and Wetlands Offsetting Plan required for the Project. The assessment should integrate both measured and qualitative parameters related specifically to plant growth (e.g., vegetation growth classes used to rank soil material suitability for revegetation). Additional indicators include soil chemical properties (e.g., ARD/ML potential, as confirmed through soil testing), admixing materials to enhance capability of poorer rated soils, compaction and rutting sensitivities, soil moisture conditions, and/or quantity of soil losses (e.g., by wind/water erosion) during soil handling or reclamation activities, etc., as indicated. The pre-construction reclamation suitability assessment within the CDA will inform site-specific mitigation measures and trigger/threshold values for implementation (e.g., to evaluate effectiveness of mitigation measures, inform adaptive management measures, and accuracy of Draft EA/IS predictions, etc.) during construction, operation, and maintenance, especially as it relates to metrics for vegetation growth. This will help to reduce the existing uncertainty relating to successful reclamation at the Project. **Recommendation b:** Soil and reclamation material suitability criteria must be evaluated throughout construction, post-construction, and operations/maintenance phases to ensure successful progressive/final rehabilitation of temporary facilities and roads, establish effective mitigation and offsetting measures, identify opportunities for adaptive management, and ultimately evaluate the predictions of the Draft EA/IS for other VCs that interact with the Physiography, Terrain & Soils VC.

9.0 PEATLANDS

9.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

The Baseline conditions of peatlands throughout the PSA note that fragmentation is generally absent but impacts to peatlands (because of the Project) are unavoidable.

Peatlands play a significant and complex role in the hydrologic cycle, carbon cycle, and in supporting habitat functions for various wildlife and plant species that have cultural significance to AFN. AFN maintains there is significant uncertainty associated with effects related to changes in groundwater and surface water VCs, which interact directly and indirectly with the peatlands VC, which make it challenging to validate the predictions in the EA/IS and assess potential impacts to AFN.

9.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

The Project relies on minimal disturbance and construction techniques (e.g., "floating road" methodology) as a primary mitigation measure for peatland ecosystems to allow for groundwater movement, yet there is not enough information known about the current interactions of peatlands, permafrost, groundwater and surface water in the CDA to confidently predict and identify all potential effects of the Project on AFN Traditional Territory.

All water is interconnected, and AFN maintains concerns that the water VC grouping was not considered in a holistic way in the Draft EA/IS, since the Peatlands VC effects assessment and baseline information was not woven into the document at the time of drafting.

9.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.5 RIPARIAN AND WETLAND ENVIRONMENTS

- *quantify, delineate and describe wetlands (fens, marshes, peat lands, bogs, etc.) within the local study area potentially directly, indirectly and/or cumulatively effected by the Project in the context of:*
    - *wetland class, ecological community type and conservation status;*
    - *biodiversity with respect to both flora and fauna;*
    - *abundance at local, regional and provincial scales;*

- *distribution; and*
- *current level of disturbance.*

IMPACT ASSESSMENT TISG – SECTION 14.3 CHANGES TO RIPARIAN, WETLAND AND TERRESTRIAL ENVIRONMENTS

- *describe direct, incidental and cumulative predicted positive and/or adverse effects to riparian, wetland (including separate description relevant to peatlands) and terrestrial biodiversity metrics, effects of fragmentation, changes to regional biodiversity that could be caused by all project activities, including but not limited to effects to wetland ecological functions, including effects that may alter the wetland's capacity to perform hydrological, biogeochemical cycling, habitat, and climate functions.*

IMPACT ASSESSMENT TISG – SECTION 15.3 TERRESTRIAL WILDLIFE AND THEIR HABITAT

- *describe the potential direct, incidental and cumulative adverse effects to other wildlife and wildlife habitat, including population level effects that could be caused by all project activities, including but not limited to: project noise and sensory disturbances, habitat alteration, air emissions and dust, increased predation, increased potential for spread of disease, invasive species introductions, poaching opportunities, any linear access corridors (roads, rights of way) particularly in the vicinity of wetland (including peatlands), lake and riparian habitats and on migratory corridors;*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 9.1.1 COMMITMENTS IDENTIFIED DURING THE TERMS OF REFERENCE

- *MFFN will assess potential effects to peatlands in the EA. An estimate of the length of road corridor that will cross through peatlands will be provided in the EA.*

9.2.2 CLIMATE CHANGE CONSIDERATIONS

In evaluating potential effects to Peatlands, the Draft EA/IS may have overrepresented select wetland ecosite types on the landscape (e.g., organic swamps/marshes). AFN is concerned that this may influence the carbon accounting for the Project and result in underestimation of soil organic carbon storage. However, it is unclear if this limitation was captured in the Carbon Storage and Flux assessment. Overall, the results indicate that peatlands function as carbon sinks; however, organic swamps are considered sources of carbon dioxide (CO_2) and account for the largest daily/seasonal releases of methane (CH_4).

There is also high uncertainty associated with the effects related to changes in groundwater quantity and flow, surface water interactions, and permafrost, as they relate to the Peatlands VC. This uncertainty may be exacerbated by the anticipated effects of climate change, which is uncertain, but generally assessed as having an adverse influence overall. The residual effects assessment indicates that climate change may lead to drier conditions in peatlands (e.g., increased rate of

evapotranspiration, rapid drainage, localized subsidence), resulting in potential disconnect between wetlands within the same complex, changes to vegetation and species phenology (i.e., alteration or loss of habitats), or increasing the potential likelihood and intensity of wildfire hazards. AFN considers community and road safety a priority for the Project.

9.2.3 CUMULATIVE EFFECTS

AFN's Traditional Territory has already been impacted by previous activities such as forestry, mineral exploration, and mining activities. The MFCAR represents the beginning of future development in the region, facilitating further development in the Ring of Fire area, increasing the volume of commercial/industrial traffic, forestry, and other forms of infrastructure expansion. This will have wide-ranging implications to wildlife habitat, migration routes, and sensitive species (including SAR), beyond the predictions identified in the Draft EA/IS.

The Anaconda and Painter Lake roads are located within the heart of AFN Traditional Territory, and traffic to the MFCAR (and therefore to the access roads) is expected to increase throughout operations and into the future. Required modifications/realignments of portions of these roads to construct the Project may create new disturbance, and alter or contribute to the loss of ecosystems that support traditional uses and/or culturally significant species. There remains significant uncertainty with respect to the cumulative effects of fugitive dust and particulate emissions on surrounding habitats in the Project Local Study Area (LSA).

Given the relatively remote nature of the Project location and current lack of invasive species observations during supporting baseline surveys, AFN maintains concerns regarding invasive species management at the Project and insists that chemical approaches to invasive species management is not acceptable. While mechanical removal or hand-pulling is the preferred approach for the MFCAR, chemical herbicides will be reserved for select conditions, based on information presented in Appendix I. Mitigation measures presented in the Draft EA/IS indicate herbicides will *not* be used during construction, and operations and maintenance phases for the Project.

9.2.4 IMPACTS TO LAND USE AND OCCUPANCY

A majority of traditionally significant vegetation species (46 of 56) were observed growing in peatland communities during field investigations, with other locations well-documented by AFN within the Traditional Territory. It is important to AFN to retain and protect access to traditional use species and known harvesting locations that support intergenerational transfer of ecological knowledge and traditional, cultural, and spiritual uses; especially considering that Project impacts to peatlands are unavoidable. Peatlands in the Project area also support habitat for various wildlife and plant SAR, in addition to species of traditional and cultural importance.

AFN is concerned that new disturbances along the access roads (in support of the Project) may also allow access for non-rights-bearing members of the public. As the Project is intended to be permanent infrastructure, AFN is also concerned that the Project may limit or restrict access to traditional use areas or travel routes during construction, and into operation and maintenance phases.

9.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

AFN's recommendations for peatlands, to allow for a full understanding of potential Project impacts to the community, Traditional Territory, and region as a whole, aligning with the TOR for the Ring of Fire Area, are as follows:

- AFN requests a commitment that the Project align disturbance and Project activities with harvesting timelines for traditional use species, and requests notification in advance; such that AFN members are afforded the appropriate space and time to take part in traditional activities on the lands and waters prior to disturbance.
- Residual effects assessments for impacted VCs, including the Peatlands VC, must integrate the required Anaconda and Painter Lake road upgrades context for a fulsome prediction of residual effects that have potential to impact AFN rights and interests.
- Update Appendix I (Peatlands Technical Support Document) and Draft EA/IS for consistency, to include missing figures, correct broken links/references, and copy/paste errors.
- Peatlands offsetting is a requirement of the TISG for the NRL Project, with similar offsetting expected for the Project. AFN requests a commitment to further engage and collaborate with AFN on any Project offsetting, restoration, or revegetation.
- AFN requests that the Proponent commit to further engagement with AFN in the planning/development and implementation of the post-construction invasive species monitoring program and Project Environmental Protection Plan.

9.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 7: Comment and Recommendations Table for Peatlands Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
44	Draft EA/IS – MFCAR (2025)	General Comment	**Comment:** The Peatlands Effects Assessment information was not included in the Draft EA/IS. Peatlands have a significant and complex role in the hydrologic cycle. Peatlands interact with both surface water and groundwater. Given the vast amount of peatlands in the study area, it is highly concerning that the peatlands assessment was not included in the Draft EA. Impacts to peatlands will have spillover effects to surface water and groundwater. Given the interconnectedness of water between surface and ground water, as it interacts in peatlands, "Water" VC group which is to include surface water, groundwater, and peatlands was not considered in a holistic way. As a result, not considering cross-over between these VC's results in the Proponent's limited understanding of hydraulic interconnectivity and related direct and indirect effects on many other VCs.	**Context:** The interactions of water and local peatlands ecosystems are inherently linked to the: a) Alteration or loss of peatlands, in turn impacting the availability of peatland habitat required for various vegetation and wildlife species (including SAR, regionally significant species, habitat-specialist species, and species of traditional/cultural importance to AFN; e.g., various focal species represented in the Birds, Vegetation, Wildlife, and Ungulates VCs). Changes to peatlands will result from changes in water flow or availability resulting from the Project, if infrastructure components are not planned or executed effectively. b) Occupancy or use by wildlife and vegetation species that require peatland habitats throughout their lifecycle will change as a result of changes to peatland habitats. c) Safety of spring water for human consumption. d) Effective restoration and rehabilitation of peatland ecosystems that may be required for offsetting Project impacts. If traditionally used wildlife and vegetation species are unavailable to AFN because of direct or indirect disturbance resulting from the Project, this may lead to further cascading impacts, including: a) Risks loss of intergenerational transfer of Traditional Ecological Knowledge (TEK) and Indigenous Knowledge (IK) of the landscape, waterways, travel routes, and species of the region. b) Rights-bearing land users and harvesters/gatherers will need to travel further in the region to acquire what is currently available locally. This may further risk safety to individual community members that actively use the land. c) Competition or conflict with licenced hunters/anglers or uneducated members of the public (i.e., poachers). **Recommendation:** AFN suggests that the Proponent revise the Draft EA/IS to include the Peatlands Effects Assessment. Subsequent impacts to groundwater and surface water should be quantified and woven into the different VC sections, including appropriate assessment of indirect effects for all VCs which intersect or otherwise are impacted along an effects pathway. It is important to consider the interactions between surface water, groundwater and peatlands to ensure the effects assessment adequately captures impacts on water in a meaningful and holistic way.

45	Appendix I – Peatlands Technical Support Document (2025)	3.0; 4.4.1; 5.3.2; 8.2.1.1	**Context:** it is possible that the Anaconda and Painter Lake Forestry Access Road upgrades may also require realignment of a portion of the road which would also represent a new disturbance and involve more extensive impacts on peatlands than if works were limited to upgrades along the existing footprint." (PDF pp. 221; Page 166) "For the purposes of route selection, it was assumed that all upgrades to Anaconda Road and Painter Lake Road required to construct and operate Segment 1 will be completed in advance by others." (PDF pp. 89; Page 41) **Comment:** Fragmentation, like that associated with forestry, camps, communities, or roads, is generally absent in the RSA; the primary influence on the landscape is natural disturbance (e.g., fire, blowdown, etc.). Areas of surface seepage are noted adjacent to the preferred route tie-in required from Section 1 of the MFCAR into the A/PL Roads. Further, the primary mitigation for peatland ecosystems in the CDA is to use a "floating road" construction methodology to allow for groundwater movement. Noted information for the road tie-ins (e.g., location, transition information, etc.), maintenance facilities, rest stops and pull outs required for the Project, is pending detailed design and not provided in the Draft EA/IS.	**Context:** Project impacts to peatlands are unavoidable during construction and operation/maintenance, with high uncertainty associated with effects related to changes in groundwater quantity and flow. Forty-six of 56 plants identified as traditionally significant to Indigenous and First Nations communities were observed growing in peatland communities during field investigations supporting the Project baseline, and other locations are well documented by AFN within the Traditional Territory. Upgrades to the A/PL Roads are required to complete the MFCAR Project and are planned to tie-into the southernmost portion of the Project (Section 1), in AFN Traditional Territory. Required modifications/realignments of portions of these access roads to construct the Project, may create new disturbance in areas considered significant to AFN, alter or contribute to the loss of ecosystems that support traditional uses and/or culturally significant species, or result in surplus cumulative effects beyond current predictions. AFN therefore requests the Proponent commit to: • **Recommendation a:** Updating the residual effects assessment for the final EA/IS integrating this context (i.e., required upgrades and/or realignments to A/PL Roads to complete construction/operations of the MFCAR) for the Peatlands, Physiography, Terrain & Soils, Vegetation, Birds, Ungulates, and Wildlife VCs, as this is a critical element to understanding potential cumulative effects associated with traditional use species and other important species (such as SAR) to AFN. Many species-project interactions are not well understood in the southernmost portion of the PSAs (overlapping AFN Traditional Territory), or there is not sufficient existing or current data to verify the predictions of the Draft EA/IS. • **Recommendation b:** Historic and current land use by AFN must inform baseline conditions in the EA/IS, while working toward shared objectives of AFN in the future. The Draft EA/IS presents information that does not highlight AFN Traditional Territory has been previously impacted by development activities, which may represent priority areas for AFN to restore and reclaim. **Information Request:** It is also important for AFN to know (at minimum) general location and preliminary design information for the tie-in and ancillary facilities for the Project, in addition to any available upgrade information for A/PL Roads within AFN Traditional Territory. Given the limited human disturbances and fragmentation of existing peatlands in the PSAs, required upgrades to the A/PL Roads, and pending data associated with peatlands (e.g., groundwater flow, permafrost investigations, including AFN TEK and IK into the Draft EA/IS, etc.) required to complete detailed design and sighting of Project infrastructure, this information is integral to fully understand potential existing, residual ,and/or cumulative risks and effects to AFN Rights and interests. AFN further requests the Proponent commit to: • **Recommendation c:** Including AFN concerns related to potential effects of the Project on groundwater. • **Recommendation d:** Include AFN TEK and IK in the Draft EA/IS that identify springs near the Ogoki River, and along A/PL Roads

				which may be impacted by associated required upgrades. Groundwater springs hold spiritual value for AFN land users. • **Recommendation e:** Collaborating with AFN to develop appropriate siting for the southernmost tie-in of the MFCAR to the A/PL Road network, and ancillary facilities for the Project within the planned ROW. • **Recommendation f:** Co-management and co-development/ implementation of required plans with AFN to complete the Project and align with other future foreseeable projects/Ring of Fire Regional Assessment.
46	Appendix I – Peatlands Technical Support Document (2025)	4.3.2.1	**Comment:** To estimate the quantity and distribution of organic swamps and organic marshes in the RSA, all marsh and swamp communities from the Ontario Land Classification mapping were included. Manual corrections were completed in an iterative process during field investigations. While organic marshes account for a small percentage of peatlands in the PSAs, organic swamps were determined to be a source of CO_2, and account for the largest daily and seasonal releases of methane of peatland groups in the LSA, representing 23% of peatlands in the LSA. It is unclear if limitations to the estimation of carbon storage in select peatland groups have been accounted for in the Draft EA/IS.	**Context:** Although this represents a conservative approach to evaluating potential Project impacts to wetlands, this method may overrepresent these ecosite types on the landscape. This may lead to misclassifications in the carbon accounting, and result in underestimating soil organic carbon storage (e.g., forested wetlands are difficult to differentiate from forested uplands unless ground verification has been completed; forested wetlands store significantly more carbon than forested uplands). **Question:** Please clarify if these limitations have been captured in the Carbon Storage and Flux assessment, and if these data gaps will be closed by information gathered in the pre-construction siting surveys.
47	Appendix I – Peatlands Technical Support Document (2025) Draft EA/IS – MFCAR (2025)	Figure 5-2; Figure 5-3 Figure 5-2, Figure 5-3	**Comment:** Plates 2 through 7 are missing from the Figures within the Appendix.	**Information Request:** Please provide the remaining plates for review and consideration in the updated Draft EA/IS.
48	Appendix I – Peatlands Technical Support Document (2025)	5.3.1; Table 5-5 General comment	**Comment:** Availability of peatlands in Section 5.3.1 indicates the RSA is 40-60% bog cover. This is inconsistent with the 2% bog cover in the RSA noted in Table 5-5. There are several broken links/references to tables and figures throughout the report.	**Recommendation a:** Please update Section 5.3.1 to be consistent with information presented in Table 5-5. **Recommendation b:** Please also correct broken links and references throughout the document for clarity and ease of reference.
49	Draft EA/IS – MFCAR (2025) Appendix I – Peatlands Technical Support Document (2025)	9.4.3.4 7.3	**Comment:** Invasive species were not observed during field surveys. While mechanical removal is the preferred approach for the Project, chemical herbicides will be reserved for select management conditions; although the Draft EA/IS state herbicides will ***not*** be used during construction and operations/maintenance phases.	**Context:** AFN maintains concerns regarding invasive species that have the potential to contribute to native and traditional use species declines in the CDA and LSA, especially considering the relatively remote nature of the Project and the current lack of observations during supporting surveys. AFN does not support the use of chemical controls for invasive species, which can further exacerbate secondary effects on peatland community

	composition and function. Similar secondary impacts to vegetation and wildlife VCs can be expected in the CDA/LSA. **Recommendation:** AFN requests the Proponent commit to further engagement with AFN, in the planning/development and implementation of the post-construction invasive species monitoring program and Environmental Protection Plan for the Project.

10.0 VEGETATION

10.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN is generally supportive of the preferred route alternative for the MFCAR; however, the Ogoki River crossing (alternative 1) and the Albany River crossing (alternative 4) locations hold significant cultural and traditional importance for AFN, especially for harvesting/gathering sustenance and medicinal plant species. Further, approximately 5.7 ha of the Albany River Provincial Park is proposed to be directly impacted by the Project. Ontario Parks has recognized and respected First Nations' rights and interests under the *Constitution Act* (1982), including activities like hunting, fishing, trapping, gathering, and spiritual ceremony. The loss of portions of Albany River Provincial Park marks a direct loss or alteration of areas used traditionally by AFN. Maintaining access to healthy lands and waters is integral to the continuation of AFN culture, way of life, and Traditional Knowledge transfer to future generations, especially at these planned crossing locations.

Overall, the Project area generally lacks fragmentation and invasive species but supports sensitive and at-risk vegetation species. Fifty-six separate traditional use vegetation species have been identified in the Project area. There are known locations of black ash (endangered in Ontario; pending listing federally under SARA; Threatened under COSEWIC; Critically endangered globally) in the CDA based on field observations, and good potential that the species is found in other locations within the CDA; however, there are severe limitations for protection of black ash under the Ontario *Endangered Species Act* in the Project area, that the Project intends to follow.

Further, the Project overlaps areas assessed by the province to be susceptible to emerald ash borer , and the Draft EA/IS identified areas of "insects" and "pests" disturbances already existing in the PSAs; however, this context was not woven into the existing conditions of the PSAs. Long-term monitoring of ecosystems and terrestrial species is important to AFN members, as this works towards the shared objectives of conservation, protection, and restoration of ecosystems for species and areas of traditional or cultural importance.

Project impacts will be largely mitigated based on the Proponent's plans for minimal disturbance construction techniques, rehabilitation of disturbed land and offsetting habitats, with the expectation that this will be successful to replace healthy and functioning habitat. There is significant uncertainty that Project impacts to AFN rights and interests will be successfully mitigated using these methods based on information provided in the Draft EA/IS.

10.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

While the landscape-level approach to the Draft EA/IS recognizes the cultural importance and connectivity of wetland and riparian ecosystems at a *regional* scale, the defined 30-m riparian buffers associated with major watercourse crossings (e.g., Ogoki and Albany rivers) along the preferred route must be weighted differently in the assessment on a *local* scale. [redacted]

Wetland function has been summarized and rated in the information provided; however, there were no definitions provided for the ratings (i.e., "low." "moderate," "variable," "high"). "The ability of each wetland vegetation community (i.e., swamp, marsh, fen, bog) to perform the associated function varies depending on characteristics such as landscape position (e.g., riparian, basin), soil type (i.e., mineral or organic), and size. The relative importance of each function also varies and may be related to the type and proximity of other vegetation communities" (PDF pp. 113; Page 80). Without knowing what metrics have been used in the assessment to evaluate wetland functions, it is unclear how the Project estimated these ratings and the associated potential impacts for each wetland type. This is especially concerning, as loss or alteration of wetlands, riparian habitats, and peatlands, *will* result from the Project (i.e., impacts are unavoidable). There is still lasting uncertainty regarding siting of ancillary facilities, and further study is required to identify interactions between related VCs (e.g., peatlands and groundwater). Supporting rationale and detailed descriptions of methods used to complete the wetlands function assessment (including sampling design), is a requirement of the TISG (Section 8.5).

Indicators such as "disease" and "insects" may impact both vegetation/forest health and wildlife health (e.g., chronic wasting disease, ticks, etc.). Although these disturbances were mapped, there was no context provided in the Draft EA/IS or Appendix J (Draft Vegetation Technical Support Document) to explain the baseline conditions of these factors or how they play a role in future predicted conditions. The current level of both anthropogenic and natural disturbances associated with vegetation is a requirement of the TISG (Section 8.7).

The protection for black ash in the PSA is important to AFN, as habitat that supports black ash is crucial for the survival and recovery of other SAR and benefit other species of traditional/cultural importance. Given the expected susceptibility of the PSA to emerald ash borer, and despite the conditional exemptions limiting black ash protections in the PSA, this species is recognized globally as critically endangered and holds great cultural significance to First Nations in the region.

10.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.7 VEGETATION

- *within the local study area of the Project, provide a description of:*
    - *the biodiversity, relative abundance and distribution of vegetation species and communities of ecological, economic or human importance (e.g., traditional use, forestry, tame pasture, native prairie, wetland or old growth);*
- *describe the use of local vegetation for medicinal or cultural purposes or as a source of country foods (traditional foods).* [redacted]
- *describe any other plant species of concern for consumption or where use has any Indigenous cultural importance;*

IMPACT ASSESSMENT TISG – SECTION 14.3 CHANGES TO RIPARIAN, WETLAND AND TERRESTRIAL ENVIRONMENTS

- *describe any changes to plant species of cultural importance*

IMPACT ASSESSMENT TISG – SECTION 15.3 TERRESTRIAL WILDLIFE AND THEIR HABITAT

- *describe the potential direct, incidental and cumulative adverse effects to other wildlife and wildlife habitat, including population level effects that could be caused by all project activities, including but not limited to: project noise and sensory disturbances, habitat alteration, air emissions and dust, increased predation, increased potential for spread of disease, invasive species introductions, poaching opportunities, any linear access corridors (roads, rights of way) particularly in the vicinity of wetland (including peatlands), lake and riparian habitats and on migratory corridors;*

IMPACT ASSESSMENT TISG – SECTION 19.1 EFFECTS TO INDIGENOUS PEOPLES

- *The potential effects, to consider assessing include both adverse and positive effects to the current use of land and resources for traditional purposes, physical and cultural heritage, and environmental, health, social and economic conditions of Indigenous peoples impacted by the Project, including interferences of the Project with the following:*
    - *quantity and quality of resources available for harvesting (e.g., species of cultural importance, including traditional and medicinal plants);*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 7.2 POTENTIAL ENVIRONMENTAL EFFECTS

- *Changes in the availability and quality of lands and resources used for traditional activities*
- *Changes in the sufficiency of lands and resources for cultural tradition*
- *Disruption of cultural heritage resources by the introduction of physical, visual, audible or atmospheric elements that are not in keeping with the character and setting of cultural heritage resources*

10.2.2 IMPACTS TO LAND USE AND OCCUPANCY

It appears that the traditional use plant habitat accessibility assessment does not include the expansive Indigenous Knowledge of AFN land users and Knowledge Holders. Although MFFN provided 43 separate species, AFN members contributed an additional 13 species to the Project list that were not woven into the assessment. This information was to be considered in determining how accessible each of the mapped ecosites are for harvesting, which may impact AFN land use and occupancy in the long term.

The use of chemical herbicides to control invasive species or fugitive dust emissions may also have a lasting perceived and/or human health impact to AFN community members within and beyond the Project ROW. Feasible vegetation control approaches required for the Project are outlined in the Draft EA/IS (per TISG, Section 8.7). However, the methods are inconsistent across the information presented for other interacting VCs.

Fugitive dust emissions and respirable particulate matter is also a significant concern to AFN land users/harvesters in both the existing and future foreseeable conditions. Dust impacts are expected beyond the defined ROW for the Project, into areas where AFN continues traditional practices. Further study must be conducted around dust emissions at the Project to fully understand the extent of existing or potential future impacts to AFN land users and Knowledge Holders, as this is a requirement of the TISG (Section 16.1, Section 17.6, Section 26).

Further, *all* monitoring results (i.e., for *all* VCs) should be validated through a First Nations lens, reducing potential impacts on the ability of disturbed lands to contribute to traditional land uses.

10.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

To fully understand potential Project impacts to the community, Traditional Territory, and the region as a whole; and align with the TOR for the Ring of Fire Area, AFN recommends:

- Several collaborative stewardship actions in sensitive/culturally significant areas (such as the Ogoki and Albany river crossing locations), such that the Project is constructed and operated in a manner that meets the needs of AFN land users and harvesters. The Project must commit to maintaining safe and undisturbed access to traditional use locations (including river

crossings) by ensuring advance notification and access/use of these areas should they become inaccessible during any time of the year.

- That the Project commit to incorporate recommendations to reassess the status of black ash protections in the PSAs (e.g., under the Vegetation Management Plan) and region as a whole (e.g., under the future regional assessment for the Ring of Fire Area)
    - Regardless of permit requirements for black ash, the Project must include offsetting, assessment/transplantation of healthy individuals, or 1:1 planted replacement of removed black ash to suitable habitat at appropriate time(s) of year. Suitable performance metrics must be developed to evaluate success during operations, as per the post-construction monitoring requirements for the Project. AFN recommends ongoing consultation and engagement to facilitate planning and implementation of any offsetting, transplantation, and/or replacement measures.
- The Draft EA/IS should be updated to include existing conditions context for all VCs that have potential to interact with forest diseases and pests for an accurate representation of existing conditions and potential future impacts to AFN rights and interests resulting from a changing climate.
- AFN recommends an ongoing proactive study to determine potential effects to humans that ingest or use vegetation species in the CDA that may be impacted by fugitive dust emissions. The study must include evaluation of seasonal implications as it relates to First Nations harvesters, consistent with the final TOR for the Ring of Fire Area (e.g., consideration for timing of traditional practices).
- As per the Government of Canada's *Supplemental Guidance on Human Health Risk Assessment for Country Foods*, tissue sample collection should reflect local methods of collection, preparation, and consumption, because food harvesting practices, preservation, treatment, and/or cooking methods can change the concentration and speciation of contaminants of concern. Sample collection should reflect the local patterns of harvesting for species retained for consumption, so that tissue samples reflect local use.
- An ongoing collaborative study with future foreseeable Project teams, to test environmentally friendly dust suppressant options (e.g., plant-derived applications) during construction to minimize requirements for water withdrawals/usage throughout all Project phases and prioritize an agreeable suppressant alternative for use during operations and maintenance phases.
- AFN requests the Proponent commit to further consultation and engagement with AFN to develop and implement the Vegetation Restoration Plan, Environmental Protection Plan, and involve AFN in development and implementation of Project monitoring activities.
    - Incorporate guidelines for developing road corridors in known ranges for SAR, incorporate reclamation/restoration/enhancement requirements for disturbed areas within critical habitat for SAR, and/or other planning requirements for the Project (e.g., ARA permitting, Overall Benefit Permits, offsetting requirements)

    - Monitoring results should be validated through a First Nations lens, reducing potential impacts on the ability of disturbed lands to contribute to traditional uses.

- Update Appendix J (Vegetation Technical Support Document) and Draft EA/IS for consistency, to include missing information (e.g., forest diseases and pests in the existing conditions scenario, “Other” ecosystem type ,wetland function metrics, supporting Anaconda and Painter Lake road upgrade requirements, etc.), and correcting typographic errors.

10.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 8: Comment and Recommendations Table for Vegetation Section.

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
50	Appendix J – Draft Vegetation Technical Support Document (2025) Draft EA/IS – MFCAR (2025)	General comment	**Comment:** [redacted] Access to healthy lands and waters is integral to the continuation of AFN culture, way of life, and capacity to transfer TK from one generation to the next. This is evident from baseline investigations, where fragmentation and invasive species are generally absent in the Project study areas and the primary influence on the landscape is natural disturbance related to wildfire.	**Context:** Particular care must be taken to avoid disturbance of key harvesting and cultural areas that have not been clearly captured in the assessment. It is clear there are substantial knowledge gaps in the Draft EA/IS that limit AFN's ability to identify interactions and potential effects, thereby restricting our collective ability to determine mitigation and management programming and understand whether the predicted Project impacts are considered acceptable. This would include whether the Project and associated infrastructure will result in habitat fragmentation, loss of wetland function, and be susceptible to the establishment or spread of invasive species. **Recommendation:** AFN requests further collaboration to complete detailed design/sighting in these sensitive and culturally significant areas (especially referring to the Ogoki and Albany River crossing locations): - To ensure an inclusive and holistic approach to environmental management by incorporating meaningful site-specific mitigation measures informed by AFN (e.g., monitor and prioritize control of invasive species using mechanical methods/hand pulling or culturally appropriate means) in the Environmental Protection Plan - Commit to incorporate recommendations that reassess the status of black ash protections under a proactive study in the Vegetation Management Plan (see comment below). - Construct and operate the Project in a manner that meets the needs of AFN land users and harvesters (e.g., include opportunities to support, retain and enhance education and transfer of knowledge around the importance/significance of traditional use species, provide offset or compensation support for areas in adjacent/accessible locations, implement adaptive management, monitoring and follow-up programs, provide notifications/access in advance of construction, etc.) - Maintain safe and undisturbed access to river crossing locations during construction to the extent feasible; AFN requests advanced notification and use of these areas, if they will be publicly inaccessible during any time of the year. This will ensure AFN citizens have adequate time, access, and space for harvesting and gathering at important sites adjacent to planned river crossings in advance of Project disturbance.

51	Appendix J – Draft Vegetation Technical Support Document (2025) Draft EA/IS – MFCAR (2025)	General comment; 7.3.1.1.1.4 General comment; 9.4.2.4	**Comment:** Fifty-six traditional use vegetation species were identified, but no invasive plant species were observed during field investigations. Invasive species are known to reduce local biodiversity, alter ecosystems, directly compete with native species, and change habitat structure (making ecosystems less suitable for SAR). One vegetation SAR (black ash) was confirmed in the Study Area overlapping AFN traditional territory during field surveys: "One known location of Black Ash is within the Construction Disturbance Area. There is good potential that Black Ash is found in other locations within the Construction Disturbance Area" (PDF pp. 236; Page 161).	**Context:** Despite "conditional exemptions" that severely limit black ash protections under the Ontario *Endangered Species Act* in the Project area, the species is critically endangered globally, with Ontario representing approximately 25% of the global range, and is a species of great cultural significance to First Nations in the area. The Project also overlaps the areas assessed by the province to be susceptible to emerald ash borer. Habitat supporting black ash is crucial for the survival and recovery of other SAR (e.g., by providing forage, shelter, ecosystem functions, biodiversity, stability of wetland/upland forests, etc.), benefit species of traditional importance that share habitat with black ash, and the recovery strategy for the species recommends ecosite-level wetland protections where one or more black ash trees are present (including young/regenerating trees). **Recommendation:** The Project, regardless of approval conditions, must include offsetting, assessment/transplantation of healthy individuals, and/or 10:1 planted sapling replacement of removed mature black ash (to suitable habitat at appropriate times of year). In addition, the co-development of acceptable performance metrics with AFN is requested, to meaningfully evaluate success and determine adaptive management actions during operations, per the requirements of the post-construction monitoring commitments (TISG). Planning and implementation of offsetting, transplantation, and/or replacement measures for vegetation (or wildlife) SAR will require ongoing consultation and engagement with AFN.
52	Draft EA/IS – MFCAR (2025)	7.2.2.1; 7.3.1.10.1.1	**Comment:** Fugitive dust emissions are expected to be produced during Project construction activities. Construction-related dust effects are considered irreversible. Project phasing anticipates construction occurring in multiple locations simultaneously to expedite construction activities for completion within three to ten years. The number of construction locations will be determined as part of detailed design. Water is anticipated to be used for dust control at temporary construction camps, but water use will be subject to a PTTW. AFN maintains concerns about dust and noise from construction and operation of the MFCAR, that will have a negative impact on human health and terrestrial systems.	**Context:** Air quality modelling shows threshold exceedances for respirable particulate matter ($PM_{2.5}$ and PM_{10}) "are predicted to be reached at less than 300 m from the emission source" (e.g., MFCAR ROW) (PDF pp. 256; Page 181) in the absence of mitigation. Residual effects from fugitive dust emissions (i.e., after mitigation measures have been applied) are predicted to degrade vegetation immediately adjacent to the Project (e.g., impede natural processes, degrade plant health, alter species composition, structure, and/or biomass, etc.). AFN recommends an ongoing proactive study to determine potential effects to humans that ingest or use vegetation in the CDA that may be impacted by fugitive dust emissions, including: - **Recommendation a:** Tissue analysis of (at minimum) a subset of the 56 identified traditional use vegetation species noted for the Project, that identifies heavy metal content or other potential cumulative effects to human health through consumption or use of vegetation in impacted areas (e.g., within 100 m of CDA or ROW). Rationale must be provided for species selection in the program. Measurable indicators/threshold values must be included and tied to adaptive management requirements; rationale must also be provided for threshold/indicator values. This may be used to assess the effectiveness of fugitive dust emission mitigation measures during construction; and/or modify or enhance mitigation measures as necessary through adaptive management during operations/maintenance.

				- **Recommendation b:** Evaluate seasonal implications as it relates to First Nations plant harvesting seasons; incorporate findings into a construction-specific adaptive management program that may include temporary traffic or activity-specific limitations, access or site-specific speed restrictions, and/or inform siting of ancillary facilities during detailed design (as required). This is consistent with the final TOR for the Ring of Fire Area, that take into consideration the timing of traditional practices. - **Recommendation c:** Consider testing environmentally friendly dust suppressant options (e.g., plant-derived applications) during construction, that minimize requirements for water withdrawal and usage through all phases of the Project.
53	Draft EA/IS – MFCAR (2025)	7.2.3.4; 7.3.1.6.2	**Context:** "Disturbed areas will be prepared for natural revegetation or seeded, as required." (PDF pp. 136; Page 88) "Use progressive restoration on-site once staging areas are no longer needed." (PDF pp. 250; Page 175) Construction phase decommissioning of temporary facilities and roads not required for maintenance, anticipate activities to encourage natural revegetation. Additional requirements for revegetation and restoration are anticipated under ARA permitting. **Comment:** The Project intends to prepare and implement a Vegetation Restoration Plan that incorporates the seeding/planting of traditional use plants. The Project impacts will be largely mitigated based on the Proponent's plans for minimal disturbance construction techniques, rehabilitation of disturbed land and offsetting habitats, with the expectation that this will be successful to replace healthy and functioning habitat. The Proponent does not provide sufficient detail in the Draft EA/IS on the rehabilitation plans, monitoring plans to determine success, and what criteria and indicators will be used to evaluate this, or what will be done if the rehabilitation trajectories are not being met.	**Context:** Passive reclamation (e.g., natural revegetation) is not guaranteed to restore ecological function. AFN is concerned that the Draft EA/IS approach to revegetation (e.g., natural succession, seeding) will not effectively re-establish habitat along most of the ROW on completion of construction; as a result, this may lead to unintentional delays in reclamation and restoration efforts of temporary facilities/roads. **Recommendation a:** AFN expects further consultation and engagement to develop and implement the Vegetation Restoration Plan that aligns with AFNs vision for end-land use restoration trajectories. The full understanding of pre-disturbance site conditions must incorporate AFN TEK and IK, and proposed reclamation methods in the Draft EA/IS must discuss: • Nature of the disturbance (i.e., watercourse crossing impacting riparian areas, temporary disturbances, ROW clearing, etc.). For example: o Guidelines for developing road corridors in the known range for SAR will need to be adhered to, such that these species will not be further threatened by the proposed Project activities. • Detailed assessment of pre-disturbance soil quality, vegetation, and hydrology (including implementing mitigation and planning contingency measures/adaptive management actions to ensure restoration trajectories, evaluating the potential for residual impacts, etc.). For example: o AFN encourages and approves of the Proponent's commitment to use traditional/cultural use vegetation species for plantings and seeding disturbed areas in the Vegetation Restoration Plan. o Active mitigations should be applied, including limiting topsoil storage, monitoring for effective invasive species management, hydrological restoration after material placement, and enhancing disturbed areas for wildlife use, etc. o Reclamation requirements for disturbed areas within critical habitat of species at risk (i.e., caribou) and/or other planning requirements for the Project (e.g., ARA

				permitting and closure requirements), must demonstrate an inventory of pre-existing site conditions that will help establish triggers and criteria (metrics) for comparison where vegetation treatments are required. • Identification of environmental sensitivities (e.g., springs, active bird nests, amphibian breeding pools, etc.) ○ This will help determine success and use of species sharing reclaimed areas, develop and implement meaningful mitigation, monitoring, protection and/or accommodation measures, in consultation with AFN. **Context:** Long-term monitoring of ecosystems and terrestrial species is important to AFN members, as this works towards the shared objectives of conservation, protection, and restoration of ecosystems for species and areas of traditional or cultural importance. **Recommendation b:** AFN requests a commitment from the Proponent to further engage AFN on the development and implementation of all monitoring activities for the Land and Water VC groups that interact with the Project. Monitoring results should be validated through a First Nations lens, reducing potential impacts on the ability of disturbed lands to contribute to traditional land uses. A monitoring program that meaningfully ensures AFN is involved to adequately address community concerns is vital to the acceptance of the Project by AFN.
54	Draft EA/IS – MFCAR (2025) Appendix J – Draft Vegetation Technical Support Document (2025)	8.2.3 4.2.3; Table 4-3; Table 4-4; Attachment A	**Comment:** Section 8.2.3 of the Draft EA/IS defines the spatial boundary of the LSA for the Vegetation VC, as 3 km from the Project centreline (e.g., 6-km-wide effects study area); whereas the technical support document identifies the LSA (Project Study Area) as both 2.5 km from the Project centreline (e.g., 5-km-wide effects study area) and 3 km from the Project centreline (e.g., consistent with the Draft EA/IS).	The LSA spatial boundary defines the area where most of the direct effects of the Project are likely to occur and must be consistent for each VC throughout all documentation provided in the application. While it appears the assessment and evaluation of impacts consider the 3-km buffer from Project centreline (e.g., 6-km-wide LSA), only Appendix J clarifies the original 2.5 km assessment area for all VCs when the assessments began in 2019. **Recommendation:** Please incorporate this information into the Draft EA/IS for clarity and ease of reference throughout the sections referring to the vegetation VC.
55	Appendix J – Draft Vegetation Technical Support Document (2025) Draft EA/IS – MFCAR (2025)	General comment	**Comment:** [redacted] Access to healthy lands and waters is integral to the continuation of AFN culture, way of life, and capacity to transfer TK from one generation to the next. This is evident from baseline investigations, where fragmentation and invasive species are generally absent in the Project study areas and the primary influence on the landscape is natural disturbance related to wildfire.	**Context:** Particular care must be taken to avoid disturbance of key harvesting and cultural areas that have not been clearly captured in the assessment. It is clear there are substantial knowledge gaps in the Draft EA/IS that limit AFN's ability to identify interactions and potential effects, thereby restricting our collective ability to determine mitigation and management programming and understand whether the predicted Project impacts are considered acceptable. This would include whether the Project and associated infrastructure will result in habitat fragmentation, loss of wetland function, and be susceptible to the establishment or spread of invasive species. **Recommendation:** AFN requests further collaboration to complete detailed design/sighting in these sensitive and culturally significant areas (especially referring to the Ogoki and Albany river crossing locations):

				- To ensure an inclusive and holistic approach to environmental management by incorporating meaningful site-specific mitigation measures informed by AFN (e.g., monitor and prioritize control of invasive species using mechanical methods/hand pulling or culturally appropriate means) in the Environmental Protection Plan. - Commit to incorporate recommendations that reassess the status of black ash protections under a proactive study in the Vegetation Management Plan (see comment below). - Construct and operate the Project in a manner that meets the needs of AFN land users and harvesters (e.g., include opportunities to support, retain and enhance education and transfer of knowledge around the importance/significance of traditional use species, provide offset or compensation support for areas in adjacent/accessible locations, implement adaptive management, monitoring and follow-up programs, provide notifications/access in advance of construction, etc.). - Maintain safe and undisturbed access to river crossing locations during construction to the extent feasible; AFN requests advance notification and use of these areas, if they will be publicly inaccessible during any time of the year. This will ensure AFN citizens have adequate time, access, and space for harvesting and gathering at important sites adjacent to planned river crossings in advance of Project disturbance.
56	Appendix J – Draft Vegetation Technical Support Document (2025)	4.3.2; Table 5-1	**Comment:** A total of 90 Vegetation ground-based field investigations and 316 aerial visual checks occurred between 2021–2023 during the appropriate season (i.e., leaf-on season), specifically: - September 19, 21-29, 2021 (10 days) - July 13-18, 22, 2022 (7 days) - June 15, 17, 18; August 3-5, 2023 (6 days) Visual photo interpretation was completed for 75 locations, with photographs taken June 1-10, 2022, and August 10-13, 2022.	**Context:** The Draft EA/IS identifies that approximately 19% of mapped ecosite types were verified through ground investigations in CDA and LSA; with the remainder of the verification process estimated through aerial/photo interpretation. AFN notes the mapping exercise has indicated the presence of “diseases” and ”pests.” which have not been assessed or verified during ground-based investigations; yet is a valuable indicator to determine existing conditions for forest and vegetation health. Please clarify if these forest health indicators have been assessed during any ground verification survey efforts, and/or if this will be included in the long-term monitoring programs. AFN stresses the importance of forest health as a crucial indicator of a thriving environment and stability in regulating vital ecosystem processes/functions required for First Nations land use and occupancy, in addition to providing the appropriate baseline context for assessing residual effects of the Project. **Recommendation:** AFN recognizes the slight deviations from the TISG study plan requirements for field verification due to limitations outside of the control of the Project team; however, every effort must be made to ensure habitat/species' sensitivities have been mapped, and mitigation has been developed, in advance of final sighting and detailed design phases.
57	Appendix J – Draft Vegetation Technical Support Document (2025)	4.3.3; 5.7.1; Table C-1	**Comment:** MFFN contributed knowledge paths and locations that were considered in determining how accessible each of the mapped ecosites were for traditional use plant harvest.	**Information Request:** It is unclear if only the original 43 species provided by MFFN were used to identify candidate traditional use plant habitat suitability in the assessment. Please clarify if additional species provided by AFN were included in the traditional use plant habitat suitability

			"Any ecosite that intersected or was within 500 m of any Indigenous Knowledge point or path received a score of 1. Ecosites that did not intersect with any Indigenous Knowledge location, or the 500 m buffer scored 0 in terms of habitat accessibility." (PDF pp. 64; Page 43)	assessment, as these have not been incorporated into Table C-1 (PDF pp. 600; Page 291). The habitat accessibility assessment does not explicitly include the expansive Indigenous and TEK of AFN land users and Knowledge Holders. This is a significant concern, as one of the Project mitigation measures commits to locate infrastructure away from known traditional use plant harvesting areas. Several traditional use harvesting areas have been mapped by AFN in the PSAs, that require further protections and mitigation measures to adequately address community concerns around access and availability of traditional use vegetation species.
58	Appendix J – Draft Vegetation Technical Support Document (2025) Draft EA/IS – MFCAR (2025)	Figure 7-6; Table 7-9 General comment	**Comment:** Figure 7-6 identifies existing natural disturbances such as "disease" and "insects" that were not summarized in the baseline information for the Draft EA/IS or Vegetation Technical Support Document (Table 7-9: Anthropogenic and Natural Disturbances in the Effects Assessment Local and Regional Study Areas). Predicted conditions indicate future climate warming may bring forest pests (e.g., defoliators like emerald ash borer), further north; future conditions may also encourage vegetation diseases (e.g., root or leaf diseases) and intensify severe weather effects (e.g., drought or snow damage).	**Information Request:** Indicators of existing forest health (such as forest diseases and/or pests identified in the terrestrial mapping exercise) must be summarized and examined in the Draft EA/IS and technical support documents to fully understand the implications of the proposed Project on the existing and future conditions surrounding environment, ensure adequate mitigation measures and adaptive management thresholds are established, and appropriate monitoring is planned for/implemented to maintain habitat functions under future operating conditions. "Disease" and "insects" can impact both vegetation/forest health and wildlife health (e.g., ticks, chronic wasting disease, etc.). This information must be included in the existing conditions assessment for identified VCs.
59	Appendix J – Draft Vegetation Technical Support Document (2025)	5.5.1	**Context:** "Approximately 8.1% of the riparian zone within the existing conditions Local Study Area and 32% of the riparian zone within the existing conditions Regional Study Area are mapped as Water. The presence of water within the riparian zone is a mapping anomaly as the Ontario Hydro Network Waterbody layer, which was one of the layers used to create the 30 m riparian buffer, does not correspond directly to the polygons mapped as "Water" during desktop vegetation community mapping." (PDF pp. 118; Page 85) **Comment:** Environment Canada recommends maintaining a minimum 30-m-wide naturally vegetated riparian area on both sides of watercourses and waterbodies to protect aquatic habitat along at least 75% of the length of the watercourse, though wider areas may be needed for highly functional wildlife habitat.	**Context:** While the landscape level approach to the Draft EA/IS recognizes cultural importance and the connectivity of wetland and riparian ecosystems at a regional scale, the riparian areas associated with major watercourse crossings along the preferred route at a local effects scale must be weighted differently, especially considering the water budget studies still required in advance of detailed design and construction. [redacted] **Recommendation a:** AFN recommends updating the local-scale effects assessment of riparian habitats for the preferred route existing conditions, to include sufficient boundaries that provide adequate protections for wildlife and sensitive vegetation habitat known to overlap the LSA and CDA. **Recommendation b:** Taking into consideration the uncertainty with mapping data and sensitivity of species known to occur in these areas, AFN recommends establishing a 100-m buffer around each water body, in line with the Birds VC Study Plan (i.e., distinguished riparian habitats by establishing a 100-m buffer surrounding each water body using the Ontario Hydro Network 1:100,000 scale watercourse and water body data set). **Context:** [redacted]

				[redacted], and the inherent uncertainty around if Project-related pits/quarries will be completed above or below the water table, a standard minimum 30-m buffer used to define the riparian areas at the Project is not appropriate to characterize the baseline, determine potential impacts or put forward effective mitigation measures to important wildlife habitat availability and use at these crossing locations. The proposed 30-m riparian area buffer width is supported in the literature as general guidance to apply broadly as a *minimum* recommendation for riparian systems as it relates to protections for aquatic habitats, and greater widths may be required to provide for highly functional wildlife habitat, as is demonstrated in the Project study areas. Beyond the proposed 30 m, [redacted]
60	Draft EA/IS – MFCAR (2025)	8.2.4.2; Table 8-16; Table 8-21	**Comment:** "Other" ecosystem type is not explained under the availability of upland and wetland ecosystems within the existing conditions Study Areas.	**Question:** Please clarify in Section 8.2.4.2, Table 8-16 and Table 8-21, what habitats the "Other" ecosystem type is comprised of. Although this ecosystem type is only present in small amounts in the RSA, without additional context it is difficult to understand potential regional impacts.
61	Draft EA/IS – MFCAR (2025)	8.2.4.4	**Comment:** "For easier mapping and analysis, ecosites have been grouped into four *upland* vegetation community groupings."	**Recommendation:** This section relates to wetland ecosystems. Please update the statement to reflect this.
62	Draft EA/IS – MFCAR (2025)	Table 8-19	**Comment:** Table 8-19 summarizes wetland function and performance within existing conditions study areas. "Low", "Moderate", "Variable" and "High" function ratings have not been defined. "The ability of each wetland vegetation community (i.e., swamp, marsh, fen, bog) to perform the associated function varies depending on characteristics such as landscape position (e.g., riparian, basin), soil type (i.e., mineral or organic), and size. The relative importance of each function also varies and may be related to the type and proximity of other vegetation communities." (PDF pp. 113; Page 80)	**Context:** Without understanding what metrics are used to understand the assessment rankings of wetland functions, it is unclear how the Project evaluated these and the associated potential impacts for each wetland type. **Question a:** Please clarify if the assessment of wetland function was completed on a site-by-site basis or regional scale. **Question b:** Please also clarify any limitations associated with the method of analysis and update the residual effects assessment to reflect any updated context. **Recommendation:** Finally, please update the Draft EA/IS (and corresponding sections of Appendix J), to include this information and the definitions of wetland function ratings used in the assessment.

11.0 WILDLIFE

11.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

The Project is expected to result in both direct/indirect and residual effects to all wildlife VCs. Mitigation measures have been proposed/expected to minimize or reduce the effects of the Project on wildlife during the construction and operations and maintenance phases. However, AFN maintains that a more conservative approach to protections and mitigation measures at the Project will be necessary for reducing potential impacts to AFN rights and interests to an acceptable level. Many focal species chosen to evaluate Project impacts are species of traditional, cultural, and/or spiritual importance for AFN. As such, validation of baseline conditions and the fulsome evaluation of potential direct/indirect and residual effects to the wildlife VC are of vital importance to AFN land users and Knowledge Holders.

There are several deviations from the TISG that have not been explained. This apparent lack of oversight of the Draft Wildlife Technical Support Document (Appendix K) is concerning to AFN. Several SAR and Special Concern species have been omitted from Appendix K, making it difficult for AFN to fully understand the information provided in a holistic manner, undermining AFN's trust that all interactions between related VCs (e.g., bats, reptiles) were considered in a meaningful way. Necessary requirements from applicable legislation have also been excluded, calling into question the validity of the report and the recognition that the reports have considered the inherent connections between the lands and waters that sustain AFN culture and way of life, and the current commitments of the Project Team.

11.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

While there were few reptile observations during baseline studies for the Project (i.e., limited to eastern gartersnake), AFN members identified several locations near the Project and along the A/PL Roads upgrade locations where turtle and snake species and/or sensitive locations for reptiles (i.e., turtle nesting locations) have been observed by AFN community members and land users. This information appears to have been omitted from the Draft EA/IS and Appendix K. There were no targeted field surveys completed for reptiles during the Project baseline, and there is a likelihood, based on AFN observations of reptile occurrences in the region, that they also occur in the CDA and PSAs. Identifying provincial, territorial, or federal permits or authorizations that may be required in relation to SAR is a requirement of the TISG (Section 15.4). It is unacceptable that the conclusions presented in the residual effects assessment for reptiles is predicted to be not significant with low prediction confidence, while habitat availability/suitability and survival/reproduction characteristics have not been adequately assessed, and several SAR reptile species have been omitted without justification or verification during baseline surveys. Snakes and turtles are considered traditionally and culturally significant wildlife to AFN.

Similarly, describing adverse effects of the Project on protected species (e.g., under provincial status, assessed by COSEWIC as extirpated, endangered, threatened, or special concern) and their habitats not currently listed federally under SARA is a requirement of the TISG (Section 15.4). Several SAR were omitted from the Draft EA/IS, including species of Endangered migratory bats and Special Concern reptiles that have potential to overlap the PSAs, and known by AFN members to occur in the region. For example, this is significant for the endangered migratory bats. The assessment notes that habitats within the PSAs may provide suitable bat maternity roosting habitat for omitted species, and that the results of high-frequency calls are challenging to identify to species-level (i.e., for eastern red bat). Both eastern red bat and hoary bat were detected in 2019 surveys supporting the Project baseline, with elevated bat activity (noted in multiple years) adjacent to the Albany and Ogoki rivers (considered significant areas for AFN). It is unacceptable that SAR were not flagged in the assessment, yet the conclusions presented note the predicted residual effects to SAR bats will be not significant and that prediction confidence is considered low.

Required context from the Ontario *Fish and Wildlife Conservation Act* is also missing, despite the Project assessment selecting focal species to represent wildlife VCs that *are* included on the Schedules of this Act (i.e., designated "Specially Protected Wildlife"). This context is critical to fully understanding the magnitude and significance of all potential Project impacts/effects to the wildlife VC in addition to validation of baseline existing conditions. This factor carries significant weight for AFN, as many of these species are also considered important for cultural, traditional, or spiritual purposes when practicing inherent rights on the lands and waters of AFN Traditional Territory.

General Habitat Descriptions (GHDs) for SAR are intended to describe the habitats required to carry out a species' life processes and define general boundaries for habitat protections to benefit the species and ensure Project activities do not negatively impact a designated species or their habitats. There is no GHD available for wolverine; the Draft EA/IS and Appendix K have not discussed detailed habitat differences and requirements for wolverine during the sensitive denning period (defined by the Project to be between February 1 and May 1, annually). There are significant differences and habitat preferences for wolverine in selecting maternal dens vs. natal dens, and this context must be made available in the Draft EA/IS to fully understand the potential Project impacts and residual effects to this species of traditional and cultural importance for AFN. Further, disturbance to active wolverine dens is a contravention of the *Fish and Wildlife Conservation Act* and Ontario *Endangered Species Act*, unless a licensed trapper is employed, despite the annual timing. The Project must consider the most conservative approach to assessing impacts and providing protections for wolverine, given the relatively unfragmented/undisturbed nature of the existing conditions within the PSAs.

A healthy and productive aquatic and riparian habitat is required for community members to exercise their inherent rights and interests in AFN Traditional Territory. Beavers also represent a significant traditional use species for AFN, as a focal species in the Wildlife VC for the Project. As such, appropriate management of this species is a priority for AFN throughout the duration of the Project. Measures to remove beaver dams/lodges and/or instream debris during all phases of the Project must align with the requirements of any *Fisheries Act* Authorizations (i.e., due to presence of fish SAR or other conditions that exclude the use of DFO's Codes of Practice) associated with the watercourse. This information was not presented in the Draft EA/IS, nor Appendix K. While various

preventative measures are available for beavers to discourage activity and use of areas that risk infrastructure or safety of the Project, including select commitments would provide a better overall understanding of the predicted effects to a culturally significant species identified by AFN.

11.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.10 TERRESTRIAL WILDLIFE AND THEIR HABITAT

- *describe the historic and current use of terrestrial wildlife as a source of country foods (traditional foods) or where use has Indigenous cultural importance (e.g., black bear, caribou, deer, moose, beaver, arctic fox, fisher, wolverine, rabbits, marten, muskrat, and otter);*

IMPACT ASSESSMENT TISG – SECTION 19.1 EFFECTS TO INDIGENOUS PEOPLES

- *quantity and quality of resources available for harvesting (e.g., species of cultural importance, including traditional and medicinal plants);*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 7.2 POTENTIAL ENVIRONMENTAL EFFECTS

- *Changes in the availability and quality of lands and resources used for traditional activities*
- *Changes in the sufficiency of lands and resources for cultural tradition*
- *Disruption of cultural heritage resources by the introduction of physical, visual, audible or atmospheric elements that are not in keeping with the character and setting of cultural heritage resources*

11.2.2 IMPACTS TO LAND USE AND OCCUPANCY

The documentation provided has left out necessary information for the Project to be successful, opting to consider the Project as a stand-alone development in the region. However, to effectively construct the Project, the A/PL Roads require upgrades to allow equipment access for construction of the Project (and ultimately operations into the future). This context is crucial to AFN's approval of the Project; understanding that the Project and associated A/PL Roads upgrades represent a significant uptake in development throughout the region, and the likelihood that this infrastructure will provide additional access and prospects for further resource development that will impact AFN community members into the future. All associated commercial/industrial and passenger traffic using the Project will be required to pass through AFN Traditional Territory. This context is also imperative to the fulsome understanding of Project impacts and potential residual effects for *all* VCs selected.

Potential impacts to land use and occupancy associated with the Wildlife VC is also linked with increased access to AFN traditional use areas and travel routes by non-rights-bearing members of the public. Increased levels of recreation and harvesting by others will result in reduced harvesting opportunities for AFN (e.g., through sensory disturbance by others, dust/traffic that make the areas less suitable for traditionally harvested species, inappropriately discarded waste, establishment or spread of invasive species, direct competition with licensed hunters or poachers, etc.), and potentially lead to reduced or altered function of wildlife habitat, and deterrence or avoidance of typically available wildlife. Significant changes to wildlife habitat quality/quantity and behaviours due to human activities may further result in cumulative impacts to land use and occupancy for AFN, including to the ability of members to share TK and TEK with future generations.

11.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITONS FOR APPROVAL

To fully understand potential Project impacts to the community, Traditional Territory, and the region as a whole; and align with the TOR for the Ring of Fire Area, AFN recommends:

- On completion of pre-construction studies required for detailed design/siting of project infrastructure (e.g., groundwater, beaver lodges, etc.), a detailed Project schedule must be developed. AFN requests an initial review of Project scheduling, that must:
    - Incorporate scheduling of all Project activities by planned segment and phased locations that overlap any permitted-, Project- or First Nations-identified environmental sensitivities (e.g., Gantt chart)
    - Incorporate mapping of the preferred route that includes any boundaries of "environmental sensitivities" identified and verified by the Project, jurisdictional authorities, and Indigenous partners. Mapped sensitive features must be referenced to recommended environmental protection and/or mitigation measures in the Environmental Protection Plan. Access notes, along with physiography, terrain, and soils sensitivities such as permafrost regions and soil salvage information, must also be included due to the Project's preference for winter construction, completing construction outside of sensitive timing windows for wildlife to the extent possible, and potential limitations/challenges associated with current uncertainty.
    - Incorporate timing considerations for the Project to provide advance notification, access, and space to AFN community members, and ensure all appropriate site-specific protections/mitigation measures are in place for birds, fish, and wildlife. As sensitive timing windows for wildlife, birds, and fish SAR cannot be strictly adhered to during disruptive Project activities, further permitting and consultation/engagement with AFN and other jurisdictions will be required.
- The Project must prioritize the development and implementation of the wildfire prevention and response plan, in collaboration with AFN. AFN discourages burning unusable timber byproducts but is open to shared management of stockpiled timber for the

benefit of AFN community members. Due to the potential for wildlife use/occupancy of stored timber at select times of year, it is recommended that a seasonal timing restriction be incorporated for this activity.

- Confirm if the Project has submitted an IGF to MECP for information regarding SAR (i.e., especially with respect to bats and reptiles). In the absence of this information, the most conservative approach to the assessment must include:
    - Rationale for not originally including these species in the Draft EA/IS, or (preferably) updating the Draft EA/IS to include these missing species.
    - Incorporating further pre-disturbance surveys/field investigations, and ongoing monitoring for these species (to determine presence/absence, sensitive habitats, etc.), in collaboration with AFN. If disturbance is required in identified sensitive habitats for SAR, an Overall Benefit Permit and Offsetting Plan to provide overall benefit to the species will be required. Further engagement and collaboration with AFN on offsetting measures will be required.
    - Endangered migratory bat species (i.e., eastern red bat, hoary bat): *all* sensitive timing windows for bats must be adhered to for all Project activities, *and* compensation habitat is recommended prior to clearing/site preparation works. Suitable maternity roosting habitat descriptions must also be included.
    - Special Concern reptiles (i.e., northern map turtle, snapping turtle): reptile habitat availability overlapping the PSAs has not been estimated in the Draft EA/IS. AFN requests the Project commit to including an evaluation of reptile habitat availability within the PSAs. Additional mitigation measures for reptiles must include pre-construction surveys and planning if relocations are required in advance of clearing and site preparation works.
- Confirm if permanent lighting will be installed for the Project.
- Commit to further engagement and collaboration in the development and implementation of the Environmental Protection Plan, Terrestrial Biodiversity Offsetting Plans, Cleanup and Reclamation Plans, and reporting protocol/systems to benefit and track wildlife, especially traditional use species and SAR:
- Relocations, as a proposed mitigation measure for herpetofauna, may require an Overall Benefit Permit (i.e., for SAR), wildlife handling permit(s), and relocation plan(s). AFN requests the Project commit to further engagement and consultation regarding salvages and relocations that involve wildlife (or vegetation), to develop and implement appropriate plans that protect and benefit wildlife and vegetation species impacted by the Project.
- The Environmental Protection Plan for the Project must include a beaver management plan, developed in consultation with AFN, which outlines how Project phases will align with the requirements of DFO Authorizations, in addition to current commitments (e.g., beaver lodges are “sensitive” habitats, afforded additional protection). The beaver management plan must include specific provisions to restore and revegetate riparian areas that may be

disturbed by Project activities, installation of ESC measures, monitoring effectiveness of mitigation measures, prevention and response for deleterious releases to waterbodies and watercourses, timing of activities to avoid sensitive periods, monitoring and response actions (contingency measures), etc.

- Should the updated information requested for wolverine above identify sensitive denning area habitat (e.g., either for maternal or natal dens, and/or high-quality movement territory between den types) within (minimum) 1.5 km of either side of the CDA, a wolverine management plan must be developed and implemented under the Environmental Protection Plan for the Project, in consultation with AFN.

11.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 9: Comment and Recommendations Table for Wildlife Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
63	Draft EA/IS – MFCAR (2025)	7.2.3.1	**Comment:** Vegetation clearing and grubbing will occur at construction laydowns, staging areas, and temporary construction camps. Clearing, grubbing, and soil material stripping is anticipated to occur as part of the CDA site preparation along the ROW. Although these Project activities are planned for execution outside of sensitive timing windows for birds, fish and wildlife, with a preference for winter clearing, the Draft EA/IS notes that if seasonal windows cannot be adhered to, additional permitting and mitigation measures will be required. Based on the information provided in the Draft EA/IS, it is not possible for the Project to adhere to all sensitive species timing windows with preference for winter construction.	Construction and site preparation activities will result in direct and indirect effects to birds, fish and wildlife. **Recommendation a:** AFN recommends, upon completion of further studies required for detailed design and siting of Project infrastructure (e.g., groundwater studies), the Project Team must incorporate scheduling of all Project activities by planned segment and phased locations into a Gantt chart, overlapping any and all mapped site-specific sensitivities (i.e., SAR, critical habitat, wetlands, beaver lodges, etc.). Maps of the preferred route alternative should be included and incorporate boundaries of sensitive features that reference recommended environmental protection/mitigation measures for contractor use. This should be a central part of the Environmental Protection Plan. **Recommendation b:** AFN further requests an initial review of Project scheduling to ensure appropriate site-specific protections and mitigation measures are in place for birds, fish, and wildlife, and to ensure Project activities do not interrupt AFN cultural and spiritual interactions with the lands and waters in the Project CDA. If sensitive timing windows for wildlife, bird, or fish SAR cannot be strictly adhered to during disruptive Project activities, further permitting and consultation/engagement with AFN and other jurisdictional authorities will be required.
64	Draft EA/IS – MFCAR (2025)	7.2.3.1	**Comment:** Brush and timber disposal is proposed for non-merchantable or unusable timber and material will be collected and burned at designated sites. A wildfire prevention and response plan for construction works is an identified mitigation measure.	**Context:** The Project must prioritize engagement and collaboration with AFN in the development and implementation of the wildfire prevention and response plan, prior to any site preparation activities. Community and road safety remains a priority for AFN. **Recommendation:** Although the wildfire prevention/response plan is a commitment of the Project, AFN discourages burning as a disposal method for unusable timber byproducts resulting from Project activities. This is due to the potential for uncontrollable conditions contributing to natural wildfire disturbance at scale, and uncertainty regarding the management of designated sites presented in the Draft EA/IS. Instead, AFN requests the Project make excess unusable timber available for use by AFN community members as a priority, before expected burning at designated sites. A time limit must be incorporated if materials are stockpiled at select times of year, such to discourage wildlife use while still allowing opportunities for AFN.
65	Draft EA/IS – MFCAR (2025)	7.2.2.1; 8.2.5.1; Table 8-24; Figure 8-16; 9.4.3	**Comment:** "If seasonal windows cannot be adhered to, additional permitting and mitigation measures will be required." (PDF pp. 130; Page 82)	**Context:** Endangered migratory bats (Scheduled species under the Ontario *Endangered Species Act*) such as eastern red bat and hoary bat would feasibly be expected to occur in the PSAs based on existing habitat conditions and known

			Bat VCs as described, do not include all SAR bats with potential to occur in the PSAs. "Suitable" maternity roosting habitat is not defined or described in the Draft EA/IS for each species, but is calculated in Table 8-24, and mapped on Figure 8-16. Analysis of the distribution of little brown myotis and northern myotis notes suitable maternity roost habitat is uncommon and unevenly distributed in the LSA/RSA, but concentrated around the Ogoki and Albany river crossings.	range of each species. Bats are considered a species of traditional importance to AFN. **Information Request a:** Please confirm if the Project has submitted an Information Gathering Form (IGF) to MECP, otherwise ***all*** sensitive timing windows specified for SAR bats overlapping the Project that have potential to occur ***must*** be adhered to for all Project activities, ***and*** compensation habitat is recommended (e.g., rocket boxes) to be in place at least one year in advance of clearing or site preparation efforts. **Information Request b:** Please include suitable maternity roosting habitat descriptions for each species in the Draft EA/IS for clarity in understanding potential impacts to bat SAR. **Information Request c:** Please also include rationale for not including endangered migratory species in the assessment, or update the Draft EA/IS to include these species for a more fulsome assessment of SAR overlapping the Project area. **Recommendation:** [redacted] to demonstrate the Project results in no negative impacts to SAR wildlife habitat. Approaches to determine presence/absence of SAR bat species and potential habitat areas along the preferred route should be included in the pre-construction field investigations. If disturbance is required in identified sensitive hibernacula/maternity roost areas, an Overall Benefit Permit and offsetting plan to provide overall benefit to the species will be required. Further engagement and collaboration with AFN on offsetting measures will also be required.
66	Draft EA/IS – MFCAR (2025) Appendix K (Draft Wildlife Technical Support Document 2025)	8.2.5.4 General comment	**Context:** "The only reptile species known to occur in the wildlife existing conditions Local Study Area and Regional Study Area is eastern gartersnake." (PDF pp. 262; Page 214) **Comment:** The reptiles and amphibians cited in the Draft EA/IS do not include snake/turtle species observed by AFN members within the Traditional Territory. Snakes and turtles are considered species of traditional and cultural importance to AFN. Table 8-27 and Figure 8-21 summarize only amphibian habitat availability overlapping the PSAs.	**Context:** [redacted] These upgrades will be required before the Project can proceed. Turtle habitat availability is also influenced by various factors that include appropriate substrate for nesting/overwintering, in proximity to foraging and basking locations. Limiting factors for turtle species tend to be the availability and suitability of nesting and overwintering sites. [redacted] This species requires large, slow-moving water bodies like those that occur in the PSAs, is listed federally and provincially as a species of Special Concern (SARA, Ontario ESA), and a Specially Protected Reptile under the Ontario *Fish and Wildlife Conservation Act*. **Recommendation a:** As garter snakes were observed during field surveys in support of characterizing the baseline conditions for the Project, and both snakes/turtles have been observed by AFN land users in the area, AFN recommends appropriate pre-construction and ongoing surveys/monitoring, targeting reptiles in collaboration with AFN:

				- In areas with potential for snake hibernacula, complete Visual Encounter Surveys and targeted habitat surveys at suitable times of year, on days with appropriate weather conditions - In areas with potential for turtle nesting and overwintering, complete Basking surveys and Visual Encounter Surveys that target breeding and emergence periods for local species, on days with appropriate weather conditions. **Recommendation b:** Further, AFN requests the Project commit to completing a reptile habitat availability assessment in the wildlife VC PSAs for an accurate and fulsome assessment in the Draft EA/IS. Relocation is discussed in other comments. Ongoing surveys for amphibians during construction is recommended to take place, as the Project denotes breeding habitat as "sensitive," warranting further protection/mitigation.
67	Draft EA/IS – MFCAR (2025)	8.2.5.2.1; 9.4.3.4	**Comment:** Wolverine is a species of traditional and cultural importance for AFN. There is no General Habitat Description (GHD) available for wolverine to describe the habitat required to carry out the species' life processes, as required under the Ontario *Endangered Species Act*. GHDs clarify a species' required habitat(s) and delineate boundaries for habitat protections, ensuring project activities do not negatively impact a designated species or its habitat. Wolverines use two types of dens during the breeding season (i.e., natal dens for parturition, maternal dens for rearing kits). Although the Project defines a wolverine denning season extending across both denning windows (Feb 1–May 1), there is no GHD available and den types may be located in different areas. Note that while the wolverine denning season timing (as defined by the Project) represents the general denning period for this species, wolverine may initiate or complete denning periods outside of this timing window.	**Context:** Disturbance to active wolverine dens is in contravention of the *Fish and Wildlife Conservation Act* and Ontario *Endangered Species Act* unless a licensed trapper is employed. **Recommendation a:** Because the GHD remains unavailable, MECP should work with the Project Team and future foreseeable project teams, in collaboration with AFN and other local First Nations communities, to incorporate ***all*** available records from the region for the Project assessment of wolverine. Information must be included in associated wildlife management/monitoring plans (as it becomes available), based on the commitments noted in the Draft EA/IS. Consideration should also be given to include any records for suitability, territory size, etc., and apply site-specific protections for wolverine based on this. The Ontario Recovery Strategy for wolverine indicates that all habitat associations, including den selection, are correlated to distance from roads and logging. Den selection for wolverine will likely consider proximity and connectivity between preferred/suitable natal den areas and maternal den areas, in addition to other habitat factors necessary for the species' life processes. AFN requests the Project commit to: - **Recommendation b:** Separating natal and maternal den timing windows (i.e., mid-February to mid-March: natal dens; mid-March to end-April: maternal dens) as currently defined in the Draft EA/IS. - **Recommendation c:** Incorporate a conservative (e.g., at minimum, month-long) extension to the sensitive period for wolverine to ensure gravid females are able to find suitable denning habitat before giving birth, and effectively rear kits postpartum (e.g. extend defined sensitive window from beginning of January until early April). - **Recommendation d:**Include appropriate habitat descriptions and availability of high-quality habitat areas for both den types used by wolverine in the PSAs. - **Recommendation e:** Should the updated information resulting from the request above identify sensitive denning area habitat (e.g., either for maternal or natal dens) within (minimum) 1.5 km of either side of

				the CDA, a wolverine management plan must be developed and implemented under the Environmental Protection Plan for the Project, in consultation with AFN.
68	Draft EA/IS – MFCAR (2025)	7.2.3.1	**Comment:** Vegetation clearing and grubbing will occur at construction laydowns, staging areas, and temporary construction camps. Clearing, grubbing, and soil material stripping is anticipated to occur as part of the CDA site preparation along the ROW. Although these Project activities are planned for execution outside of sensitive timing windows for birds, fish and wildlife, with a preference for winter clearing, the Draft EA/IS notes that if seasonal windows cannot be adhered to, additional permitting and mitigation measures will be required. Based on the information provided in the Draft EA/IS, it is not possible for the Project to adhere to all sensitive species timing windows with preference for winter construction.	Construction and site preparation activities will result in direct and indirect effects to birds, fish and wildlife. **Recommendation a:** AFN recommends, upon completion of further studies required for detailed design and siting of Project infrastructure (e.g., groundwater studies), the Project Team must incorporate scheduling of all Project activities by planned segment and phased locations into a Gantt chart, overlapping any and all mapped site-specific sensitivities (i.e., SAR, critical habitat, wetlands, beaver lodges, etc.). Maps of the preferred route alternative should be included and incorporate boundaries of sensitive features that reference recommended environmental protection/mitigation measures for contractor use. This should be a central part of the Environmental Protection Plan. **Recommendation b:** AFN further requests an initial review of Project scheduling to ensure appropriate site-specific protections and mitigation measures are in place for birds, fish and wildlife, and to ensure Project activities do not interrupt AFN cultural and spiritual interactions with the lands and waters in the Project CDA. **Recommendation c:** If sensitive timing windows for wildlife, bird, or fish SAR cannot be strictly adhered to during disruptive Project activities, further permitting and consultation/engagement with AFN and other jurisdictional authorities will be required.
69	Draft EA/IS – MFCAR (2025)	Table 9-2	**Comment:** It is unclear why Wildlife (ungulates) have both potential and no potential pathways for indirect effects as it relates to the visual environment, resulting from Project interactions between VCs. Similarly, wildlife are expected to interact with each other, resulting in indirect effects to other focal wildlife VCs, as a result of the Project.	**Information Request:** Please clarify both potential and no potential pathways indicated for indirect effects between wildlife (ungulates) VCs and the visual environment in the Draft EA/IS. **Context:** Indirect interactions between wildlife VCs may result from Project activities due to noise/sensory disturbance that deter select species into surrounding habitats, attractants in localized areas, creation of preferred habitat characteristics for select species that encroach into surrounding habitats, etc. **Recommendation:** Please update the Draft EA/IS for same, or provide additional context or rationale explaining why wildlife VCs are not expected to interact indirectly with each other as a result of the Project.
70	Draft EA/IS – MFCAR (2025) Appendix K – Wildlife Technical Support Document (2025)	General comment	**Comment:** It is unclear if permanent lighting will be installed as part of the infrastructure required for the Project.	**Question:** Will permanent lighting be installed for the Project during construction or operations phases? Permanent lighting will result in cumulative sensory disturbance to wildlife (e.g., attractant or deterrent), which may be mitigated by appropriate siting and directional shielding; however, this may also result in improved safety conditions during operations and maintenance phases considering there are currently no operational timing restrictions identified for commercial or passenger vehicles.
71	Draft EA/IS – MFCAR (2025)	9.4.3.4	**Comment:** Developing a mandatory protocol/system for reporting incidental wildlife interactions and collisions at the Project, in addition	**Recommendation:** AFN requests the Project commit to further engagement and collaboration in the development and implementation of the

	Appendix K – Wildlife Technical Support Document (2025)	Table 7-10	to Terrestrial Biodiversity Offset Plans, are identified as a mitigation and enhancement measure for wildlife.	Environmental Protection Plan, Terrestrial Biodiversity Offsetting Plans, Cleanup and Reclamation Plans, and reporting protocol/systems to benefit and track wildlife, especially traditional use species and SAR.
72	Draft EA/IS – MFCAR (2025)	Table 9-21; 9.4.3.2; 9.4.3.4; Table 9-22	**Comment:** Project-environmental interactions do not consider the potential for Project activities/construction to result in habitat sinks for reptiles and amphibians. Reptile and amphibian eco-passages and exclusion fencing have been proposed as potential mitigation measures. "Any reptiles or amphibians found within work areas will be relocated to suitable habitat nearby. Safe handling practices will be used to move turtles, snakes and other herpetofauna to areas away from the construction (for example, Ontario Species at Risk Handling Manual: For Endangered Species Act Authorization Holders)." (PDF pp. 503; Page 505)	**Context:** The loss or alteration of habitats required for reptiles and amphibians can lead to physical harm of individuals, change reproduction habits, reduce habitat quality, and/or disrupt habitat connectivity, which would make these habitats less suitable for these species or result in potential localized habitat sinks. As noted in earlier comments, it appears that not all species of reptiles/amphibians (including SAR, and important traditional or cultural use species) have been considered in the assessment. **Recommendation a:** In the absence of species-specific baseline information relating to TEK of reptile and amphibian species from AFN land users and Knowledge Holders, AFN recommends the Proponent commit to the development and implementation of pre-construction surveys and an ongoing monitoring program targeting reptile and amphibian habitats along the preferred route. This will also help to validate and site reptile passages/tunnels as an effective/successful mitigation measure for reptiles/amphibians, and identify areas for wildlife exclusion fencing or relocations. Relocations, as a proposed mitigation measure for herpetofauna, will potentially require an overall benefit permit (e.g., for SAR), wildlife handling permits, and relocation plans. **Recommendation b:** AFN requests the following are included in any Relocation Plans: a) Permit conditions and wildlife reporting requirements b) Weave overall Project wildlife tracking approach and results from preconstruction and ongoing survey efforts targeting reptiles and amphibians, into adaptive management actions that ensure likelihood of success and resilience of relocated populations c) Salvage must be completed under appropriate weather conditions and at appropriate time(s) of year d) The salvaged individual(s) are treated with appropriate husbandry and handling requirements that ensure likelihood of survival e) Relocation to adequate, and sufficiently sized habitat during appropriate time(s) of year, and under appropriate weather conditions f) Monitor for, and manage, potential disease transfer during salvage operations g) Complete ongoing monitoring of salvage and relocation habitats to ensure overall success. **Recommendation c:** AFN requests the Proponent commit to further engagement and consultation regarding salvages and relocations that involve wildlife or vegetation, to develop and implement appropriate plans that protect, and benefit wildlife and vegetation species impacted by the Project.

73	Draft EA/IS – MFCAR (2025) Appendix K – Wildlife Technical Support Document (2025)	Table 9-22; 9.4.3.4 Table 8-10	**Comment:** The summary of residual effects for wildlife, indicates several species with only "net residual effect" identified (e.g., no assessment of magnitude, direction, geographic extent, etc.) in the Draft EA/IS. For example, Bats (little brown myotis and northern myotis) VC during operations and maintenance phases, related to potential incidental take; Furbearer (wolverine) VCs during operations and maintenance phases, related to habitat loss and alteration, and incidental take.	**Recommendation:** Please incorporate the evaluation information from Table 8-10 (Appendix K) into the characterization of predicted residual effects and determination of significance for wildlife VCs in the Draft EA/IS for clarity and ease of reference.
74	Draft EA/IS – MFCAR (2025) Appendix K – Wildlife Technical Support Document (2025)	9.4.3.4 7.3.1.5; 9.0 (General comment)	**Comment:** Mitigation and enhancement measures for beaver during construction and operations and maintenance phases include only beaver guards installed on culverts as a preventative measure to discourage beaver activity along the preferred route. Measures to remove beaver dams and lodges will also require alignment with *Fisheries Act* Authorizations required for the Project, as the standard conditions for DFO Codes of Practice (COP) do not apply. This has not been identified in the Draft EA/IS (wildlife-specific sections). A healthy and productive aquatic and riparian habitat is required for community members to exercise rights and interests in AFN Traditional Territory.	**Recommendation a:** AFN requests the Proponent commit to further collaboration and engagement to develop and implement the Environmental Protection Plan (EPP) and Cleanup and Reclamation Plan for the Project. The EPP must include a beaver management plan developed in consultation with AFN, which outlines how construction and operations will align with the requirements of DFO Authorizations, in addition to current commitments (e.g., beaver lodges identified as sensitive habitats, affording them additional protection). This should also include specific provisions to restore and revegetate riparian areas disturbed by Project works/activities, installation of ESC measures, monitoring for effectiveness of ESC, prevention and response for deleterious releases to waterbodies/watercourses, timing of activities to avoid sensitive periods, etc. Reference to *Fisheries Act* requirements in the beaver-specific sections of the Draft EA/IS and Appendix K must be updated for a fulsome assessment of potential impacts. **Context:** Beaver dam removal is known to impact dissolved oxygen content in water, with impacts to fish survival. The management plan must further include monitoring and response actions for potential changes in dissolved oxygen content during dam, and major debris removals. Repeated removal of beaver dams at a watercourse may result in cumulative stressors in the aquatic environment that may require additional offsetting, or accommodation plans to prevent long-term impacts. Various preventative measures are available for beavers to discourage activity that may impact infrastructure or safety of the Project during construction, operations and maintenance phases of the Project (e.g., install fencing/grates on or around culverts that allow fish passage/hydrological connectivity but deter beaver activity; reduce forage availability/install tree protection devices, trapping, etc.). While these may be outlined in BMPs or associated approvals, permits or authorizations, including select commitments will provide a better understanding of the predicted residual effects to a culturally significant species identified by AFN. **Recommendation b:** AFN recommends the Project include preventative/deterrence measures, in addition to ongoing monitoring for beaver activities at both temporary (during construction) and permanent (during construction/operations) crossing locations. This will help to maintain flow/connectivity at these locations while minimizing the need for extensive debris removal.

12.0 BIRDS

12.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN maintains concerns that the proxy species assessed to characterize the Birds VC did not fully incorporate IK and information on Indigenous land and resource use/cultural values into the design and implementation of the field programs from 2018–2022. One or few representative species from each habitat type may not be sufficient for the analysis of wide-ranging effects to birds at the Project, especially due to the lack of baseline information available and gathered to support the Project Birds VC RSA from 2018–2022, and the Project commitment for a post-construction Before-After-Control-Impact (BACI) Study to validate the predictions of the assessment. It is insufficient to AFN that the Project has only conducted baseline surveys to describe the pre-construction conditions for the Birds VC (including SAR proxy species), with no further pre-construction surveys required to validate the predictions in the assessment.

12.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

Several species identified by the Project as proxy species for the Birds VC are species of traditional importance to AFN and observed by AFN members within Traditional Territory (some species are also considered SAR). AFN maintains concerns about instances where SAR habitat availability, abundance, and distribution have been estimated by limited sampling intensity/frequency, temporal, or spatial coverage throughout the PSAs, with no targeted surveys completed (although habitat is available, e.g., for short-eared owl, eastern whip-poor-will).

Information presented in the results do not include AFN IK and TEK relating to Bird VC proxy species at the Project. Further, proxy species were assumed to occur in sufficient numbers within the PSAs to support modelling; however, standard error calculations are incomplete for several species due to low sample size. These are conditions outlined in the TISG for the Project.

12.2.1 ASSESSMENT DEFICIENCIES

Through review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, AFN found the following items to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.9 BIRDS, MIGRATORY BIRDS AND THEIR HABITAT

- *describe the use of (magnitude, timing) migratory and non-migratory birds as a source of country foods (traditional foods) or where use has Indigenous cultural importance (e.g., Canada Goose, Snow goose, Swans, Gyrfalcon, Loon, Peregrine Falcon, and duck species);*

IMPACT ASSESSMENT TISG – SECTION 15.2 BIRDS, MIGRATION BIRDS AND THEIR HABITAT

- *describe direct, incidental and cumulative predicted positive and/or adverse effects to migratory birds and non-migratory birds, including population level effects that could be caused by all project activities, including but not limited to:*
    - *site preparation/vegetation removal;*
    - *air emissions and dust;*
    - *deposit of harmful substances in waters that are frequented by migratory birds;*
    - *changes to the aquatic flow regime and sediment load;*
    - *sensory disturbance;*
    - *increased predation opportunities;*
    - *disruption of wildlife movement corridors;*
    - *increased poaching opportunities; and*
    - *site reclamation.*
- *Describe the potential direct, incidental and cumulative adverse effects of the Project on migratory bird species (such as SARA-listed Yellow-Rail) who inhabit the project area during breeding season as well as during migration (as staging and stopover sites);*

IMPACT ASSESSMENT TISG – SECTION 19. 1 EFFECTS TO INDIGENOUS PEOPLES

- *quantity and quality of resources available for harvesting (e.g., species of cultural importance, including traditional and medicinal plants);*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 7.2 POTENTIAL ENVIRONMENTAL EFFECTS

- *Changes in the availability and quality of lands and resources used for traditional activities*
- *Changes in the sufficiency of lands and resources for cultural tradition*
- *Disruption of cultural heritage resources by the introduction of physical, visual, audible or atmospheric elements that are not in keeping with the character and setting of cultural heritage resources*

12.2.2 IMPACTS TO LAND USE AND OCCUPANCY

Different species demonstrate varying tolerance and resilience to potential changes predicted by the Project and future foreseeable projects in the region, which directly effect species availability for AFN traditional, cultural and spiritual use. Potential impacts to land use and occupancy associated with the Birds VC is also linked with increased access to AFN traditional use areas and travel routes by non-rights-bearing members of the public. Increased levels of recreation and harvesting by others will result in reduced harvesting opportunities for AFN (e.g., through sensory disturbance by others, dust/traffic that make the areas less suitable for traditionally harvested species, inappropriately discarded waste, establishment or spread of invasive species, direct competition with licensed hunters or poachers), and potentially lead to reduced or altered function of wildlife habitat, and deterrence or avoidance of typically available wildlife (including birds). Significant changes to habitat quality/quantity and behaviours due to human activities may further result in cumulative impacts to land use and occupancy for AFN through the transition of TK and TEK to future generations.

12.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

The following AFN recommendations for Birds, will allow for a full understanding of potential Project impacts to the community, Traditional Territory, the region as a whole, and align with the TOR for the Ring of Fire Area:

- The Environmental Protection Plan must include a Bird Management Plan that:
    - Outlines specific measures implemented to minimize or mitigate potential Project impacts (including direct, indirect, residual effects) to BCRs 7 & 8
    - Includes a commitment to conduct ongoing monitoring during all phases of the Project as recommended in specific AFN comment (Appendix A)
    - Identifies species-specific activity setback distances consistent with ECCC guidance for all species observed during the baseline survey efforts; operational restrictions must be applied within these buffers (no disturbance is preferred).
    - The Draft EA/IS must be updated to:
- Reassess the cumulative impacts of the Project on the Birds VC to account for *all* potential sources of environmental change in BCRs 7 & 8 to adhere to the ECCC strategies outlined for each region.
- Clarify/justify how the potential effects of the Project would be better determined for Birds VC through a small number of proxy species, and prior to incorporating IK/TEK from local First Nations.
- Clarify how bird species affected by Project activities in the LSA will be identified. A tracking/reporting procedure similar to that proposed for Wildlife VCs must be employed

for the Birds VC. AFN requests a commitment to further engage and consult on overall Project wildlife tracking and reporting procedures.

- Update the status of species known to be in consideration for downlisting under SARA
- Incorporate requirements and sensitivities afforded by the *Fish and Wildlife Conservation Act*, or justify why this legislation is not relevant to the Project (applicable, at minimum, to various focal species representing the Wildlife, Birds, and Ungulates VCs). The assessment of effects should reconsider sensitivity weightings for applicable species.
- Clarify how Section 15.4 requirements of the TISG will be met for all Birds VC SAR.
- Clarify how ARU analysis will reduce observer bias from point count surveys, and if this information will be included in the BACI study plan to verify the post-construction predictions of the assessment.
- Commit to further pre-construction and ongoing monitoring of birds at the Project.

12.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 10: Comment and Recommendations Table for Birds Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
75	Draft EA/IS – MFCAR (2025)	General comment	**Comment:** Many birds selected as focal species are also considered priority species under BCR Strategies available for Regions 7 and 8 (e.g., Project overlaps these BCR Regions).	**Context:** The conservation objectives and recommendations under the BCR strategies are to be used as the basis to develop guidelines and BMPs that adhere to the MBCA. To better align the Draft EA/IS with ECCCs management strategies for BCR 7 and BCR 8, as well as the ToR for the Ring of Fire Area, AFN emphasizes the thorough evaluation of cumulative effects on the focal species chosen for the Bird VC at a regional scale. **Recommendation:** AFN recommends the Environmental Protection Plan includes a Bird Management Plan, outlining specific measures implemented to minimize or mitigate potential Project impacts (i.e., direct, indirect, residual) to the BCRs associated with the Project. To thoroughly assess cumulative impacts of the Project, ***all*** potential sources of environmental change in these regions must be considered.
76	Draft EA/IS – MFCAR (2025)	General comment	**Comment:** Various bird species selected for focus to represent the Bird VC are adaptive and resilient to human disturbances. AFN is concerned that these selected focal species may not represent the most conservative species and habitat assumptions for the assessment, as the proxy species were assumed to occur in sufficient numbers within the PSAs to support model validation. The cumulative effects assessment for the Birds VC does not consider focal species separately, such as SAR and species of traditional and cultural importance for AFN. This is a requirement of the TISG.	**Context:** One or a few representative species from each habitat-type may not be sufficient for the analysis of wide-ranging effects to the Birds VC. It is unclear, as there is no rationale provided, how the potential effects of the Project would be better determined for birds through a small number of selected proxy species, prior to incorporating IK and TEK from local First Nations. **Information Request a:** Please clarify this with justification. **Context:** It is also unclear how any bird species likely to be directly or indirectly affected by the activities taking place in the LSA, will be identified. **Information Request b:** Please clarify if the tracking and reporting approach (anticipated as a mitigation measure for Wildlife VCs) will also be used for the Birds VC.
77	Draft EA/IS – MFCAR (2025)	General comment; 9.0	**Comment:** Species listed as Specially Protected Wildlife under the Ontario *Fish and Wildlife Conservation Act* have not been denoted or discussed throughout the Draft EA/IS. This is applicable (at minimum) to focal/proxy species representing wildlife, bird, and ungulate VCs.	**Context:** Specially Protected Raptors under Schedule 7 include osprey, boreal owl, bald eagle, peregrine falcon, and short eared owl. Specially Protected Birds under Schedule 8 include rusty blackbird. There is several other focal wildlife species presented under other Schedules within the *Act* (e.g., Schedule 6 - mammals). **Recommendation:** Please update the Draft EA/IS to include this extra context, or provide rationale as to why the *Act* and its supporting Schedules are not applicable to the Project. The assessment of effects should reconsider sensitivity weightings as context for applicable species.
78	Draft EA/IS – MFCAR (2025) Appendix L – Draft Bird	9.4.4.1 General comment	**Comment:** There is no standard deviation provided for boreal owl, Wilson's snipe, mallard, sora, common nighthawk and eastern whip-poor-will, eastern wood-pewee, short-eared owl, black tern, lesser yellowlegs, and yellow rail density estimates.	**Context:** Providing estimates of abundance and distribution of proxy species for the Bird VC, in addition to predicted confidence or error approximations, are a requirement of the TISG (Section 8.9). Published studies may not be able to provide sufficient information to replace data collection, analysis and area-specific modelling for the PSAs that contribute to estimates provided in the Draft EA/IS.

	Technical Support Document (2025)		Some error calculations were not able to be completed due to low sample size. No density estimate was provided because ARUs represent unlimited distance point counts.	**Question:** Please provide rationale as to why this was only completed for *select* proxy species identified for the Birds VC, or (preferably) include this information in the updated final report.
79	Draft EA/IS – MFCAR (2025)	8.2.6.6; 14.1.2.3	**Comment:** Existing conditions in the PSAs do not show modelled habitat availability for SAR birds (e.g., figures), as is the case for all other Bird VC focal species, and per noted commitments of the Study Plan for Bird VCs. The Draft EA/IS notes that additional pre-construction monitoring for the Birds VC is not required. The Study Plan and TISG requirements for Birds VCs note point count recordings will be taken during ground-based point count surveys with human observers; however, paired ARU and breeding bird surveys were not completed for the Project. It is unclear how the data will be analyzed to reduce potential human observer bias.	**Context:** Surveys in 2018 and 2019 were completed prior to the development of the TISG, with noted differences in methods across years. Baseline data collected for breeding birds, nightjars (such as, common nighthawk and eastern whip-poor will), and marsh birds during point count and autonomous recording unit surveys from 2018 to 2022 are assumed to be adequate for pre-construction monitoring; however, the TISG (Section 8.9, Section 8.11) notes that rare species often require additional survey effort and rarity should be accounted for in the survey design, increasing number or duration of surveys, and the design/implementation of the study plan occurred before the integration of IK and TEK from local affected First Nations. Although scheduled recording timeframes for ARUs deployed in 2022 provided more frequent data collection (i.e., valuable for detecting rare species), it is unclear if all requirements from Section 15.4 of the TISG will be met for all SAR. **Information Request a:** Please provide additional information and clarification into same. **Information Request b:** Please also provide justification for omitting the modelled habitat availability for SAR Bird VC proxy species, or (preferably) include same in the Final Draft EA/IS. **Context:** AFN maintains concerns relating to SAR birds, as many species are also considered traditionally or culturally significant. **Recommendation:** AFN requests the Project commit to additional pre-construction and ongoing monitoring of birds at the Project, as indicated further in the comment below. **Information Request c:** Lastly, please clarify ARU analysis to reduce observer bias, as noted in the Study Plan; and if this information will be included in the BACI study plan to verify the post-construction predictions of the assessment.
80	Draft EA/IS – MFCAR (2025)	9.4.4.4; 14.2.2.3	**Comment:** Mitigation measures for the bird VC include preclearing bird nesting surveys during the migratory bird breeding season (April 28 – August 14; corresponding to the General Nesting Period [GNP] for migratory birds in Zone C5 and C6); in addition, wildlife sweeps for pileated woodpecker nests and raptor stick nests prior to clearing is recommended at any time of year in select habitat types. The GNP is established by ECCC as a guide and establishes when the highest number of birds are likely to be nesting in a given zone. However, birds may nest outside of the GNP and disturbance of active nests is prohibited by the MBCA regardless of timing. Nest sweeps should be conducted in the weeks leading up to and following the GNP.	**Context:** Detectability of migratory birds may change over the course of a survey, varies with type and quality of habitat, density of vegetation growth, and surveyor experience. Given the extent of the areas to be cleared, it is highly likely that nest sweeps may not identify all active nests in advance of clearing efforts (i.e., Draft EA/IS indicated clearing will occur between August 15 and April 27; however, it is also noted that if seasonal windows cannot be adhered to, additional permitting and mitigation measures will be required). **Recommendation a:** Active nests should not only be located, but the nesting species should be identified so that appropriate mitigations can be applied. *The Guideline to Reduce Risk to Migratory Birds* recommends two benchmark measurements that should be applied to determine appropriate setback distance from an active nest: alert distance and flush distance (ECCC, 2021). **Recommendation b:** Identified nests will require species-specific no work areas (i.e., buffers) and ongoing monitoring to ensure adequate protection is established around active bird nests, or ensure the nests are determined inactive, prior to vegetation clearing during the GNP (e.g., complete sweep within 48 hours prior to disturbance vs. within 3- to 10-days, as breeding birds can construct a nest and lay eggs in as little as two to three days). Bird species have varying tolerances to disturbance; as such, species-specific buffers must be sufficient to mitigate Project-related effects to sensitive species. Operational restrictions must be applied within the buffer; no disturbance is preferred.

				Recommendation c: Nest sweeps conducted ahead of vegetation clearing must have a validation period. This validation period must be short enough to ensure new nests will likely not be constructed, or no new eggs are laid between sweeps and the start of construction; but also be long enough to not disturb the nest being monitored. Limited details are provided on the methods or conditions for these surveys (e.g., additional information pending to understand search effort, size of areas, weather conditions, surveyor qualifications, etc.). Sweeps do not supersede the requirements and rigor of survey efforts, especially for sensitive or at-risk species. AFN further recommends (at minimum): - **Recommendation d:** Annual call playback surveys targeting inconspicuous nesters/cavity-dwelling bird species (e.g., pileated woodpecker, owls), during appropriate times of year, and under appropriate weather conditions. The Migratory Birds Regulations (MBR) under MBCA, protect pileated woodpecker nests year-round, and require ***surveys*** to identify the presence of nests, assess their condition, and determine avoidance actions or minimize impacts. If avoidance is not possible, permitting and installation of compensation habitat may be required. - **Recommendation e:** Commitment to further engagement with AFN to develop and implement ongoing monitoring programs for wildlife, birds and ungulates at the Project.
81	Draft EA/IS – MFCAR (2025)	9.4.4.4	**Comment:** The evaluation of residual effects to the Birds VC, anticipate sensory disturbance to most species in proximity to the CDA, with varying levels of spatial tolerance. Mallard, chimney swift, barn swallow, and bank swallow do not have identified sensory disturbance limitations like other focal Bird VCs.	**Context:** As noted in the comment above, *The Guideline to Reduce Risk to Migratory Birds* recommends two benchmark measurements that should be applied to determine appropriate setback distance from an active nest: alert distance and flush distance (ECCC, 2021). The MBR denote other setback distance recommendations. **Recommendation:** A species-specific guide to Project activity setback distances should be included in the Environmental Protection Plan for the Project to ensure consistent protections for all birds. There must also be a commitment from the Project Team to ensure appropriate collaboration and alignment with other future foreseeable Projects. Many focal species evaluated under the Birds VC for the Project are considered species of traditional or cultural importance to AFN.
82	Appendix L – Draft Birds Technical Support Document (2025)	General comment	**Comment:** Eastern whip-poor-will call playback survey locations identified in the study plan note only one existing and one additional proposed station along the preferred route alternative. All stations targeting this species in the Study Plan are located south of Dusey Lake. Sampling effort for eastern whip-poor-will in 2022 placed 8 ARUs in the same locations as those sampled in 2019 (i.e., only one location on the preferred route alternative was sampled).	**Context:** AFN notes IK and information on Indigenous land and resource use/cultural values were not available at the time of the design/implementation of bird field programs supporting the baseline characterization of Bird VC proxy species at the Project. AFN has identified eastern whip-poor-will (among other proxy species chosen for the Draft EA/IS), as a species of traditional and cultural importance, with observations in the Traditional Territory. Despite increased ARU sampling effort in the PSA, there are minimal results available for eastern whip-poor-will along the preferred route alternative. Similarly, there were ***no*** ARUs deployed for short-eared owl within the preferred route alternative LSA. No targeted surveys were completed for these SAR, and no ARUs were deployed in the RSA to use as comparison to verify the predictions of the Draft EA/IS. The limited results presented for these species does not necessarily indicate their lack of presence or occurrence within the PSAs. It is unacceptable to AFN that the Project has noted baseline surveys are sufficient to describe pre-construction conditions for the Birds VC (including SAR proxy species) and no further pre-construction surveys are required to validate the predictions in the assessment.

				Recommendation: Please refer to the comments above for AFNs recommendations and requirements for monitoring the Birds VC during all phases of the Project, so satisfy AFN rights and interests.
83	Appendix L – Draft Birds Technical Support Document (2025)	Annexure A: Bird Species List	**Comment:** Although a comprehensive listing of species observed during baseline surveys has been provided in Annexure A, it appears several species denoted as not observed during baseline surveys were actually observed (e.g., short-eared owl detected on deployed ARU in 2022).	**Information Request:** Please review and correct Annexure A to reflect all positive detections in the PSAs for listed species. For those confirmed "Yes", please include the method of detection (e.g., ARU, point count, aerial, etc.), and year (i.e., unless observed in all years).

13.0 UNGULATES

13.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

There remains significant uncertainty around potential impacts to the Ungulates VC from the Project as a whole, and traditional use species that represent the Ungulates VC in the PSAs.

The Cervid Ecological Framework has been used to help characterize baseline conditions for moose, yet it also provides broad management guidance for other focal species representing the Ungulate VC (i.e., caribou), which was not discussed in the Draft EA/IS. Similarly, Significant Wildlife Habitat (SWH) has been described only for moose. While SWH has not been described for Ecoregions 2E and 3W (i.e., ecoregions overlapping the PSAs that do not have corresponding criteria schedules) Ontario guidance on SWH would be broadly applicable to many other species of wildlife and plants identified as proxy/focal species representing their associated VCs (for example, seasonal concentration areas, animal movement corridors). The most conservative approach to the assessment would include describing potential SWH and include a fulsome assessment of potential SWH for all focal species identified in the Draft EA/IS.

An agreement under Sections 10 and 11 of the *Species at Risk Act*, 2002 (SARA) was formalized between the province of Ontario and the Government of Canada in 2022 (ECCC, MECP, 2022). This agreement outlines specific requirements for Ontario to undertake in alignment with federal plans for the conservation and recovery of woodland caribou in Canada, with a focus on maintaining and recovering self-sustaining boreal caribou populations. Various conservation measures, including habitat restoration, protected areas, evidence-based management strategies, monitoring/reporting, and collaboration with Indigenous communities are included in the commitments. To meet their objectives, the province of Ontario has agreed to implement a caribou-specific Range Management Policy, supporting the federal conservation and recovery goals for the species (MECP, 2019). The policy's guiding principles for range management include managing for:

- Cumulative disturbance, to maintain or move toward supporting self-sustaining populations.
- Amount and arrangement of habitat, to remain consistent with natural landscapes that support the species
- Forest composition, pattern, and structure, to maintain ecological functions and habitat features benefitting caribou.

ECCC has identified caribou habitat overlapping the Project PSAs and the Project must therefore be subject to the Sections 10 and 11 agreement that includes collaboration with Indigenous communities. AFN is deeply concerned that this information was omitted from the Draft EA/IS and supporting Appendix M (Draft Ungulates Technical Support Document) yet remains directly applicable to the species' management at the Project.

13.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

Similar to wolverine (a focal Wildlife VC), there is also no GHD available for eastern migratory caribou. The Draft EA/IS, and Appendix M (Draft Ungulates Technical Support Document) assume that all caribou in the Project RSA may be represented by boreal woodland caribou due to the evidence of overlap between species in their seasonal ranges. These documents also assume that anticipated mitigation measures for boreal woodland caribou would likely result in avoidance and minimization of the effects to eastern migratory caribou. The caribou assessment is further constrained to the winter ranges of eastern migratory caribou, when they are anticipated to occur within the Project LSA. While the Project anticipates that effects to eastern migratory caribou may be overestimated in the assessment, results of the collaring program to collect baseline data suggest that at least six collared females were regularly travelling beyond the Project LSA (mortality investigations of individuals), into the RSA and beyond, where there is significantly more overlap between caribou subpopulations and ranges. AFN considers caribou a species of traditional and cultural importance. Harvesters and land users have mapped several locations where caribou have been observed in the PSAs that have not been included in the baseline characterization for Ungulates at the Project.

AFN maintains that it is inappropriate that the Project suggest boreal woodland and eastern migratory caribou be represented by only boreal woodland caribou. This is due to the significant lack of data available to fully understand potential Project impacts to both subspecies in the PSAs, and between caribou herds in the region. Considering that this will be a likely component of the Regional Assessment for the Ring of Fire Area, and a likely condition of provincial and federal permitting, overall benefit will need to be provided by the Project to compensate for impacts to caribou in the CDA. AFN must be included in further discussions regarding the planning and implementation of overall benefit requirements and mitigation measures targeting caribou and other focal species representing the Ungulates VC.

13.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 1.1 FACTORS TO BE CONSIDERED IN THE IMPACT ASSESSMENT

- *Indigenous knowledge provided with respect to the designated project;*

IMPACT ASSESSMENT TISG – SECTION 8.11 SPECIES AT RISK

- *In relation to providing required information for caribou, the Impact Statement must:*
    - *describe boreal caribou use of the study areas (e.g., distribution, movement) over time using surveys to complement existing data if data within the project study areas are insufficient*

or unavailable to be able to understand how caribou use the habitat. Involve province of Ontario for data and survey requirements. Consider Indigenous knowledge and community knowledge;

IMPACT ASSESSMENT TISG – SECTION 15.4 SPECIES AT RISK AND THEIR HABITAT SCIENCE-BASED EVIDENCE FROM THE RELEVANT JURISDICTION THAT IS CONSISTENT WITH THE RECOVERY STRATEGY

- *The sources of information that should be consulted are:*
    - *Indigenous knowledge*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 7.2 POTENTIAL ENVIRONMENTAL EFFECTS

- *Changes in the availability and quality of lands and resources used for traditional activities*
- *Changes in the sufficiency of lands and resources for cultural tradition*
- *Disruption of cultural heritage resources by the introduction of physical, visual, audible or atmospheric elements that are not in keeping with the character and setting of cultural heritage resources*

13.2.2 IMPACTS TO LAND USE AND OCCUPANCY

AFN notes that IK from AFN was *not* included in the Ungulates Technical Support Document and therefore the Draft EA/IS. There are extensive data collected by AFN harvesters and land users that can and must contribute to the Project's characterization of existing conditions for the Ungulates VC. This includes potential sensitive locations that require additional protections and/or establishment of restoration priorities by the Project. Despite the Project suggesting additional pre-construction monitoring is not required targeting the Ungulates VC, AFN respectfully disagrees. This is based partially on the Proponent's admitted lack of data to support assessment predictions for caribou and moose in the PSAs over time. Baseline data must continue to be expanded upon, and monitoring programs adapted, including use of the extensive IK available from AFN for ungulates.

Anticipated impacts to the focal species represented by the Ungulates VC (also considered species of traditional and cultural importance to AFN) include exhibiting strong behavioural avoidance of the PSAs throughout the lifespan of the MFCAR. Project-related changes in habitat availability/distribution and survival/reproduction of caribou could also approach or extend beyond the resilience capabilities of one or more of the populations represented within or beyond the RSA. Similar concerns have been raised by AFN in reviewing other VCs (i.e., anticipated sensory disturbance resulting from increased traffic that will have future impacts on the presence of traditional use species in these previously undisturbed areas). These anticipated effects will directly impact species availability for use in traditional practices by AFN, and in turn could influence important Indigenous Knowledge transfer to future generations.

Timing restrictions are not proposed for moose in the Draft EA/IS or Appendix M. Knowing that the most current information provided to characterize moose populations in the PSAs demonstrate moose are in decline, specific protections and targeted mitigation measures must be afforded to moose at the Project. AFN recognizes that sensitive periods for moose include (at minimum):

- Mating/rutting season (i.e., typically from late September to December, annually), when moose are often more active near waterbodies/wetlands and bulls are more aggressive:
    - Daily activity peaks (around dawn and dusk), when moose are most active, travelling between habitats and foraging should inform the timing of– construction, operations and maintenance of the Project, especially throughout the rutting period, and should avoid potential human-wildlife interactions to the extent possible
    - Incidental observations of individuals during construction and maintenance phases must be subject to a temporary "stop work" policy that allows undisturbed access for species of traditional importance to traverse between their natural habitats.
- Calving season (i.e., typically mid-May to early June, annually), when moose are often observed near islands, peninsulas, shorelines, or open wetlands; cows select preferred sites providing isolation, cover, and escape from predators; and,
- Active use of aquatic feeding areas (spring/summer), early or late winter concentration areas (before/after rut), and mineral licks (throughout the year). For the protection of identified site-specific habitat features, access roads and other temporary/permanent disturbance must be routed to avoid these features, and access restrictions must kept in place during sensitive timeframes. General guidelines must be followed to maintain habitat values in these locations, and AFN recommends a protective setback for these identified areas of no less than 150 m.

13.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITONS FOR APPROVAL

AFN's recommendations for Ungulates, to allow for a full understanding of potential Project impacts to the community, Traditional Territory, and the region as a whole; and align with the TOR for the Ring of Fire Area, are as follows:

- AFN requests that the Draft EA/IS and Appendix M be updated to correct errors, update figures for clarity, and include:
    - The Project must adhere to various conservation measures and objectives of Sections 10 and 11 of the SARA bilateral Agreement. This includes the implementation of caribou-specific Range Management Policy principles, Recovery Zones (based on ecoregion boundaries, known caribou use, and regional threats), and action plans that focus on specific needs of caribou. This is especially important to AFN because of the potential cumulative effects

associated with the future foreseeable developments and linear disturbances predicted to occur with the approval of the MFCAR, and the continued uncertainty around residual effects to populations of focal species representing the Ungulates VC assessed by the Project.

  - Broad management strategies and mitigation measures/best practices guidance information for all focal species represented by the Ungulates VC, from the Cervid Ecological Framework.

  - A fulsome assessment of potential SWH for all focal species identified in the Draft EA/IS (as the most conservative approach to the assessment), or include rationale as to why SWH was only considered for moose.

  - Timing sensitivities and mitigation measures targeting moose at the Project.

- Specific provisions for traditionally important ungulates that include an Ungulate Management Plan as part of the overall Environmental Protection Plan, to be developed in collaboration with AFN. The Ungulate Management Plan must include (at minimum):

- Collaboration with future foreseeable Project Teams to ensure consistent, adequate, and long-term protections for focal species representing the Ungulates V.

- Expanding riparian buffer zone protections to 100 m around waterbodies or wetlands providing moderate-high quality habitat (i.e., equal to riparian area assessment for birds).

- Wildlife policy must include a temporary "stop work" requirement for incidentally encountered ungulates, that would allow individuals time and space to pass through the CDA without expending valuable energy to avoid sensory disturbances (i.e., stop work for 15–30 minutes, allowing individuals to pass through area undisturbed). Incidentally encountered wildlife must be identified and reported during all phases of the Project, and data will inform adaptive management measures and monitoring efforts moving forward.

- Mortality investigations involving ungulates must include tissue sampling for factors affecting human health and/or to improve baseline information (i.e., chronic wasting disease, heavy metals, pregnancy, etc.), if decomposition or conditions do not compromise testing. This information must be used to inform adaptive management measures and monitoring efforts moving forward.

- Progressive and final rehabilitation and reclamation measures must include targeted habitat enhancements and/or replacement measures that provide overall benefit to ungulates at the Project. This should also include ways to mitigate line-of-sight issues (i.e., deters predation), and strategic plantings or vegetation management measures to encourage or discourage habitat use in select areas that benefit ungulates for use by AFN.

- Signage along the CDAs must inform vehicle traffic of high-risk wildlife crossing areas and reduce speed limits within 50 km of identified sensitive areas. Regular security should patrol constructed road networks in collaboration with future foreseeable Projects in the

PSAs, to enforce limitations or access restrictions, and report collisions/conduct testing, as required.

- AFN requests further capacity and involvement in the development and implementation of any programs that provide overall benefit to caribou within the Traditional Territory. This includes collaborating on the development and implementation of ongoing studies to fill information gaps relating to caribou in the southern portion of the PSAs, within AFN Traditional Territory.

13.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 11: Comment and Recommendations Table for Ungulates Section.

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
84	Draft EA/IS – MFCAR (2025) Appendix M – Draft Ungulates Technical Support Document (2025)	Figure 8-34; Figure 8-35; Figure 8-36; Figure 8-37; Figure 8-38 General Comment	**Comment:** The figures in the Draft EA/IS indicate large portions of the region are "Federal Lands". Corresponding figures in the Appendix also suggest large portions of the region are "Federal Lands". There are several copy/paste errors (e.g., table numbers, misspelled words) and incomplete sentences throughout the Appendix and Draft EA/IS, making it difficult to fully understand the information provided.	**Recommendation a:** Please update the figures for accuracy and consistency with other sections of the Draft EA/IS. The clear delineation of federal and non-federal lands relating to SAR is another requirement of the TISG (Section 15.4). **Recommendation b:** Please correct typographic errors throughout the Draft EA/IS and Appendix M for clarity.
85	Draft EA/IS – MFCAR (2025) Appendix M – Draft Ungulates Technical Support Document (2025)	8.2.7.1 5.1	**Context**: "For this assessment, the forest-dwelling boreal caribou will be treated as a stand-in for all caribou. We assume that eastern migratory caribou will face the same effects as boreal caribou when they are in the ungulates study areas." (PDF pp. 290; Page 242) "However, we don't have enough data on caribou in the southern part to understand connectivity there." (PDF pp. 299; Page 251) "The lack of collared caribou in the southern portions of the Caribou existing conditions Regional Study Area limits the ability to understand connectivity in that area…. under existing conditions, caribou survival and reproduction does not appear to be constrained by a lack of connectivity on the landscape in the caribou existing conditions Local Study Area and northern portion of the caribou existing conditions Regional Study Area." (PDF pp. 164; Page 136) **Comment:** Survival estimates were not calculated for Ozhiski herd assessment due to a lack of collaring data available. The Nipigon herd range was assessed federally as being already below the 65% threshold of undisturbed habitat required to support a self-sustaining population. More recent landcover data indicates both Nipigon and Pagwachuan ranges are more disturbed than the published federal and provincial assessments.	**Context:** While boreal woodland caribou and eastern migratory caribou share many similarities, they differ significantly in their migratory patterns and seasonal use of habitats. Ontario has developed a General Habitat Description for boreal woodland caribou but not eastern migratory caribou; as such, similar habitat protections are not applicable for eastern migratory populations. Overall, there appears to be uncertainty about population trends in the caribou RSA. There is clearly a need for more data to fully understand potential Project impacts to woodland and eastern migratory caribou, in the southern and northernmost portions (respectively) of the RSA. This is expected to be included in the priorities of the TOR for the Regional Assessment in the RoF Area, and likely a condition of provincial/federal permitting that will require the Project to provide overall benefit to compensate for Project impacts to caribou in the CDA. **Recommendation a:** AFN requests involvement in the development and implementation of any programs that provide overall benefit to caribou within the Traditional Territory. **Context:** Suitability of habitat for caribou may be altered or isolated from preferred baseline habitat existing conditions as a result of the Project (i.e., northern portions of the PSAs). Given the current lack of fragmentation and disturbance in the northern portions of the RSA, preference or use of this habitat by caribou (boreal woodland or eastern migratory) is likely to change as a result of the Project; however, the magnitude of these changes is unknown due to the current lack of data available for all subpopulations. These changes also represent potential alteration to the availability and harvest of traditional use species, such as caribou; and ultimately the

				transition of Traditional Ecological Knowledge and Indigenous Knowledge of the lands and waters within the Traditional Territory to future generations. **Recommendation b:** AFN further requests the Proponent collaborate with AFN on the development and implementation of an ongoing study to fill information gaps relating to caribou in the southern portions of the PSAs within AFN Traditional Territory, especially considering the entire Project is within critical habitat for caribou, biophysical attributes and objectives to maintain 65% undisturbed habitat are priorities for the provincial and federal governments (Agreement for the Conservation of Caribou, Boreal Population in Ontario, 2022), and caribou are considered a species of traditional and cultural significance for AFN.
86	Draft EA/IS – MFCAR (2025)	8.2.7.2	**Comment:** Cervid Ecological Zones defined in the framework by MNR, and used to characterize the baseline conditions for moose, provide broad management guidance for other focused ungulate valued components (e.g., caribou). This was not identified in the Draft EA/IS.	**Context:** The Cervid Ecological Framework (CEF) also underlines broad management strategies for caribou in Ontario, and is focused on species and population recovery through landscape-scale habitat management and minimization of stressors. The CEF uses a tiered approach to establish requirements and conditions for caribou that would ensure no net loss of undisturbed habitat resulting from the Project. It emphasizes the importance of maintaining large and undisturbed natural habitats (as these factors are crucial for caribou survival and movement), and includes the potential establishment of new management areas for caribou. The framework also integrates the management of caribou with other cervids (e.g., moose, deer) across seasons, and addresses threats like human activities that alter hydrological patterns. **Recommendation:** This information should be included in the Draft EA/IS mitigation measures and baseline management information for caribou and not just moose.
87	Draft EA/IS – MFCAR (2025)	8.2.7.2	**Comment:** In the southern portion of the RSA, there are moose aquatic feeding areas, calving sites, and mineral licks. None have been documented in the LSA, but they likely exist and just have not been documented yet. Similarly, significant wildlife habitat (SWH) has been described only for moose but also apply to other wildlife and plants. This information was not provided in other applicable sections of the Draft EA/IS.	**Context:** SWH in Ontario is divided into four broad categories, including: seasonal concentration areas, rare vegetation communities or specialized habitats for wildlife, habitats of species of conservation concern (excluding habitats of endangered/threatened species), and animal movement corridors. SWH may be applicable to several other focused VC species/habitats included in the characterization of the baseline for the Project, but this was not assessed outside of the potential impacts to SWH of moose, likely due to the lack of information available for the 2E and 3W ecoregions (i.e., where the project is situated). As a result, potential SWH for other species may be overlooked (e.g., failing to identify and protect SWH during construction or operations and maintenance phases may lead to habitat loss, fragmentation, degradation, etc.) or significance may be underrepresented in the impact assessment (e.g., AFN identified areas of turtle nesting SWH that were not captured in the Draft EA/IS, noting eastern gartersnake is the only reptile in the PSAs). **Recommendation:** Please provide a fulsome assessment of potential SWH for all focal species identified in the Draft EA/IS as the most conservative approach to the assessment or include rationale as to why SWH was only considered for moose.
88	Draft EA/IS – MFCAR (2025)	General comment	**Comment:** Existing information describes moose populations in Ontario in decline, particularly in the northern portions of their range; with at least one	**Context:** AFN notes that TEK and IK from AFN, was **not** included in the Ungulates Technical Support Document. There is extensive data collected by

	Appendix M – Draft Ungulates Technical Support Document (2025)		management unit overlapping the PSAs below the 2030 population objectives. There appears to be overall uncertainty around the population trends of moose in the ungulate existing condition PSAs. Similarly, there is uncertainty around population trends of caribou in the PSAs. Moose and caribou are among other ungulate species of traditional and cultural importance to AFN, and it is of utmost importance that ungulate species are managed appropriately throughout the duration of the Project.	AFN harvesters and land users that can contribute to the Project's characterization of existing conditions for the Ungulates VC, and potential sensitive locations that require additional protections by the Project. **Recommendation:** AFN requests specific provisions for traditionally important ungulates that include an Ungulate Management Plan as part of the overall Environmental Protection Plan. The Ungulate Management Plan must include (at minimum): - Collaboration with Proponent and future foreseeable Project Teams that ensure consistent and adequate protections for focal species representing the Ungulates VC in the long-term. - Expanding riparian buffer zone protections to 100m around waterbodies or wetlands providing moderate-high quality habitat (i.e., equal to riparian area assessment for birds). - Wildlife policy must include a temporary 'stop work' requirement for incidentally encountered ungulates - that would allow individuals time and space to pass through the CDA without expending valuable energy to avoid sensory disturbances (i.e., stop work for 15-30 minutes allowing individuals to pass through area undisturbed). Incidentally encountered wildlife must be identified and reported during all phases of the Project, and data will inform adaptive management measures and monitoring efforts moving forward. - Mortality investigations involving ungulates must include tissue sampling for factors affecting human health and/or to improve baseline information (i.e., Chronic wasting disease, heavy metals, pregnancy, etc.), if decomposition or conditions do not compromise testing. This information must be used to inform adaptive management measures and monitoring efforts moving forward. - Progressive and final rehabilitation and reclamation measures must include targeted habitat enhancements and/or replacement measures that provide overall benefit to ungulates at the Project. This should also include ways to mitigate line of sight issues (i.e., deters predation), forage accessibility (i.e., lichen-dominated habitat replacement), and strategic plantings or vegetation management measures to encourage or discourage habitat use in select areas that benefit ungulates for use by AFN. - Signage along the CDAs must inform vehicle traffic of high-risk wildlife crossing areas and reduce speed limits within 50km of identified sensitive areas. Regular security should patrol constructed road networks in collaboration with future foreseeable Projects in the PSAs, to enforce limitations or access restrictions, and report collisions/conduct testing, as required. - Limitations on the use of air breaks must be considered as a sensory disturbance mitigation measure during critical sensitive timeframes while the road is in the operations and maintenance phase
89	Draft EA/IS – MFCAR (2025)	General comment	**Comment:** ECCC has identified caribou habitat overlapping the Project PSAs and must therefore be subject to the bilateral Sections 10 and 11 SARA agreement (2022) between Canada and Ontario, that includes collaboration	**Recommendation:** AFN requests the Draft EA/IS and Appendix M be updated with the requirements of the Sections 10 and 11 SARA bilateral Agreement. The Project must adhere to various conservation measures and

	Appendix M – Draft Ungulates Technical Support Document (2025)	with Indigenous communities. AFN is deeply concerned that this information was omitted from the Draft EA/IS and supporting Appendix M (Draft Ungulates Technical Support Document) yet remains directly applicable to the species' management at the Project.	objectives of the agreement, including the implementation of caribou-specific Range Management Policy principles, Recovery Zones (based on ecoregion boundaries, known caribou use, and regional threats), and action plans that focus on specific needs of caribou. This is especially important to AFN because of the potential cumulative effects associated with the future foreseeable developments and linear disturbances predicted to occur with the approval of the MFCAR, and the continued uncertainty around residual effects to populations of focal species representing the Ungulates VC assessed by the Project.

14.0 AIR QUALITY & GREENHOUSE GAS

14.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN is concerned about the potential impacts from the Project on air quality and emissions, especially with regards to the potential for dust that may be kicked up during the construction and operational phases. AFN band members have experienced the impacts of dust kicked up by trucks along the forestry roads throughout their Traditional Territory and are keenly aware that they are likely to experience similar impacts along the MFCAR and surrounding area to a potentially much larger magnitude, given the estimated 700 vehicles per day travelling the route by 2046. The draft EA/IS discusses the potential for dust suppression activities, but due to the potential significance of the impacts from dust, AFN would like to see a more detailed mitigation strategy that also implements ongoing monitoring of the issue.

14.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

AFN is concerned that the construction and operation of the MFCAR will affect air quality and release greenhouse gases, potentially impacting AFN's Aboriginal and Treaty Rights in the following ways:

- Generation and spread of dust and particulate matter via construction and vehicles driving on the road. This will impact AFN band members' willingness and safety to use the road to access their Territory for land-based activities, and dust may coat vegetation and pollute waterways far beyond the ROW for the road, impacting harvesting, gathering, and staying out on the land.

14.2.1 IMPACTS TO LAND USE AND OCCUPANCY

The main impact to land use and occupancy is the potential for the generation and spread of dust and particulate material during the construction and operational phases of the road. This will impact AFN band members' willingness and safety to use the road to access their Territory for land-based activities, and dust may coat vegetation and pollute waterways far beyond the right of way for the road, impacting harvesting, gathering, and staying out on the land.

14.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

- AFN needs to understand the baseline and potential impacts of increased traffic emissions during construction and operation. Understanding of these impacts is needed before approvals.
- A detailed monitoring plan for specific identified sites is needed to understand and protect sites of concern and significance.

14.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 12: Comment and Recommendations Table for Air Quality and Greenhouse Gas Section.

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
90	Draft EA-IS Document	7.2.5.2	**Comment:** Indicates there ”may be” dust suppression activities. A road of this speed, construction, and traffic levels will create dust that will not only impact the safety of users but the surrounding environment. Covering localized vegetation in dust makes it unavailable for use or the collection of plants for cultural purposes.	**Recommendation a:** Dust mitigation plan should ensure that dust is controlled to the 100-m ROW and does not extend past the ROW, impacting sites identified by AFN or other communities. **Recommendation b:** AFN recommends that, as a condition of approval for this Project (if approved), the Proponent be required to develop a dust management plan that identifies how dust will be minimized through construction and operation of the road, expected levels of acceptable dust suspension and dust fall, and monitoring and management approaches for intervening if dust exceeds acceptable limits. This can be modelled after existing gravel highways with similar speeds from across Canada in remote areas (e.g. Robert Campbell Hwy in the Yukon).
91	Draft EA-IS Document	14.2.3.5	**Comment:** Lacks monitoring plan details.	**Context:** The construction and operation phase will increase air, dust, noise, and vibration increase on AFN, serving as access to the construction area. **Recommendation:** AFN recommends that the proponent develop a base plan to monitor impacts on the community and any identified sites along the route.

15.0 LAND USE

15.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN largely concurs with the Project's characterization of the various planning regimes that overlap with the PSA and how they may influence the Project's trajectory and outcome. However, due to the significant overlap in territory between MFFN and AFN within the PSA, from the southern portion of the ROW up to the northern shores of the Albany River, AFN asserts that MFFN's Community Based Land Use Plan (CBLUP) process under the Far North Act must include AFN, and that AFN must be a decision-maker with regards to the final plan. The Proponent asserts that there is no conflict between MFFN's CBLUP and the Project because MFFN, as the Proponent, can simply update the plan as necessary. This perspective ignores AFN's inherent jurisdiction and right of governance authority over these lands as an integral part of their Traditional Territory, but AFN believes that this can be rectified by including them in the planning process to ensure that potential land use conflicts are identified early and addressed appropriately throughout the permitting and construction phases.

AFN also has some concerns with how the Proponent has portrayed potential impacts to trapping as "not significant." The Draft EA/IS makes this conclusion by noting that the amount of land disturbed by the Project is a small portion of each trapline's total land tenure. However, the Proponent did not engage any of the trappers to understand how they use the lands within their traplines, and no specific information about where they set up their traplines and overnight locations is included in the analysis of impacts. From AFN's perspective, the Proponent needs to seek input from the trappers whose traplines they are proposing to build the ROW for the road through.

15.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

Due to the fact that the Project's proposed ROW intersects with a significant portion of AFN's Traditional Territory, AFN understands that the construction and operational phases of the Project are likely to impact AFN's Aboriginal and Treaty Rights. These impacts are discussed throughout this report and appendices. AFN believes that a significant step that the Proponent can take in working with AFN to understand these impacts and to develop mitigation strategies for them is to include AFN in the process for planning and making final decisions on MFFN's CBLUP.

AFN also believes that impacts to land use activities like trapping are likely to be more than the Draft EA/IS's determination of "not significant." It is not enough to determine that, because trapline tenures are large, trappers will simply be able to move their activities to an unimpacted area. Trappers have a deep and historic connection to the land that includes access routes, overnight locations, and ecological knowledge that stretches back generations, and the Proponent is wrong to assume that they can simply move their trapping areas to a new location without any impact to their land use and occupancy. The Proponent must engage with trapline holders to understand the real potential

impacts of the Project to trapping and how, if at all, these potential impacts can be mitigated or accommodated.

15.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

15.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

AFN requires the following conditions for approval related to land use planning and considerations for the Project:

- MFFN inclusion of AFN in the development of their CBLUP in areas where there is territory overlap between the two First Nations, from the southern limit of the PSA to the north bank of the Albany River. AFN should be engaged and included as a decision-maker for land use planning purposes.
- The Proponent must engage AFN's trapline holders for [redacted] to better understand the potential impacts of the Project on their ability to exercise their Aboriginal and Treaty Rights within their traplines and to develop mitigation and accommodation measures where determined necessary by AFN and the trapline holders
- AFN should be included in the development and implementation of any Environmental Protection Plans for the LSA

15.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 13: Comment and Recommendations Table for Land Use Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
92	Draft EA-IS Document; Appendix U-Land Use	8.3.9.1, p. 365; 5.1.2, p. 62, 7.2.1, p. 99	**Comment:** The draft EA states that AFN is continuing the planning process to develop a Community Based Land Use Plan under the *Far North Act*. This is incorrect as the province withdrew funding for AFN in 2020 and ended AFN's participation in this process. Were AFN allowed by Ontario to continue this process, the LSA would fall within lands under jurisdiction of AFN's Community-Based Land Use Plan and it is possible that adverse effects to Land Use Compatibility VCs would be identified.	**Recommendation a:** Please update the wording to accurately reflect the current status that AFN is not continuing the planning process because Ontario withdrew funding for AFN's participation. **Recommendation b:** Furthermore, as expressed in the Draft EA/IS, AFN would like to resume their participation in the Community-Based Land Use Planning process, including through participation and engagement with MFFN in their planning process. AFN and MFFN share a significant portion of their territories, including a significant portion within the SA, and AFN would like to be engaged and included in MFFN's planning process, including in the final decision-making process about the final plan.
93	Appendix U-Land Use	7.2.1, p. 100	**Comment:** The Proponent recommends that MFFN be involved in planning activities related to new developments in the RSA that may occur because of the Project, with justification due to MFFN's CBLUP. AFN is not included in this recommendation, despite significant overlapping territory with MFFN in the RSA.	**Recommendation:** AFN believes that due to the significant overlap in AFN and MFFN's territory within the RSA, and that AFN's own CBLUP was defunded by Ontario that the Proponent should also recommend that AFN be involved in land and resource use planning activities to manage new development that may occur due to the Project, at least within AFN and MFFN's shared territory.
94	Draft EA-IS Document	8.3.9.6, p. 367	**Comment:** Section claims that trapping is less common due to decline in fur prices and rising cost of inputs and then states, "Trapping is now largely recognized as a pastime and a way to preserve Indigenous culture and not a commercial activity." This framing could be interpreted to undermine AFN band members Aboriginal and treaty rights, and the importance of trapping as a method of cultural expression, continuity and education.	**Context:** Trapping, like hunting, fishing and gathering, is a way of life for AFN band members and is enshrined in their Aboriginal and treaty rights. The current decline in the economic value of trapping should have no bearing on the Crown's duty to ensure that trapping is protected and that any potential impacts to trapping by the Project are understood and mitigated. **Recommendation:** The section should be rewritten to emphasize the importance of trapping as a way of life for First Nation peoples in the region, and to recognize the potential land use incompatibility between the Project and trapping.
95	Draft EA-IS Document; Appendix U-Land Use	10.4.8, p. 837; 7.2.7, pp. 118 - 124	**Comment:** Draft EA/IS states "the total area removed/potentially disturbed by the combined projects is still relatively small compared to the size of the trapping tenure. As such, the cumulative effect is low to moderate in magnitude and considered to be non-significant." However, the Draft Land and Resource Technical Support Document states that for each trapline that intersects the LSA, specific information from the trapline holder was unavailable, with no comment about if or how the Proponent attempted to engage trappers.	**Context:** AFN does not agree that the Proponent can make the assertion that impacts to trapping will be "non-significant" without conducting meaningful consultation with trapline holders in the LSA. Consultation to determine the level of significance of impacts must consider *where* trappers set up their traplines within their tenure, and other factors that influence this geography, including quality of the area for the purpose of trapping, location of furbearing animals, travel and transportation routes, overnight locations and areas of cultural significance. Furthermore, the opening up of the area to other travelers and land users by the Project indicates a significant potential for cumulative impacts that could put stress on furbearing animal populations. **Recommendation:** AFN asks that the Proponent provide a detailed rationale as to how they have determined that cumulative impacts to trapping will be non-significant, provide further opportunities to consult with trapline holders, particularly AFN band members who are the

				trapline holders for [redacted] and to commit to a follow-up monitoring program to capture the ebb and flow of furbearing population sizes over at least the
96	Appendix U-Land Use	Table 7-3, p. 137	**Comment:** An Environmental Protection Plan will be implemented, in part, to address and mitigate potential impacts to trapping in the LSA during the construction phase.	**Recommendation:** AFN would like to be included in the development of any Environmental Protection Plan for the LSA, especially as it pertains to access restrictions and operational considerations such as speed limits. AFN would also like these measures, or similar, to pertain to the operations and maintenance phase of the project.
97	Appendix U-Land Use	Table 7-3, p. 138	**Comment:** In determining potential effects on trapping during the operations and maintenance phase, impacts from dust were not considered.	**Recommendation:** Consideration of potential impacts to trapping should include effects from dust to trapping, including impacts directly to trappers on the land and to the populations of furbearing mammals.

16.0 HUMAN HEALTH

16.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

It is important to consider the definition of health beyond a physical or mental state. Individual and community health is intrinsically tied to the health of spirit, culture, and the lands and waters. Colonial influences have impacted all of these components of health, and continue to perpetuate pressures and shifts socially, economically, and environmentally that cumulatively impact the health of AFN members.

16.2 EVALUATION OF IMPACTS TO AROLAND FIRST NATION

The Draft Community Well-Being Technical Support Document (Appendix T), which forms the basis of the assessment of Project impacts to human health for the Draft EA/IS, did not include a comparison of field study data against applicable human health risk-based standards. The exclusion of this information from the assessment makes it very difficult to accurately and appropriately assess the potential risks to human health, and therefore the impacts to AFN. Additionally, no country foods dietary surveys or country foods sampling programs have taken place to inform the human health risk assessment process. Without this essential baseline data on the existing conditions, it is difficult to determine potential exposures to contaminants during the Project construction and operation. This lack of data will also make it impossible to determine if food consumption patterns shift as a result from the Project's effects (real and/or perceived) on country food quantity and/or quality. Until this additional data is collected and appropriately evaluated, the potential impacts to AFN members' health is uncertain.

16.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 9. BASELINE CONDITIONS – HUMAN HEALTH

- *Provide the approximate number, distance and identity factors of likely human receptors, including any foreseeable future receptors, that may be impacted by changes in air, water, country food quality (e.g., dust deposition on vegetation), and noise levels. At minimum, provide a map showing approximate locations of permanent residences, temporary land uses (e.g., cabins and traditional sites) and known locations of sensitive human receptors (e.g., schools, hospitals, community centres, retirement complexes or assisted care homes);*
- *Describe drinking water sources which may be effected by the Project, including surface and/or groundwater (permanent, seasonal, periodic or temporary), their distance from project activities and approximate wellhead capture zones;*

- *Provide baseline contaminant concentrations in drinking water and in the tissues of country foods (traditional foods) consumed by Indigenous groups and local communities. For game animals, the proponent is expected to work with local Indigenous groups to gather tissues samples, as appropriate;*
- *Describe the consumption of country foods (traditional foods) outside of the commercial food chain, including food that is trapped, fished, hunted, harvested or grown for consumption, medicinal purposes or has cultural value. Specify which species are used, quantities, frequency, harvesting locations, and how the data were collected (e.g., site specific consumption surveys);*
- *If a Human Health Risk Assessment is required, provide baseline contaminant concentrations in the tissues of country foods (traditional foods) consumed by Indigenous groups and local communities; and*
- *Describe the status of food security and food sovereignty within the Indigenous groups and local communities.*
- *The proponent should refer to Health Canada guidance documents such that best practices are followed in the collection of baseline information to assess real and perceived project related impacts to human health due to changes in air quality, noise, drinking and recreational water quality, country foods and/or multiple pathways of exposure to contaminants. The proponent should provide a detailed rationale/explanation for any deviation from recommended baseline characterization approaches and methods, including from Health Canada's guidance, or when determining such characterization is not warranted.*

IMPACT ASSESSMENT TISG – SECTION 16 EFFECTS TO VALUED COMPONENTS – HUMAN HEALTH

- *Within the context of the predicted changes to the biophysical environment, social and economic conditions resulting from the Project, the proponent must assess the adverse and positive effects of the Project on human health, particularly regarding the effects of the higher-level health determinants on well-being.*
- *The assessment must consistently take into account real and perceived risk and carry out baseline studies using recognized methodological best practices and as reflected in these guidelines, to determine perceived risk.*
- *The proponent must describe how community and Indigenous knowledge was used to collect baseline data and assess health effects and disaggregate the source of community or Indigenous knowledge, as well as social, economic, and health data, by representation by sex, age and other community relevant identity factors to support identification of disproportionate effects through the application of GBA+.*

IMPACT ASSESSMENT TISG – SECTION 16.1 BIOPHYSICAL DETERMINANTS OF HEALTH

- *Provide an assessment of adverse and positive effects on human health in consideration of, but not limited to, potential changes in: o air quality66 67; o noise exposure; o effects of vibration; o current and future availability (including contamination/quality) of country foods (i.e., food that is trapped, fished, hunted, harvested or grown for subsistence, cultural or medicinal purposes); and o current and future availability (including contamination/quality) of water for drinking, recreational and cultural uses.*
- *Identify predicted effects of the Project on the quality and quantity of ground or surface water used for domestic uses based on the most stringent guideline values of the following criteria; Canadian Drinking Water Quality Guidelines (CDWQG), Ontario Drinking Water Quality Standards (ODWQS), or Ontario Soil, Groundwater and Sediment Standards (SGSS);*
- *Describe and quantify the health risk from exposure to COPCs (e.g., arsenic, chromium, mercury) via consumption of country foods and differential risk for vulnerable subgroups;*
- *Conduct a problem formulation exercise/preliminary model predictions to determine whether a Human Health Risk Assessment is required. The proponent must provide a rationale/explanation if problem*

formulation/preliminary model predictions indicate that a Human Health Risk Assessment is not warranted;

- *Provide a detailed rationale/explanation if a determination is made that an assessment of any COPCs (e.g., arsenic, chromium, mercury) or exposure pathways should be excluded and/or screened out of the assessment and if the proponent decides to deviate from the suggested assessment approaches and methods or determines that such assessment is not warranted;*
- *Describe and quantify the project-related activities, and provide an inventory of contaminants of potential concern and their sources, potential exposure pathways, adverse human health effects and the potential human receptors of these effects;*
- *Describe nuisances and environmental, social and economic changes that could potentially be sources of adverse human health effects and the potential human receptors of these effects;*
- *In situations where project related air, water or noise emissions meet local, provincial, territorial or federal guidelines, and yet public concerns were raised regarding human health effects, provide a description of the public concerns and how they were or are to be addressed;*
- *Food security: describe effects to availability, use and consumption of country foods (traditional foods) and health impacts of this effect; and*
- *Describe any project-related changes that may result in positive health effects.*

IMPACT ASSESSMENT TISG – SECTION 20 MITIGATION AND ENHANCEMENT MEASURES

- *Propose mitigation measures to reduce all potential adverse effects to health conditions of all potentially impacted communities and Indigenous groups and present opportunities for enhancing positive effects;*

IMPACT ASSESSMENT TISG – SECTION 21 RESIDUAL EFFECTS

- *Characterize residual effects for human health using human health-related criteria most appropriate for the carcinogenic and non-carcinogenic health effects of non-threshold contaminants*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 7.2 POTENTIAL ENVIRONMENTAL EFFECTS

- *Changes in air quality, noise levels and water quality*
- *Changes to public health and community safety*
- *Changes to diet*

16.2.2 IMPACTS TO LAND USE AND OCCUPANCY

- N/A

16.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

AFN is concerned by extensive deficiencies related to assessment of human health in comparison to the guiding TISG and TOR, a well as the overall lack of assessment of impacts and corresponding

mitigation measures. Prior to the final EA/IS being submitted, AFN requires that the following recommendations be implemented by the Proponent:

- Completion of the human health sections of the EA/IS such that all requirements from the guiding TISG and TOR are fulfilled.
- All available field study data must be screened against the human health risk-based standards and included in the problem formulation, with a corresponding quantitative human health risk assessment if deemed appropriate based on the screening.
- Completion of a country foods study for AFN, including the determination of the current baseline of traditional food consumption patterns from AFN members, regular ongoing monitoring of consumption patterns and attitudes toward harvesting traditional foods through a representative dietary survey (including behavioural shifts in consumption due to both real and perceived contamination), and adequate baseline and ongoing sampling of the tissues of traditional foods.
- Completion of a quantitative human health risk assessment for inhalation of vapours and/or suspended particulates in air.
- An evaluation of how climate change exacerbates potential predicted effects to human health.

16.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 14: Comment and Recommendations Table for Human Health Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
98	Appendix T – Draft Community Well-Being Technical Support Document	Table 4-1, p. 16	**Comment:** Traditional foods is listed as a VC, with the rationale for selection being the potential for contamination due to construction and operations activities, and availability changes due to habitat disturbance or increased harvesting pressure. The potential for changes in availability of traditional foods as a result of behavioural shifts from perceived contamination has not been considered.	**Recommendation:** AFN requests that the community well-being study assess the potential for changes in consumption of traditional foods due to behavioural shifts related to perceived contamination. The assessment should include a current baseline of traditional food consumption patterns for AFN members, with regular future monitoring of consumption patterns and attitudes towards harvesting traditional foods to appropriately determine if shifts in behaviour have occurred as a result of the Project, and/or as a cumulative effect from multiple future projects within AFN's Traditional Territory.
99	Appendix T – Draft Community Well-Being Technical Support Document	Table 4-8, p. 34	**Comment:** The magnitude definitions for the "Consumption of Traditional Foods" VC is based on only improved access to traditional harvesting sites and the potential positive effects that may arise from the Project. The definitions do not consider the potential for negative effects to the consumption of traditional foods.	**Recommendation:** In order to properly and fully assess the potential impacts of the Project on AFN, it is important that both positive and negative effects are discussed and defined in the IA process. The magnitude definitions for the "Consumption of Traditional Foods" VC should include the possibility for potential decreased availability of traditional foods as a result of increased external pressures, perceived and/or actual contamination and food quality risks, decreased availability of traditional foods because of direct project impacts to the quantity of harvested species, etc.
100	Appendix T – Draft Community Well-Being Technical Support Document	5.1.11.2, p. 115	**Comment:** AFN members have expressed concerns about contamination in traditional foods, however no contaminant analyses have taken place to form a baseline of existing conditions for traditional food contaminant concentrations.	**Context:** Despite the concerns that have been expressed by AFN members regarding contamination of traditional foods from glyphosate and various industries, no baseline data on existing conditions has been collected for tissue concentrations for key harvested species, nor has a baseline traditional foods consumption survey been completed. **Recommendation**: AFN requests that these traditional foods assessments take place, so that appropriate mitigation measures can be implemented, if necessary, to minimize potential cumulative effects on AFN member concerns with traditional foods and further shift consumption patterns away from traditional foods to purchased foods.
101	Appendix T – Draft Community Well-Being Technical Support Document	General Comment (applicable throughout Appendix T)	**Comment:** No screening of available field study data against human-health risk-based standards has been completed for inclusion in the problem formulation, nor has a country food sampling program and accompanying traditional food consumption survey taken place.	**Context:** It is imperative that the existing baseline conditions are appropriately characterized prior to Project approval decisions, so that risks can be fully understood and mitigated against. Without this information, it is difficult to fully appreciate what health risks might arise from the MFCAR construction and operations, and would make it nearly impossible to determine if Project effects are realized. As per the Tailored Impact Statement Guidelines, there is a requirement from IAAC for the Project Draft EA/IS to describe and quantify the health risk from exposure to COPCs via consumption of country foods, and include an assessment of

				differential risk for vulnerable subgroups. Prior to any approval decisions being issued for the Project, AFN requires that: • **Recommendation a:** Available field study data is screened against human health risk-based standards and included in the problem formulation, with a corresponding quantitative human health risk assessment if deemed appropriate based on the screening. AFN requests an opportunity to review and provide input and comment to the screening outcomes and potentially accompanying risk assessment. • **Recommendation b:** A country food sampling program is undertaken, with meaningful input from AFN on its design and implementation, to determine a baseline for contaminant concentrations in the tissues of traditional foods harvested by AFN members. The sampling program must consider the specific parts of the plants and animals that are consumed by AFN members, be adequately representative of the species consumed (e.g., statistically significant sample sizes for the species being analyzed), and appropriately reflect the seasons in which they are harvested and consumed. The data resulting from the country food sampling program must be assessed as part of the problem formulation, and be used as a baseline of conditions for comparison in future, ongoing monitoring programs aimed at assessing potential impacts of the Project. • **Recommendation c:** A household dietary survey is undertaken, with appropriate representation from AFN members, that is used to assess potential exposures in the human health risk assessment. The survey must be designed such that it can be replicated in the future, to monitor potential shifts in traditional food consumption patterns resulting from the Project, its contribution to cumulative effects within AFN's Traditional Territories, and potential behavioural shifts from perceived effects to traditional food quality.
102	Appendix T – Draft Community Well-Being Technical Support Document	Attachment A – Draft Problem Formulation for Human Health Risk Assessment, Table 9-1, p. 102	**Comment:** Table 9-1 suggests that a quantitative human health risk assessment should take place for the inhalation of vapours and/or suspended particles in the air. There is no mention of if and when such a risk assessment will take place.	**Recommendation a:** As per the recommendation in Table 9-1, AFN requires that a quantitative human health risk assessment for inhalation of vapours and/or suspended particulates in air be completed, prior to a Project approval decision. **Recommendation b:** AFN requests sufficient time and opportunity to review and provide comment on future human health risk assessments that will be completed as part of the EA process for this Project.
103	Appendix T – Draft Community Well-Being Technical Support Document	General Comment	**Comment:** There is no information on how climate change may contribute to the Project's potential impacts to human health.	**Recommendation:** AFN requests that the assessment of community well-being, and in particular the assessment of biophysical determinants of health, explicitly identify and evaluate potential impacts or exacerbation of predicted effects to human health due to climate change.

17.0 VISUAL

17.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN understands that the Project will result in visual impacts on the landscape throughout the construction and operational phases. AFN does not have concerns with the methodological approach that the Proponent used to determine the level and magnitude of the visual impacts. However, the Proponent did not include analysis of AFN's cultural values within the PSA or CDA that AFN provided as part of their IKLUS.

17.2 EVALUATION OF IMPACTS ON AROLAND FIRST NATION

AFN is unable to accurately evaluate the Proponent's characterization of visual impacts because AFN's data has not been included in this analysis. The final EA/IS must include AFN's mapped values in this analysis and edits to the Visual Technical Report based on AFN's data must be identified to AFN.

17.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 8.1 ATMOSPHERIC, ACOUSTIC, AND VISUAL ENVIRONMENT

- *provide the approximate number, distance and identity factors of likely human receptors, including any foreseeable future receptors, that may be impacted by changes in air, water, country food quality (e.g., dust deposition on vegetation), and noise levels. At minimum, provide a map showing approximate locations of permanent residences, temporary land uses (e.g., cabins and traditional sites) and known locations of sensitive human receptors (e.g., schools, hospitals, community centres, retirement complexes or assisted care homes).*

IMPACT ASSESSMENT TISG – SECTION 12.2 CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES

- *access to resources (e.g., physical access to harvest specific species, culturally important harvesting locations, timing, seasonality, distance from community);*
- *the experience of the practice (e.g., connection to the landscape without artificial noise and sensory disturbances, air quality, visual landscape, perceived or real contamination, etc.); and*

- *other current uses identified by Indigenous groups.*

IMPACT ASSESSMENT TISG – SECTION 12.4 CONDITIONS RELATED TO THE RIGHTS OF INDIGENOUS PEOPLES

- *the experience associated with the exercise of rights (e.g., noise and sensory disturbances, air quality, visual landscape);*

IMPACT ASSESSMENT TISG – SECTION 14.1 CHANGES TO THE ATMOSPHERIC, ACOUSTIC, AND VISUAL ENVIRONMENT

- *describe consultation with regulators, stakeholders, community groups, landowners and Indigenous groups about potential effects to the atmospheric, acoustic, and visual environment*

IMPACT ASSESSMENT TISG – SECTION 16.2 SOCIAL DETERMINANTS OF HEALTH

- *identify predicted visual or other aesthetic effects of the project on existing land use in the study area;*

IMPACT ASSESSMENT TISG – SECTION 19.1 EFFECTS TO INDIGENOUS PEOPLES

- *cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance to groups, including, but not limited to:*
    - *visual aesthetics over the life of the Project and post-Project abandonment or decommissioning.*

ENVIRONMENTAL ASSESSMENT TOR – SECTION 7.2 POTENTIAL ENVIRONMENTAL EFFECTS

- *Alteration of existing landscape and visual character of the area (e.g., scenic values and viewpoints)*

17.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

- The final report must include any cultural heritage values identified in AFN's IKLUS that may be within the CDA or PSA, including evaluation for magnitude of impact.
- The Proponent must invite AFN monitors to participate in any work related to ground truthing to identify potential effects to sensitive receptors and commit to providing adequate capacity funding for AFN's participation.

17.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 15: Comment and Recommendations Table for Visual Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
104	Appendix V- Visual Technical Report	Table 7-1, p. 76	**Comment:** Table lists Cultural Heritage Sensitive Receptors by segments throughout the proposed right of way within the PSA and CDA. The table does not include sites identified by AFN's IKLU study.	**Recommendation:** The final report must include any cultural heritage values identified in AFN's IKLU study that may be within the CDA or PSA and evaluate for magnitude of impact. Edits to this table must be identified to AFN.
105	Appendix V – Visual Technical Report	Table 7-2, pp. 101-104	**Comment:** Mitigation measures for Cultural Heritage Resources includes ground truthing sensitive receptors within CDA.	**Recommendation:** The Proponent must invite AFN monitors in any work related to ground truthing to identify potential effects to sensitive receptors, including the provision of adequate capacity funding for AFN participation.

18.0 ABORIGINAL TREATY RIGHTS AND INTERESTS & INDIGENOUS KNOWLEDGE

18.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

The lack of AFN comments and recommendations in this review related to the integration of Indigenous Knowledge must not be interpreted by the Proponent nor the Crown as AFN accepting the contents of the draft EA/IS.

AFN was unable to review and provide comment on the majority of the draft EA/IS related to the inclusion of Indigenous Knowledge given the Project team's failure to integrate the information provided in the Aroland First Nation Indigenous Knowledge and Land Use Study for the Marten Falls Community Access Road submitted in September of 2024. This Study provides critical information for the EI/IS related to AFN's Indigenous Knowledge of the area, including areas of land use and occupancy as well as cultural values of significance. Further, the Aboriginal and Treaty Rights and Interests (ATRI) report was not included as part of the draft EA/IS technical documents, rendering AFN unable to review this information.

The Project team informed AFN that the ATRI would be made available, and AFN's input included in the draft EA/IS, at a later date with an independent timeline for review. AFN does not agree with this approach as both the information provided in the ATRI and integration of AFN's Indigenous Knowledge in the draft EA/IS are critical to informing the Proponent's interpretation of potential impacts on AFN's Aboriginal and Treaty Rights. As a result, AFN has determined their only option is to wait for the ATRI to be made available, and their Indigenous Knowledge appropriately integrated into the EA/IS, to conduct a fulsome technical review. The EA/IS must not be approved in any way without the integration of AFN's Indigenous Knowledge.

19.0 ARCHAEOLOGICAL ASSESSMENTS

19.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

The lands and waters within the Study Area include a significant portion of AFN's Traditional Territory, where its members have hunted, fished, trapped, gathered, travelled, and lived for time immemorial, creating many sites of cultural and archaeological importance, including historic settlements, camps, burial grounds and more. Many of AFN's sites of cultural and archaeological importance have been documented as part of their IK mapping, but believe that there are many more important sites that could be impacted by the Project. AFN requires that they be actively involved in the identification of sites before, and during any activity undertaken on the ground by the Project.

19.2 EVALUATION OF IMPACTS ON AROLAND FIRST NATION

The Project has the potential to significantly impact sites of cultural and archaeological importance to AFN, including historic settlements, camps, burial grounds and more. Because the Proponent has not integrated AFN's IK data into the draft EA/IS, they do not consider AFN's mapped cultural values in identifying potential sites, and falls short of best practices for understanding and protecting the full archaeological history of the region. The report does not consider how the land may have changed over time over the past several thousand years, and how that may have influenced patterns of settlement and movement. Nor are human disturbances like dam construction and the resulting fluctuation in water levels considered in understanding how the environment may have looked differently in the past.

19.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

AFN is concerned by the lack of engagement undertaken by the Proponent to identify and u\nderstand potential cultural heritage and archaeological sites located within the Study Area, as well as the lack of inclusion of AFN's IK and cultural heritage data shared with the Proponent in September, 2024. As a condition for approval, AFN would like to see the following actions:

- The Proponent must provide AFN with the opportunity to fully participate in all activities undertaken to locate and identify potential archaeological sites within the Study Area. The Proponent must also provide AFN with the opportunity and capacity to ensure that monitors can be present during work activities to ensure that all archaeological protocols are followed in order to protect AFN's cultural and archaeological heritage resources.

- Inclusion of AFN's cultural values mapping and IK information into the analysis of important archaeological sites and heritage resources within the Study Area

19.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 18: Comment and Recommendations Table for Archaeological Assessment Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
106	Appendix Q: Draft Cultural Heritage Technical Support Document	Page 9; Table 8-1, pp. 74	**Comment:** The Draft Cultural Heritage Technical Support Document has identified one site of cultural significance for AFN. This is not accurate or reflective of the information that AFN provided in the MFCAR IK report in September 2024 It is expected that the information from AFN is included and an updated comprehensive assessment will be completed prior to the final EA being released.	**Recommendation:** The Proponent must consider all information provided in the AFN as it relates to sites of cultural heritage as identified in the Draft Cultural Heritage Technical Support Document (harvest areas, travel routes, habitation areas, and cultural, spiritual, and sacred sites.
107	Appendix R – Archaeological Assessments – Stage 1 (P438-0207-2020)	Section 1.3.1.1	The report presents the notion that the current environment is the same as it would have been 2,000 – 5,000 years ago and does not account for changes to the landscape, especially as a result of human disturbance through damn construction and the fluctuation of water levels.	**Recommendation:** The report should be updated to reflect how the environment would have looked in the past, and must consider the impacts of human disturbances on the landscape.
108	Appendix R – Archaeological Assessments – Stage 1 (P438-0207-2020)	Section 1.1.1	The use of LiDAR is not discussed. The assessment relied on Satellite Imagery but neither the source of the imagery nor the resolution is disclosed.	**Information Request:** The Proponent must explain why LiDAR, which is more reliable than satellite imagery and topographical maps was not used. Regarding the use of satellite imagery, the Proponent must disclose the source of the imagery and the resolution of the images.
109	Appendix R – Archaeological Assessments – Stage 1 (P438-0207-2020)	Section 1.3.3	The report only lists four registered archaeological sites within 50 km of the Study Area. The rationale for the low number of sites is the lack of development in the area as well as the effects of fluvial processes that could have washed sites away. However, consideration is not given that these areas have just not been examined extensively for archaeological resources because of the lack of development. This should be considered a bias- the lack of sites does not mean that there aren't many more that have not been discovered and/or documented.	**Recommendation:** The Proponent needs to clarify how they have considered the potential for archaeological sites that have not yet been identified within the LSA. The Proponent must include AFN and AFN band members in the identification of additional potential sites and must describe how AFN's IK data has been considered in site identification.
110	Appendix R – Archaeological Assessments – Stage 1 (P438-0207-2020)	Section 2.3	The report does not give consideration for navigable waterways, nor does it include discussion about how lands were used in the past and what might be important to Indigenous peoples as they travelled the landscape.	**Recommendation:** The Proponent should conduct physical inspection of all areas that require shovel testing as a means to narrow down what needs to be tested in greater detail. Not every water body would have been used in the past and may not be appropriate for testing, but must be considered with regards to how Indigenous people utilized the landscape and waterways.
111	Appendix R – Archaeological Assessment – Stage 2 (P438-0225-2020)	Executive Summary	The report does not explain efforts to include Indigenous participation in the field assessment. AFN members have a vast amount of information of the area that could be vital to the interpretation of archaeological potential.	**Recommendation:** The Proponent must explain how AFN band members' knowledge and information of the LSA has been incorporated into identifying sites of archaeological potential.

112	Appendix R – Archaeological Assessment – Stage 2 (P438-0225-2020)	Section 3.1	The report states that an artifact was found during a beach survey but does not specify what type of survey or follow up testing was conducted. Was it a pedestrian surface find? Was it found in a shovel test pit? If it was found on a beach was there subsequent shovel testing? The report stats that investigators walked the area- was that all that was done?	**Question:** Please provide more detail about the manner in which the artifact was discovered and the tests that were conducted as a result of the find.

20.0 CLIMATE CHANGE & RESILIENCY

20.1 SUMMARY OF AROLAND FIRST NATION'S PERSPECTIVE

AFN recognizes the importance of climate change adaptation measures in ensuring that the MFCAR remains operational and resilient in the face of changing conditions and increasingly frequent climate events such as wildfire, increased precipitation, extreme heat, and more. As climatic conditions and events evolve, AFN also appreciates the necessity of shifting and reassessing approaches to climate change adaptation and resiliency. It is AFN's priority to ensure that decisions surrounding climate change as it relates to the MFCAR, including the implementation of adaptation measures, are made in a way that is collaborative and respects AFN rights and interests, and draws on the Indigenous Knowledge shared by community members. AFN must be included as a party in the decision-making process for any climate change related decisions.

20.2 EVALUATION OF IMPACTS ON AROLAND FIRST NATION

While climate change adaptation measures are necessary for ensuring the resiliency of the MFCAR into the future, AFN has outstanding concerns surrounding how the proposed climate change adaptation measures may impact AFN and the surrounding environment. It remains unclear how some proposed climate change adaptation measures (e.g. fire breaks, vegetation trimming and control) might impact the surrounding land and wildlife, and in turn, AFN community members who rely on them.

Climate change and the development of the MFCAR in combination have the potential to change patterns of access and travel throughout the region. AFN is concerned that where warmer winters due to climate change mean that areas accessed by winter roads are becoming less accessible, areas surrounding the MFCAR will become more accessible. There is potential that non-Treaty Nine members, with increased access to AFN's Territory, facilitated by the MFCAR, will use the territory for harvesting (hunting, fishing, gathering), which could put increased pressure on areas surrounding the MFCAR and AFN's Aboriginal and Treaty Rights.

To ensure these impacts are appropriately avoided and mitigated where appropriate, it is critical that AFN be included in decision-making and monitoring processes related to climate change impacts and adaptation.

20.2.1 ASSESSMENT DEFICIENCIES

Through AFN's review of the Draft EA/IS, and in comparison to the guiding TISG, TOR, and Best Practices or AFN Expectations, the following items were found to be absent or deficient:

IMPACT ASSESSMENT TISG – SECTION 23.2 EFFECTS OF THE ENVIRONMENT ON THE PROJECT

- *identify the Project's sensitivities/vulnerabilities to change in climate (both in mean conditions and extremes such as short-duration heavy precipitation events), describe climate resilience of the Project and how climate change effects have been incorporated into the Project design (e.g., water crossings) and planning over the lifetime of the Project and describe the climate data, projections used, and related information used to evaluate these sensitivities (i.e., risks) over the full project lifetime;*

BEST PRACTICES OR AFN EXPECTATIONS

20.2.2 CUMULATIVE EFFECTS

Climate change will not only produce extreme weather events requiring adaptation as detailed in Section 12 of this assessment but will also exacerbate or otherwise interact with other environmental and human impacts. Given these interactions, climate change must be considered not only as a source of direct weather-related impacts but also part of the larger context of cumulative effects this Project exists in.

Climate events are also cumulative, in that they can co-occur spatially and temporally or create the conditions for new events. For example, extreme heat, drought, and wildfire are all interconnected and can amplify the severity and frequency of one another. From this perspective, the impacts of climate change must be assessed in combination and not as singular events.

Leveraging Indigenous Knowledge related to climate change and cumulative effects is necessary for understanding these interactions from a holistic perspective. While this assessment summarizes some Indigenous Knowledge related to climate change contributed by surrounding communities, further research is required to better understand how climate change might impact the road and what adaptation measures are appropriate for the surrounding environment.

20.3 AROLAND FIRST NATION'S RECOMMENDATIONS AND CONDITIONS FOR APPROVAL

AFN requires the following actions to ensure that issues related to climate change and resiliency are addressed:

- The Proponent should ensure Indigenous Knowledge is integrated alongside western scientific data in assessing climate change to more fulsomely leverage an Indigenous climate lens. Gaps in the Indigenous Knowledge included (i.e. areas that require further research) should be clearly identified in the assessment and accompanied by appropriate plans for follow-up to fill them in partnership with surrounding Indigenous communities.

- Decisions surrounding climate change adaptation measures, including their design and implementation, should be made in partnership with AFN, as a deciding party, to ensure that

they do not create additional impacts to the land and/or wildlife, or exacerbate changes already being experienced by community members in the region. A monitoring and decision-making framework should include:

    - Pathways for AFN to collect and share Indigenous Knowledge on an ongoing basis
    - AFN involvement and decision-making in ongoing monitoring and inspections
    - AFN inclusion as a decision-making party in any decision-making related to the creation of new adaptation measures or updates to existing adaptation measures

- The Proponent must provide further information surrounding how climate change and the development of the MFCAR in combination could change patterns of access and travel throughout the region.
- Follow-up and monitoring plans are critical in the context of climate change as conditions evolve over time. The Proponent must develop clear processes and protocols for follow-up and monitoring that include AFN participation and ensure:

    - Climate change projections and metrics are updated at regular intervals
    - New scientific findings and insights related to climate change adaptation measures are reviewed and included on an ongoing basis
    - Indigenous Knowledge is gathered and revisited on an ongoing basis to contribute further insight into changes on the land and the efficacy of adaptation measures

20.4 SPECIFIC COMMENTS AND RECOMMENDATIONS

Table 19: Comment and Recommendations Table for Climate Change and Resiliency Section

COMMENT #	DOCUMENT NAME	EA/IS SECTION REFERENCE	ISSUE	QUESTION/RECOMMENDATION
113	Draft EA/IS Document	12.1.4	**Comment:** Section 12.1.4 speaks about leveraging an Indigenous climate lens and the importance of Indigenous Knowledge in understanding climate change and associated potential impacts. However, it remains unclear how the Indigenous Knowledge related to climate change documented as part of this assessment and summarized in Section 12.1.4 was integrated in the process of characterizing impacts and developing adaptation measures related to the Project.	**Recommendation:** Indigenous Knowledge, including that shared by AFN, should be integrated alongside western scientific data in characterizing what impacts of climate change are already occurring or being experienced in the area, determining what areas or elements of the land surrounding the Project are vulnerable to further impacts of climate change, and developing appropriate adaptation measures. The assessment should clearly outline where and to what extent Indigenous Knowledge was used to draw conclusions and develop the recommended adaptation measures. If gaps exist where additional Indigenous Knowledge is needed to truly leverage an Indigenous climate lens for the MFCAR, the assessment should clearly identify these gaps and appropriate follow-up measures to address them in partnership with AFN.
114	Draft EA/IS Document	Table 12-3, Table 12-4	**Comment:** Table 12-3 and Table 12-4 identify climate change adaptation measures, but the assessment overall lacks detail surrounding how these measures might impact the land and environment (e.g. fire breaks, oversized culverts, vegetation trimming). Further, it does not consider how these measures might interact with ongoing changes already being experienced in the region and documented through Indigenous Knowledge.	**Context:** AFN supports the development of climate change adaptations to support the resilience of the MFCAR. It is AFN's view that such measures must be designed and implemented in a way that does not create additional impacts to the land and/or wildlife, or exacerbate impacts and changes already being experienced by community members in the region. For example, changes in stream flows and vegetation were identified as ongoing changes being experienced by Indigenous communities in the region in Section 12.1.4, which could be exacerbated by adaptation measures such as oversized culverts and vegetation control, respectively. **Recommendation:** The Proponent should identify how decisions surrounding the implementation of adaptation measures will be made, and what steps will be taken both prior to construction and on an ongoing basis to ensure potential impacts as a result of these adaptation measures are avoided or mitigated appropriately. Decisions surrounding their design and implementation should be made in partnership with AFN and draw on Indigenous Knowledge as appropriate.
115	Draft EA/IS Document	12.1.4	**Comment:** Climate change is anticipated to impact winter access roads to northern communities throughout the region. In combination with the development of the Project, this has significant potential to change patterns of travel and access throughout AFN's territory. The assessment largely focuses on direct impacts to the MFCAR as a result of climate change and does not consider this broader context.	**Context:** AFN recognizes the importance of the MFCAR in the context of climate change and reduced reliability of winter access roads throughout the region. However, AFN has outstanding questions surrounding how climate change is projected to impact existing winter access roads, and how this in combination with the creation of the MFCAR might change or redirect patterns of travel and harvest throughout their territory. For example,

				unreliable winter roads preventing access to some areas may redirect harvesters to those more easily accessed via the MFCAR in AFN territory. **Recommendation:** AFN seeks to better understand how climate change and associated impacts to surrounding winter access roads are anticipated to change patterns of access and use of the MFCAR in their territory. Ultimately, this should inform the development of appropriate mitigation, monitoring, and management plans in partnership with AFN to address potential issues related to increased access or use of AFN territory by non-AFN members facilitated by the MFCAR.
116	Draft EA-IS Document	Table 12-3, Table 12-4	**Comment:** The assessment of potential impacts to the MFCAR as a result of climate change, and development of associated adaptation measures, does not include clear plans or frameworks for follow-up, monitoring, or ongoing decision-making.	**Context:** AFN appreciates that adaptive management will be required to ensure the resilience of the MFCAR in the long-term and in the context of climate change. It is likely that the adaptation measures conceived of at this stage will need to change over time to account for new conditions and events. This will require follow-up and monitoring initiatives, as well as ongoing decision-making processes as new information emerges. **Recommendation:** AFN must be appropriately and meaningfully included in decision-making as it relates to climate change adaptation measures and the resiliency of the MFCAR on an ongoing basis. The Proponent should develop plans that include: • Pathways for AFN to collect and share IK of climate change and climate change impacts as they relate to the MFCAR to inform operations and maintenance decisions. • AFN involvement in ongoing monitoring and inspections related to climate change adaptation measures. • Processes for AFN to be included in decision-making related to the adjustment of existing adaptation measures, or development of new ones as climate and weather conditions change.
117	Appendix Y	8.0	**Context:** The Existing Conditions and Effects Assessment does not consider climate impacts from a cumulative perspective, or those that are spatially and/or temporally co-occurring: “The underlying assumption for this assessment was singularity – the events occur independently, successively, and without impacting one another.”	**Context:** Climate events do not occur in isolation, often interacting with or preconditioning one another and/or spatially and temporally co-occurring. Assuming that events occur in singularity does not create a holistic or accurate picture of how climate change and associated events are likely to occur as they relate to the MFCAR. **Recommendation:** AFN requests additional information surrounding how climate events are likely to occur from a cumulative perspective, and how this might impact the MFCAR. The Proponent should detail in the assessment how and to what extent the results of their analysis can be applied to the Project even with the understanding that climate events are likely to be preconditioned or co-occur spatially and temporally.
118	Appendix Y	9.0	**Comment:** The Existing Conditions and Effects Assessment acknowledges that the results of the risk assessment must be reviewed again as scientific findings, human behaviour, and site characteristics are altered. However, it	**Recommendation:** Due to the evolving nature of climate change and associated impacts, it is critical that the Proponent develop appropriate follow-up and monitoring measures to ensure that climate change data related to the MFCAR remains up to date. This will serve to ensure that mitigation adaptation measures are adjusted to account for changing conditions over time on a

	does not identify any measures for monitoring programs, follow-up, or future commitments.	proactive basis (i.e. looking ahead) rather than reactively (i.e. in response to events that have already occurred) to the extent possible. Follow-up and monitoring measures should include: • Revisiting climate projections and associated potential impacts from climate change as they relate to the MFCAR at regular intervals • Reviewing relevant scientific findings and new insights related to climate change adaptation measures for the MFCAR at regular intervals • Development of long-term climate monitoring initiatives with a focus on IK in partnership with AFN

BIBLIOGRAPHY

Andradóttir, H. (2017). Impact of Wind on Stormwater Pond Particulate Removal. *Journal of Environmental Engineering*, *143*(8). https://doi.org/10.1061/(ASCE)EE.1943-7870.000122

ECCC, MECP. (2022). Agreement for the Conservation of Caribou, Boreal Population in Ontario. Environment and Climate Change Canada and Ontario Ministry of the Environment, Conservation, and Parks. https://www.cclmportal.ca/sites/default/files/2023-05/s11_ontario.pdf

MECP. (2019). *Range Management Policy in Support of Woodland Caribou Conservation and Recovery*. Ministry of Environment, Conservation and Parks. https://www.ontario.ca/page/range-management-policy-support-woodland-caribou-conservation-and-recovery#:~:text=Woodland%20Caribou%20(Rangifer%20tarandus%20caribou,listed%20as%20endangered%20or%20threatened

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Invitation to Participate in Upcoming Archaeological Investigations

Andrew Peach <[redacted]> Mon, Jul 28, 2025 at 1:17 PM
To: "Lachance, Nolan" <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Chief Sonny Gagnon <[redacted]>, Lucia Jara Moreno <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Angelis, Niki" <[redacted]>

Hello Nolan,

Thanks for reaching out about this opportunity for Aroland to participate in the fieldwork for the upcoming archaeological investigations. I have spoken with him and can confirm that Aroland is interested in having a monitor participate in the fieldwork. The monitor would most likely be Jerry himself, and if he is not available he has a few other people in mind that could support.

Could you please reach out to Jerry with any other details that he would need to get set up to participate?

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[Quoted text hidden]

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Invitation to Participate in Upcoming Archaeological Investigations

Andrew Peach <[redacted]> Wed, Aug 6, 2025 at 4:03 PM
To: "Lachance, Nolan" <[redacted]>, Jerry Shabogamik <[redacted]>
Cc: Councillor Joe Baxter <[redacted]>, Councillor Mark Bell <[redacted]>, Ashley Childs <[redacted]>, Qasim Saddique <[redacted]>, Jennifer Bruin <[redacted]>, Chief Sonny Gagnon <[redacted]>, Lucia Jara Moreno <[redacted]>, "Trimble, Ingrid" <[redacted]>, "Angelis, Niki" <[redacted]>, "Price, Katelyn" <[redacted]>, "[redacted]" <[redacted]>, "Markham, Samantha" <[redacted]>

Hello Nolan,

I have just heard that Jerry is going to be off for the remainder of the week for personal reasons. I hope that you are able to accommodate him joining for the fieldwork when he has returned to work next week.

In the meantime, I can do my best to support with anything that you need from Aroland's perspective.

[Quoted text hidden]
[Quoted text hidden]

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Aroland - Community Updates

Andrew Peach <[redacted]> Wed, Aug 13, 2025 at 1:09 PM
To: "Lachance, Nolan" <[redacted]>
Cc: Lucia Jara Moreno <[redacted]>, Ashley Childs <[redacted]>

Hi Nolan,

I am available this afternoon for a short call if that works for you. After 2:30 works for me. Best to reach me directly on my cell at [redacted].

Speak with you this afternoon,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[Quoted text hidden]

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender immediately via email. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Archaeological Investigation Opportunities

Ashley Childs <[redacted]> Fri, Aug 22, 2025 at 11:21 AM
To: "Lachance, Nolan" <[redacted]>
Cc: Andrew Peach <[redacted]>

Hi Nolan,

Here is Jeff's email: [redacted]

Once I hear from Jerry on if Jeff has availability for Monday, I will be sure to let you know.

Have a great weekend.

Ashley

Ashley Childs, BMgmt | **Organizational Development Advisor**

(She/her – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

DILLON CONSULTING

Lachance, Nolan <[redacted]>

Fwd: Invoice: AFN Community Meeting

Andrew Peach <[redacted]> Thu, Aug 28, 2025 at 11:08 AM
To: "Lachance, Nolan" <[redacted]>
Cc: Lucia Jara Moreno <[redacted]>, Ashley Childs <[redacted]>, "Angelis, Niki" <[redacted]>

Good morning Nolan,

Thanks for reaching out. Unfortunately, I have not been able to make any progress as I have not been able to contact Jerry over the past few weeks. Hopefully I will be able to connect with him soon to get this addressed.

Thanks very much,

Andrew Peach, MSc | **Senior Planning Consultant and Project Director**

(He/him – why is this here?)

SHARED VALUE SOLUTIONS

[redacted]

[redacted]

www.sharedvaluesolutions.com

SVS is a certified B Corporation using the power of business

to solve social and environmental problems.

[Quoted text hidden]

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

B2.3 Community Specific Meeting Materials

Project Name:	Marten Falls First Nation (MFFN) All Season Community Access Road (CAR)	**Date of Meeting:**	February 20, 2025
		Time:	1:00-2:00 pm EST
		Project #:	[redacted]
Attendees:	Joe Baxter, Aroland First Nation Councillor Jerry Shabogamik, Aroland First Nation Consultation Coordinator Qasim Saddique, MFFN CAR Project Team Jennifer Bruin, MFFN CAR Project Team Bob Baxter, MFFN CAR Senior Community Member Advisor Ingrid Trimble, MFFN CAR Project Consultant Gabbie Ratajczak, MFFN CAR Project Consultant	**Location:**	Thunder Bay, Three Road Projects Gathering and Expo
		Prepared By:	Gabbie Ratajczak (MFFN CAR Project Consultant)

Absent:
N/A

Regarding: MFFN CAR Breakout Session at Three Road Projects Gathering and Expo

Notes of Meeting

Meeting Summary

The MFFN CAR Project Team (the Project Team) and representatives of Aroland First Nation privately met to discuss the Community Access Road and the Draft Environmental Assessment / Impact Statement (EA / IS) during the Three Road Projects Gathering and Expo.

Summary of Meeting Action Items

- N/A

Item #	Topic / Theme	Comments / Questions	Response / Action Items
1	Traffic	• What is the estimated traffic on the road once completed?	• The MFFN CAR Project Team indicated that Appendix W of the draft EA / IS includes information on MFFN's traffic assumptions and challenges. MFFN indicated that a previous traffic report had forecasted Annual Average Daily Traffic (AADT) of 500, while the Ministry of Transportation was suggesting an AADT of 1,000. Appendix W outlines MFFN's assumption of an estimated AADT of 700 for the north-south portion of the Community Access Road and 100 for the east-west portion. MFFN clarified that the volumes reflected an anticipated peak traffic in 2046.
2	Construction	• How long will it take to build the road once construction starts?	• Between 3-10 years for the MFFN CAR.
3	General Project	• What is the cost for building this road?	• The MFFN CAR Project Team indicated that information is confidential and that the final number will be different from the current number. The next 2-3 years will allow for the cost to be refined.
4	Socio-Community, Accidents and Malfunctions	• In the past our community has experienced chemical spills, and it wiped out the trout in the rivers. It took 70 years for the trout to return. We are unaware of what chemicals were used. Those are some concerns we have – what chemicals will the mines bring in	• There are ongoing discussions between MFFN and the province on the ownership and responsibility for the CAR. The legal perspective that the MFFN CAR received is that the liability associated with the development

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		the future? Additionally, what will the road bring? Aroland is going to be a doorway to the CAR. If accidents happen or drugs enter the community, there will be a liability. Many people have asked us who will be responsible for that.	of the CAR is very significant. All concerns will go to the provincial government as they are providing the funding. The conversations occurring are trying to have more active policing and having community members involved with continuous monitoring. These are some ideas proposed, but nothing has been decided yet.
5	Access, Security	• There also needs to be control in who is insured and ensure all are driving insured vehicles on the road, along with valid drivers licenses.	• All vehicles will need to be insured and all people driving on the road will need a drivers license. If people are not insured, they will be in violation of the Act.

Any errors or omissions please contact Gabbie Ratajczak within 2 weeks of distribution. Finalized meeting minutes will be included in the public Record of Consultation.

Marten Falls First Nation Community Access Road
Aroland First Nation Community Members Only Meetings
(Associated with Public Information Centre #6)
May 28 and 29, 2025
Summary Report

This summary report has been prepared to provide an overview of the feedback captured at the Aroland First Nation community members meetings on May 28, 2025, in Thunder Bay and May 29, 2025, in Aroland First Nation.

Timing and Location

Italian Cultural Centre
Thunder Bay, Ontario
May 28, 2025
5:00 p.m. – 8:00 p.m.

Johnny Therriault Memorial School
Aroland, Ontario
May 29, 2025
4:00 p.m. – 7:00 p.m.

Purpose

These meetings were planned for Aroland First Nation community members only. The content presented was related to Public Information Centre (PIC) #6 for the Draft Environmental Assessment / Impact Statement (EA / IS) of the Marten Falls First Nation (MFFN) Community Access Road. The purpose of the meetings was to provide updates on:

- Draft EA / IS review process, schedule, and ways to review and provide comments;
- How the Preferred Route was selected;
- Understanding potential effects and mitigations;
- The cumulative effects process and results;
- Final projects / activities considered as part of the Cumulative Effects Assessment;
- How the Community Access Road could affect community well-being for Marten Falls and nearby communities;
- Land and resource use;
- The opportunity to participate in a bridge / culverts navigability exercise;
- The opportunity to participate in the Country Foods Program; and
- How to provide input on the Draft EA / IS and upcoming activities.

Notices and Promotion

The meeting details were provided to the Aroland First Nation key community representative for distribution. Outreach consisted of an email with meeting details for each engagement along with a poster for distribution. The email notification showed the correct meeting dates (May 28, 2025, in Thunder Bay and May 29, 2025, in Aroland First Nation), however a typo on the poster led to a miscommunication around the Thunder Bay meeting date. As a result, Aroland First Nation members attended the MFFN Members meeting on May 27, 2025, in Thunder Bay, as well as the planned Aroland meeting on May 28, 2025. A copy of the poster is provided in **Appendix A** and email notification in **Appendix B**.

Format

The community meetings were held in an open house format and featured a series of display boards, large, printed maps as well as hand outs related to the Draft EA / IS, the Cumulative Effects Assessment and Community Well-Being studies. MFFN Community Access Road Project Team, including MFFN Senior Community Member Advisors (together hereafter referred to as the Project Team) and consultants, were available to guide attendees through the display boards and answer questions. Attendees were encouraged to review display boards and provide comments and feedback by having one-on-one discussions with the Project Team members and consultants.
The following printed materials were made available to attendees:

- Open house display boards;
- Frequently Asked Questions – Draft EA / IS;
- Draft EA / IS Executive Summary (English, Oji-Cree, and Ojibway);
- 11 plain language summaries (English, Oji-Cree, and Ojibway) including:
    - Archeology and Cultural Heritage
    - Climate Change Adaptation
    - Community Well-Being
    - Fish and Fish Habitat
    - Groundwater and Surface Water
    - Acoustics (Noise and Vibration)
    - Peatlands
    - Physiography, Terrain, and Soils and Vegetation
    - Ungulates
    - Visual Environment and Land and Resource Use
    - Wildlife and Birds
- Maps of: Preferred Route, tourism outfitter locations, Project Inclusions List (cumulative effects), water crossings and tissue sampling area;
- Cumulative Effects information sheet

- Community Well-Being Economics information sheet;
- Socio-Community Effects and Mitigations information sheet; and
- Feedback form.

All engagement materials shared are included in Appendix C; maps are included in Appendix D (maps with confidential information are not included in the appendix).

In addition to the display boards, there were additional opportunities for the Community Well-Being Teams to engage with Aroland First Nation community members through the Country Foods Program and Story Beads Exercise.

Country Foods Program

The Community Well-Being Team conducted a Country Foods Program where community members provided samples of foods that they had hunted, fished, or gathered from the land and water, including fish, wild plants, and animals. The purpose of collecting these samples was to assess existing contaminant levels, if any in traditional food species commonly harvested and consumed in the community. The collected samples included moose meat, beaver meat, pickerel / walleye, goose meat and wild blueberries. In total, 18 samples were collected.

These samples will help the Community Well-Being Team understand which contaminants may currently be present in local foods. This information will serve as a baseline before the Community Access Road is built, allowing Aroland First Nation to track any potential impacts over time.

Advertisements for the program were provided to the Key Contact for Aroland First Nation for distribution to their membership. Many participants learned about the program upon attending the meeting and were able to retrieve and provide samples within the meeting timeframe.

The samples are currently being tested. Once the results of the program are received, they will be shared with the community.

Story Beads Exercise

The Story Beads exercise was intended to create space for intergenerational dialogue and shared storytelling using beadwork as a metaphor. Participants were offered a variety of colored beads, each representing a theme (e.g., green = land, blue = water, yellow = food, purple = youth, red = healing, black = challenges, white = hope). Participants were asked to select 3 to 5 beads and string them onto a cord or safety pin and share the story or memory behind their choices, either by writing it down, drawing, or sharing with a facilitator. Aroland First Nation community members expressed strong interest in the Community Access Road, highlighting its potential to improve access to food, goods, services, and employment opportunities. There's a clear emphasis on preserving Indigenous Knowledge and traditions, with concerns about environmental impacts, especially related to water, wildlife migration and the Ring of Fire. Many also commented on the importance of cultural healing, traditional foods and maintaining connections between communities like Aroland First Nation and MFFN.

Attendance

Approximately 12 individuals attended the community meeting in Thunder Bay on May 28, 2025, and approximately 23 individuals attended the meeting in Aroland First Nation on May 29, 2025. However, due to a miscommunication regarding the date and time of the Aroland First Nation community members only meeting, members of Aroland First Nation attended the MFFN Members meeting on May 27, 2025, as well. Approximately 22 Aroland First Nation community members attended the meeting on May 27, 2025.

Paul MacInnis and Jason Frachette from the Ministry of Energy and Mines (MEM) were present at both meetings to provide a brief update and assist in answering questions from attendees.

Highlights of Participant Feedback

Attendees were encouraged to share their feedback, concerns and pose questions throughout the meeting or provide written feedback using the feedback form provided. Comments, questions or concerns from the meetings are included in this summary report. Key themes / items of interest raised by attendees are included below. Note that all questions are labeled with a 'Q', comments with a 'C' and answers with an 'A'. Questions were answered by the Project Team and consultants. Seven participants completed the feedback form that was available at the meeting. Please note comments and questions from Aroland First Nation members who attended the May 27, 2025, meeting are also captured below.

Community Well-Being: Country Foods Program

C: A community member noted that dandelions have many good properties.

C: A community member noted traditional medicine is found around Trebell Lake.
A: The information was documented.

C: A community member shared their concern for blueberries and how they may be impacted by the activities related to the Community Access Road. The individual was happy that the Country Foods Program was testing foods prior to the start of construction to document any changes. The community member was generally concerned about unintended consequences for the land and hopes that the planning is being done properly.
A: The Project Team recorded the comment and noted that impact to the land is being accounted for in the development of the Final EA / IS.

C: A community member inquired about why walleye was selected over other fish for the Country Foods Program.
A: It was noted that walleye was common in the area, especially at this time of year.

C: A community member discussed the healing properties of blueberries, specifically the use of blueberry stems for medicinal treatments in healing tea. The community member flagged the importance of collecting samples to ensure they are not negatively impacted by the road.

Community Well-Being: Health

C: A community member noted past instances where ponds that were previously drinkable water became contaminated due to dust and roads built in close proximity.
A: The concern was discussed with the community member and some mitigation measures described in the Draft EA / IS related to dust, including the use of dust suppressants that are free of chlorides were noted.

C: A community member noted the importance of traditional medicine, including the use of blueberries, dandelions, stinging nettle and tree bark for various healing purposes.

C: A community member shared a story about how blueberries have been sprayed by planes and that the group of people who ate those blueberries got sick.

Cultural Heritage

C: A community member provided information on a smallpox outbreak at Dusey Lake was shared. The outbreak took the lives of approximately 30 people and there are burial grounds there.

Land and Resource Use - Traplines

C: A community member noted a trapline used by her family and mentioned her plan to retire in the area, indicating a long-term connection to the area.
A: The area of the trapline was documented.

C: A community member provided information on a trapline located by Painter Lake, referred to as the "southern trap" or "bottom trap". He also noted its winter use.
A: The area of the trapline was documented.

C: A community member mentioned a trapline at the north with a canoe and boat route used as part of a circuit for portaging, accessing the Ogoki River.
A: The area of the trapline was documented.

C: A community member flagged and requested that trap lines be specifically considered in the project planning.
A: The MEM representative noted that existing conditions for trap lines, such as buffers and timer constrictions, are included in the Forest Management Plan, and the Community Access Road cannot go against this plan. It was suggested that the best approach is to get paperwork done through the Ministry of Natural Resources (MNR) to designate the head trapper for a trapline. The MEM representative offered to connect the community member to the appropriate person.

C: Several community members noted their knowledge of trap lines on the map including trapline 147 and one around Trebell Lake.
A: The area of the traplines was documented.

C: A community member mentioned accessing the Ogoki River via a trapline route that is part of a circuit used for portaging.
A: The area of the trapline was documented.

C: A community member raised concerns about traplines and future generation's ability to use them.

Water Crossings

The purpose of the water-crossing navigability exercise was to gather input on the uses or activities that are known to take place at specific water crossings that are being proposed for the Preferred Route. Please note that all information specific to water crossings was marked on the physical maps and transcribed into formal documentation. The water crossings map can be viewed in Appendix D. The following comments were made and documented.

C: A Community member provided information related to the southern crossings (Proposed Culvert Site: C01).

C: A community member specifically noted past problems with culverts causing flooding in Geraldton and preferred a bridge structure to allow boats /canoes through without flooding issues.
A: Local input from fishers, hunters, and trappers can help identify the right clearances for water crossings. While some traditional knowledge has been gathered, more details may be helpful during the detailed design phase. Hydraulic studies are conducted to assess whether culverts or bridges can handle expected water flows and designed to help reduce potential incidents of flooding.

C: Community members noted that many creeks are very narrow, necessitating portaging, sometimes using logs.

C: A community member provided feedback on site conditions near the south end of the route, indicating that it was very swampy and narrow. The area can accommodate canoeing and portaging, but not larger boats.

C: A community member shared concerns regarding the influence of the dam and stressed that the road design needs to take water level fluctuation into consideration.

C: A community member noted lots of people are travelling via canoe in the area south of Anaconda Road and from road to lakes.

C: A community member noted use of ski-doo, canoe, and trapping in the south portion of Anaconda Road and from road to lakes. He also noted moose hunting in this area.

C: A community member noted boat use, moose hunting, traditional medicine, canoeing, and portaging around Trebell Lake, specifying that no big boats can get to this area.

C: A community member noted that throughout the bush in the area, many people died a long time ago from pneumonia, suggesting there could be remains found.

C: A community member noted her parents' traditional area on the map as an area (noted areas used for canoeing, snowmobiling, and portaging. They also noted locations of burial sites that are present in the southern portion of the route.

Potential Effects

C: A community member conveyed that her daughter thinks the Community Access Road is a risk to the environment and has concerns.
A: The concerns were discussed with the attendee, and it was explained that the purpose of the EA / IS is to mitigate environmental impacts as much as possible. The attendee was encouraged to view the Draft EA / IS for information on her specific concerns.

C: A concern was raised about dust on vegetation due to the road.
A: Some mitigation measures described in the Draft EA / IS related to dust, including the use of dust suppressants that are free of chlorides were noted.

C: A community member emphasized the risk of contamination from machinery or people entering the area (e.g., seeds) and suggested that anything coming in should be cleaned beforehand.
A: Mitigation measures to prevent contamination outlined in the Draft EA / IS, including cleaning equipment were shared.

Other

Q: A community member asked if the proposed road connects Marten Falls and Aroland First Nation.
A: Where the Preferred Route would connect to Painter Lake Road was shown.

C: Several community members stated that they are supportive of the Community Access Road and believe it will promote employment.

Next Steps

The Draft EA / IS is available online. Feedback from community members was welcomed between February 18, 2025, and until the end of the review period on June 23, 2025. Community input during this time will help shape the Final EA / IS, targeted for release in 2026. Upcoming engagement opportunities were shared including a webinar on Land and Resource Use scheduled for Thursday, June 5, 2025.