

B4. Constance Lake First Nation

- B4.1 Outgoing Community Specific Correspondence
- B4.2 Incoming Community Specific Correspondence
- B4.3 Community Specific Meeting Materials

B4.1 Outgoing Community Specific Correspondence

From: Angelis, Niki [REDACTED]

Sent: Friday, August 9, 2024 9:47 PM

To: Jennifer Duncan [REDACTED]; Andrea Nokleby [REDACTED]

Cc: Kimberly Jorgenson [REDACTED]; Holly Pyhtila [REDACTED]; Alanna Robbins

[REDACTED]; Amanda Misnakoshkang [REDACTED]; Micheal Fisher

[REDACTED]; Bertha Sutherland [REDACTED]; [REDACTED] LRManager

[REDACTED]; Calvin Taylor [REDACTED]; Wayne Neegan [REDACTED]

Subject: RE: Request for hardcopy of EA and Draft copy of Table of Contents - MFCAR

Good afternoon Jennifer,

Thank you for your email and interest in reviewing the Draft EA / IS for the Community Access Road.

I have taken note of the 5 contacts (representing Matawa First Nations Management, Long Lake 58 First Nation, Constance Lake First Nation and Ginoogaming First Nation) who would like to receive hardcopies of the Draft EA / IS in November.

Please note, that the Draft is a very large document (close to 20,000 pages) and to expect it to be shipped in 3-4 bankers boxes.

If interested, the draft is also available to be shared on a USB storage drive.

As for the Table of Contents, I can certainly share a copy of that once it is finalised (likely in the fall, closer to the release of the draft).

Please let me know if you have any questions or requests.

Thank you again for your interest and have a lovely weekend,
Niki

Niki Angelis
Communication and Community Engagement

[REDACTED]



[REDACTED]

aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

From: Angelis, Niki [redacted]
Sent: Wednesday, September 11, 2024 10:24 PM
To: Jennifer Duncan [redacted]
Cc: Kimberly Jorgenson [redacted]; Holly Pyhtila [redacted]; Alanna Robbins [redacted];
[redacted]; Amanda Misnakoshkang [redacted]; Micheal Fisher [redacted];
[redacted]; Bertha Sutherland [redacted]; Andrea Nokleby [redacted];
[redacted]; LRManager [redacted]; Calvin Taylor [redacted]; Wayne
Neegan [redacted]
Subject: RE: Request for hardcopy of EA and Draft copy of Table of Contents - MFCAR

Good afternoon Jennifer,

I hope you are well.

I wanted to follow up with you regarding your earlier request from August 9, 2024 for the Table of Contents of the upcoming Draft EA / IS.

Please find the draft table of contents below and be advised that it is still subject to change:

1. Our Story
2. Why we need this road
3. Our roles
4. How we selected our road
5. Roles of the regulators
6. Our approach
7. The engineering of our road
8. Life on our land
9. How our road could change our land
10. Cumulative effects
11. How the environment and other factors can affect our road
12. We listened
13. Our changing climate
14. Contributions to sustainability
15. What is next

In addition to the above chapters there will also be supporting documents attached to the draft, including the technical reports of the valued component studies (this list is also subject to change):

- Water
 - Fish, Fish Habitat
 - Groundwater and Geochemistry
 - Peatlands
 - Surface Water

- People
 - Acoustic and Vibration Environment
 - Archaeology
 - Atmospheric and GHG
 - Cultural Heritage
 - Visual
 - Human Health
 - Social
 - Land and Resource Uses
 - Climate Adaptation and Resiliency
 - Economic
 - ATRI

- Land
 - Physiography, Terrain and Soils
 - Ungulates
 - Wildlife
 - Vegetation

Birds

Please let me know if you have any questions.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement





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From: Angelis, Niki [redacted] >
Sent: Wednesday, 25 September 2024 18:16
To: [redacted]
Cc: Bertha Sutherland; Monica John-George; Kimberly Jorgenson; Jennifer Duncan; [redacted] Alanna Robbins; qsaddique; Jennifer Bruin; [redacted]
Subject: MFFN Community Access Road – About the Draft EA / IS
Attachments: [redacted]

Dear Chief Richard Allen

I hope this email finds you well.

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,

Niki Angelis
Communication and Community Engagement

[redacted]



[redacted]

aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)



September 25, 2024



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

Dear Chief Richard Allen,

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).

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.

Phone: [Redacted]

Email: info@martenfallsaccessroad.ca

Web: <http://www.martenfallsaccessroad.ca>





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

Phone: [REDACTED]

Email: info@martenfallsaccessroad.ca

Web: <http://www.martenfallsaccessroad.ca>





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 and help coordinate the review of this and associated documents.

If you would like a Community Coordinator in your community, 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,



Qasim Saddique
Project Director



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
- Sasha McLeod, Special Project Officers, Ministry of the Environment
- Dorothy Moszynski, Special Project Officers, Ministry of the Environment

Phone: [REDACTED]

Email: info@martenfallsaccessroad.ca

Web: <http://www.martenfallsaccessroad.ca>





- Bertha Sutherland, First Nation Land Use Planning Coordinator, Constance Lake First Nation
- Monica John-George, Executive Director, Constance Lake First Nation
- Wayne Neegan, Constance Lake First Nation
- Roger Wesley, Lands and Resource Department Manager, Constance Lake First Nation
- Rosemary Moonias, Executive Assistant, Constance Lake First Nation
- Kimberly Jorgenson, Environmental Services Coordinator, Constance Lake First Nation
- Jennifer Duncan, Environmental Services Coordinator, Constance Lake First Nation
- Alanna Robbins, Engagement Specialist, Constance Lake First Nation

Phone: [REDACTED]

Email: info@martenfallsaccessroad.ca

Web: <http://www.martenfallsaccessroad.ca>





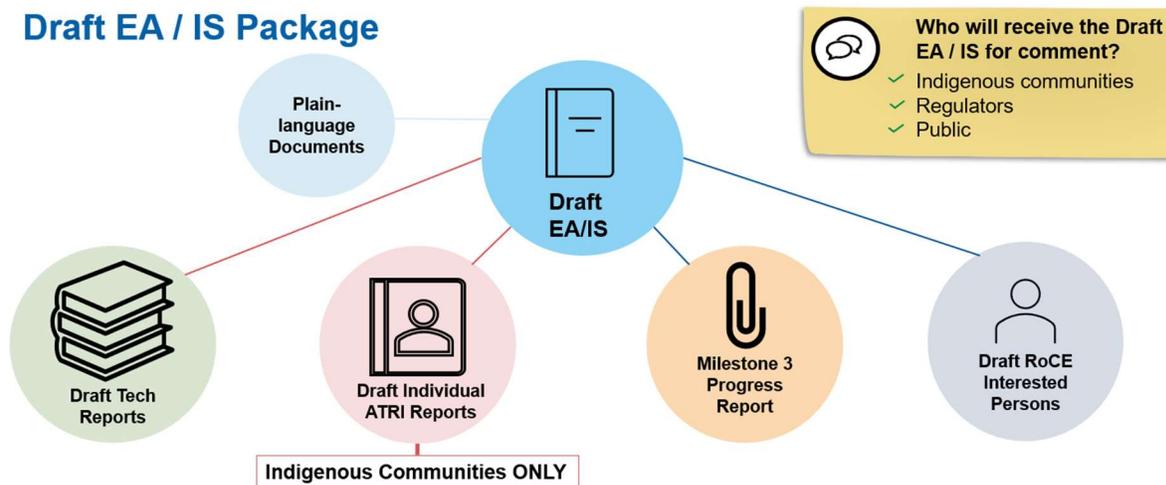
Frequently Asked Questions – Draft EA / IS

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.

Draft EA / IS Package



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.



Marten Falls First Nation Community Access Road: Draft EA / IS Submission

When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.

* Required

Privacy Statement

All comments, questions, and responses submitted for this survey will be collected and considered in the development of an Environmental Assessment / Impact Statement that will be a part of public record and will be made available to individuals or organizations with an interest in this project. Under the Freedom of Information and Protection Privacy Act, personal information such as name and address will not be included in the Environmental Assessment / Impact Statement but may be released, if requested in accordance with the Act, to any person as part of the review of the Environmental Assessment / Impact Statement.

1. Full Name (first & last)

Enter your answer

2. Email

Enter your answer

3. Community or Organization

Enter your answer

4. Please provide the name and contact information of the key contact who will be receiving the full Draft EA / IS including, Plain-language documents, 17 Technical

Reports, Individual ATRI Reports (by Community), Milestone 3 Progress Report, Record of Consultation and Engagement - Public (Approximately 20,000 pages)? *

Enter your answer

5. Please choose the format(s) you would like to receive the Draft EA / IS. *

Printed

Digital (USB)

Both

6. Plain Language Guides will be made available to Indigenous Communities. What traditional languages would you like these documents translated into? *

Cree (Swampy)

Oji-Cree

Ojibwe

7. Which studies is your community most interested in? Please select as many as you like. *

Noise and Vibrations

Groundwater and Geochemistry

Surface Water

Fish and Fish Habitat

Physiography, Terrain and Soils

Peatlands

Vegetation

Wildlife

Birds

Ungulates

Air Quality and Green House Gas

Land Use

Human Health

Social

Economics

Visual

Aboriginal and / or Treaty Rights Interests (ATRI) / Indigenous Knowledge

8. Would you like to organize a meeting(s) with the MFFN CAR Project Team to discuss receiving and reviewing the Draft EA / IS? *

Yes

No

You can print a copy of your answer after you submit

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From: Angelis, Niki [REDACTED]

Sent: Thursday, September 26, 2024 8:55 PM

To: LRManager [REDACTED] Chief [REDACTED]

Cc: Bertha Sutherland [REDACTED] Monica John-George [REDACTED] Kimberly Jorgenson [REDACTED]

[REDACTED] Jennifer Duncan [REDACTED] Wayne Neegar [REDACTED] Rosemary [REDACTED]

[REDACTED] Moonias [REDACTED] Alanna Robbins [REDACTED] qsaddique [REDACTED]

Jennifer Bruin [REDACTED]

Subject: RE: MFFN Community Access Road – About the Draft EA / IS

Hello Roger,

Thank you for your interest in learning about the Community Access Road.

We would be pleased to give a presentation about the Community Access Road to the Constance Lake First Nation community members.

Please let me know what dates might work for the community the week of October 14 or the week of October 21.

Please also advise if there are any particular topics you are interested in learning about so that I may ensure we invite the right consultants to speak.

I look forward to connecting with you soon.

Best,
Niki

From: Angelis, Niki [REDACTED]
Sent: Friday, 27 September 2024 21:36
To: [REDACTED]
Subject: FW: For Review - Draft Preliminary Aboriginal and / or Treaty Rights and Interests Existing Conditions Report

Attachments: [REDACTED]

Hello Roger,

Please find the original email regarding the Draft ATRI Report

Best,
Niki

From: Nokleby, Andrea [REDACTED]
Sent: Tuesday, November 28, 2023 2:52 PM
To: Chief [REDACTED]; Bertha Sutherland [REDACTED]; Monica John-George [REDACTED]; [REDACTED]; Kimberly Jorgenson [REDACTED]; Jennifer Duncan [REDACTED]
Cc: Bob Baxter [REDACTED]; Lawrence Baxter <[REDACTED]>; Qasim Saddique [REDACTED]; Jennifer Bruin [REDACTED]; Angelis, Niki [REDACTED]
Subject: For Review - Draft Preliminary Aboriginal and / or Treaty Rights and Interests Existing Conditions Report

Booshoo / Wachea,

Bertha and Jennifer it was really nice meeting you at the ATRI Forum last week. It was also really great getting to meet Wayne and Carly in person. I kept this email to the distribution list we have on file but please let me know if I should forward this on to others.

As discussed, Marten Falls First Nation is completing a Federal Impact Assessment and Provincial Environmental Assessment for the Proposed Community Access Road Project.

Marten Falls First Nation is **required** to complete an Assessment of Potential Impacts on the Rights of Indigenous Peoples, as part of the assessment processes. Marten Falls First Nation also **wants** to understand your rights and how they may be affected by the proposed Project.

The Project Team has prepared the attached ***Draft Preliminary Aboriginal and / or Treaty Rights and Interests Existing Conditions Report***, which describes our current understanding of your community's Aboriginal and / or Treaty Rights and Interests as they relate to the proposed Project.

This report is important because it will be used for the future impact / environmental assessment (i.e., this report is not the assessment). In order to do a meaningful impact assessment in the future, the Project Team really needs to understand your community's rights and / or interests with respect to the proposed Project.

The Report has been prepared based on any information provided directly to Marten Falls First Nation and publicly available sources of information.

We want to work with you to update the Draft Preliminary Existing Conditions Report with information your community chooses to share with Marten Falls First Nation. Important dates to note:

- We are asking for communities to provide input on the draft report by **January 19, 2024**, where possible, so it can be woven into the Draft Impact Statement / Environmental Assessment Report (2024).
- Additional information, feedback, comments and edits can be shared after this date. This Draft Preliminary Existing Conditions Report will not be finalized until later in 2024.
- Information **received after January 19, 2024** will be woven into the next phases of the assessment processes including the Final Environmental Assessment / Impact Statement Report (2025).

We would be more than happy to meet with you to:

- Hear your feedback - what did we miss, what did we get wrong, what is correct?
- Discuss the best way to update the report; and

- Review and discuss the Project schedule and next steps.

It is important to note that this is an iterative process, and we will continue to update our understanding of your rights and / or interests as we work towards completing the Impact Statement / Environmental Assessment.

We hope all is well with you and your community.

Andrea

Andrea Nokleby
Partner
Dillon Consulting Limited



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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.

From: Angelis, Niki [REDACTED]
Sent: Friday, September 27, 2024 8:30 PM
To: LRManager [REDACTED]
Cc: Chief [REDACTED]; Bertha Sutherland [REDACTED]; Monica John-George [REDACTED];
[REDACTED]; Jennifer Duncan [REDACTED]; Wayne Neegan [REDACTED];
[REDACTED]; Rosemary Moonias [REDACTED]
Subject: RE: MFFN CAR - Ways to get involved

Hello,

Thank you for reaching out and sorry to have hit you with all these items at once!

Draft EA/ IS – Meeting

We would be happy to present on the Draft EA/ IS review process to CLFN membership. I will be in touch next week with some date options in mid/late October. However if you have any preferred dates in mind (or no-go dates) for a meeting please let me know.

Draft ATRI Existing Conditions Report

I will forward you the original email and attachment following this email.

Community Coordinator Program

Attached you will find the original letter issued for some background on the Community Coordinator program. I will have to follow up with you on the funding agreement, because it is now out of date. But it is a structured lump-sum payment system that would be made directly to the Community band office and the band office would distribute payment to the Community Coordinator (rather than the Community Coordinator being paid directly).

Have a wonderful long weekend and I look forward to connecting with you next week!

Sincerely,
Niki



Chief Ramona Sutherland
Constance Lake First Nation

Date: March 17, 2022

Re: Marten Falls First Nation Community Access Road Community Coordinator Program

Dear Chief Sutherland,

The Marten Falls First Nation (MFFN) Community Access Road Project Team is excited to announce that we are offering to hire members of specific Indigenous communities as **Community Coordinators**. As we continue to move through the provincial Environmental Assessment (EA) and federal Impact Assessment (IA), we want to continue to engage and consult with Constance Lake First Nation on a consistent basis and in a way that works best for your community. The Community Coordinator Program is set to begin early April 2022.

The Community Coordinator Program will support Community Access Road Project activities, meetings and events; helping to make sure input is collected from the right people and shared back with the Project Team so as to be included in the EA processes. The position is \$[REDACTED] an hour and is expected to be approximately 16 hours of work per week for up to three years. Please see the attached job description for a list of responsibilities.

Is Constance Lake First Nation interested in participating in the Community Coordinator Program? If so, we are looking for your input on who should be the Community Coordinator in your community. We understand that Constance Lake First Nation currently has funding from the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) for Bertha Sutherland as a Community Coordinator. We would like to propose supplementing the funding already provided by NDMNRF for this position, so as to increase the hours already being worked on the Project. The choice of candidate, however, is yours to make. You know best who is the best fit for this role. Are you and Council members comfortable with Bertha Sutherland being hired in this role for the MFFN Community Access Road? If not, please let us know if we can support you by reaching out to your members to see if someone else is interested. We hope to hear from you by **March 31, 2022**.

We appreciate your time and thoughts on this Program and are open to have a detailed discussion. We believe the hiring of Community Coordinators will strengthen our collective efforts on both the EA and IA and allow for a more open and responsive consultation and engagement between Constance Lake First Nation and the MFFN Community Access Road Project Team. If you have any questions or would like to setup a meeting, please contact [REDACTED] or call 1-800-764-9114. We will follow-up directly with you in advance of the two-week deadline to answer any questions or concerns you may have regarding the Community Coordinator Program.

Phone [REDACTED]

Email: info@martenfallsaccessroad.ca

Web: <http://www.martenfallsaccessroad.ca>

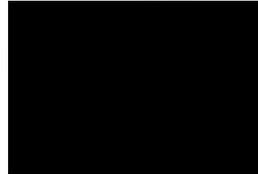




Sincerely,



Qasim Saddique
Project Director



Lawrence Baxter
Senior Community Member Advisor

Encl. MFFN Community Access Road Community Coordinator Job Posting

CC:

- Wayne Neegan, Community Communications Liaison Officer, Constance Lake First Nation
- Monica John-George, Executive Director, Constance Lake First Nation
- Bertha Sutherland, Community Coordinator, Constance Lake First Nation
- Kimberly Jorgenson, Environmental Services Coordinator, Four Rivers
- Jennifer Duncan, Environmental Services Coordinator, Four Rivers
- Lawrence Baxter, Senior Community Member Advisor, MFFN Community Access Road Project Team
- Qasim Saddique, Project Director, MFFN Community Access Road Project Team
- Nyden Iron Nighthtraveller, Consultant, MFFN Community Access Road Project Team



From: Angelis, Niki [REDACTED]
Sent: Friday, 27 September 2024 19:41
To: [REDACTED]
Cc: [REDACTED]
Subject: MFFN CAR - Ways to get involved
Attachments: Community Coordinator _ Job Posting.pdf

Good afternoon Roger,

I hope you have had a good week. As you know, earlier this week I shared information on the Draft EA / IS review process for the Community Access Road with Chief Richard Allen with information on how Constance Lake First Nation can take part.

I would also like to highlight the Community Coordinator Program. Constance Lake First Nation expressed interest in taking part in the program in the past and a funding agreement was shared. If you are still interested in the program, please let me know. I have attached the job posting that can be shared with your community members.

And finally, I wanted to follow up on the draft ATRI Existing Conditions report to ask if Constance Lake would like to provide any comments or have questions about the content. The ATRI team is still accepting feedback and would be happy to discuss.

Sincerely,

Niki Angelis
Communication and Community Engagement

[REDACTED]



[REDACTED]

aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)



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 of your 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.

Subject: RE: Request for hardcopy of EA and Draft copy of Table of Contents - MFCAR

Sent: 2024-10-04, 2:12:31 PM

From: Angelis, Niki [REDACTED]

To: Alanna Robbins

Cc: Kimberly Jorgenson; Holly Pyhtila; Jennifer Duncan; Micheal Fisher; Bertha Sutherland; [REDACTED];
LRManager; Calvin Taylor; Wayne Neegan

Hello Alanna,

Thank you for reaching out.

Descriptions of the Draft EA / IS chapters are being drafted. I will follow up with the EA Team on when we can expect those and I will forward them to the group once they are available.

Sincerely,
Niki

From: Angelis, Niki <[REDACTED]>
Sent: Thursday, October 31, 2024 1:55 PM
To: Chief [REDACTED]
Cc: Bertha Sutherland [REDACTED]; Monica John-George [REDACTED];
[REDACTED]; LRManager [REDACTED]; Jennifer Duncan [REDACTED];
Wayne Neegan [REDACTED]; Rosemary Moonias [REDACTED]
Subject: MFFN CAR - Ways to get involved

Good afternoon Chief Allen,
I am emailing today with the latest updates on the Marten Falls First Nation (MFFN) Community Access Road. The final route for the CAR has been approved by MFFN Chief and Council and the Project Team is close to the release of the Draft Environmental Assessment / Impact Statement (EA /IS). I understand there is interest in a meeting to discuss the process with Constance Lake First Nation membership and look forward to scheduling that as a time that best serves the community.
Further to my last update, there are changes coming to the Community Coordinator program that we think will better suite the needs of the community to support the review of the Draft EA / IS and I will send that information in a separate email.
And finally, I did want to advise that the Indigenous Knowledge (IK) Sharing Program is ongoing and I understand that Constance Lake First Nation has expressed interest in participating in the past. While the window to provide input into the *Draft* EA / IS has passed, the Project Team continues to accept Indigenous Knowledge that can be included in the Final EA / IS. Funding is also available to participate in the program. As a refresher, please find the IK Sharing and funding agreements are attached for your reference and review.
Please feel welcome to contact me if you have any questions.
Sincerely,

Niki Angelis
Communication and Community Engagement

[REDACTED]



[REDACTED]

aecom.com [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

Indigenous Knowledge Program Funding Agreement (the "Agreement")

THIS AGREEMENT made as of the _____ day of _____, _____.

BETWEEN:

CONSTANCE LAKE FIRST NATION

(Hereinafter called the "Constance Lake First Nation"),

OF THE FIRST PART

- AND -

Marten Falls First Nation Project Team
(Hereinafter called the "Project Team")

OF THE SECOND PART

- AND -

Dillon Consulting Limited
(Hereinafter referred to as "Dillon")

OF THE THIRD PART

WHEREAS

WHEREAS Marten Falls First Nation ("MFFN") is a remote First Nation community in northern Ontario located at the junction of the Albany and Ogoki rivers, approximately 430 km northeast of Thunder Bay.

AND WHEREAS the MFFN community is currently only accessible by air and a winter road. Given the unreliability of the winter road, MFFN is proposing an all-season community access road (the "Project") to connect MFFN to Ontario's provincial highway network (i.e., Highway 643) to the south via the existing Painter Lake Road.

AND WHEREAS MFFN is represented by the Project Team to assist MFFN with a Provincial Environmental Assessment and Federal Impact Assessment (the "Assessments") to assess the potential Project effects and benefits.

~~AND WHEREAS~~ whereas the "Project Team" comprised of the following positions: f... and... (list of names of the team) Project Director, Community Consultation Coordinator / Advisor -and Community EA Technical Advisor, MFFN CAR Community Member Advisors, and MFFN CAR Project Consultants led by AECOM and includes Dillon Consulting Limited.

AND WHEREAS as part of the Assessment the Project Team would like to engage the Constance Lake First Nation for the Indigenous Knowledge Program (the "IK") and to complete a Project-Specific IK Study (the "IK Study")

AND WHEREAS the Constance Lake First Nation has agreed to participate in the IK program and produce an IK Study specific to the Project area and community.

AND WHEREAS, specific to this Agreement, the Project Team has retained Dillon for the sole purpose of the

administration of the receipt of the IK Study and payment of the funding for the IK Study to the Constance Lake First Nation as set out in this Agreement.

NOW THEREFORE THIS AGREEMENT WITNESSES that the Project Team, Constance Lake First Nation and Dillon (the "Parties") hereby agree as follows:

ARTICLE I: SCOPE OF SERVICES

1.1 Services by Constance Lake First Nation. The Constance Lake First Nation ~~will shall~~ complete and provide to the Project Team, an IK Study Report, covering the geographic area identified in Schedule A, with that degree of care, skill and diligence normally provided in the performance of an IK Study on projects of a similar nature.

1.2 Scope of Services.—The Constance Lake First Nation shall complete the IK Study Report in accordance with the provisions as set out in the *MFFN Community Access Road Project - Indigenous Knowledge Program Guidance Document*, dated November 2020, a copy of which is attached as Schedule B.

ARTICLE II: Project Team Responsibilities

2.1 Information. The Project Team shall provide to the Constance Lake First Nation, in a timely manner, relevant information required to complete the IK Study.

ARTICLE III: CONSTANCE LAKE FIRST NATION RESPONSIBILITIES

3.1 Deliverables. The Constance Lake First Nation shall provide the following reports, upon the timelines set out:

- IK Program check in meeting with the Project Team for FN to provide a status update and share preliminary data (GIS)/Draft Report/Information), and
- Final IK Study Report and associated mapping/GIS files. Preliminary Data (GIS)/Draft Report, by no later than
- Final IK Study Report and associated mapping/GIS files, by no later than

ARTICLE IV: Compensation

4.1 Compensation. The Project Team agrees to compensate Constance Lake First Nation for the IK Report, in the amount of \$ [redacted] inclusive of all applicable taxes (the "IK Payment").

4.2 Schedule of Payments. Upon execution of this Agreement by all parties, the Project Team shall direct Dillon to pay the Constance Lake First Nation the IK Payment based upon the following schedule:

- An initial payment of \$ [redacted] within 30 days of the execution of this Agreement by all Parties,
- A second payment of \$ [redacted] within 30 days of receipt, by the Project Team, of the Preliminary Data (GIS)/Draft Report,
- A final payment of \$ [redacted] within 30 days of receipt, by the Project Team, of the Final IK Study Report and associated mapping/GIS file.

Notwithstanding article 7.7, the Constance Lake First Nation here by directs Dillon to make the three individual IK Payments, payable to [redacted] and to deliver the payments to [redacted], and this shall be Dillon's good and valid authority to do so.

Commented [NA1]: For CLFN to update
Commented [NA2]: For CLFN to update

ARTICLE V: CONFIDENTIALITY, USE AND DISCLOSURE

5.1 Confidentiality. The Project Team and the Constance Lake First Nation have previously executed an Indigenous Knowledge Information Sharing Agreement (the "IK Agreement"). The Project Team and the Constance

Lake First Nation Parties agree that all matters relating to the confidentiality, use and disclosure of the IK Report shall be governed by the IK Agreement. In the event of any conflict between terms of the IK Agreement and this Agreement, the terms and conditions of the IK Agreement shall govern.

ARTICLE VI: CONFIRMATION

6.1 Confirmation. The Constance Lake First Nation confirms that it will complete the *Final IK Study Report and associated mapping/GIS files* with due care, attention, and diligence.

ARTICLE VII: OTHER

7.1 Governing Law. This Agreement shall be governed by the laws of the Province of Ontario.

7.2 Entire Agreement. This Agreement (a) constitutes the entire agreement and understanding between the Parties with respect to the subject matter hereof and (b) supersedes all prior agreements, understandings, negotiations and discussions by or between the Parties pertaining to the subject matter of this Agreement. There are no warranties, representations or other agreements, whether oral or written, express or implied, collateral or otherwise, by or between the Parties pertaining to the subject matter of this Agreement except as set forth in this Agreement.

7.3 Acknowledge and Confirmation of Project Team and Constance Lake First Nation. The Project Team and the Constance Lake First Nation confirm and agree that Dillon's only obligations under this Agreement is the payment of the IK Payment upon the terms and conditions set out in Article 4.2. The Project Team and Constance Lake First Nation acknowledge and agree that Dillon shall have no other obligations or requirements, of any kind or nature whatsoever, with respect to this Agreement or the IK Study. The Project Team and the Constance Lake First Nation agree and acknowledge that Dillon makes no representations, and shall have no responsibility, as to the completeness of the IK Report nor any obligations or requirements regarding the timeliness of the draft or final IK Report to the Constance Lake First Nation or the Project Team.

7.4 Independent Professional Services Constance Lake First Nation. The Constance Lake First Nation is an independent professional services provider in performing services under this agreement, and accordingly it is further acknowledged that the Constance Lake First Nation is an independent contractor.

7.5 Assignment. Neither party may assign this Agreement without the prior consent in writing of the other party.

7.6 Modification and Waiver. This Agreement may not be modified, amended or supplemented except by written agreement of the Parties. No act or omission by a party, other than a written waiver, shall constitute a waiver of any provision of this Agreement. No waiver of any provision of this Agreement shall constitute a waiver of any other provision, nor shall any such waiver constitute a continuing waiver, unless otherwise specifically agreed in writing by the Parties.

7.7 Notices. All notices, instructions and other communications required or permitted to be given hereunder must be in writing and must be delivered via email, or mailed by first class mail, to the parties and at the addresses set forth, in the event of a notice being sent by first class mail the notice shall be deemed to be received by the addressee on the fifth business day after the mail is postmarked:

- [Project Team - Qasim Saddique, Project Director](#)

- [REDACTED]

- [FN insert contact person and title](#)

- [Email](#)

Commented [NA3]: For CLFN to update

- [Address](#)
- [Dillon - Andrea Nokleby, MFFN CAR Project Consultant:](#)
- [\[Redacted\]](#)
- [\[Redacted\]](#)
- [_MFFN Project Team, insert address, Qasim Saddique, Project Director](#)
- [Constance Lake First Nation, insert address and contact person or title](#)
- [Dillon, insert address and contact person or title](#)

7.8 Inurement. This Agreement shall be binding upon the Parties, and shall continue in full force and effect in the event any Party is permitted to assign this Agreement or if there is any change in ownership, control or management of any Party.

7.9 Counterparts, Signatures and Retention. This Agreement may be executed in one or more counterparts, each of which is an original, and which, taken together, shall constitute one and the same agreement. The signing of a facsimile copy or portable document format (PDF) copy of this Agreement and any amendments thereto shall have the same effect as the signing of an original. The retention of an electronic version of this Agreement is permitted and the subsequent production of an electronic version of this document shall be treated as if it was the production of an original signed copy.

IN WITNESS WHEREOF the Parties hereto have executed this Agreement all as of the day and year first above written.

Constance Lake First Nation

Per: _____
 I/We have authority to bind the Constance Lake
 First Nation.

Name: _____
 Title: _____
 Date: _____

Per: _____
 I/We have authority to bind the Constance Lake
 First Nation.

Name: _____
 Title: _____
 Date: _____

Marten Falls First Nation Project Team

Per: _____
 I/We have authority to bind the MFFN Project
 Team.

Name: _____
 Title: _____
 Date: _____

Per: _____
 I/We have authority to bind the MFFN Project
 Team.

Name: _____
 Title: _____
 Date: _____

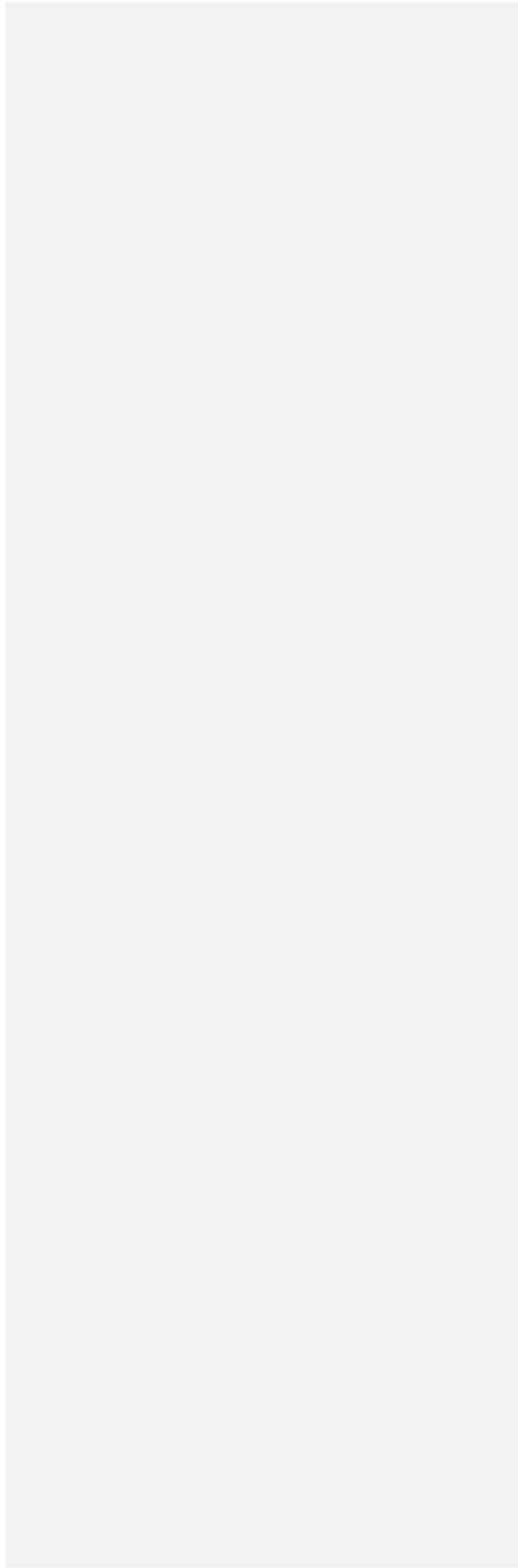
Dillon Consulting Limited

Per: _____
 I/We have authority to bind Dillon Consulting
 Limited

Name: _____
 Title: _____
 Date: _____

Per: _____
 I/We have authority to bind the Dillon Consulting
 Limited.

Name: _____
 Title: _____
 Date: _____



SCHEDULE "B"

**INDIGENOUS KNOWLEDGE
INFORMATION SHARING AGREEMENT**

Marten Falls First Nation
Community Access Road
CONFIDENTIAL INFORMATION

dated the ____ day of _____, 2024

As part of the environmental/impact assessment and design of the Marten Falls First Nation (MFFN) Community Access Road Project, (the "Project"), Constance Lake First Nation hereby agrees to provide Confidential Information pertaining to traditional land use and current use of lands and resources for traditional purposes. The Confidential Information may include:

1. Indigenous Knowledge/Traditional Knowledge: encompasses but not limited to traditional spirituality, beliefs, values, practices, knowledge, customs, language, oral history, stories, art forms, laws, land-based activities, land use, innovations, experiences, expressions and everyday life-skills. It includes knowledge held by individuals, groups of individuals, families or the collective as a whole. It is handed down from one generation to another. It is fundamental to the identity of Indigenous Peoples is closely linked to the environment and is holistic in nature. It is a cumulative body of knowledge, understandings, observations, experiences, beliefs about the environment, and about the relationship of living beings with one another and the environment, handed down through generations and is the traditional way of life of Indigenous Peoples.
2. Contemporary knowledge/land use for traditional purposes: recent and current knowledge of land use by community members, including but not limited to areas used for hunting, trapping, fishing, plant gathering, travelling, camping, ceremonies, and sacred locations, including cultural modified trees.
3. Data: physical and digital copies of information including, but not limited to: geospatial data (shapefiles, geodatabases, mapping projects, GPS files, raster images (satellite and aerial), LiDar, any other forms of geospatial data including CSV, Excel, text and KML files); data related to Indigenous Knowledge (audio, video, pictures, interview transcripts, etc.); digital copies of scanned maps, digital copies of interview material (questionnaires, surveys, notes, stories, legends, etc.); and, any other relevant physical or digital copies of documents containing relevant and important information. Geospatial data: includes data that is linked to a location. For example, geospatial data can include GPS points or values drawn on a map. Geospatial data typically is used with a Geographic Information System (GIS).

For greater certainty, Confidential Information shall also include other information which, given the circumstances surrounding its disclosure and the context of the subject matter of discussions, would be considered confidential. Constance Lake First Nation will identify such Confidential Information prior to sharing.

The Confidential Information provided by Constance Lake First Nation is provided to the Community Access Road Project Team (also referred to as the MFFN CAR Project Team) and AECOM (the "Recipients"), to better understand how Constance Lake First Nation lands and resources may be affected by the Project. The Confidential Information can only be used for the Project (e.g. informing the Environmental and Impact Assessments and Design). The Confidential Information may be used to

SCHEDULE "B"

better understand how Constance Lake First Nation community members are using the lands and resources and to consider adjustments such as to routing and to also potentially develop mitigation measures that may reduce the effect of the Project on the land and resources identified.

The MFFN CAR Project Team has commenced with an Indigenous Knowledge (IK) Program for the Project that involves:

- Sharing existing and relevant IK and Indigenous land and resource use information previously collected by communities (e.g., for community- based land use planning) with the Recipients; and
- Completing a Project-specific IK and Indigenous Land and resource Use Study to collect relevant IK and information on Indigenous land and resource use in the vicinity of the Project.

Information shared (i.e., reporting, mapping, spatial data, etc.) through the IK Program will be governed by the provisions of this Agreement.

The Recipients of the Confidential Information will not use this Confidential Information for other purposes, such as informing other projects, government initiatives or for research purposes beyond those associated with the Project. The Recipients agree to protect and hold the Confidential Information in strict confidence. The Recipients maintain the right to disclose the Confidential Information as necessary to their employees and team members who will also be bound by the terms of this Agreement.

Data Access: Data will be physically and digitally transferred from Constance Lake First Nation to the recipient and will be accessible to the recipient(s) in any form. Except to the extent required by applicable law, Confidential Information will not be shared by the Recipient with other proponents, government agencies, other communities, or external researchers without express written consent of Constance Lake First Nation. **The Recipients acknowledge and agree that the Confidential Information is the property of Constance Lake First Nation and nothing in this agreement transfers any ownership interest to the Recipients. All information provided shall remain under the control of Constance Lake First Nation.** Except to the extent required by applicable laws (including professional obligation), the retention period for data storage is up to the discretion of Constance Lake First Nation and can be a fixed term as specified below or unless an extension is requested by the Recipients and approved by Constance Lake First Nation:

Retention Period: *November 1, 2024* to *December 31, 2025*

Commented [NA1]: Dates to be updated / confirmed upon signing

On termination of this Agreement or on written notice by Constance Lake First Nation, the Recipients shall as directed by Constance Lake First Nation to either: promptly destroy or return to Constance Lake First Nation all Confidential Information and all copies thereof, with the exception of those copies required by applicable laws (including professional obligation), provided only one copy is retained and is stored with Recipient's legal counsel. Each party shall send correspondence to the other confirming the termination of this agreement and that data has been returned in full by the Recipients and received by Constance Lake First Nation.

The Recipients shall take all prudent measures to ensure that the Confidential Information provided by Constance Lake First Nation is kept confidential. Data security measures and protocols will be documented and agreed upon by both parties and implemented to maintain the security of the Confidential Information while in the custody of the Recipients. Data shall be protected against such risks as unauthorized access, collection, use, disclosure or disposal.

SCHEDULE "B"

Agreed to on behalf of Constance Lake First Nation:

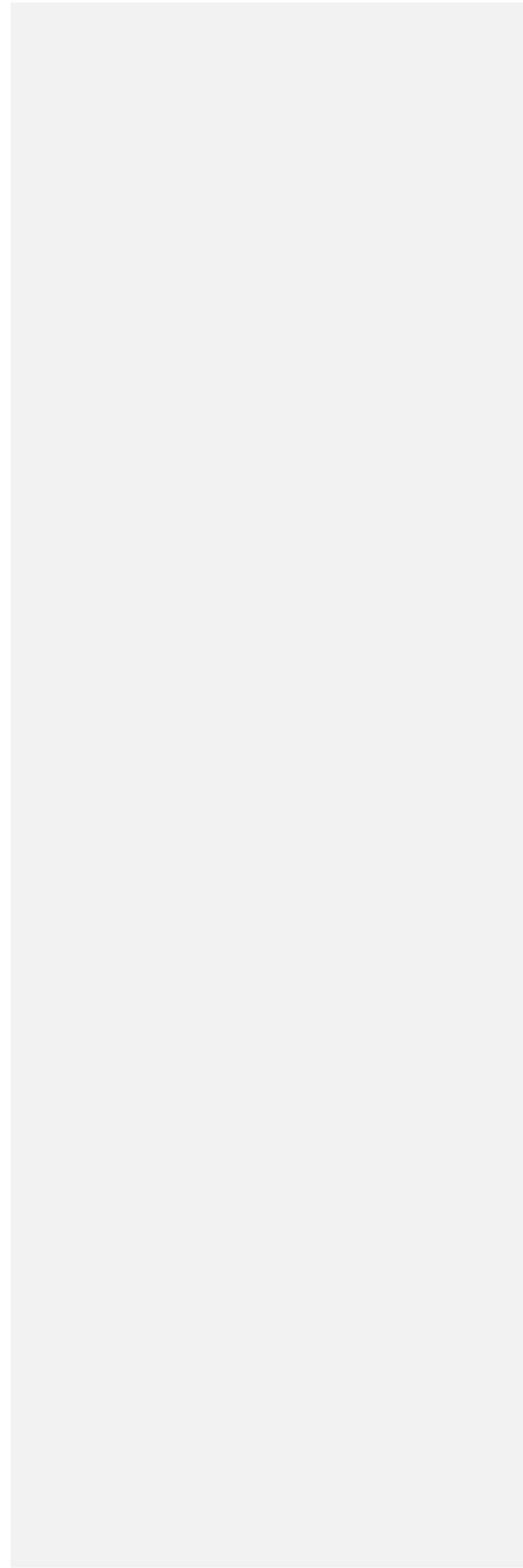
Chief Richard Allen
(Authorized representative)

Date

Agreed to on behalf of the Recipients:

(Authorized representative)

Date



From: Angelis, Niki [REDACTED]

Sent: Thursday, 31 October 2024 20:31

To: Rosemary Moonias [REDACTED]

Subject: RE: MFFN CAR - Ways to get involved

Hello Rosemary,

Thank you for the update. I will remove Monica from the key contact list for Constance Lake First Nation.

Sincerely,

Niki

Subject: MFFN CAR - Changes to the Community Coordinator Program

Sent: 2024/11/07, 20:35:17

From: Angelis, Niki [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Good afternoon,

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

The timing window for participation in the Community Coordinator Program has passed and the program will be 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 Centers, 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 lumpsum 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 so 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 and 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 me know if you have any questions.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement
[REDACTED]



[REDACTED]

aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

From: Angelis, Niki
Sent: November 15, 2024 12:24 PM
To: [REDACTED]
Subject: MFFN CAR - Capacity Funding and In-Person meetings

Hello Roger,

It was so nice to connect on the phone with you today.

Further to our discussion, I will be sending Constance Lake First Nation the updated Capacity Funding Agreement as soon as possible for their review and consideration. The agreement is being updated to reflect the switch from the Community Coordinator Program to the lumpsum capacity funding (in the amount of \$ [REDACTED]). I will be in touch as soon as the agreement is prepared.

The MFFN CAR Project Team is eager to connect with CLFN members in person. Understanding that the community is still warming up to the idea of in-person engagements (due to COVID) and current weather constraints, we hope that we can arrange an in-person meeting in the new year to discuss the CAR and the related Draft EA / IS Report. Let's keep in touch on this and please share preferred dates when you are ready.

I understand that it may be of interest to CLFN to have all three road projects (Webequie Supply Road, Northern Road Link and the CAR) present in-community together and that is certainly something I can look into.

And finally, while I do not have a direct contact from the Northern Road Link project, you can visit their website for more information here: [REDACTED]

Thank you again for the call and have a lovely weekend.

Best,
Niki

Niki Angelis
Communication and Community Engagement

[REDACTED]



[REDACTED]

aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

Subject: MFFN CAR - Milestone 3 Report

Sent: 2024/11/28, 18:57:49

From: Angelis, Niki<[REDACTED]>

To: [REDACTED]

Good afternoon Chief Allen

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 **Constance Lake First Nation** [REDACTED]

The Milestone #3 Progress Report covers June 1, 2023, to July 31, 2024.

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

If you have any questions or comments about the Community Access Road, please reply to this email.

Sincerely,

Niki Angelis

Communication and Community Engagement

AECOM Delivering a better world

[REDACTED]

aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

Subject: Webinar on Building the Community Access Road – Thank You for Joining
Sent: 2024-12-02, 1:01:09 PM
From: MFFN Community Access Road Project Team<info@martenfallsaccessroad.ca>

Cc: [Redacted]
Bcc: [Redacted]

Thank you for registering and / or attending the Marten Falls First Nation Community Access Road Webinar: Building the Community Access Road.

The webinar focused on the final route, design features of the road and details on how it will be constructed. We also discussed the upcoming release of the Draft Environmental Assessment / Impact Statement. **The recording of this webinar, and others, can be viewed** [Redacted]

There are more webinars to come in 2025 – stay tuned for updates!

Sincerely,

Marten Falls First Nation Community Access Road Project Team

--
MFFN Community Access Road Project Team
Visit our website: [Redacted]
Follow us on Facebook [Redacted]
Call us: [Redacted]
Email us: info@martenfallsaccessroad.ca

Subject: RE: MFFN CAR - Capacity Funding and In-Person meetings
Sent: 2024/12/05, 20:51:49
From: Angelis, Niki [Redacted]
To: [Redacted]
Cc: [Redacted]
Attachments: [Redacted]

Hello Roger,

I hope you are well.

Further to my previous email regarding the Community Capacity Funding Program, attached please find the Funding Agreement for review and consideration by Constance Lake First Nation.

While considering the agreement, please provide the following information so that I may start the payment process if / when you choose to join the program:

- Community Name or entity owned by the community (e.g. the Band Office)
- Phone Number
- Key point of contact (with the authority to sign on behalf of the community)
- Email address
- Mailing Address

Let me know if you have any questions.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement

[Redacted]



[Redacted]

aecom.com [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

Community Capacity Funding Agreement

THIS COMMUNITY CAPACITY FUNDING AGREEMENT (“Agreement”) made as of the _____ day of _____, 202__.

BETWEEN:

OF THE FIRST PART

[Enter Name of Community]

[Enter Mailing Address]

Attention: [Enter Primary Contact Name]

Email: [Enter Primary Contract Email Address]

(hereinafter, the “Community”),

- AND -

OF THE SECOND PART

Marten Falls First Nation as represented by 2617482 Ontario Inc.

[Enter Mailing Address]

Attention: Qasim Saddique, Project Director

Email: [REDACTED]

(hereinafter, the “Project Team”),

- AND -

OF THE THIRD PART

AECOM Canada Ltd.

[Enter Mailing Address]

Attention: [Enter Contact Name]

Email: [Enter Primary Contract Email Address]

(hereinafter, “AECOM”),

(Each a “Party” and collectively the “Parties” to this Agreement)

RECITALS:

WHEREAS Marten Falls First Nation (“MFFN”) is a remote First Nation community in northern Ontario located at the junction of the Albany and Ogoki rivers, approximately 430 km northeast of Thunder Bay;

AND WHEREAS MFFN is currently only accessible by air and a winter road. Given the unreliability of the winter road, MFFN is proposing an all-season community access road (the “Project”) to connect MFFN to Ontario’s provincial highway network (i.e., Highway 643) to the south via the existing Painter Lake Road;

AND WHEREAS MFFN is represented by the Project Team to assist MFFN with a Provincial Environmental Assessment and Federal Impact Assessment (the “Draft EA/IS”) to assess the potential Project effects and benefits;

AND WHEREAS the Project Team would like to engage the Community for participation in a “Community Capacity

Funding Program” as set out in this Agreement so as to facilitate the review of the Draft EA/IS by the Community and the gathering of feedback where provided by the Community.

AND WHEREAS, through this Agreement, the Community has agreed to participate in the Community Capacity Funding Program.

AND WHEREAS the Parties agree that it is the Community’s responsibility to identify the use and allocation of the funds in connection with this Agreement for the purposes of reviewing the Draft EA/IS and, further, to have an opportunity to provide feedback at its discretion to AECOM and the Project Team (“**Funding Purpose**”).

AND WHEREAS, specific to this Agreement, the Project Team has retained AECOM for the sole purpose of making payment of the Capacity Funding (as defined below) to the Community at the direction of the Project Team as set out in this Agreement.

NOW THEREFORE THIS AGREEMENT WITNESSES that, for the good and valuable consideration set out herein, the Parties hereby agree as follows:

ARTICLE I: PAYMENT OF CAPACITY FUNDING

1.1 Lump Sum Payment. The Project Team agrees to pay the Community a one-time, lump sum payment of [REDACTED] (“**Capacity Funding**”).

1.2 Schedule of Payment. Upon execution of this Agreement by all Parties, the Project Team hereby directs AECOM to pay the Community the Capacity Funding within 30 days of the execution of this Agreement by all Parties.

ARTICLE II: SCOPE OF CAPACITY FUNDING

2.1 Scope of Capacity Funding. The Capacity Funding is intended to support the Community's ability to engage on the Project in accordance with the Funding Purpose. The Capacity Funding may be used to facilitate the Funding Purpose by financially supporting the Community's review of the Draft EA/IS, including costs related to: (a) securing meeting space, (b) rental or purchase of office and/or accessibility equipment; (c) office materials and incidentals; (d) compensating community members for their time to review and the provision of feedback; or (e) hiring of a community coordinator to facilitate the Community's review and organize the submission of feedback.

2.2 Confirmation of Draft EA/IS Review and Provision of Feedback. The Community agrees that it shall review the Draft EA/IS and provide written confirmation of its completed review to AECOM and the Project Team. This written confirmation shall be provided by no later than 120 days following the Community’s receipt of the Draft EA/IS (“**Review Date**”). Additionally, the Community may provide feedback it obtains through the review process to AECOM and the Project Team at its sole discretion before the Review Date.

2.3 Voluntary Participation. The Community agrees that it is participating in the Community Capacity Funding Program voluntarily, without pressure, duress or inducement. As the Community Capacity Funding Program is being used to facilitate engagement with several First Nations across northern Ontario, it is acknowledged and agreed that the Capacity Funding is intended to support Community consultation and that neither the Project Team nor AECOM make any representations or warranties, express or implied, in relation to the sufficiency of the Capacity Funding to fully facilitate the Community’s engagement on Project, including the Funding Purpose as set out herein.

ARTICLE III: USE OF INFORMATION

3.1 Use of Information. The Project Team and AECOM may use the information gathered through the Community Capacity Funding Program and this Agreement for the purposes of incorporating the Community review

and feedback into finalizing the Provincial Environmental Assessment and Federal Impact Assessment of the Project. Further, AECOM and the Project Team may use the information to report on the Community Capacity Funding Program to the MFFN or any authority having jurisdiction, including on issues pertaining to specific Community consultation or First Nation consultation generally, in respect of the Project or any other reasonable use or purpose, including to comply with any legal obligations.

3.2 No Expectation of Confidentiality. There is no expectation of confidentiality associated with the Community Capacity Funding Program, including in relation to this Agreement, receipt of written confirmation of the Community's review and feedback, and the Capacity Funding.

ARTICLE IV: RELATIONSHIPS AMONGST PARTIES WITHIN COMMUNITY CAPACITY FUNDING PROGRAM

4.1 Role of AECOM. The Project Team and the Community confirm and agree that AECOM's only responsibility under this Agreement is to facilitate the payment of the Capacity Funding in accordance with Article I (Payment of Capacity Funding). The Project Team and Community acknowledge and agree that AECOM shall have no other obligations or requirements of any kind or nature whatsoever with respect to this Agreement. AECOM and the Project Team have no responsibility for, or control of, the Community or its personnel and AECOM and the Project Team will have no liability for any acts or omissions of the Community or its personnel. The Project Team and the Community agree and acknowledge that AECOM makes no representations, and shall have no responsibility, as to the completeness or sufficiency of the Community Capacity Funding Program or the Capacity Funding for any purpose, including the Funding Purpose. AECOM does not have responsibility regarding the treatment of Community's consultation or feedback by any authority having jurisdiction in relation to the Project.

4.2 Independence of Community. The Parties acknowledge and agree that the Community is not a consultant, subconsultant, contractor, subcontractor, employee, or advisor of AECOM or the Project Team. For greater certainty, this Agreement shall not be interpreted or construed to create an association, joint venture, agency relationship, vendor-client relationship or partnership between the Parties. It is understood and agreed that the Community's participation in the Community Capacity Funding Program does not represent the Community's position in relation to the Draft EA/IS in any way whatsoever and this Agreement shall not be interpreted or construed to represent a position by the Community in relation to the Draft EA/IS for any purpose.

ARTICLE V: GENERAL

5.1 Governing Law. This Agreement shall be governed by the laws of the Province of Ontario.

5.2 Entire Agreement. This Agreement (a) constitutes the entire agreement and understanding between the Parties with respect to the subject matter hereof and (b) supersedes all prior agreements, understandings, negotiations and discussions by or between the Parties pertaining to the subject matter of this Agreement. There are no warranties, representations or other agreements, whether oral or written, express or implied, collateral or otherwise, by or between the Parties pertaining to the subject matter of this Agreement except as set forth in this Agreement.

5.3 Assignment. No Party may assign this Agreement without the prior consent in writing of the other Parties.

5.4 Modification and Waiver. This Agreement may not be modified, amended or supplemented except by written agreement of the Parties. No act or omission by a Party, other than a written waiver, shall constitute a waiver of any provision of this Agreement. No waiver of any provision of this Agreement shall constitute a waiver of any other provision, nor shall any such waiver constitute a continuing waiver, unless otherwise specifically agreed in writing by the Parties.

5.5 Notice. All written notices required to be given in this Agreement must be in writing and must be delivered to each Party's representative at each Party's address first listed above. Notice may be given by (a) hand delivery; (b) email; or (c) registered mail. Notice by hand delivery or registered mail shall be effective on the day of delivery. Notice by email shall only be effective on the day of written responding confirmation of receipt (which, for certainty, does not include any automated replies from a recipient's email account.) Each Party's representative and address may be changed upon the delivery of written notice to the Parties.

5.6 Successors and Assigns. This Agreement shall be binding upon the Parties and shall continue in full force and effect in the event any Party is permitted to assign this Agreement or if there is any change in ownership, control or management of any Party.

5.7 Dispute Resolution. Upon the delivery of a written notice of a dispute arising out of or in connection with this Agreement by any Party, the Parties shall attempt to resolve such dispute, by structured negotiation, on a without prejudice basis, with the assistance of a mediator appointed by the Parties. If a dispute cannot be settled within a period of 30 days after such notice of dispute, or such longer period as may be agreed to by the Parties, the Parties shall be free to pursue any other procedures or remedies available to them, including arbitration or litigation, in an effort to finally resolve the dispute.

5.8 Interpretation. The recitals first listed above form an integral and essential part of this Agreement. Capitalized terms shall be given the meaning as first set out in this Agreement.

5.9 Severability. The invalidity or unenforceability of any provision of this Agreement will not affect the validity or enforceability of any other provision but this Agreement will be construed as if such invalid provision were omitted.

5.10 Counterparts, Signatures and Retention. This Agreement may be executed in one or more counterparts, each of which is an original, and which, taken together, shall constitute one and the same agreement. The signing of a facsimile copy or portable document format (PDF) copy of this Agreement and any amendments thereto shall have the same effect as the signing of an original. The retention of an electronic version of this Agreement is permitted and the subsequent production of an electronic version of this document shall be treated as if it was the production of an original signed copy.

[Remainder of page intentionally blank. Signature page follows.]

IN WITNESS WHEREOF the Parties hereto have executed this Agreement as of the day and year first written above.

[NAME OF COMMUNITY]

Per: _____
I/We have authority to bind the [name of
community].

Name: _____
Title: _____
Date: _____

Per: _____
I/We have authority to bind the [name of
community].

Name: _____
Title: _____
Date: _____

Marten Falls First Nation as represented by 2617482 Ontario Inc.

Per: _____
I/We have authority to bind 2617482 Ontario
Inc. and the MFFN Project Team.

Name: _____
Title: _____
Date: _____

Per: _____
I/We have authority to bind the MFFN Project
Team.

Name: _____
Title: _____
Date: _____

AECOM Canada Ltd.

Per: _____
I/We have authority to bind AECOM Canada Ltd.

Name: _____
Title: _____
Date: _____

Per: _____
I/We have authority to bind the AECOM Canada
Ltd.

Name: _____
Title: _____
Date: _____

Subject: MFFN CAR - End of Year Greetings

Sent: 2024/12/19, 20:14:50

From: Angelis, Niki [Redacted]

To: [Redacted]

Good afternoon Chief Richard Allen,

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 virtual and in-community meetings. 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

Milestone #3 Progress Report Feedback

On November 28 / 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.**

Community Capacity Funding Agreement

In November, information was provided about the new Community Capacity Funding Program that offers a lumpsum payment of \$ [Redacted] to help support engagement activities related to the Community Access Road and the review of the Draft EA / IS. The funding agreement was provided for your review. If you have any questions about the program or the agreement, please let me know.

IK Program

As you may know, the Indigenous Knowledge (IK) Sharing Program is ongoing and I understand that Constance Lake First Nation has expressed interest in participating in the past. While the window to provide input into the *Draft* EA / IS has passed, the Project Team continues to accept Indigenous Knowledge that can be included in the Final EA / IS. Separate funding is also available to participate in the program.

Wishing you a warm holiday season.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement
[Redacted]

Out of Office: Dec 23, 2024 – Jan 1, 2025



[Redacted]

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From: Angelis, Niki [REDACTED]
Sent: Thursday, 09 January 2025 16:31
To: Rosemary Moonias [REDACTED]
Subject: RE: MFFN CAR - Capacity Funding and In-Person meetings

Good morning Rosemary,
Happy New Year!

Thank you for reaching out - I have not heard back regarding the Capacity Funding Agreement from your team.

If you think Constance Lake First Nation is interested in entering the agreement for Capacity Funding, I would recommend getting the payment process initiated while the agreement is being reviewed - as this takes a bit of time to set up.

Information needed to start the payment process **if / when** you choose to join the program:

- Community Name or entity owned by the community (e.g. the Band Office)
- Phone Number
- Key point of contact (with the authority to sign on behalf of the community)
- Email address
- Mailing Address

Please let me know if you have any questions about the agreement or Program in general.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement

[REDACTED]



[REDACTED]

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Subject: RE: Visit to CLFN

Sent: 2025/01/10, 21:55:34

From: Angelis, Niki [REDACTED]

To: LRManager

Hello Roger,

Happy New Year!

Yes, we are very interested in holding a community information session in Constance Lake. I believe during our chat before the holidays, we discussed trying to set something up in January or February.

The Community Access Road Project Team are actively working on finalising the Draft Environmental Assessment this month, but there are plans to be in the area in mid-late February. I will contact the Team and ask for potential dates. Please let me know if the Community has any preferred dates, or if there are any "no-go" dates.

Thank you for reaching out and I will be in touch again soon with potential meeting dates.

Best,
Niki

From: Angelis, Niki [REDACTED]
Sent: Friday, 10 January 2025 21:43
To: LRManager [REDACTED]
Subject: RE: MFFN CAR - Webinar Q&A Submission

Hello Roger,

Meegwetch and thank you for sharing these insights and experiences from Constance Lake First Nation. I will share this with our Climate Change Adaptation team and Human Health team for their information.

Sincerely,
Niki

Subject: MFFN CAR - Webinar Q&A Submission

Sent: 2025/01/10, 19:14:03

From: Angelis, Niki [REDACTED]

To: [REDACTED]

Good afternoon Roger,

Thank you for attending the **Building the Community Access Road** webinar that was held on Tuesday November 26, 2024.

During the webinar you submitted questions to the panelists for response, but the panelist ran out of time to answer all questions live. Below are answers (A) to the questions (Q) you posed:

Q: Have you considered Climate Change impacts in the planning process?

A: Climate Change is a significant consideration with the design of the Community Access Road.

Through our studies, we are aware of the shoulder seasons, flooding events, and return periods of storm events and the potential for extreme events including forest fires. The current climate change related literature has been considered and the current design standards have been met. We are now adding a significant factor of safety to account for what we know is being experienced in similar geographies and what is projected for.

With respect to the road design, erosion control measures, such as rock check dams (used on steeper slopes to slow down water movement caused by high rainfall events) would be incorporated in the design. Additionally, the road's 60 meter wide corridor, acts as a natural fire breaker. Additional considerations will be available in the Draft EA / IS Report that will be made available this winter.

Q: What measures will be applied to ice conditions on road?

A: With a gravel road of this nature, the first measure for winter road maintenance is snow removal. The motor graders in winter have what's referred to as 'ice blades' that have little ridges or teeth which scarifies or makes little cuts into the ice surface that improves traction. Sanding would not typically be done for the entire length of the road, but would potentially be applied where the road curves or at water crossings. In the event of severe inclement weather like ice and / or freezing rain, other measures could be taken.

The recording of the Building the Community Access Road webinar (along with previous webinars) is available on the Project website and can be viewed here: [REDACTED]

Thank you again for your participation.
Sincerely,

Niki Angelis
Communication and Community Engagement
[REDACTED]

Out of Office: Dec 23, 2024 – Jan 1, 2025



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Subject: RE: Visit to CLFN

Sent: 2025/01/20, 20:27:06

From: Angelis, Niki [REDACTED]

To: LRManager

Good afternoon Roger!

Thank you for sending the Community's availability for a Community Access Road visit to Constance Lake First Nation.

The dates you provided correspond with the Three-Road Forum and Expo in Thunder Bay (taking place on February 19 & 20). The MFFN Community Access Road Project Team and consultants will be attending and I hope you (or other representatives from Constance Lake First Nation) are planning to attend too.

How do you feel about the MFFN Community Access Road Project Team visiting Constance Lake First Nation on Friday (February 21) or on Saturday (February 22)?

Let me know what you think and we can start planning from there.

Best,
Niki

From: Angelis, Niki [REDACTED]
Sent: Saturday, 25 January 2025 00:27
To: LRManager [REDACTED]
Subject: RE: Visit to CLFN

Good evening Roger,

Thank you for providing a date and proposed schedule for a meeting in Constance Lake.

I was hoping to get everyone's availability by today to confirm the community session on February 22, but our MFFN Community Advisors are travelling. I will be in touch with you on Tuesday to confirm the date and talk about planning.

Have a lovely weekend and speak to you soon.

Best,
Niki

Subject: RE: MFFN CAR - Capacity Funding and In-Person meetings
Sent: 2025/01/25, 01:09:59
From: Angelis, Nik [REDACTED]
To: Kevin Proctor; Rosemary Moonias
Cc: Roger Wesley

Hello Kevin,

Thank you for reaching out and providing me with the requested information for the funding transfer.

Please note the following, as the payment transfer process is a bit tedious (I apologize in advance)!

Some background:

To deliver the funding, AECOM (the company I work for and who Marten Falls First Nation has hired to help carry out the Environmental Assessment) is responsible for issuing the payment.

AECOM uses a third-party company called **Coupa** to issue payments to “vendors and suppliers”. In this case, Coupa must set up your community as a “vendor”, “supplier”, “subcontractor” or “partner” of AECOM within their system in order to issue the lumpsum payment.

Please be advised that this is the default language of the Coupa system and **does not** reflect your relationship with AECOM. For further assurance, please see Article IV of the Community Capacity Funding Agreement.

Next Steps:

I will send the key contact information to Coupa and they will send you an email from **Coupa Supplier Portal** [REDACTED] inviting you to register for the Coupa Supplier Portal. (screen shot below).

In the email you will find a link near the bottom of the email: “Join Coupa Supplier Portal”. Click on the link and set up a profile.

You will be asked to do the following:

1. Complete the Banking Information on the Coupa portal
2. Attach any mandatory documents in the Coupa system, these include:
 - a. *Voided check or Bank Letterhead (this is for direct deposit)*
 - b. *Invoice copy or vendor letterhead with remittance address and GST number (due to your tax exemption, you may be asked to produce proof of your tax exemption, so please have this handy).*
 - i. Because Coupa is typically used to pay a vendor or supplier, an invoice from your community will be required for funds to be released. If your community does not have an invoice template, your letterhead can be used for this (and we can assist in creating an invoice to satisfy Coupa).

You may receive follow-up emails repeating the above information – please note that you do not need to send any financial info over email – everything goes through the Coupa Portal.

Please ignore the wording regarding US suppliers and conducting business in the US, tax certificates W9 or W8 etc., as these are not required.



Action Required - AECOM Technology Corp Registration Instructions

Hi,

As part of our supplier/subcontractor qualification and onboarding process, we have a few actions we request that you complete. You can learn more about the process [here](#).

What You Can Expect

Coupa Supplier Portal

As an AECOM supplier, we require you to register for the Coupa Supplier Portal. This free portal allows you to submit and monitor Invoices and Purchase Orders (PO) electronically. You can register for the portal by clicking on "Join and Respond" below.

~~You will need to provide relevant tax certifications (e.g., W9 or W8, as applicable), and payment details.~~

If you are asked to "Subscribe to Coupa Verified" for an annual fee, this is an advertisement from Coupa and is **not required** for you to use the Coupa Supplier Portal with AECOM. You can ignore this request or contact Coupa directly via [this link](#) if you need to unsubscribe.

Coupa Risk Assess

Depending on the services your company will be providing, you may be invited to create a Coupa Risk Assess account. This invitation will be sent via email with an authentication code to setup your account and complete an Inherent Risk Questionnaire (IRQ). The IRQ enables us to understand your business practices (e.g., ethics, quality management and health, safety & environmental). These emails will come from the **AECOM Procurement Support Center**.

Procurement Support Center

Not providing this information in a timely manner may impact your ability to do business with AECOM. The link you receive will expire, if not used, in 48 hours for security purposes. If your link expires or if you need additional support, click [here](#) to email the AECOM Supplier Onboarding team.

What We Need From You

As a supplier or subcontractor, for us to award work to you, it's important that you provide the requested information in our Coupa procurement system to finalize your onboarding process.

Thank you for partnering with us!

[Join Coupa Supplier Portal](#)

[Forward Invitation](#)

I hope this email is helpful, but if you have any questions, please feel welcome to call me and we can go over it on the phone.

Have a great weekend and speak with you soon.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement

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Subject: MFFN Community Access Road Update
Sent: 2025/01/25, 01:26:53
From: Angelis, Niki [Redacted]
To: [Redacted]
Cc: [Redacted]

Hello Chief Allen,

I hope this email finds you well.

The MFFN Community Access Road is progressing and the release of the Draft Environmental Assessment / Impact Statement is approaching. We look forward to sharing the report with Constance Lake First Nation and having the opportunity to connect at upcoming events in February.

I also wanted to send a reminder of the **Milestone #3 Progress Report** that was sent on November 28, 2024. We welcome any edits or comments to your community-specific section which you may provide through email, telephone or by scheduling a meeting. If you have any feedback to share, please provide it by February 14, 2025.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement

[Redacted]



[Redacted]

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Subject: RE: Visit to CLFN - Saturday Feb 22

Sent: 2025/01/29, 17:00:40

From: Angelis, Niki [REDACTED]

To: LRManager

Hello Roger,

I have been speaking with the Project Team and we are looking forward to visiting Constance Lake First Nation on February 22 for a dinner and presentation.

Please note however, that only our technical team is available to come. Bob Baxter, a MFFN Councillor and the Community Access Road's Senior Community Advisor is still away and has not been able to confirm his availability for that day, yet.

Please let me know if you are ok if it is just our technical team that comes for the visit.

Sincerely,

Niki

Subject: MFFN CAR - Follow-Up on ATRI Forum #2
Sent: 2025/03/06, 16:32:28
From: Angelis, Niki [REDACTED]
To: Carly John-George; Jennifer Duncan; Bertha Sutherland; [REDACTED]
Cc: Andrea Nokleby
Attachments: [REDACTED]

Good morning,

The Project Team for the Marten Falls First Nation Community Access Road is finalizing their reporting on consultation and engagement activities for 2024 in relation to their Environmental Assessment / Impact Assessment (EA / IA). At this time, we would like to provide you with some general updates and opportunities to discuss next steps with the Project Team.

Over the last two years, as a result of feedback from participating communities and their representatives, this Indigenous-led road Project Team has worked to reduce consultation fatigue by combining efforts with other road projects (Webequie Supply Road and Northern Road Link) in Northern Ontario to host events together where possible. The Aboriginal and / or Treaty Rights and Interests (ATRI) Forums held in February and November 2023, and the Three Roads Projects Gathering and Expo in June 2024 and February 2025, were undertaken to address consultation and engagement priorities while being respectful of cultural protocols. These events provided opportunities to share information in settings that encouraged discussions and feedback. They have also encouraged community representatives from potentially affected Indigenous communities to participate in learning more about these road projects and to share information individually with each of the Project Teams, that can be considered in each of the EA / IA processes.

Today, we would like to provide you with summaries of the feedback we have received through your community's participation in the ATRI Forum held in November 2023. Attached you will find summaries of discussions held in the MFCAR breakout sessions your representatives attended in November 2023 and participation in the Cumulative Effects Workshop undertaken on the last day of the ATRI Forum.

Chi Miigwech,

Niki Angelis
Communication and Community Engagement
[REDACTED]



[REDACTED]

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Cumulative Effects Workshop

Marten Falls First Nation Community Access Road (MFCAR) • Northern Road Link (NRL) • Webequie Supply Road (WSR)

November 23rd, 2023

The Cumulative Effects Workshop was undertaken with all community representatives present on Day 3 of the Aboriginal and/or Treaty Rights and Interests Forum in Thunder Bay held from November 21st to 23rd, 2023. The purpose of the Workshop was to introduce the concept of cumulative effects and how they would be assessed in the environmental assessment/impact assessment (EA/IA).

The Workshop opened with an overview presentation on Cumulative Effects Assessment by representatives of the three road Project Teams which was followed by the Impact Assessment Agency of Canada's (IAAC) overview presentation. This was then followed by a formal Q&A session where community representatives could ask questions of members of the Project Teams, for Marten Falls Community Access Road (MFCAR), Northern Road Link (NRL), and Webequie Supply Road (WSR), IAAC staff, and the Ministry of the Environment, Conservation, and Parks (MECP) staff about cumulative effects and the cumulative effects assessment process.

The table below outlines the comments made and issues raised by participating community representatives and the responses provided during the session by members of the MFCAR, NRL, and WSR Project Teams, IAAC, MECP, Ministry of Mines (MINES), and Ministry of Natural Resources (MNR) staff. The last column provides further information from the Project Teams as overall post-forum responses considered feedback on comments shared and issues raised by participating community representatives. The table includes comments from an Attawapiskat First Nation community member who attended for information purposes only and were not representing Attawapiskat First Nation. No formal representation from Attawapiskat First Nation was present during the Forum.

ABORIGINAL AND / OR TREATY RIGHTS AND INTERESTS

WEBEQUIE SUPPLY ROAD (WSR) • MARTEN FALLS FIRST NATION COMMUNITY ACCESS ROAD (MFCAR) • NORTHERN ROAD LINK (NRL)

MIIGWECH / MIIGWETCH / THANK YOU!

Webequie First Nation and Marten Falls First Nation greatly appreciate your community's participation in the 3-day Aboriginal and/or Treaty Rights and Interests Forum and Cumulative Effects Workshop held in Thunder Bay from November 21 to 23, 2023. The Forum focused on discussing potential impacts to northern Indigenous communities' Aboriginal and/or Treaty Rights and Interests and the Workshop provided an overview and discussion of the Cumulative Effects Assessment as they relate to the following Projects:

**Webequie Supply Road (WSR) • Northern Road Link (NRL)
Marten Falls First Nation Community Access Road (MFCAR)**

**AS PART OF THE ASSESSMENT PROCESSES FOR THE PROJECT(S),
OUR GOAL IS TO WORK WITH YOU TO:**



Develop an understanding of Aboriginal and/or Treaty Rights and Interests of each community within each distinct Project area.



By understanding Rights and Interests we will be in a better position to have discussions about potential Project(s) impacts.



Together, we can then look at ways of avoiding, reducing, and mitigating potential negative impacts while enhancing potential opportunities to support Aboriginal and/or Treaty Rights and Interest.

The Forum was also an important opportunity to:

- Meet face-to-face
- Connect on how we can work together
- Better understand the roles we all play in assessing potential impacts to Aboriginal and/or Treaty Rights and Interests
- Reduce consultation fatigue
- Provide input into the ongoing Baseline (Existing) Conditions reporting for all three road Projects

For your review and comment, please find attached:

- Summary of comments your community provided in the individual Project-Specific Breakout Session(s)
- Summary of comments provided during the Cumulative Effects Discussion (Day Three Morning)

As First Nation Proponents we understand that assessing potential impacts to Aboriginal and/or Treaty Rights and Interests is complex and iterative. As such, we would greatly appreciate the opportunity to meet with your community one-on-one to further our conversations on this important part of the assessment processes.

Based on positive feedback, we planned related sessions in 2024 and 2025.
Please stay tuned for updates on other sessions and more information on upcoming ones.

To **schedule a one-on-one meeting** or to share further information about your Aboriginal and/or Treaty Rights and Interests with Project Team Representatives please contact:

MFCAR: Andrea Nokleby: [REDACTED]

NRL: Mishal Naseer: [REDACTED]

WSR: Michael Fox: [REDACTED]



MARTEN FALLS FIRST NATION
COMMUNITY ACCESS ROAD



Subject: MFFN CAR - Draft EA / IS Review and Upcoming Webinars

Sent: 2025/03/27, 23:25:02

From: Angelis, Niki <[redacted]>

To: [redacted]

Kevin Proctor

Cc: [redacted]

Good afternoon,

I hope this email finds you well.

As you know, the Draft Environmental Assessment / Impact Statement (EA / IS) is available for your review. In addition to hard copies that were mailed out, the full document can also be downloaded here:

[redacted] Please submit questions and or feedback directly to the Draft EA / IS review team here: [redacted]

To help with your review of the Draft EA / IS, **Community Capacity Funding** of \$ [redacted] is available to you. If you are still interested in these funds, please return the signed agreement with a void cheque so that I can initiate the transfer. If you have any additional questions about the program please contact me.

Other items:

Aboriginal and / or Treaty Rights and Interests (ATRI) Forum #2 Summary

On March 6 we distributed the ATRI Forum #2 Summary with comments and notes. Please let the MFFN CAR Project Team know if there are any adjustments needed to the comments your community has provided by April 11, 2025. Please note that the summary will form part of the public record. If you need additional time to review the summary, please let me know.

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 info@martenfallsaccessroad.ca!

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement

[redacted]



[redacted]

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Subject: RE: Constance Lake Contacts for MFCAR/NRL/WSR

Sent: 2025/04/16, 17:32:50

From: Angelis, Niki [REDACTED]

To: Jennifer Duncan

Cc: Kimberly Jorgenson; Bertha Sutherland; LRManager; Wayne Neegan; Shannon Costigan

Hello Jennifer,

Thank you for providing the name and contact information for Shannon Costigan. I will add Shannon to the CAR contact list and she will begin receiving updates and emails moving forward.

Sincerely,

Niki

Subject: MFFN CAR - Upcoming Engagement Activities
Sent: 5/2/2025, 4:51:20 PM
From: Angelis, Niki [redacted]
To: [redacted]

Good afternoon,

I hope this email finds you well. Below is some news on upcoming engagement opportunities related to the Community Access Road.

Upcoming Webinars

Our Draft EA / IS webinar series starts next week!

The first in this series is **Community Well-Being**, held on Tuesday, May 6, 2025, at 4:00 p.m. EST.
Register now by following this link: [redacted]

You can also register for the upcoming webinars:

- **Land: Ungulates (Mooz / Moose and Atik / Caribou) - Thursday, May 8 - [Register Here](#)**
- **Water: Fish and Fish Habitat - Thursday, May 22 - [Register Here](#)**
- **People: Land and Resource Use - Thursday, June 5 - [Register Here](#)**

Public Information Centre #6 – Save the Date!

We will be hosting Public Information Centre #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 [redacted] and keep an eye out for updates from info@martenfallsaccessroad.ca.

Draft Environmental Assessment / Impact Statement

The Draft Environmental Assessment / Impact Statement is available for your review. In addition to hard copies that were mailed out, the full document can also be downloaded here: <https://eais.martenfallsaccessroad.ca/>. Just a reminder that the Community Well-Being Report was updated to the website on April 18 and is also available for review.

We are halfway through the review process of the Draft! Please submit questions and or feedback directly to the Draft EA / IS review team here: [redacted] by June 23, 2025

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement
[redacted]



aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

Subject: MFFN CAR - Meeting Materials
Sent: 2025-05-30, 4:29:42 PM
From: Angelis, Niki [REDACTED]
To: Jennifer Duncan
Cc: Kimberly Jorgenson; Shannon Costigan

Hello Jennifer,

I hope this email finds you well.

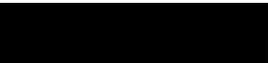
During the PIC #6 this past week in Thunder Bay and Geraldton, I heard that Four Rivers will be hosting some meetings regarding the Community Access Road. I stopped by your office today to drop off some large maps of the preferred route, a bound Assessment Summary booklet with the Plain Language Summaries and the Executive Summary in English, OjiCree and Ojibway.

I hope your meetings go well and please let me know if you require anything to support your outreach.

Have a nice weekend!

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement



aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

AECOM Canada celebrates 114 years in Canada delivering our most iconic infrastructure projects.

Subject: RE: MFFN CAR Capacity Funding and Meeting Reimbursement
Sent: 6/6/2025, 1:34:27 PM
From: Angelis, Niki [REDACTED]
To: Ting Du; Gilles Boucher; Kevin Proctor; Bertha Sutherland; Wayne Neegan; LRManager
Attachments: [REDACTED]

Good afternoon,

I hope this email finds you well.

Attached please find the signed Capacity Funding Agreement for your records. I understand that the funds were transferred on May 30, 2025

Have a great weekend!

Sincerely,
Niki

Community Capacity Funding Agreement

THIS COMMUNITY CAPACITY FUNDING AGREEMENT (“Agreement”) made as of the 8 day of April, 2025.

BETWEEN:

OF THE FIRST PART

Constance Lake First Nation

37 Wa-wa-ska-shoo St. - PO Box 4000, Constance Lake, ON P0L 1B0

Attention: Kevin Proctor, Executive Director

Email: [REDACTED]

(hereinafter, the “Community”),

- AND -

OF THE SECOND PART

Marten Falls First Nation as represented by 2617482 Ontario Inc.

[Enter Mailing Address]

Attention: Qasim Saddique, Project Director

Email: [REDACTED]

(hereinafter, the “Project Team”),

- AND -

OF THE THIRD PART

AECOM Canada ULC

99 Commerce Drive, Winnipeg, MB

Attention: James McCutcheon |

Email: [REDACTED] address]

(hereinafter, “AECOM”),

(Each a “Party” and collectively the “Parties” to this Agreement)

RECITALS:

WHEREAS Marten Falls First Nation (“MFFN”) is a remote First Nation community in northern Ontario located at the junction of the Albany and Ogoki rivers, approximately 430 km northeast of Thunder Bay;

AND WHEREAS MFFN is currently only accessible by air and a winter road. Given the unreliability of the winter road, MFFN is proposing an all-season community access road (the “Project”) to connect MFFN to Ontario’s provincial highway network (i.e., Highway 643) to the south via the existing Painter Lake Road;

AND WHEREAS MFFN is represented by the Project Team to assist MFFN with a Provincial Environmental Assessment and Federal Impact Assessment (the “Draft EA/IS”) to assess the potential Project effects and benefits;

AND WHEREAS the Project Team would like to engage the Community for participation in a “Community Capacity

Funding Program” as set out in this Agreement so as to facilitate the review of the Draft EA/IS by the Community and the gathering of feedback where provided by the Community.

AND WHEREAS, through this Agreement, the Community has agreed to participate in the Community Capacity Funding Program.

AND WHEREAS the Parties agree that it is the Community’s responsibility to identify the use and allocation of the funds in connection with this Agreement for the purposes of reviewing the Draft EA/IS and, further, to have an opportunity to provide feedback at its discretion to AECOM and the Project Team (“**Funding Purpose**”).

AND WHEREAS, specific to this Agreement, the Project Team has retained AECOM for the sole purpose of making payment of the Capacity Funding (as defined below) to the Community at the direction of the Project Team as set out in this Agreement.

NOW THEREFORE THIS AGREEMENT WITNESSES that, for the good and valuable consideration set out herein, the Parties hereby agree as follows:

ARTICLE I: PAYMENT OF CAPACITY FUNDING

1.1 Lump Sum Payment. The Project Team agrees to pay the Community a one-time, lump sum payment of [REDACTED] (“**Capacity Funding**”).

1.2 Schedule of Payment. Upon execution of this Agreement by all Parties, the Project Team hereby directs AECOM to pay the Community the Capacity Funding within 30 days of the execution of this Agreement by all Parties.

ARTICLE II: SCOPE OF CAPACITY FUNDING

2.1 Scope of Capacity Funding. The Capacity Funding is intended to support the Community's ability to engage on the Project in accordance with the Funding Purpose. The Capacity Funding may be used to facilitate the Funding Purpose by financially supporting the Community's review of the Draft EA/IS, including costs related to: (a) securing meeting space, (b) rental or purchase of office and/or accessibility equipment; (c) office materials and incidentals; (d) compensating community members for their time to review and the provision of feedback; or (e) hiring of a community coordinator to facilitate the Community's review and organize the submission of feedback.

2.2 Confirmation of Draft EA/IS Review and Provision of Feedback. The Community agrees that it shall review the Draft EA/IS and provide written confirmation of its completed review to AECOM and the Project Team. This written confirmation shall be provided by no later than 120 days following the Community’s receipt of the Draft EA/IS (“**Review Date**”). Additionally, the Community may provide feedback it obtains through the review process to AECOM and the Project Team at its sole discretion before the Review Date.

2.3 Voluntary Participation. The Community agrees that it is participating in the Community Capacity Funding Program voluntarily, without pressure, duress or inducement. As the Community Capacity Funding Program is being used to facilitate engagement with several First Nations across northern Ontario, it is acknowledged and agreed that the Capacity Funding is intended to support Community consultation and that neither the Project Team nor AECOM make any representations or warranties, express or implied, in relation to the sufficiency of the Capacity Funding to

fully facilitate the Community's engagement on Project, including the Funding Purpose as set out herein.

ARTICLE III: USE OF INFORMATION

3.1 Use of Information. The Project Team and AECOM may use the information gathered through the Community Capacity Funding Program and this Agreement for the purposes of incorporating the Community review and feedback into finalizing the Provincial Environmental Assessment and Federal Impact Assessment of the Project. Further, AECOM and the Project Team may use the information to report on the Community Capacity Funding Program to the MFFN or any authority having jurisdiction, including on issues pertaining to specific Community consultation or First Nation consultation generally, in respect of the Project or any other reasonable use or purpose, including to comply with any legal obligations.

3.2 No Expectation of Confidentiality. There is no expectation of confidentiality associated with the Community Capacity Funding Program, including in relation to this Agreement, receipt of written confirmation of the Community's review and feedback, and the Capacity Funding.

ARTICLE IV: RELATIONSHIPS AMONGST PARTIES WITHIN COMMUNITY CAPACITY FUNDING PROGRAM

4.1 Role of AECOM. The Project Team and the Community confirm and agree that AECOM's only responsibility under this Agreement is to facilitate the payment of the Capacity Funding in accordance with Article I (Payment of Capacity Funding). The Project Team and Community acknowledge and agree that AECOM shall have no other obligations or requirements of any kind or nature whatsoever with respect to this Agreement. AECOM and the Project Team have no responsibility for, or control of, the Community or its personnel and AECOM and the Project Team will have no liability for any acts or omissions of the Community or its personnel. The Project Team and the Community agree and acknowledge that AECOM makes no representations, and shall have no responsibility, as to the completeness or sufficiency of the Community Capacity Funding Program or the Capacity Funding for any purpose, including the Funding Purpose. AECOM does not have responsibility regarding the treatment of Community's consultation or feedback by any authority having jurisdiction in relation to the Project.

4.2 Independence of Community. The Parties acknowledge and agree that the Community is not a consultant, subconsultant, contractor, subcontractor, employee, or advisor of AECOM or the Project Team. For greater certainty, this Agreement shall not be interpreted or construed to create an association, joint venture, agency relationship, vendor-client relationship or partnership between the Parties. It is understood and agreed that the Community's participation in the Community Capacity Funding Program does not represent the Community's position in relation to the Draft EA/IS in any way whatsoever and this Agreement shall not be interpreted or construed to represent a position by the Community in relation to the Draft EA/IS for any purpose.

ARTICLE V: GENERAL

5.1 Governing Law. This Agreement shall be governed by the laws of the Province of Ontario.

5.2 Entire Agreement. This Agreement (a) constitutes the entire agreement and understanding between the Parties with respect to the subject matter hereof and (b) supersedes all prior agreements, understandings, negotiations and discussions by or between the Parties pertaining to the subject matter of this Agreement. There are no warranties, representations or other agreements, whether oral or written, express or implied, collateral or otherwise, by or between the Parties pertaining to the subject matter of this Agreement except as set forth in this Agreement.

5.3 Assignment. No Party may assign this Agreement without the prior consent in writing of the other Parties.

5.4 Modification and Waiver. This Agreement may not be modified, amended or supplemented except by written agreement of the Parties. No act or omission by a Party, other than a written waiver, shall constitute a waiver of any provision of this Agreement. No waiver of any provision of this Agreement shall constitute a waiver of any other provision, nor shall any such waiver constitute a continuing waiver, unless otherwise specifically agreed in writing by the Parties.

5.5 Notice. All written notices required to be given in this Agreement must be in writing and must be delivered to each Party's representative at each Party's address first listed above. Notice may be given by (a) hand delivery; (b) email; or (c) registered mail. Notice by hand delivery or registered mail shall be effective on the day of delivery. Notice by email shall only be effective on the day of written responding confirmation of receipt (which, for certainty, does not include any automated replies from a recipient's email account.) Each Party's representative and address may be changed upon the delivery of written notice to the Parties.

5.6 Successors and Assigns. This Agreement shall be binding upon the Parties and shall continue in full force and effect in the event any Party is permitted to assign this Agreement or if there is any change in ownership, control or management of any Party.

5.7 Dispute Resolution. Upon the delivery of a written notice of a dispute arising out of or in connection with this Agreement by any Party, the Parties shall attempt to resolve such dispute, by structured negotiation, on a without prejudice basis, with the assistance of a mediator appointed by the Parties. If a dispute cannot be settled within a period of 30 days after such notice of dispute, or such longer period as may be agreed to by the Parties, the Parties shall be free to pursue any other procedures or remedies available to them, including arbitration or litigation, in an effort to finally resolve the dispute.

5.8 Interpretation. The recitals first listed above form an integral and essential part of this Agreement. Capitalized terms shall be given the meaning as first set out in this Agreement.

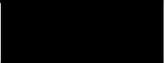
5.9 Severability. The invalidity or unenforceability of any provision of this Agreement will not affect the validity or enforceability of any other provision but this Agreement will be construed as if such invalid provision were omitted.

5.10 Counterparts, Signatures and Retention. This Agreement may be executed in one or more counterparts, each of which is an original, and which, taken together, shall constitute one and the same agreement. The signing of a facsimile copy or portable document format (PDF) copy of this Agreement and any amendments thereto shall have the same effect as the signing of an original. The retention of an electronic version of this Agreement is permitted and the subsequent production of an electronic version of this document shall be treated as if it was the production of an original signed copy.

[Remainder of page intentionally blank. Signature page follows.]

IN WITNESS WHEREOF the Parties hereto have executed this Agreement as of the day and year first written above.

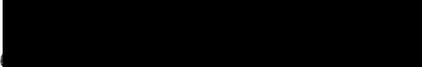
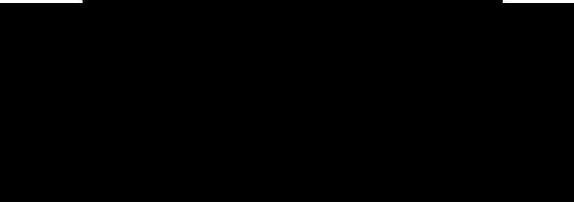
[Constance Lake First Nation]

Per: 
I/We have authority to bind Constance Lake
First Nation.
Name: Kevin Proctor
Title: Executive Director
Date: April 8, 2025

Per: _____
I/We have authority to bind the [name of
community] .
Name: _____
Title: _____
Date: _____

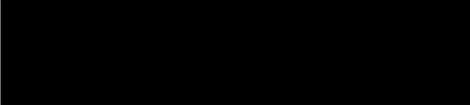
Apr 8, 2025

Marten Falls First Nation as represented by 2617482 Ontario Inc.

Per: 


Per: _____
I/We have authority to bind the MFFN Project
Team.
Name: _____
Title: _____
Date: _____

AECOM Canada ULC

Per: 
Name: James McCutcheon
Title: AECOM Project Manager
Date: April 17, 2025

Per: _____
I/We have authority to bind the AECOM Canada
Ltd.
Name: _____
Title: _____
Date: _____

Subject: MFFN Community Access Road - CLFN Community Meeting Summary - February
Sent: 6/17/2025, 2:58:10 PM
From: Angelis, Niki<[REDACTED]>
To: LRManager; Bertha Sutherland
Cc: Jennifer Bruin; Trimble, Ingrid; Bob Baxter
Attachments: [REDACTED]

Good afternoon Roger and Bertha,

Further to the in-person meeting held on February 22, 2025 in Constance Lake First Nation, please find the meeting summary attached for you review.

Please let me know if you have any comments or edits you would like made to the minutes. If you can send me feedback by June 30, that would be great.

Thank you,
Niki



MARTEN FALLS FIRST NATION ALL SEASON COMMUNITY ACCESS ROAD

Project Name: Marten Falls First Nation (MFFN) All Season Community Access Road (CAR)

Date of Meeting: February 22, 2025
Time: 5:00-9:00 pm EST

Attendees: Constance Lake First Nation Community Members (eight attendees)
Roger Wesley, Constance Lake First Nation – Lands and Resource Department Manager (Community Representative)
Bertha Sutherland, Constance Lake First Nation – CBLUP Land Use Planning Coordinator (Community Representative)
Jennifer Bruin, MFFN CAR Project Team
Ingrid Trimble, MFFN CAR Project Consultant
Niki Angelis, MFFN CAR Project Consultant
Gabbie Ratajczak, MFFN CAR Project Consultant

Project #: [REDACTED]
Location: In-person, Constance Lake First Nation

Prepared By: Gabbie Ratajczak (MFFN CAR Project Consultant)

Absent: Bob Baxter, MFFN CAR Senior Community Member Advisor

Regarding: MFFN CAR Project Overview and Update on Draft Environmental Assessment / Impact Statement

Notes of Meeting

Meeting Summary

The Marten Falls First Nation (MFFN) Community Access Road (CAR) Project Team (the Project Team) and representatives and community members of Constance Lake First Nation met to discuss the Community Access Road, provide a general overview and present an update on the Draft Environmental Assessment / Impact Statement (EA / IS).

The meeting started with a presentation from the Project team to share general information on the CAR and the Draft EA / IS. There was an opportunity for discussion and questions throughout the meeting. A summary of comments, questions and action items are captured below.

The following materials were made available to Constance Lake First Nation during the meeting:

- Draft EA / IS Assessment Summary Package, which included:
 - Chief's Letter





Meeting Summary

- Plain Language Summaries
- Maps
- Executive Summary

The following action items were identified during the meeting:

- Constance Lake First Nation shared information about climate change, fish and blastomycosis, The Project team will share this information with the Climate Change Adaptation, Fish and Fish Habitat and Community Well Being teams. (Complete)

Item #	Topic / Theme	Comments / Questions	Response / Action Items
1	General Project	<ul style="list-style-type: none"> ● The Community Representative welcomed attendees and explained the purpose of the CAR, which is to provide MFFN with all-season access for health and social purposes. MFFN community members want this road for their own community, and are not involved in the Ring of Fire process. 	<ul style="list-style-type: none"> ● Comment acknowledged.
2	Fish and Fish Habitat, Surface Water	<ul style="list-style-type: none"> ● A Constance Lake First Nation community member expressed concern about the Albany River and what efforts will be made to protect it. They expressed that while they support MFFN and acknowledge that the CAR is needed for their prosperity, they (Constance Lake First Nation) are concerned about the long-term effects of the road on the river and tributaries that they rely on for fishing. 	<ul style="list-style-type: none"> ● The Project Consultant described that potential effects, mitigation measures and cumulative effects are considered in the Draft EA / IS. ● The information on surface water is summarized in Sections 8, 9, 10 of the Draft EA / IS, while a full technical report is appended.
3	Access	<ul style="list-style-type: none"> ● A Constance Lake First Nation community member asked who will own the road and will it be publicly accessible. ● A Constance Lake First Nation community member commented that people are coming up from southern Ontario and the United States and 	<ul style="list-style-type: none"> ● The Project Team confirmed that access concerns have been shared with them. They also confirmed that discussions regarding ownership and long-term operation and maintenance





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		<p>using their rivers. The community is worried if there are no measures put in place for the road.</p> <ul style="list-style-type: none"> The Community Representative explained that discussions surrounding access and control of the road are currently ongoing between MFFN and the province. However, once the road is established, the opportunity for access will open up to others. 	<p>are ongoing between MFFN and the province.</p>
4	Human Health	<ul style="list-style-type: none"> The Community Representative commented that the community has seen the presence of blastomycosis in the area. It used to occur only within Weenusk and has now spread to Constance Lake and the surrounding area. The Community Representative explained the illness of blastomycosis, the cause and the loss of five community members to the illness. 	<ul style="list-style-type: none"> Action: The Project Team will share the information with the Climate Change Adaptation and Community Well Being teams.
5	Climate Change, Fish and Fish Habitat	<ul style="list-style-type: none"> A Constance Lake First Nation community member commented that climate change is also affecting the community and noted that bass are now found in the rivers where there were none before. 	<ul style="list-style-type: none"> Action: The Project Team will share the information with the Climate Change Adaptation and Fish and Fish Habitat teams.
7	Indigenous Knowledge and Land Use, Aboriginal and Treaty Rights	<ul style="list-style-type: none"> A Constance Lake First Nation community member commented that Constance Lake has no say in this process. MFFN and Aroland are proponents on this road. However, there are things that occur that come into our river streams. The Albany River feeds into our stream. There is a fear of what will happen to the animals and fish. There are no more fish, and we can't go swimming anymore. 	<ul style="list-style-type: none"> The Project Team shared that MFFN members provided information about the impacts that damming had on their Community. MFFN Community members also provided information on surface water baseline conditions that informed our studies. <i>Post-Meeting Note: The Draft EA / IS contains information on the existing conditions of rivers, lakes and streams in the study area, as well as potential effects, mitigation</i>





MARTEN FALLS FIRST NATION ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
			<i>measures and cumulative effects. Please see Sections 8, 9 and 10 for more information or the Surface Water Technical Support Document.</i>
8	Consultation Methods	<ul style="list-style-type: none"> A Constance Lake First Nation community member asked if Fort Albany and Kashechwan First Nations are also involved. The Albany River is a means of transportation for those communities as well. 	<ul style="list-style-type: none"> The Project Team confirmed that those communities are involved. MFFN is consulting with 22 other Indigenous communities and considering aspects that are important to them. The Record of Consultation and Engagement is available on the Draft EA / IS website. You can filter and see what comments we have received from neighbouring Indigenous Communities and our responses.
9	Aboriginal and / or Treaty Rights and Interests, Consultation Methods	<ul style="list-style-type: none"> A Constance Lake First Nation community member asked if it is just MFFN's decision on the road. Will they consider other communities? The Community Representative explained that the decision on the road itself will likely sit with MFFN, however, the community would likely respect Constance Lake First Nation's input on river crossings and take it into consideration. 	<ul style="list-style-type: none"> The Project Team added that feedback from 22 neighbouring Indigenous Communities has been sought since the start of the planning process and have incorporated feedback where appropriate.
10	General Project	<ul style="list-style-type: none"> A Constance Lake First Nation community member asked what has been happening with the winter access road. The Community Representative explained that the winter season for the winter road is becoming shorter each year due to climate change. Community members have to fly in and 	<ul style="list-style-type: none"> Comment confirmed.





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		out more often and it's costing more money.	
11	Crossing Structure, Consultation Methods	<ul style="list-style-type: none"> The Community Representative commented that the Albany River crossing and other river crossings affect other First Nations outside of MFFN. MFFN would likely respect our opinions regarding the crossings and consider it into their decision. 	<ul style="list-style-type: none"> The Project Team noted how MFFN feedback informed the selection of river crossings with the intend to minimize impacts. However, the detailed design phase is not yet complete and we have created buffer areas. This means that there is flexibility in the design and we are allowed to adjust the route design if issues arise.
12	Consultation Methods	<ul style="list-style-type: none"> A Constance Lake First Nation community member suggested that the Project team visit on a weekday next time instead of a weekend. The Community Representative clarified based on past community turnouts, Constance Lake First Nation invited the Project team to visit on a weekend. 	
13	Consultation Methods, Indigenous Knowledge and Land Use, Aboriginal and Treaty Rights	<ul style="list-style-type: none"> The Community Representative asked where the Indigenous Knowledge component is in this process. They indicated that in Australia and New Zealand they are using an Indigenous science approach in combination with western science. The Community Representative was wondering if something similar was being done for the CAR. All the information shared from Constance Lake First Nation is 	<ul style="list-style-type: none"> The Project Team explained the use of an Indigenous Knowledge that includes contributions from many communities. Other aspects include having MFFN Community Members Advisors on the Project Team providing Indigenous Knowledge, and input is constantly received from MFFN community members through participation in field programs. There is information in the Draft





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		processed in a western format. There is no recognition of our knowledge holders and the spiritual connection.	EA / IS that is written in the perspective of community members, has been reviewed by community members and captures their voice.
14	Provincial EA Process, Federal IA Process	<ul style="list-style-type: none"> The Community Representative commented that there is a lot of conversation outside of the environmental area. What are the key pillars of the EA? Was economic development part of it? 	<ul style="list-style-type: none"> The Project Team shared a physical copy of the Draft EA / IS assessment summary package and explained the components of it, displaying all the discipline plain language summaries.

**Post-meeting Notes are included above. Although the information referenced in the Post-meeting Notes was not explicitly discussed during the meeting, the intent is to include additional related information to improve information sharing and progress the discussion with Constance Lake First Nation.*

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.



Subject: MFFN Community Access Road - Latest Updates
Sent: 6/27/2025, 11:58:31 AM
From: Angelis, Niki [Redacted]
To: [Redacted]

Good afternoon,

I hope this email finds you well. Below please find the latest updates on the Community Access Road.

Draft Environmental Assessment / Impact Statement Review Period Complete!

The review period for the Draft Environmental Assessment / Impact statement officially closed on June 23, 2025. The Project Team has received the feedback from Constance Lake First Nation and sincerely value all the feedback provided. Comments and questions received will be recorded, and responses tracked and addressed where possible, in the Final Environmental Assessment / Impact Statement.

If you have questions or if you would like to schedule a meeting to discuss, please contact us.

Public Information Centre #6

Public Information Centre #6 was held on May 26 and 29, 2025, in Thunder Bay and Geraldton, respectively. Thank you to all those who were able to attend the meetings in person. You may review the materials on our website:

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 your community! Ways to provide feedback will be included.

Sincerely,
Niki

Niki Angelis
Communication and Community Engagement



aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

AECOM Canada celebrates 114 years in Canada delivering our most iconic infrastructure projects.

Subject: MFFN CAR - Aboriginal and / or Treaty Rights and Interests: DRAFT Impact Assessment Report
Sent: 7/10/2025, 6:49:55 AM
From: Angelis, [REDACTED]
To: [REDACTED]
Cc: [REDACTED]

Dear Chief Richard Allen,

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 Draft 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 **October 8, 2025** the 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,

Niki Angelis
Communication and Community Engagement
Mobile: [REDACTED]

Out of Office July 10 & 11, 2025



[REDACTED]
aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

AECOM Canada celebrates 114 years in Canada delivering our most iconic infrastructure projects.

Subject: MFFN Community Access Road Updates
Sent: 7/30/2025, 7:02:12 AM
From: Angelis, Niki [redacted]
To: [redacted]

Good morning,

I hope this email finds you well.

Further to the monthly e-blast, field programs are starting up again! Field programs to support the Preliminary Design and future permitting for the MFFN CAR will commence this summer and into the fall. The following three field programs are included in the Summer / Fall 2025 Field Notice: Stage 2 Archaeological Assessment, Groundwater Well Decommissioning and Geotechnical Investigation.

For more information, read the full field notice here: [redacted]

I would also like to remind you that your community specific **Draft Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report** (Draft Report) was sent on July 10, 2025 for your review and feedback. You may 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. Please submit any comments, questions, additional Indigenous Knowledge or details about important sites, areas or resources through email. If we don't hear back with new information by **October 8, 2025** the report will be finalized.

Kind regards,

Niki Angelis
Communication and Community Engagement
Mobile: [redacted]

Out of Office July 10 & 11, 2025



[redacted]
aecom.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

AECOM Canada celebrates 114 years in Canada delivering our most iconic infrastructure projects.

Niki Angelis
Communication and Community Engagement
[redacted]

Subject: MFFN Community Access Road Latest News
Sent: 8/28/2025, 7:35:02 AM
From: Angelis, Niki [Redacted]
To: [Redacted]

Good morning,

I hope this email finds you well.

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 Community Access Road on the environment and the Community.

To watch our latest video, click here: [Redacted]

Draft Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report

I would also like to remind you that your community specific Draft Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report (Draft Report) was sent on July 10, 2025 for your review and feedback. You may use the following link to access and download your Draft Report here:

- [Redacted]

The review period for this report is 90 calendar days. Please submit any comments, questions, additional Indigenous Knowledge or details about important sites, areas or resources through email. If we don't hear back with new information by **October 8, 2025** the report will be finalized.

Kind regards,

Niki Angelis
Communication and Community Engagement
Mobile: [Redacted]



[Redacted]

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AECOM Canada celebrates 114 years in Canada delivering our most iconic infrastructure projects.

Niki Angelis
Communication and Community Engagement
Mobile: [Redacted]

Out of Office July 10 & 11, 2025

B4.2 Incoming Community Specific Correspondence

From: LRManager [REDACTED]
Sent: Wednesday, September 25, 2024 4:07 PM
To: Angelis, Niki [REDACTED] Chief [REDACTED]
Cc: Bertha Sutherland [REDACTED]; Monica John-George [REDACTED]; Kimberly Jorgenson [REDACTED]; Jennifer Duncan [REDACTED]; Wayne Neegan [REDACTED]; LRManager [REDACTED]; Rosemary Moonias [REDACTED]; Alanna Robbins [REDACTED]; [REDACTED]; Jennifer Bruin [REDACTED]; [REDACTED]; [REDACTED]

Subject: RE: MFFN Community Access Road – About the Draft EA / IS

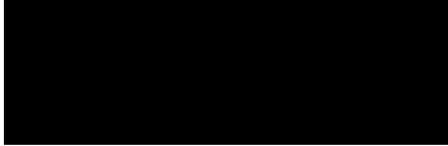
Watcheay Niki

I was wondering if you were able to make a presentation in CLFN sometime soon as per MFFNCAR. Please let me know if this is doable and if you have any dates in mind.

Meegwetch



Roger Wesley
Lands & Resource Manager
Constance Lake First Nation



From: LRManager <[redacted]>
Sent: Friday, September 27, 2024 1:59 PM
To: Angelis, Niki [redacted]; LRManager [redacted]
Cc: Chief [redacted]; Bertha Sutherland [redacted]; Monica John-George [redacted]
[redacted]; Jennifer Duncan [redacted]; Wayne Neegan [redacted]
Rosemary Moonias [redacted]
Subject: RE: MFFN CAR - Ways to get involved

Watcheay/Booshoo Niki
Kitchi Meegwetch for reaching back and raising all these items. As the new guy on the team I am still getting myself caught up.
As far as the Draft EA/IS review process I was hoping we could get your team into CLFN to make public presentation to membership. This way they can be informed and hopefully share their feedback for your use.
I am not sure about the Community Coordinator Program but sounds very interesting and supportive. Would like to request you resend me the agreement you are referring to for further review on my end. I would be very interested in getting this opportunity going again if it was not activated earlier.
The ATRI review is also something I am very interested in. Please resend me this document as well and will get my team to review for feedback as soon as possible for your use.
So please resend me the past documents and I will get things going on all of them. We wish the Marten Falls First Nation all the best as you navigate through this process to realize your dreams of a community access road sooner than later. If any questions please give me a call at cell info found below. Wishing you a great long weekend. Take care and keep safe if you out travelling this weekend.
Meegwetch



Roger Wesley
Lands & Resource Manager
Constance Lake First Nation
[redacted]

From: Rosemary Moonias [REDACTED]
Sent: October 31, 2024 2:26 PM
To: Angelis, Niki [REDACTED]
Subject: Re: MFFN CAR - Ways to get involved

Please remove Monica John-George from the email list. She is no longer in the same position.

Regards,

Rosemary Moonias
Executive Director
Constance Lake First Nation
[REDACTED]

From: Rosemary Moonias <[REDACTED]>
Sent: January 9, 2025 9:13 AM
To: Angelis, Niki <[REDACTED]>
Subject: Re: MFFN CAR - Capacity Funding and In-Person meetings

Good morning,
I came across this email while searching for something else. I'm not sure if my team responded to your email.

Regards,

Rosemary Moonias
Executive Director
Constance Lake First Nation

[REDACTED]

From: LRManager <[REDACTED]>
Sent: January 10, 2025 3:34 PM
To: Angelis, Niki <[REDACTED]>
Subject: RE: Visit to CLFN

Niki

The week of February 17-21, 2025 is currently open for a visit. Let me know if that works for you team. Any date that week could work.

Meegwetch

From: LRManager <[REDACTED]>
Sent: January 10, 2025 1:59 PM
To: Angelis, Niki <[REDACTED]>
Subject: Visit to CLFN

Good Day Niki

Is there any interests for a community visit in CLFN. We would welcome you and your team to a community information session if your available. We could set up and promote an information session if you able. We have done this with the Webequie Supply Road team and it gives our membership a good update and have seen much good feedback on their project. I think I asked about this earlier but figured I would ask again, lol. Never hurts to ask I was told in my younger days. Let me know if this is possible and what dates work for you if there is interests.

If interested in we would do a CLFN Staff Teams meeting for an hour or two followed by a community information session at our Community Hall. The community information session will be a catered feast followed by MFCAR presentation and opportunity of feedback and questions. Just so you have an idea of what we do here in CLFN. Looking forward to your response.

Meegwetch

Roger

From: LRManager <[REDACTED]>
Sent: January 10, 2025 1:42 PM
To: Angelis, Niki <[REDACTED]>
Subject: RE: MFFN CAR - Webinar Q&A Submission

Niki

Thanks for the response to my questions. I asked about climate change as we are seeing and living through some severe impacts the past few years. The new weather patterns with increase average temperatures, severe wind patterns from the south as well as unnatural rainfall patterns have brought on new natural health factors. In the past few years we have been seeing very high not natural impacts from Blastomycis, a common fungi that exists in on out traditional lands. When our members got infected they survived a disease called Blastomycosis which killed several of our members during an outbreak in 2021. We also had another 60+ members catch this Blastomycosis and many were hospitalized for several months before recovering. Just wanted to bring this to your attention.

Meegwetch
Roger

From: LRManager [REDACTED]
Sent: January 21, 2025 8:57 AM
To: Angelis, Niki [REDACTED]
Subject: RE: Visit to CLFN

Watcheay Niki

Wayne Neegan will be attending the 19th and 20th session in Thunder Bay. I am still working my schedule and hope to be there as well but as of right now I have another commitment I hope to move. I would love for you and your team to visit CLFN. I am thinking Saturday the 22nd would be best for a community session. Friday's not a good day for public session in CLFN as most folks are heading out of the community for their shopping needs. We could do a public dinner followed by your projects presentation. Say we start dinner at 5pm and presentation at 6pm until 9pm. If that works for you we could coordinate the catering and haul bookings. We do have a projector but would advise you bring your own in case we have technical difficulties. Let me know what works best for you and your team.

Meegwetch
Roger

From: Kevin Proctor [REDACTED]
Sent: January 24, 2025 1:46 PM
To: Rosemary Moonias [REDACTED] Angelis, Niki [REDACTED]
Cc: Roger Wesley <[REDACTED]>
Subject: Re: MFFN CAR - Capacity Funding and In-Person meetings

Hi Niki,

With much appreciation,

Rosemary forwarded your email to me, and I'll be your primary contact for this capacity funding moving forward.

Please find the answers to your questions below. Could you also kindly provide a copy of the transfer payment agreement? This will help me ensure that all reporting requirements are met.

Thank you very much for your support and assistance!

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[My Calendar & Book a Meeting](#)

From: Ting Du <[REDACTED]>

Sent: April 8, 2025 1:23 PM

To: Angelis, Niki [REDACTED]

Cc: Gilles Boucher [REDACTED]; Kevin Proctor [REDACTED]; Bertha Sutherland [REDACTED]; Wayne Neegan [REDACTED]

Subject: MFFN CAR Capacity Funding and Meeting Reimbursement

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You have not previously corresponded with this sender.

Hi Niki,

Hope you are well!

Please see the signed document and CLFN void cheque attached here.

Please let me know if you have any questions.

Thanks,
Ting

From: Jennifer Duncan <[REDACTED]>

Sent: June 4, 2025 8:11 AM

To: Angelis, Niki [REDACTED]

Cc: Kimberly Jorgenson [REDACTED]; Shannon Costigan [REDACTED]

Subject: Re: MFFN CAR - Meeting Materials

Thank you Niki! Much appreciated.

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CONSTANCE LAKE FIRST NATION



June 23, 2025

AECOM Canada Ltd.
C/O Joanne Wang



Email: eaisinput@martenfallsaccessroad.ca

Re: Constance Lake First Nation Comment Submission on Marten Falls Community Access Road Draft EA/IS

Dear Joanne,

Please find attached Constance Lake First Nation's final comment submission on the Marten Falls Community Access Road (MFCAR) Draft EA/IS that was released to Indigenous communities for review in February 2025. Constance Lake First Nation (CLFN) completed a Technical Review of the EA/IS documentation and completed a series of Community Engagement Sessions to capture community feedback specific to the project. The combined outcomes of the activities are compiled in the attached submission.

While our Nation has concerns about the environmental impacts of MFCAR, we respect the need for Marten Falls First Nation to advance this project for the betterment of their people and community. Our Nation has familial and kinship ties to Marten Falls going back many generations and we understand their desire to have improved access to resources and services. However, that support does not mean our concerns should be minimized. We expect that Canada, Ontario, and the Proponent will take seriously the issues raised in this submission and implement measures to mitigate environmental and cultural risks, increase accountability, and ensure that benefits are shared equitably with all impacted Nations.

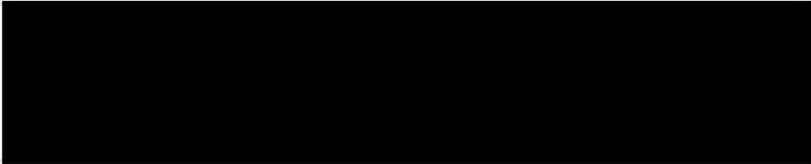
The MFCAR is a major infrastructure undertaking in a relatively pristine, ecologically sensitive and culturally significant region. While our review has focused strictly on the MFCAR project as scoped in the EA/IS, we recognize that it may serve as a foundation for future development, including access to the Ring of Fire. CLFN therefore emphasizes that the findings and recommendations in this review must not be viewed in isolation and do not imply consent to further development. Our Nation will assess the impacts of the Northern Road Link and mines in the Ring of Fire with a more critical lens and will likely consider additional impacts on the MFCAR corridor from the Ring of Fire mining projects when those projects are under review.

CLFN remains committed to constructive dialogue and regional collaboration. We are prepared to work alongside other Nations, governments, and proponents to ensure that any development in our homelands proceeds in a way that is respectful, balanced, and aligned with our values, rights,

and responsibilities to the land.

Respectfully yours,

On behalf of Constance Lake First Nation Chief & Council



- cc. Roger Wesley, CLFN (LRManager@clfn.on.ca)
Bertha Sutherland., CLFN (bertha.sutherland@clfn.on.ca)
Kimberly Jorgenson, Four Rivers Inc. (kjorgenson@fourrivers.group)
Jennifer Duncan, Four Rivers Inc. (jduncan@fourrivers.group)
Shannon Costigan, Four Rivers Inc. (scostigan@fourrivers.group)
Andrew Bubar, Tamarack Environmental. (andrew@tamarackenvironmental.ca)
Ryan Smith, Tamarack Environmental (ryan@tamarackenvironmental.ca)
Chief Bruce Achneepineskum, MFFN (bruce.achneepineskum@gmail.com)
Lawrence Baxter, MFCAR Project Team (lawrencebax@gmail.com)
Dorothy Moszynski, MOECP (dorothy.moszynski@ontario.ca)
Sasha McLeod, MOECP (sasha.mcleod@ontario.ca)
Caitlin Cafaro, IAAC (martenfalls@iaac-aeic.gc.ca)



Marten Falls First Nation Community Access Road – Environmental Assessment / Impact Statement

Technical Review

June 23, 2025

Submitted by: Constance Lake First Nation



Executive Summary

This technical review was prepared by Constance Lake First Nation (CLFN) to evaluate the Environmental Assessment/Impact Statement (EA/IS) for the proposed Marten Falls Community Access Road (MFCAR; the Project). The review was developed through a combination of technical analysis, community input, and Traditional Knowledge shared by land users, knowledge holders and elders. It reflects the deep concern of our Nation regarding the environmental, cultural, and rights-based impacts of the proposed road, which would cross a region where our members have harvested, travelled, and lived since time immemorial. While CLFN is aware that the road enables future development to access the Ring of Fire, CLFN focused our review solely on the MFCAR project.

While our Nation has concerns about the environmental impacts of MFCAR, we are broadly supportive of Marten Falls establishing road access to their community. Our Nation has familial and kinship ties to Marten Falls going back many generations and we understand their desire to have improved access to resources and services. While we are supportive of the Project, we have identified a number of gaps and limitations in the EA/IS through our review. Key findings are summarized below:

- **Terrestrial Ecology:** Species such as woodland caribou, moose, and wolverine will lose habitat and face increased stress from fragmentation, noise, and human access. Hunting and poaching pressure will likely increase, but the EA/IS does not propose effective means to mitigate these issues.
- **Aquatic Ecology:** Incomplete studies at river crossings, missing baseline data, and lack of integrated watershed analysis make it difficult to assess true risks to fish and aquatic ecosystems. Spill response planning is vague, especially given the extremely remote setting of the road and the large, fast-flowing rivers in the area.
- **Water Resources:** The EA/IS lacks a detailed water management and monitoring plan, particularly for high-risk events like spring melt or major rainstorms and for management of high flow events on the major water crossings that have upstream water control structures. Baseline groundwater contamination findings were not explained or contextualized.
- **Air Quality:** No operations phase monitoring is proposed for dust, emissions, or smoke from debris burning, despite risks to human and environmental health. The potential impacts of increased road traffic and exposure for land users are not addressed.
- **Climate Change:** The EA/IS fails to consider how a changing climate—including permafrost thaw, flooding, wildfire, and heat—will impact road integrity, safety, and nearby ecosystems.
- **Socio-economics:** The EA/IS provides limited analysis of how the Project will impact social well-being, health, safety or access for surrounding First Nations other than Aroland and Marten Falls. There is no clear plan to ensure that Nations other than Aroland and Marten Falls will benefit from employment, training, or procurement opportunities from the Project.



Based on our review findings, CLFN has prepared a series of comments and recommendations on the EA/IS to reduce the negative impacts of the Project and to increase the benefits to impacted First Nations. In addition to the comments and recommendations in our review, CLFN has the following general recommendations to Canada, Ontario and the Proponent:

1. **Support community-led environmental stewardship along the road corridor** by funding CLFN (and other impacted Nations) Guardian involvement in water, wildlife, and spill monitoring, and integrating ongoing traditional knowledge into environmental management.
2. **Advance equitable economic opportunities for CLFN and other impacted First Nations** through mandatory Indigenous hiring targets, procurement policies, and exploring revenue-sharing or toll structures tied to road use for future industrial development.
3. **Strengthen road planning and design to protect land, water, and cultural use** by incorporating CLFN and other Nation feedback on trapline access, spill response infrastructure, baseline data needs, and culturally significant areas.
4. **Confirm clear and demonstrated community support from Marten Falls First Nation** by the Proponent providing transparent evidence of broad-based community support before Project approval.
5. **Ensure road access is managed through a secure, gated system** led by Marten Falls and Aroland, with protocols for monitoring traffic, limiting unauthorized use, and protecting the surrounding environment.

Because of our support for Marten Falls to establish road access to their community, our EA/IS review has focused narrowly on the impacts of the road itself and does not consider the Ring of Fire beyond what is scoped into the cumulative effects assessment in the EA/IS. Our Nation will assess the impacts of the Northern Road Link and mines in the Ring of Fire with a more critical lens, and will likely consider additional impacts on the MFCAR corridor from the Ring of Fire mining projects when those projects are under review.



Contents

1.0	Introduction.....	1
2.0	About Constance Lake First Nation.....	2
3.0	The Marten Falls First Nation Community Access Road	3
4.0	Community Engagement	5
4.1	Summary of Engagement Activities	5
4.2	Summary of Community Input.....	5
4.2.1	Environmental Protection & Water Concerns.....	5
4.2.2	Wildlife & Invasive Species	6
4.2.3	Land Access, Traplines & Cultural Impacts.....	6
4.2.4	Governance, Consultation & Trust.....	6
4.2.5	Social Impacts & Long-Term Planning.....	6
4.2.6	Safety & Access Management	7
4.2.7	Procurement, Employment & Equity	7
4.2.8	Monitoring & Education	7
5.0	Technical Review of the Environmental Assessment	8
5.1	Summary of Key Findings.....	8
5.1.1	Overall Key Findings	8
5.1.2	Terrestrial Ecology Key Findings	8
5.1.3	Aquatic Ecology Key Findings	9
5.1.4	Water Resources Key Findings	9
5.1.5	Air Quality Key Findings	10
5.1.6	Climate Change Key Findings	10
5.2	CLFN Detailed Comments and Recommendations on the MFCAR EA/IS 11	
6.0	Conclusion.....	55
7.0	References	56



1.0 Introduction

Constance Lake First Nation is a steward of lands and waters within our Traditional Territory encompassing the Albany, Missinaibi and Attawapiskat River Watersheds. For countless generations, our members have exercised their inherent rights to hunt, fish, trap, gather medicine, and conduct ceremonies across our vast territory. The proposed Marten Falls First Nation Community Access Road (MFCAR) cuts directly through areas that remain central to our cultural identity, livelihood, and spiritual practices.

We recognize that the MFCAR — championed by Marten Falls First Nation (MFFN; the Proponent) — promises improved connectivity and economic opportunity for their community. At the same time, its footprint and associated activities carry the potential to disrupt waterways, fragment wildlife habitat, alter hydrological regimes, and disturb sites of archaeological and cultural importance. Without careful analysis and responsive measures, even well-intentioned infrastructure can severely impact the rights of our Nation and other impacted Indigenous Nations.

The purpose of this technical review is to ensure that CLFN's rights, Traditional Knowledge, and land-use values are fully integrated into the Environmental Assessment/Impact Statement (EA/IS) for the MFCAR. Through this review, we:

- Document our key areas of concern—from water quality and wetland hydrology to wildlife corridors and cultural heritage;
- Highlight technical gaps in the EA/IS that, if unaddressed, could lead to adverse impacts on our rights and the health of our lands and waters; and
- Offer targeted, practicable recommendations for project design adjustments, mitigation strategies, and monitoring programs.

Our analysis is grounded in:

- Community-driven Traditional Knowledge and Land Use, which pinpoints seasonal harvesting areas, travel routes, and sacred sites;
- Technical review of EA/IS content supported by our technical advisors; and
- Ongoing dialogue with our membership and with the Proponent, aimed at co-developing solutions that uphold both Project objectives and our Nation's enduring relationship with these lands.

By presenting this technical review, CLFN underscores our commitment to meaningful collaboration and co-governance. We seek not simply to identify concerns, but to work with MFFN, regulatory authorities, and other Indigenous Nations to develop a Project pathway that respects our rights, sustains ecological integrity, and upholds the enduring relationship between our members and this land. From this lens, we have prepared a series of comments and



recommendations on the EA/IS with a focus on the implications and potential impacts on our Treaty and Aboriginal rights and interests. These technical comments and recommendations were directly informed by input from our members.

2.0 About Constance Lake First Nation

We are Constance Lake First Nation, an Oji-Cree Nation with a long-standing history rooted in the river systems, forests, and muskeg of northern Ontario. Our people come from the traditional territories surrounding Mammamattawa, a place where the Kenogami, Kabinakagami, and Nagagami Rivers meet. In our language, Mammamattawa means “the meeting of the waters.” This place was a central gathering area for our ancestors and many neighbouring First Nations in the Albany, Missinaibi and Attawapiskat river watersheds. Our members lived on the land over these vast watersheds for generations, following the rhythms of the land through hunting, trapping, fishing, and ceremony. Mammamattawa was also a key site for trade and travel, with both Hudson’s Bay Company and Revillon Frères posts established there.

In 1905, during the signing of Treaty No. 9, our ancestors were recognized by the Crown as the English River Band, considered a branch of the larger Albany Band. The federal government established the English River Reserve, known today as English River 66, near the junction of the rivers. This reserve was meant to serve as a permanent home for our people, but it quickly became clear that the location was unsuitable for year-round living. The area is mostly very low lying and swampy, making it unsuitable to develop the infrastructure to support a growing community.

By the 1940s, many families were forced to leave the Mammamattawa area. Some moved temporarily to Pagwa River, where rail lines and forestry jobs provided economic opportunity. In 1944, the Department of Indian Affairs established a new reserve for our Nation near Hearst, Ontario, where our Nation now resides. It was not our first home, but it became a place where our community could rebuild, reconnect, and continue our way of life.

Although our community is now located near Hearst, our connection to Mammamattawa and our broader Traditional Territory remains strong. We maintain close familial and kinship ties to Marten Falls First Nation and many other Matawa and Mushkegowuk Nations. The waterways in our Traditional Territory were, and still are, cultural highways that link our communities through shared land use, intermarriage, and seasonal harvesting. These are not just historic ties; they continue to shape our relationships today.

As Oji-Cree people, we carry the knowledge, laws, and languages of both our Ojibwe and Cree ancestors. This cultural blending defines who we are and how we live. It informs our relationships to the land and water and guides our responsibilities to protect the territory that has sustained us for generations. Constance Lake First Nation remains committed to defending our rights, speaking for our lands, and maintaining strong relations with our neighbours, including Marten Falls. Our identity is grounded in our past, but our responsibilities are to the future.



3.0 The Marten Falls First Nation Community Access Road

The Marten Falls First Nation Community Access Road (MFCAR) is a proposed all-season road intended to connect the remote community of Marten Falls First Nation to Ontario's provincial highway network. Located in the James Bay Lowlands region of northern Ontario, MFFN is currently accessible only by air and a seasonal winter road. The planned access road would span approximately 184 kilometers from the northern terminus of Painter Lake Road, north of Aroland and Nakina, to the MFFN community at the confluence of the Albany and Ogoki Rivers. The project is led by MFFN and is designed to provide reliable, year-round transportation to improve access to essential services, goods, and opportunities for economic and community development.

The proposed road will be a two-lane, all-season gravel corridor with associated infrastructure including stream and river crossings, such as culverts and bridges, and temporary construction features such as work camps, access trails, and aggregate source areas. The project is expected to enhance quality of life in Marten Falls by improving access to healthcare, education, and food security while reducing the cost of living. Additionally, the road is intended to serve as a step toward enabling future resource development associated with the Ring of Fire. The MFCAR would include the following major components:

- Approximately 184 kilometres of all-season gravel road, with the roadway 12-13 metres wide and cleared to a width of 60 metres
- 47 bridges and 21 culverts
- 40 aggregate sites
- 7 temporary work camps
- 35 temporary roads to access temporary camps and aggregate pits
- Rest areas and maintenance facilities that will be identified during detailed engineering
- Ongoing maintenance and inspection requirements post-construction.

Marten Falls First Nation is both the project proponent and an Indigenous community affected by the proposed development. The project is currently undergoing both a federal Impact Assessment and a provincial Environmental Assessment. The EA/IS will broadly follow the Impact Assessment Process outlined in the Impact Assessment Act (2019). The Terms of Reference for the provincial EA was approved in October 2021, and the Draft EA/IS was released for public and Indigenous review in February 2025. Following the technical review of the draft EA/IS, the Proponent will prepare and submit a final EA/IS based on the Indigenous and public input. IAAC and Ontario will then prepare and Impact Assessment Report which will be provided to the Minister of Environment and Climate Change Canada (ECCC) to make a determination on whether the Project is in the public interest. Impacted Indigenous Nations will have the opportunity to co-draft components of

the Impact Assessment Report for the Project with IAAC.

Although the MFCAR is framed as a community access road, its strategic function within Ontario’s infrastructure and resource development agenda cannot be understated. The road would open up large, relatively intact landscapes to year-round vehicular access for the first time, raising concerns about future development, increased pressure on wildlife, and degradation of water quality and wetlands in the James Bay Lowlands.

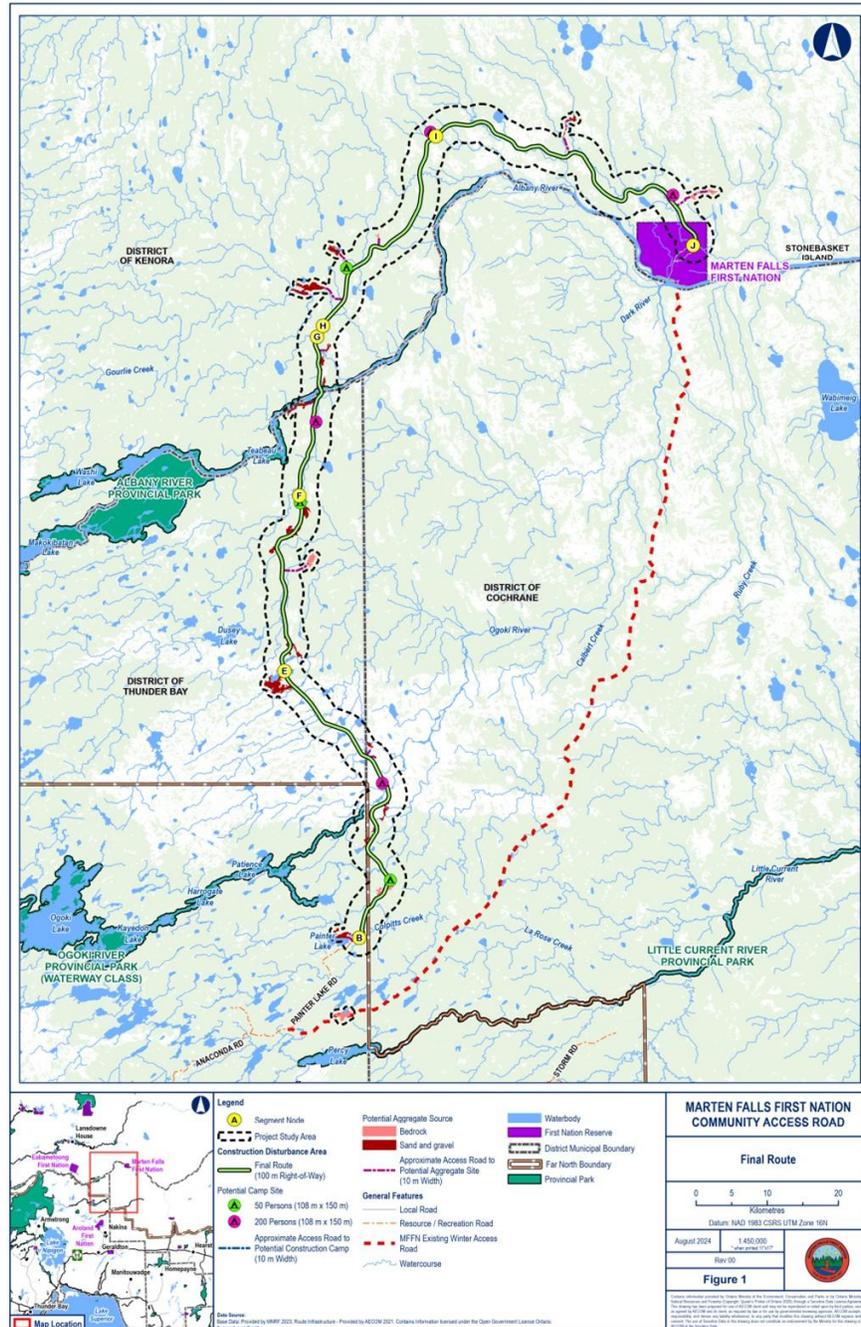


Figure 1: Map of the Marten Falls First Nation Community Access Road Route

4.0 Community Engagement

CLFN staff, along with assistance from Four Rivers Environmental Services (Four Rivers) and Tamarack Environmental Associates (Tamarack), facilitated community engagement sessions to gather input and perspectives on the EA/IS for the MFCAR. A draft version of this report was prepared in advance of the community engagement, and the preliminary findings from this report were presented at the community engagement sessions. This final version of the report has been modified based on the input and perspectives provided by CLFN members during the community engagement sessions.

4.1 Summary of Engagement Activities

The community engagement sessions occurred on the CLFN reserve on June 2nd and 3rd, 2025. All sessions included a short presentation by CLFN, Four Rivers and Tamarack, followed by an extended discussion period where members asked questions and shared their perspectives on the Project.

Table 1: Summary of community engagement sessions on MFCAR EA/IS

Date and Time	Location	Approximate # of CLFN Attendees
June 2, 11am – 12pm	CLFN High School	20
June 2, 1pm – 4:45pm	CLFN Lands and Resource Meeting Room	7
June 3, 1pm – 4:30pm	CLFN Lands and Resource Meeting Room	8
June 3, 5pm – 8pm	CLFN Community Hall	20

4.2 Summary of Community Input

CLFN staff, Four Rivers and Tamarack all took extensive notes during all of the community engagement sessions. While the findings from the community engagement sessions are incorporated throughout the comment table in Section 5.2 of this report, the key topics raised by community members are summarized in the following subsections.

4.2.1 Environmental Protection & Water Concerns

- Strong concerns about spills affecting rivers, fish, and wetlands (especially sturgeon, whitefish, walleye, pike, and peatlands).
- Calls for emergency spill response kits and monitoring stations along the road.

- Requests for greater baseline studies, including fish sensitivity, river crossings, and shade/tree loss impacts.
- Participants noted the significant historical and ongoing impacts of Waboose and Long Lake Dams and highlighted past impacts of bridge construction throughout CLFN territory.
- Concerns about salt, herbicide spraying, loss of permafrost and loss of shade on small rivers.

4.2.2 Wildlife & Invasive Species

- Noted risk of increased overharvesting, poaching, and introduction of invasive species (e.g., bass, zebra mussels, cormorants).
- Calls for an improved wildlife baseline assessment on species like wolverines, turtles, porcupines, and Arctic fox.
- Requests for invasive species management plans and regional Indigenous monitoring that includes CLFN.

4.2.3 Land Access, Traplines & Cultural Impacts

- Worries about the road's effect on trapline holders and moose habitat.
- Interest in compensation and clear identification of whose traplines are affected.
- Emphasis on preserving burial sites, traditional land use areas, and Oji-Cree identity and connections to the land.

4.2.4 Governance, Consultation & Trust

- Major concern about Marten Falls' level of community engagement—does the Project represent the majority of MFFN members, or is it driven by consultants?
- Requests for full transparency from Marten Falls and Ontario on the intention for the Projects role in relation to the Ring of Fire, with suggestions to send letters to Premier Ford.
- Demand that Treaty 9-wide impacts be acknowledged and addressed.
- Skepticism over the fast-tracking of the project and limited time for off-reserve consultation.

4.2.5 Social Impacts & Long-Term Planning

- Calls to consider drug epidemics, intergenerational unemployment, and seven generations into the future through a range of socio-economic programs.

- Suggestions to use the Project to uplift CLFN and other communities, not just build infrastructure.

4.2.6 Safety & Access Management

- Suggestions to install gates at the start and end of the road that are controlled by Marten Falls First Nation.
- Proposals for two-way radios or satellite phones for road users to ensure safety.
- Concerns about lack of police presence and road-related dangers (accidents, wildlife collisions, getting stranded).

4.2.7 Procurement, Employment & Equity

- Frustration over lack of local hiring and failure of contractors to hire CLFN members.
- Call for a First Nations-led procurement strategy and potential for CLFN employment centre.
- Suggested toll system and royalties if the road connects to the Ring of Fire.

4.2.8 Monitoring & Education

- Strong push for long-term environmental monitoring during both construction and operation.
- Suggestions for CLFN guardians to be involved directly.
- CLFN noted an interest in learning from this EA process to potentially conduct our own in the future.

5.0 Technical Review of the Environmental Assessment

Constance Lake First Nation has undertaken a technical review of the EA/IS for the Project including the appendices made available by the Proponent. This technical review is focused on potential impacts to CLFN rights and interests and includes an examination of information gaps, deficiencies in data, underrepresentation of potential effects, inadequate monitoring, and lack of involvement of CLFN. Recommendations have been written to identify means by which the Proponent and/or the Crown can address the potential impacts to CLFN rights and interests through commensurate avoidance, mitigation, accommodation and/or compensation measures.

5.1 Summary of Key Findings

The key findings from CLFN technical review of the EA/IS are summarized below. Detailed comments and recommendations on the EA/IS are presented in Section 5.2

5.1.1 Overall Key Findings

- **Impacts are downplayed through flawed methods:** The EA/IS assumes everything will be built and operated perfectly, and that mitigation measures will always work. It rates nearly all impacts as “low” or “negligible,” even when the risks to water, wildlife, and cultural heritage are serious.
- **The process leaves out many Indigenous Nations:** While Marten Falls First Nation and Aroland First Nation are rightfully included in Project decisions, CLFN and other Indigenous Nations with significant rights and interests in the project area were not meaningfully involved in shaping the EA/IS.
- **Western science dominates the assessment:** Indigenous Knowledge is not used to assess environmental change or determine significance. This makes the EA/IS feel one-sided and disconnected from the lived experience of our members on the land.

5.1.2 Terrestrial Ecology Key Findings

- **Wildlife will be harmed:** Species like woodland caribou, moose, and wolverine will lose critical habitat due to forest clearing, noise, and new human access.
- **Key animal corridors will be broken up:** The road will create new barriers and increase the risk of predation and vehicle collisions. This disrupts seasonal movement patterns for many species and isolates populations for sensitive species that need intact habitats.

- **Hunting pressure will increase:** The road will allow more people into previously remote areas. This will increase hunting and trapping pressure on species that are already sensitive, but the EA/IS fails to consider this in detail.
- **Long-term habitat change is not monitored:** There is no strong plan to track how habitat fragmentation or vegetation loss will change over time or how that affects animal populations.

5.1.3 Aquatic Ecology Key Findings

- **Fish and fish habitat are not fully protected:** In-stream work and water crossings can harm fish spawning and habitat, especially during spring melt or low-flow periods. The EA/IS lacks details on how these risks will be managed and monitored.
- **Only some rivers have been studied:** Out of 9 major river crossings, only 2 have received archaeological and ecological assessment. The rest are missing baseline data, which creates serious blind spots, especially the lack of information on fish spawning areas.
- **Impacts to aquatic life are assessed in isolation:** The EA/IS looks at each crossing as a separate issue, without studying how effects add up across the entire watershed or over time.
- **No clear plan for spill response at rivers:** The EA/IS does not explain how fuel or chemical spills would be quickly contained in fast-moving waters or in areas that are hard to reach, especially in winter or spring flood seasons.
- **Invasive aquatic species could spread:** There is no solid plan to monitor or prevent the spread of invasive fish or aquatic plants along the road corridor, despite this being a known risk with new access routes.

5.1.4 Water Resources Key Findings

- **Storm events and spring melt are not planned for:** The EA/IS does not require special water monitoring during periods when erosion and sediment runoff are most likely, even though these events pose the greatest risk to rivers and wetlands. This is particularly concerning in relation to the [REDACTED]
- **Groundwater already shows serious contamination:** Water samples show high levels of arsenic, uranium, and other harmful metals. The EA/IS does not explain where this contamination is coming from or how it might affect downstream users.
- **Real-time monitoring is missing:** There are no commitments to use real-time sensors or automatic triggers to pause work if water quality drops. This means problems could go undetected for days.
- **Peatlands and wetlands will be damaged:** Over 2,000 hectares of sensitive wetlands will be disturbed or drained. These systems are critical for storing water and filtering pollution, and

they are very difficult to restore once harmed, and impacts from roads extend far beyond the roadway itself.

- **Culverts may not maintain natural water flow:** The EA/IS assumes culverts and drainage structures will keep water moving normally, but there is no long-term plan to monitor whether this is actually happening—especially in frozen or shifting ground and in peatland areas with complex groundwater flow.

5.1.5 Air Quality Key Findings

- **Air monitoring is missing:** There is no commitment to track dust, diesel emissions, or smoke from burning debris—even though these pollutants can affect health and land use nearby.
- **Dust could harm traditional foods:** Dust from gravel roads and construction will settle on berries, medicines, and wetlands. This will affect food safety and gathering practices, but is not addressed in the EA/IS.
- **Exposure for land users is ignored:** CLFN land users and members working on the Project who spend time along the route may face regular exposure to air pollution, but the EA/IS does not consider how this affects health or land use rights.

5.1.6 Climate Change Key Findings

- **Climate risks are not assessed:** The EA/IS does not examine how floods, droughts, wildfires, or heatwaves may impact road safety, integrity, or environmental health over time. This is particularly lacking in the cumulative effects assessment.
- **Permafrost and unstable soils are not considered:** Parts of the region may contain frozen or soft ground that shifts as temperatures rise or as the road itself alters temperatures in the soils. There is no plan to monitor or adapt to these conditions during or after construction.
- **Peatland damage will increase overall emissions:** Draining or clearing peatlands releases stored carbon, contributing to climate change. The EA/IS does not properly count these emissions in its climate analysis.
- **No plan for future climate adaptation:** The EA/IS does not consider how road maintenance or emergency response will need to change in a warmer, more unpredictable climate.
- **Species already stressed by climate change will face more pressure:** The EA/IS ignores how animals, plants, and water systems already affected by climate change will be more vulnerable to the added stress of a new road.

5.2 CLFN Detailed Comments and Recommendations on the MFCAR EA/IS

#	Document Reference	Comment	Recommendation
General Comments			
1.	General Comment	<p>CLFN acknowledges and respects the unique challenges faced by MFFN as a remote, fly-in community. We recognize the need for safe, reliable, and year-round access to essential services, goods, and economic opportunities. CLFN supports the goal of improving quality of life for MFFN members through the construction of a community access road. We understand that for MFFN, the Marten MFCAR represents an important step toward enhanced self-determination and community well-being.</p> <p>At the same time, CLFN remains deeply concerned about the broader development trajectory in the region, particularly the road's potential to serve as a precursor to industrial development in the Ring of Fire. While we support MFFN's right to pursue infrastructure that meets their community needs, we view the proposed access road as a separate and distinct project from the broader development agenda associated with the Ring of Fire.</p> <p>CLFN's support for the MFCAR as a community road for Marten Falls does not and must not be interpreted to imply our consent for future projects that may be connected to this road, including the Northern Road Link or mining developments in the Ring of Fire region. Any future project that extends from or builds upon the MFCAR must be subject to separate and robust environmental assessments, consultation processes, and decision-making protocols. Our Nation's consent must be sought independently for each project based on full information, clear purpose, and meaningful engagement.</p> <p>We emphasize that our support for the well-being of MFFN does not diminish our right to protect the lands, waters, and rights of</p>	<p>A. The Crown, including both federal and provincial governments, must clearly recognize that CLFN's support for the Marten Falls Community Access Road is limited to its stated function as a community access initiative. This position must be documented in all decision-making materials related to the Project.</p> <p>B. CLFN's support for the MFCAR does not constitute or imply consent for future projects that may rely on or be enabled by this road. Each of those projects must be subject to their own environmental assessment processes, with full and early consultation, accommodation, and the requirement for free, prior, and informed consent from CLFN.</p> <p>C. The Proponent must not reference CLFN's support for the MFCAR as an endorsement of broader regional development. Public communications and project documentation should clearly distinguish CLFN's support for the road from any position on future development in the Ring of Fire.</p>

		CLFN members from cumulative and long-term impacts associated with industrial access.	
2.	General Comment	The introduction of Ontario’s proposed Bill 5 (2025) raises significant concerns about the future permitting framework for the MFCAR project. This legislation enables exemptions from critical provincial permitting processes, including those under the Aggregate Resources Act, Permits to Take Water, and Environmental Compliance Approvals. These permitting pathways currently serve as key mechanisms for technical review, environmental protection, and Indigenous consultation. Exemptions under Bill 5 would introduce substantial regulatory uncertainty and elevate environmental and rights-based risks, particularly in a region of high ecological sensitivity and cultural importance to our Nation. The EA/IS does not acknowledge or evaluate these emerging risks, despite their potential to fundamentally alter how the project is reviewed, approved, and monitored.	<p>A. The Proponent should commit to upholding existing environmental and permitting standards, even if future changes to legislation (such as under Bill 5) provide exemptions. This includes a commitment to continue seeking Permits to Take Water, Environmental Compliance Approvals, and approvals under the Aggregate Resources Act regardless of any exemption status.</p> <p>B. The Proponent should formally commit to meaningful consultation with CLFN throughout all permitting and regulatory phases of the project, regardless of the requirements imposed (or waived) by the Province. These commitments should be documented and reflected in the Impact Statement and any subsequent agreements to ensure accountability, transparency, and trust. Recognizing the heightened risk posed by legislative uncertainty, the EA/IS should be revised to include a detailed risk assessment of potential regulatory changes and their implications for the project and Indigenous rights.</p>
3.	General Comment	<p>The EA/IS for the MFCAR is being fully funded by the Government of Ontario, which also serves as the primary regulatory authority responsible for approving the EA/IS and issuing associated permits.</p> <p>Public statements from Premier Doug Ford and other senior provincial officials have made it unequivocally clear that the Ontario Government views the MFCAR and the Northern Road Link as strategic infrastructure to accelerate access to the Ring of Fire and facilitate the extraction of both critical and conventional minerals.</p>	<p>A. To address the clear conflict of interest posed by the Ontario Government’s dual role as both project funder and regulatory authority for the MFCAR EA/IS, IAAC must establish independent oversight for the Project that is joint with CLFN First Nation.</p> <p>B. IAAC should exercise its authority to ensure that meaningful consultation with CLFN First Nation is upheld in accordance with the Honour of the Crown, and that cumulative impacts of industrial development in the region are fully assessed through other proposed environmental assessments that are specific to the Ring of Fire, including through the RoF RA.</p>

		<p>Given this dual role as both project funder and regulator—and the Province’s stated objective of expediting mining development - CLFN asserts that the Government of Ontario is in a clear conflict of interest. This conflict undermines the integrity of the EA/IS process, particularly in relation to its obligations to uphold environmental protection and ensure meaningful, good-faith consultation with First Nations whose rights and lands are directly impacted by the project.</p>	
4.	<p>Section 4.5 (How We Selected our Road – Summary)</p>	<p>Section 4.5 of the EA/IS states that the Preferred Route was not the engineers’ preferred option, and that the Project Team worked with engineers to ensure that the selected route is “constructable and safe” for long-term use. However, the EA/IS provides no detailed explanation of the engineering rationale, the specific concerns raised about constructability, or the trade-offs between engineering feasibility, cost, and environmental or cultural considerations.</p> <p>There is also no information provided on the cost implications of selecting a less technically preferred route. Without this information, reviewers cannot evaluate:</p> <ul style="list-style-type: none"> • Whether the Preferred Route is truly sustainable and economically viable; • What long-term risks may be introduced due to terrain, hydrology, or maintenance challenges; • How engineering mitigation will be applied to address those risks. <p>Given the complexity of northern infrastructure development — including challenging soil conditions, sensitive waterways, wetlands, and potential permafrost — it is essential to understand not only how the route balances environmental and cultural values, but what the technical and financial costs are of those decisions.</p>	<p>A. The Proponent should include a summary of the engineers’ comparative assessment of all routes, identifying:</p> <ul style="list-style-type: none"> • The engineering reasons why certain routes were preferred or not preferred; • The specific challenges associated with the selected route; • How those challenges will be mitigated through design, construction, and long-term maintenance. <p>B. The Proponent should disclose cost comparisons between the Preferred Route and other technically preferred alternatives, including:</p> <ul style="list-style-type: none"> • Estimated construction costs; • Projected lifecycle maintenance costs; • Any known increased risks to durability or access resulting from site conditions (e.g., unstable soils, flood-prone areas, water crossings). <p>C. The Proponent should explain how constructability concerns raised by engineers have been fully addressed, and whether additional study or contingency planning will be required prior to detailed design.</p>

5.	Section 6.8.2 (Cumulative Effects Assessment – Project Inclusions List)	<p>Section 6.8.2 of the EA/IS reveals that:</p> <ul style="list-style-type: none"> • <i>“Construction of the MFCAR is anticipated to start within 2 to 5 years of Environmental Assessment / Impact Statement approval, depending on funding and permit acquisition; and</i> • <i>construction duration is anticipated to last between 3 and 10 years.”</i> <p>This extended window — up to 15 years from approval to completion — points to significant uncertainty regarding the practical feasibility of building the MFCAR. Such a broad timeline suggests unresolved issues related to permitting, engineering challenges, and seasonal construction limits. This long construction period suggests that it will still be quite an extended period of time before the cost of living and quality of life in Marten Falls improves.</p>	<p>A. Ontario should disclose cost estimates for the MFCAR under a range of construction durations, including worst-case scenarios for cost overruns and delays.</p> <p>B. Ontario and Canada should push to have the road to Marten Falls built as quickly as possible.</p>
6.	General Comment	<p>The EA/IS appears to place significant emphasis on the perspectives and interests of Marten Falls First Nation and Aroland First Nation, particularly in relation to route selection, project design, environmental monitoring and Proponent collaboration. This is understandable given their geographic proximity to the project and as directly affected communities with strong, well-established rights and interests in the area.</p> <p>However, CLFN also holds a strong and well-established relationship to the lands and waters affected by the MFCAR. The rights, interests, and responsibilities of CLFN — including under Section 35 of the Constitution — are clearly engaged by the project, yet the EA/IS does not appear to reflect the Nation’s perspectives or concerns with the same level of attention or integration as those of Marten Falls and Aroland.</p> <p>While it is appropriate for the EA/IS to highlight the role of Nations geographically closest to the project, a more balanced and inclusive approach that reflects the knowledge, governance, and</p>	<p>A. CLFN requests that Ontario, Canada and the Proponent includes our Nation in the proposed environmental monitoring programs and through the working groups that are established to ensure benefits are accrued to all Nations that are commensurate to the impacts from the Project on impacted Nations. The socio-economic working groups should have a wide mandate both on equitable distribution of project benefits but also supporting member employment and skill building as well as work around managing socioeconomic risks such as the transport of illicit substances along the road.</p> <p>B. CLFN requests that IAAC impose a condition of approval for the Project for environmental monitoring that is inclusive of all impacted Nations.</p> <p>C. CLFN requests that IAAC impose a condition of approval for the Project for the socio-economic working groups that is inclusive of all impacted Nations. CLFN would like to co-draft the condition with IAAC.</p>

		<p>stewardship responsibilities of all impacted Nations — including CLFN — is essential to ensure the assessment process is fair, comprehensive, and credible.</p>	
7.	<p>Section 6.8.1 (Cumulative Effects Methodology)</p>	<p>The approach to assessing cumulative effects outlined in the EA/IS — which involves identifying residual effects of the MFCAR, defining spatial and temporal boundaries based on those effects, and identifying overlapping project interactions — is overly narrow and methodologically insufficient given the complexity of the environmental, cultural, and ecological systems potentially affected by the MFCAR project. Specifically, this interaction-based approach fails to account for:</p> <ul style="list-style-type: none"> • Non-point, system-wide stressors such as climate change, which interact with and amplify local disturbances but are excluded from the analysis because they are not tied to a specific, overlapping “reasonably foreseeable project”; • Chronic and compounding effects on vulnerable species such as boreal caribou, who are highly sensitive to even small-scale habitat fragmentation. Caribou populations do not experience effects in a linear or additive way — rather, the cumulative degradation of intact habitat and increased human presence leads to disproportionately severe outcomes over time; • Indigenous land-use systems and knowledge, which emphasize the interconnectedness of all aspects of land, water, animals, and people. The current CEA framework, rooted in Western analytical methods, fails to incorporate Indigenous values, long-term observations, and relational understandings of how ecosystems experience and respond to stress. • The broader strategic development context in which this road will enable a series of industrial developments in the Ring of Fire region. <p>This assessment is also being carried out in parallel with the RoF RA, a process designed explicitly to examine cumulative effects at the regional scale — including cumulative biodiversity loss,</p>	<ul style="list-style-type: none"> A. Canada and Ontario must require all project assessments for proposed mines in the RoF to be delayed until the issuance of the final report on the RoF Regional Assessment is released. This will allow the RoF mines to incorporate emerging regional-scale data, thresholds, and Indigenous-defined values and indicators. B. For mines in the RoF, Canada and Ontario should require the Project proponents employ a scenario-based, regionally integrated assessment approach, using multiple development futures (e.g., full build-out of MFCAR, Northern Road Link, and Ring of Fire mines) to model cumulative effects on key values such as water, caribou, and Indigenous cultural continuity. C. For mines in the RoF, Canada and Ontario should require the Project proponents expand the scope of the cumulative effects assessment to include non-project stressors such as: <ul style="list-style-type: none"> • Climate change; • Regional hydrological shifts; • Long-range pollution (e.g., mercury transport); • Landscape-level fire suppression and forestry legacies. • Long-term habitat fragmentation trends; • Disturbance buffers beyond the road right-of-way; • Thresholds for population viability under the federal Boreal Caribou Recovery Strategy.

		<p>Indigenous land-use fragmentation, and ecological tipping points. While Table 11-9 of the EA/IS asserts that the RA is “outside the scope” of the MFCAR, this interpretation limits the value of that important work and ignores the significant overlap in purpose and geographic relevance between the two processes.</p> <p>CLFN notes that we are supportive of Marten Falls acquiring road access, so we do not wish to unnecessarily delay this Project to incorporate a more rigorous cumulative effects assessment. Rather our strong preference is to defer a more fulsome cumulative effects assessment to the environmental assessments that are directly tied the development of the RoF, especially the environmental assessments for the mine developments.</p>	
8.	General Comment	<p>CLFN would like to better understand how Marten Falls First Nation (MFFN) selected the proposed road corridor and determined that the MFCAR project had community support. It remains unclear whether decisions were made by leadership alone or with broad input from MFFN members, including those living off-reserve. The EA/IS does not explain who within MFFN was consulted or how consensus was reached. Given that this project will have major long-term environmental and cultural impacts across a shared region, CLFN must have confidence that MFFN’s process reflects meaningful internal consultation and informed community support.</p>	<p>A. CLFN requests a meeting with representatives from MFFN leadership to better understand how engagement with MFFN membership was conducted in relation to the MFCAR. This meeting would provide an opportunity to learn more about how members were informed about the Project, how their input was gathered and considered, and how MFFN ensured that the views of its broader membership were incorporated into project planning and decision-making.</p> <p>B. CLFN recommends that the EA/IS be updated to clearly document the internal engagement and decision-making process undertaken by MFFN. Specifically, the EA/IS should:</p> <ul style="list-style-type: none"> • Describe the methods used by MFFN to engage its members (e.g., meetings, mailouts, surveys, voting processes). Indicate the level of participation and key feedback themes raised by members. • Summarize how this feedback informed project components such as route selection, community benefit planning, and environmental mitigation. • Distinguish between leadership-level decisions and broader community involvement.

9.	General Comment	CLFN has experienced the long-term consequences of improperly managed industrial activity across our Traditional Territory. Our Nation carries the legacy of centuries of mistrust due to past development decisions that were made without our oversight or consent, often resulting in harm to our lands, waters, and community well-being. In the context of the MFCAR, the remoteness of the proposed road corridor significantly increases the risk that materials may be dumped or abandoned without detection. For our Nation, the absence of proper safeguards is not a hypothetical risk, it reflects a pattern we have already lived through.	CLFN recommends that the EA/IS include a long-term, enforceable Road Monitoring and Dumping Prevention Plan developed in collaboration with CLFN. This plan should clearly outline how the road will be actively monitored, how incidents will be reported and addressed, and how CLFN, impacted Indigenous Nations and provincial law enforcement will be involved in ongoing oversight to ensure the road does not become a source of further harm to our lands, waters, and rights.
10.	General Comment	<p>CLFN has observed cumulative impacts across our Traditional Territory from decades of industrial activity, including forestry, mining, and road development. Our Territory sustained our traditional way of life for generations, but it is now heavily fragmented and degraded in many areas due to overlapping disturbances. The proposed MFCAR would cut through one of the few remaining areas of relatively undisturbed wilderness in our Territory. For this reason, CLFN considers any further development in this landscape to be significant, regardless of footprint size or project type.</p> <p>The Proponent's assertion that the impacts on water, fish, and wildlife species are "not significant" does not align with our lived experience over the past century of industrial development since the signing of Treaty 9. We have witnessed how successive projects have led to widespread degradation of ecosystems and loss of culturally important species. Despite our disagreement with the Proponent's conclusions in the residual effects assessment and cumulative effects assessment, we are still supportive of the MFCAR project being constructed to allow Marten Falls to have road access.</p>	<p>A. CLFN requests that the Proponent revise the residual effects assessment and cumulative effects assessment to take a more conservative approach to the determination of significance. Almost all impacts should be deemed significant.</p> <p>B. CLFN recommends that Canada approve the Project for construction, with the increased assessment of significance of impacts addressed through conditions of approval imposed on the Project.</p>
11.	General Comment	CLFN has not seen meaningful capacity-building opportunities associated with the MFCAR process to date. Despite the scale	CLFN recommends that the Proponent and Crown commit dedicated funding and resources to support capacity building for

		and duration of this Project, and the known long-term implications for our lands, waters, and rights, there has been little effort to support CLFN in building the internal expertise, staffing, and infrastructure needed to fully participate in environmental review, monitoring, and decision-making. This limits our ability to engage in the process on equal footing with the Proponent, government, and consultants. CLFN views capacity building not as a benefit, but as a prerequisite for respectful, informed, and equitable involvement in the planning and governance of infrastructure projects within our Traditional Territory.	CLFN throughout all phases of the Project. This should include training, staffing support, technical assistance, and funding for community-based monitoring, environmental governance, and participation in regulatory processes. Capacity building must begin immediately and continue through construction, operation, and long-term monitoring, ensuring CLFN can fully and equitably participate in decision-making and oversight of the MFCAR within our Traditional Territory.
12.	General Comment	CLFN has lived through the long-term impacts of road development. The construction of Highway 11 in the 1930s and 1940s has had lasting consequences for our Nation. While the road brought certain conveniences, it also had serious negative effects on our ability to exercise our Treaty rights. It led to increased access to our territory, habitat loss, and enduring disruptions to our way of life. CLFN would welcome the opportunity to meet with MFFN to share our stories and experiences, and to speak openly about how roads have impacted our land, our people, and our rights.	CLFN requests a meeting with MFFN membership and leadership (not consultants) to share our experiences with the impacts of Highway 11. We believe it would be meaningful to sit down together, share stories, and learn from one another about how road development has affected our communities.
13.	General Comment	CLFN has been significantly and negatively impacted by unrestricted road access in our traditional lands. The construction of roads without sufficient access control has led to numerous adverse effects including increased poaching, unregulated hunting, unauthorized industrial activity, and disturbances to our cultural and spiritual sites. These impacts have degraded our lands and infringed on our rights. Given these past experiences, we are deeply concerned that the MFCAR could result in similar impacts for MFFN if appropriate access controls are not implemented.	CLFN recommends that gates be installed at both the southern and northern ends of the MFCAR to prevent unrestricted access. Marten Falls First Nation should retain full authority to determine who is permitted to use the road. The road must be actively monitored to deter unauthorized activity and enable enforcement.
14.	General Comment	CLFN is concerned that the remote nature of the MFCAR, combined with frequent harsh weather conditions (e.g., extreme	A. CLFN recommends that the Proponent install survival stations at regular intervals along the road, stocked with emergency

		cold, heavy snow, wildfires, flooding, and limited visibility), poses serious safety risks for road users. Given the lack of nearby emergency services and long distances between communities, travelers could become stranded without access to assistance, putting lives at risk.	<p>supplies such as blankets, food, water, heat sources, and communication tools.</p> <p>B. CLFN recommends that the Proponent provide two-way radios or satellite phones at each gate for travellers to borrow, ensuring they have a reliable means of emergency communication in areas without cell coverage.</p>
Aquatic Ecology			
15.	Section 14.2.1.2 Fish and Fish habitat, bullet 3	The current monitoring program for sedimentation control is insufficient because there is only mention of monitors being present prior and during construction of the MFCAR.	CLFN urges the Proponent to have a monitoring team evaluate streams for sedimentation and turbidity after the first 2 rainfalls, as loose gravel and sediment from newly graded roads are more prone to runoff during heavy precipitation events. It's imperative to have benchmark measurements for turbidity and percentage of fine sediment before road construction begins. For turbidity, a common water quality probe (i.e. YSI) will suffice, while a fine sediment analysis is recommended for determining baseline substrate composition.
16.	Section 8.1.6.5 Benthic Invertebrates	The report primarily discusses benthic macroinvertebrate collection using kick netting in water crossings with smaller substrates such as cobble, gravel, fine sediments, and organic matter. However, it does not mention any assessment of benthic invertebrates in habitats with larger substrates like boulders, bedrock, and larger cobble.	<p>A. CLFN recommends that benthic invertebrate studies be conducted at water crossings where larger substrate was present.</p> <p>B. A common practice used in the <i>Canadian Aquatic Biomonitoring Network</i> when investigating invertebrate richness is to use the rock grab method. 100 coarse rocks (selected at random) are lifted and inspected. Documenting macroinvertebrate counts and species diversity for these habitat types are imperative for gathering a holistic understanding of benthic invertebrates across the project's watersheds. CLFN recommend that the Proponent employ the rock grab method as part of the benthic invertebrate baseline monitoring program.</p>
17.	Figure 4-1: Route Alternatives;	CLFN reviewed the desktop information available in the EA/IS and Appendix B (Route Selection Methodology) evaluated the	A. Based on the information provided, CLFN is generally supportive of the approach taken for determining the Preferred

	<p>Figure 11-3: Location of Neighboring Indigenous Communities; Appendix B – Route Selection Method</p>	<p>alternative routes. From this information, a route was selected that would reduce the overall length of road in proximity to watercourses, limit the number of watercourse crossings, and reduce the overlap with existing provincial parks or other sensitive areas. Based on the information provided, it appears the preferred route would be:</p> <ul style="list-style-type: none"> • Alternative 1 for southern section (Segment 1) • Alternative 4 for central section (Segment 2) • Alternative 4 for northern section (Segment 3) <p>For greater clarity, this would involve constructing using the following segment node pathway: B→E→F→G→H→I→J</p> <p>This route aligns with the Preferred Route (Figure ES 4-1 and Figure 4-7) selected by the Proponent.</p>	<p>Route and the route itself. However, there must be an opportunity for further refinement of the preferred route. For example, the route could be adjusted slightly to minimize proximity to watercourses and identify preferred crossing locations. For this reason, CLFN requests that the Proponent invite CLFN to provide input on the final route. We are open to how this can be achieved, for example, written correspondence, community meetings, and/or workshops.</p> <p>B. Secondly, CLFN requests clarification on the flexibility to modify the Preferred Route once the EA/IS is complete. For example, will it be possible to choose a route outside of the 100 m Right of Way?</p>
<p>18.</p>	<p>Appendix G – Section 5 Existing Conditions</p>	<p>The Proponent has only completed detailed fish habitat, fish community sampling, and benthic invertebrate sampling at a subset of 50% (55 locations), 50% (46 locations), and 25% of proposed watercourse crossings, respectively. These were completed in 2019-2022. Fish sampling was conducted primarily with backpack electrofisher and minnow traps.</p> <p>This level of effort is far below what is considered best practice. It is typical to conduct multi-season multi-year baseline studies to adequately characterize natural variability and the habitat use by different species based on their unique life histories.</p>	<p>CLFN requests additional baseline sampling to adequately characterize the aquatic habitat within the LSA. While multi-season sampling at each location is standard, it is recognized that the potential impacts of road are well understood and can be managed with appropriate mitigation measures. Therefore a more practical approach would be to complete a minimum of one baseline sampling event to characterize detailed fish habitat characteristics at all crossing sites of the selected route, in advance of construction (i.e. not just the 50% subset). Of these, areas with high potential for high value habitat (of the selected VC species) should be targeted for fish community sampling as well. This sampling can occur as part of pre-construction monitoring and is not required for completion of the Impact Assessment.</p>
<p>19.</p>	<p>Appendix G – Section 5.5 Existing Environment Characterization by Valued Component Fish Species</p>	<p>The Proponent has not presented any detailed mapping information on locations of spawning habitats for the selected fish VCs. In particular, the absence of thorough assessments of spawning habitat for lake sturgeon (<i>Acipenser fulvescens</i>) and brook trout (<i>Salvelinus fontinalis</i>) presents a significant concern. Both species rely on specialized environmental conditions for successful reproduction, including specific substrate types, water</p>	<p>CLFN recommends that additional efforts be undertaken to evaluate all crossings with potential spawning habitat for lake sturgeon and brook trout. This information should be presented in the EA/IS. Then based on this information, the identification of crossing locations can be optimized to avoid any impacts to spawning areas.</p>

		temperature ranges, flow dynamics, and oxygen levels. Without proper evaluation and identification of these habitats, several risks arise, including the possibility of degrading and/or destroying those habitats which may overlap with crossings.	
20.	Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	The Proponent has stated that an Erosion and Sediment Control Plan will be developed for the Project. This is a critical measure that must be rigorously developed and implemented to adequately mitigate the potential impacts of the road.	CLFN requests the opportunity to review and provide input on the Erosion and Sediment Control Plan once available.
21.	Section 7.1 Summary of Project Components and the Existing Environment	<p>The Proponent states that there will be at least 45 major waterbody crossings along the Preferred Route. This includes 13 culverts, 22 clear-span bridges, and 10 multi-span bridges along permanent crossings. For temporary access roads, there will be 24 temporary waterbody crossings, including 6 culverts, 12 clear-span bridges, and 6 multi-span bridges.</p> <p>However, there is not sufficient details on crossing types and whether they will require site-specific mitigation measures. Given the potential risk of erosion and sedimentation at these important points, there must be additional information on watercourse crossings. This is especially important for areas with potential spawning habitat of all VCs, potential for lake sturgeon, or other environmental sensitivities.</p>	<p>CLFN requests additional information on existing crossings and whether there is a need for site-specific mitigation measures to limit the effects of sedimentation and erosion. For example, it is not clear whether existing crossings provide adequate freeboard or setback distances to avoid effects to watercourse banks and/or prevent ice-damming and associated erosion.</p> <p>Where necessary, the Erosion and Sediment Control Plan should include site-specific plans for sensitive watercourse crossings.</p>
22.	Section 7.1.2.2 Bridges and Culverts; Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	<p>The Proponent has stated crossings will be constructed in a “manner that maintains downstream flows and fish passage”. However, there has been no assessment of minimum/maximum velocities/depths required at crossings to maintain fish passage based on species present. Further, there is not adequate discussion on how sizing of crossings will be planned.</p> <p>Ensuring that watercourse crossings are adequately designed (e.g. to meet depth and flow velocity requirements) is essential for maintaining fish passage and reducing potential effects of erosion and sedimentation. Many fish species rely on specific water</p>	<p>CLFN requests that the Proponent include a commitment that crossings installed will ensure that minimum/maximum flow velocities and depths will be maintained to ensure adequate fish passage for the species present at each crossing. Where possible, this should include:</p> <ul style="list-style-type: none"> Ensuring crossings are adequately sized to pass normal range of water (i.e. 1000-year return period for permanent crossings, and 10-year return period for temporary crossings).

		<p>conditions to migrate, access spawning habitats, and complete their life cycles. If crossings create barriers—such as shallow water, excessive velocity, or obstructions—fish may struggle to move upstream or downstream, leading to habitat fragmentation. Properly designed crossings mimic natural stream conditions, allowing fish to navigate safely while preserving biodiversity and habitat connectivity.</p>	<ul style="list-style-type: none"> • Use open-bottom structures or embedded culverts wherever possible to allow natural sediment transport and habitat continuity. • Design crossings to maintain adequate water depth and manageable flow velocities to support fish passage. • Avoid excessive water speeds that could impede movement, particularly for juvenile or species with low burst speeds.
23.	Section 8.1.6.4 Invasive Species	<p>The Proponent has identified that rock bass and smallmouth bass have been documented in the Albany River and some other locations with the RSA. They have stated that they will “Implement best management practices and regulations outlined by the Ministry of Natural Resources to reduce the spread of invasive species” (Table 9-10). However, they have otherwise not assessed the potential impacts of invasive species on aquatic ecosystems or meaningfully planned any associated mitigation measures. This is a significant oversight.</p> <p>Northern Ontario's aquatic ecosystems remain relatively unimpacted by invasive species, providing native fish populations with stable environmental conditions. However, the construction of new roads in the region may inadvertently introduce aquatic invasive species, posing a serious threat to local biodiversity and ecosystem health. Construction and subsequent road use may lead to the unintentional transport of invasive species via contaminated equipment, vehicles, or recreational activities. Once established, aquatic invasive species are difficult and costly to remove, requiring ongoing mitigation and control effort.</p>	<p>A. CLFN requires that the Proponent evaluate the potential pathways of introduction and potential impacts of aquatic invasive species as part of the EA/IS.</p> <p>B. The Proponent must prepare an invasive species management plan that includes details on how they plan to prevent and manage the accidental introduction of invasive species through all phases of the Project.</p> <p>C. The Proponent should share this plan with the CLFN for review and comment prior to finalization or approval.</p> <p>D. The Proponent should support the establishment of a regional road invasive species subcommittee that includes CLFN and other impacted Nations. This body should coordinate monitoring, prevention protocols, and response measures across all road-linked developments in the region to address the cumulative risk of invasive species introduction and spread.</p>
24.	Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	<p>The layout for Table 9-10 is confusing and makes understanding the information difficult. There are many items that are duplicated, except for the final column. For example, the first two items appear identical (Table 9-10 pp 407 and Table 9-10 pp 410), with the exception of the predicted residual effect. It appears that the difference here is between the project activities being evaluated</p>	<p>A. CLFN requests that Table 9-10 be updated to improve clarity on what project activities are being considered. Potential improvements include;</p> <ul style="list-style-type: none"> • Adding additional description to clarify the activities and/or effects being considered (e.g. include description about whether the effect is above or below the high water mark)

		(above high water mark and below high water mark) but that is only clear when looking at the residual effect. CLFN notes that such lack of clear communication of the critical information in the EA/IS may be construed as making the findings deliberately difficult to interpret and thus avoid proper scrutiny of the Project.	<ul style="list-style-type: none"> List mitigation and enhancement measures in a separate table with associated numbers for each. This will help avoid the duplication of text in the table. <p>B. Similar updates should be made to the tables for all valued components of the project.</p>
25.	Table 9-30: Summary of Residual Effects for Physiography, Terrain and Soils	The Proponent has identified that they will “Avoid placing soil stockpiles near waterbodies or drainage features” (Table 9-30, pp 667). However, this language is vague and is not a useful measure for planning (or for contractors in the future). As stockpiles of overburden and soils are an important source of sediment, it is important that there is a sufficient setback/buffer to prevent potential erosion and sedimentation, especially during periods of high rainfall and/or melting snow.	CLFN requests that excavated materials and stockpiles be placed at a minimum distance of 100m from watercourses. Furthermore, efforts should be made to ensure that stockpiles are covered, revegetated, or otherwise stabilized prior to spring freshet. This should be included as a mitigation measure in Table 9-10.
26.	Table 9-10: Summary of Residual Effects for Fish and Fish Habitat	Similarly to the comment noted above, the Proponent has stated that they will “Locate temporary access roads, staging areas, camps, and debris and / or timber stockpiles a minimum of 30 meters away from the ordinary high-water mark of a waterbody, where possible” (Table 9-10 pp 408). One of the major potential impacts of the Project during construction is the risk of sediment and erosion from stockpiles, camps, and staging areas. It is important that there is a sufficient setback/buffer to prevent potential erosion and sedimentation, especially during periods of high rainfall and/or melting snow.	CLFN requests that a minimum distance of 100m from watercourses be applied to all temporary camps, staging areas, and stockpiles of overburden, aggregates, and soil. Furthermore, efforts should be made to ensure that stockpiles are covered, revegetated, or otherwise stabilized prior to spring freshet. This should be included as a mitigation measure in Table 9-10. It is understood that temporary access roads, debris, and timber stockpiles may need to be within 30 m, therefore the 30m buffer for those activities may be appropriate, depending on the circumstances.
27.	Section 8.1.6.4 Invasive Species	CLFN’s Traditional Territory has been increasingly impacted by aquatic invasive species which pose a serious threat to native fish populations, aquatic vegetation, and culturally important harvesting sites. The construction of the MFCAR will increase the risk of introduction and spread of invasive species through contaminated equipment, vehicles, and expanded public access to previously isolated waterways. This risk is cumulative when considered alongside other road and industrial developments in	The Proponent should support the creation of a regional road invasive species subcommittee with representation from CLFN and other impacted Nations. This group should coordinate aquatic invasive species monitoring, equipment hygiene protocols, public awareness initiatives, and rapid response strategies across all regional access roads. This subcommittee should be formally recognized in the EA/IS as a long-term governance mechanism for

		the region. Given the connectivity of northern water systems, CLFN emphasizes the need for a coordinated, regional approach to aquatic invasive species management.	managing aquatic invasive species introduced or exacerbated by road construction and use.
Terrestrial Ecology			
28.	Table 9-17: Summary of Residual Effects for Riparian Ecosystems (Page 451)	<p>The project will result in the direct loss of approximately 116.7 hectares of riparian vegetation—1% of riparian ecosystems within the Regional Study Area. Although this may seem numerically small, riparian areas provide disproportionately important ecosystem services making them uniquely important.</p> <p>These areas are especially sensitive to disturbance, and even those portions that remain physically intact may experience functional degradation as a result of adjacent clearing and fragmentation. As noted in the assessment, the loss of riparian area could reduce the ability of the remaining ecosystems to carry out their natural functions, emphasizing the need for stronger commitments to protection, restoration, and long-term monitoring.</p>	<p>A. The Proponent must commit to offsetting residual functional losses to riparian ecosystems through the adoption a no-net-loss approach—an established ecological principle that seeks to ensure that the total <i>area</i> and <i>function</i> of a habitat type are maintained or enhanced over time. In practice, this means that when impacts to a habitat cannot be entirely avoided or fully restored, they must be offset through equivalent or greater ecological gains elsewhere.</p> <p>B. The Proponent should commit to limiting clearing of vegetation within 100m of waterbodies.</p> <p>C. The Proponent must strengthen the monitoring and adaptive management framework within the Vegetation Restoration Plan to ensure riparian ecosystem recovery. A long-term, riparian-specific monitoring program must be included in the Vegetation Restoration Plan. Performance benchmarks must be clearly defined, and thresholds should be set to trigger corrective actions if restoration is not proceeding as expected.</p>
29.	Table 9-17: Summary of Residual Effects for Vegetation (Black Ash)	The project currently falls outside the regulated zone for Black Ash (<i>Fraxinus nigra</i>) established under Ontario Regulation 6/24 (Endangered Species Act, 2007); however, the proposed project creates a clear and significant pathway for the introduction of invasive species, especially the Emerald Ash Borer (<i>Agilus planipennis</i>). Construction activities such as equipment mobilization, timber handling, and increased public access along the permanent access road increase the risk of Emerald Ash Borer being introduced into areas where it is not yet present.	<p>A. The Proponent must recognize and proactively manage B [REDACTED].</p> <p>B. The Proponent must integrate Emerald Ash Borer prevention and long-term surveillance into invasive species mitigation.</p> <p>C. The Proponent must update the Vegetation Management Plan to include [REDACTED] and the emerging ecological risks.</p>

		<p>The risk is magnified by the permanent nature of the road, which facilitates ongoing vehicle movement and human activity into relatively intact northern ecosystems. Furthermore, the Emerald Ash Borer’s known range has been steadily expanding northward, and this trend is expected to continue as shorter, milder winters and increased growing degree days under climate change create conditions suitable for the insect’s survival and reproduction in more northern latitudes. As overwintering mortality declines and thermal thresholds are increasingly met, the pest’s establishment risk in currently unaffected regions grows significantly over the lifespan of this project.</p> <p>Importantly, [REDACTED]</p> <p>The current mitigation measures—limited to re-evaluating Black Ash status under future regulatory updates and conducting localized surveys if its listing changes—are reactive and insufficient given the foreseeable threat trajectory.</p>	
30.	Table 9-22: Summary of Residual Effects for Wildlife - Furbearers (Wolverine)	<p>The Environmental Assessment acknowledges that the project will result in a permanent loss of approximately 4,700 hectares of wolverine habitat and indirect alteration to an additional 189,145 hectares through habitat fragmentation, sensory disturbance, and edge effects. Despite concluding that the net residual effect on wolverines is significant, the current mitigation strategy does not include any offsetting or compensation to address this large-scale, irreversible loss.</p> <p>Furthermore, the proposed mitigation measures remain focused on localized, site-specific actions—such as timing restrictions near</p>	<p>A. The Proponent must commit to habitat offsetting to compensate for the permanent loss of 4,700 hectares of core habitat within the biodiversity offsetting and compensation plan. The offsetting strategy should be informed by a regional connectivity assessment to ensure that compensation efforts support landscape-level ecological function and align with known wolverine movement corridors. The connectivity assessment should also include maintaining permeability across the road corridor through measures such as wildlife overpasses, or underpasses informed by local and regional</p>

		<p>active dens and general reclamation of temporary features—but fail to incorporate a landscape-scale or connectivity-based approach. Wolverines are wide-ranging, low-density carnivores that depend on expansive, connected tracts of intact habitat. The construction and operation of a permanent road corridor introduces long-term fragmentation, potential barriers to movement, and increased vulnerability to cumulative stressors. However, the assessment does not identify or protect key movement corridors, nor does it propose any measures to maintain or restore regional habitat connectivity.</p> <p>Without compensating for the permanent loss of core habitat and planning for long-term landscape permeability, the project risks contributing to the functional isolation of wolverine populations and undermining regional conservation objectives for this sensitive species. The absence of offsetting and connectivity planning represents a significant gap in the mitigation strategy for a species already facing pressure from habitat fragmentation across its southern range.</p>	<p>wolverine movement data.</p> <p>B. CLFN would like to have input into the development of the biodiversity offsetting and compensation plan, specifically regarding wolverine habitat restoration and connectivity. Our Nation has important knowledge to share about the land and would like to be involved in planning how habitat will be restored and protected over the long term.</p>
31.	<p>Table 9-22: Summary of Residual Effects for Wildlife - Furbearers (Wolverine)</p>	<p>The assessment of increased public access as a pathway for wolverine mortality contains several key flaws and understatements that diminish the importance of this effect. While the residual effect is described as “not significant,” the assessment itself acknowledges that the duration is permanent, the reversibility is irreversible, and the likelihood of impact is possible. Despite these admissions, the frequency is incorrectly characterized as “continuous until the Construction Phase is over,” which contradicts the permanent nature of the road and its associated access infrastructure.</p> <p>Additionally, the conclusion of “not significant” fails to adequately account for the vulnerability of wolverines to human encroachment and incidental trapping. As a wide-ranging, low-density species already subject to multiple project stressors (e.g., habitat loss, fragmentation, den disturbance), even low levels of increased</p>	<p>A. The Proponent should acknowledge that increased public access and its associated impacts on wolverine are permanent in duration and ongoing in frequency, not limited to the construction phase.</p> <p>B. Given the species’ sensitivity to human disturbance and the cumulative effects of habitat loss and fragmentation, the residual effect should be re-evaluated as significant.</p> <p>C. The following measures to mitigate for the residual effect of increased public access should be incorporated into the project to protect the regional wolverine population:</p> <ul style="list-style-type: none"> • Establish designated trap-free buffer zones around key wolverine habitats, movement corridors, and denning areas in consultation with local first nation trappers.

		mortality from trapping could have population-level consequences (Scrafford et al. 2025) (Krebs et al. 2004), particularly in the absence of population monitoring.	<ul style="list-style-type: none"> • Consult with local trappers on the feasibility of using modified trap designs or exclusion devices that reduce the risk of incidental capture of wolverines in areas where trapping remains permitted, rather than requiring their use. • Implement a program to monitor wolverine presence, movements, and mortality incidents using remote cameras, genetic sampling, and collaring where feasible. • Develop a centralized system to report and analyze all known or suspected mortalities (e.g., trapping, roadkill) in cooperation with local first nation communities, trappers, and enforcement agencies. • Establish clear mortality thresholds that, if exceeded, would trigger enhanced mitigation or project operational changes.
32.	Table 9-22: Summary of Residual Effects for Wildlife - Furbearers (Beaver)	The EA/IS does not include a strategy for addressing potential beaver-related conflicts at culverts, bridges, or other water control structures. While incidental take procedures are outlined and active lodges will be flagged during construction, the plan does not anticipate or address the high likelihood of damming activity at culverts, which is a common and predictable outcome in beaver-inhabited landscapes. Without a proactive conflict management strategy, this gap may lead to future flooding, infrastructure damage, and unnecessary lethal control measures, undermining both environmental performance and the project's stated mitigation objectives.	The Proponent should develop and implement a Beaver Conflict Management Plan to proactively address the risk of damming and flooding at culverts, bridges, and other water crossings. This plan should identify high-risk water crossings during detailed design and incorporate non-lethal mitigation measures, such as flow devices and exclusion fencing. The plan should also establish a routine monitoring and maintenance protocol for water crossings during both construction and operation phases.
33.	Section 10.3.3 Wildlife (Wolverine)	The conclusion in the Cumulative Effects Assessment (CEA) that cumulative impacts on wolverines are “not significant” is not scientifically defensible due to a critical omission of the Ring of Fire development and associated industrial expansion. The MFCAR is not an isolated project; it is explicitly intended to enable access to Ontario’s most significant undeveloped mineral deposit, the Ring of Fire, and to catalyze broader industrial activity in the region. The Eagle’s Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to	A. CLFN acknowledges that the current Environmental Assessment is limited in scope and does not fully account for the broader regional impacts associated with the MFCAR, particularly the full extent of foreseeable development in the Ring of Fire. As a result, the assessment likely underestimates the potential impacts on wolverines, a species highly sensitive to habitat loss and fragmentation. While this represents a gap in the cumulative effects analysis, it can be addressed through future project-specific environmental assessments that consider the full range of anticipated development and their

		<p>facilitate mineral extraction at a much broader scale than the Eagle’s Nest mine alone. By omitting this context, the CEA adopts an artificially narrow spatial and temporal scope, which results in a significant underestimation of cumulative habitat loss and fragmentation.</p>	<p>implications for wolverine habitat, movement, and long-term population viability.</p>
<p>34.</p>	<p>Section 10.3.3 Wildlife (Wolverine)</p>	<p>The EA/IS concludes that the cumulative effects of the Project and other reasonably foreseeable developments on wolverine are "not significant." However, this assessment does not adequately account for climate change as a compounding stressor on wolverine populations, despite acknowledging its influence as "mostly assumed to have an adverse effect" with "low" prediction confidence.</p> <p>Wolverine survival and reproduction are closely tied to cold, structured microhabitats that allow for food caching and denning, both of which are threatened by rising temperatures and diminishing spring snow cover. Wolverines rely on these microhabitats to cache food that supports lactation during February–April, a period of high energetic demand and low prey availability. The degradation of snow-dependent “refrigeration zones” reduces cache viability by increasing decomposition and competition from scavengers and microbes, leading to increased risk of early litter loss (Inman, Magoun, Persson, & Mattisson, 2012)</p> <p>This concern is especially pronounced in northern Ontario, where the project is situated within the Hudson Bay Lowlands (HBL)—a subarctic zone that, until recently, was among the last Arctic refugia from global warming, buffered by the cooling influence of Hudson Bay Sea ice (Smol et al. 2013). However, detailed climate and lake sediment records now show that the region crossed a climatic tipping point in the 1990s, transitioning abruptly into a phase of rapid warming, particularly during winter and autumn (Smol et al. 2013). This warming is directly linked to shorter snow seasons and earlier ice melt, conditions that undermine the</p>	<p>A. Any assessment of effects on wolverine must account for the ongoing loss of persistent spring snow cover and cold microhabitats that are essential for successful denning and food caching. These features are fundamental to wolverine reproductive success, and their decline due to climate warming, when combined with project-related disturbances, may heighten reproductive failure risks. The CEA should be evaluate the long-term implications of climate change for wolverine persistence in the region.</p> <p>B. The Proponent should integrate region-specific climate models into the CEA to assess projected changes in snowpack duration, depth, and spring persistence, particularly during the wolverine denning period (February–April).</p> <p>C. The Proponent should incorporate observed regional warming trends (e.g., Smol et al. 2013) into the assessment framework to better evaluate the interaction between anthropogenic habitat alteration and climate-driven loss of suitable denning and caching habitat.</p> <p>D. The Proponent should commit to long-term monitoring of climate-sensitive indicators, such as spring snow duration, den occupancy, and reproductive success, to inform adaptive mitigation and management responses.</p>

		<p>persistent spring snow cover critical to wolverine denning and food caching.</p> <p>The EA/IS fails to meaningfully assess these climate-sensitive behaviors, particularly the species' reliance on persistent spring snow for denning and the strategic use of winter food caches to bridge periods of scarcity. These adaptations are central to the species' reproductive success in a low-productivity, cold-niche environment, and are known to be highly vulnerable to climate warming (Inman, Magoun, Persson, & Mattisson, 2012). As such, the interaction between habitat alteration from the Project and climate-induced stressors could produce non-linear cumulative effects that are not captured by habitat area metrics alone.</p>	
35.	Section 9.4.5.1.1 Woodland Caribou	<p>The Proponent estimates that 21% (98,417 ha) of the ungulate effects assessment LSA is disturbed, based on a 500-meter buffer around anthropogenic features, in accordance with Environment and Climate Change Canada (2023) guidance (ECCC, 2023). However, this buffer distance represents the low end of the scientific consensus and does not align with current understanding of caribou behavior or jurisdictional best practices. Woodland caribou are known to avoid both physical and sensory disturbances at significantly greater distances than 500m (Vors et al., 2007). Ontario's guidance reflects this by recommending that project proponents minimize sensory disturbance within ten kilometers of known or potential high use areas. These avoidance behaviors are well-documented and underscore growing concerns about the persistent underestimation of disturbance effects in environmental assessments (Collard, Dempsey, & Mollie, 2020) (Cameron & Kennedy, 2023). A 500-meter buffer does not capture the ecological sensitivity of these areas, nor the full spatial extent of functional habitat loss experienced by caribou.</p> <p>Assuming a 1-kilometer buffer—which remains at the lower end of scientifically supported avoidance distances—the total disturbed area in the LSA would increase to approximately 196,834</p>	<p>A. The Proponent must recalculate functionally lost caribou habitat using a range of buffer distances—from 500 meters to 15 kilometers—based on proximity to known or potential high-use areas and ecologically sensitive locations such as calving grounds, wintering habitat, and key travel corridors. This approach reflects well-documented variability in caribou responses to disturbance and aligns with both jurisdictional guidance and peer-reviewed literature demonstrating that avoidance can occur at distances far greater than 500 meters.</p> <p>B. The Proponent should use the updated analysis of functional habitat loss to inform the assessment of project impacts, and to guide the development of effective mitigation and offsetting strategies.</p>

		<p>hectares, or 42% of the study area. This would reduce the proportion of undisturbed habitat from the reported 73.5% to approximately 58%, falling well below the 65% threshold identified by Environment and Climate Change Canada (2023) as necessary to support self-sustaining local caribou populations. This shift is particularly concerning in the context of broader cumulative effects, especially given this project’s potential to enable large-scale resource development across the Ring of Fire region.</p>	
36.	Section 10.3.5.1.1 Woodland Caribou	<p>The CEA for caribou fails to incorporate all the foreseeable industrial expansion associated with the Ring of Fire. The MFCAR is not an isolated project; it serves as the enabling infrastructure for one of Canada’s largest undeveloped mineral deposits. The Eagle’s Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to facilitate mineral extraction at a much broader scale than the Eagle’s Nest mine alone. By omitting this context, the CEA adopts an artificially narrow spatial and temporal scope, which results in a significant underestimation of cumulative habitat loss and fragmentation. The assessment does not consider the full footprint of anticipated mining operations, secondary access roads, transmission corridors, and permanent industrial infrastructure, all of which are reasonably foreseeable outcomes of the MFCAR. This omission critically undermines the validity of the CEA’s conclusions regarding the long-term impacts on caribou habitat and population viability.</p>	<p>CLFN recommends that the cumulative impacts on caribou associated with future Ring of Fire development be addressed through future project-specific environmental assessments. These assessments should consider the full range of anticipated activities and their implications for caribou habitat, movement, and long-term population health.</p>
37.	Section 10.3.5.1.1 Woodland Caribou	<p>The CEA does not account for wildfire as a major and increasing source of disturbance in the boreal forest. Scientific evidence indicates that wildfires are expected to increase in both frequency and intensity due to a combination of rising temperatures, increased lightning activity, and prolonged periods of drought associated with climate change. These factors are altering fire regimes across Northern Ontario, making larger and more severe fires increasingly common.</p>	<p>The CEA should incorporate wildfire as a major and increasing source of disturbance in the boreal forest. The assessment must account for the expected rise in wildfire frequency and severity due to climate change and evaluate how wildfire interacts with anthropogenic disturbances to impact caribou habitat, predator-prey dynamics, and range connectivity.</p>

		<p>This is highly relevant for caribou, as wildfire removes mature conifer forests that provide essential winter forage in the form of terrestrial lichens. Following fire, the landscape regenerates into early successional forest types dominated by shrubs and young deciduous growth. These habitats are more supportive of moose, which thrive in areas with dense browse and regenerating vegetation. As moose populations increase, wolf densities also rise, since wolves rely on moose as a primary prey species. This leads to elevated predation pressure on caribou, which are more vulnerable in areas where they overlap with high densities of both moose and wolves.</p> <p>The exclusion of wildfire from the CEA represents a significant gap, particularly given its compounding interaction with anthropogenic disturbances. Wildfire contributes not only to the direct loss of caribou habitat, but also to long-term changes in predator-prey dynamics and range connectivity. For a comprehensive assessment of impacts to caribou, wildfire must be included as an interacting disturbance factor alongside development and infrastructure.</p>	
38.	Section 9.4.7.4.2 Moose	<p>The CEA for moose fails to fully incorporate foreseeable industrial expansion associated with the Ring of Fire. The Eagle’s Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to facilitate mineral extraction at a much broader scale than the Eagle’s Nest mine alone. By omitting this reasonably foreseeable development, the Proponent cannot credibly conclude that the project will not have significant impacts on moose. Without accounting for cumulative habitat loss, fragmentation, and increased access pressures tied to broader regional development, the assessment underestimates the risk to moose populations and their long-term viability in the region.</p>	<p>CLFN considers the impacts of the Project on moose and moose habitat to be significant. While the current assessment may not fully capture the broader scope of foreseeable development in the Ring of Fire, CLFN expects that the cumulative impacts of access, habitat loss, and disturbance on moose populations will need to be addressed through future Environmental Assessments associated with subsequent mining projects in the region.</p>

39.	Table 9-27: Summary of Residual Effects for Ungulates	<p>The EA/IS underestimates the long-term effects of increased public access on moose populations associated with the MFCAR. While the assessment acknowledges that new roads and trails can lead to greater access by hunters and therefore increase harvest pressure, it ultimately concludes that the resulting effects on moose survival and reproduction will be moderate in magnitude and not significant. This conclusion is not well-supported. The permanent introduction of a year-round access corridor into a largely roadless landscape represents a substantial change to the existing conditions.</p> <p>The EA/IS does not provide details on how unauthorized use of access roads or off-highway vehicles will be monitored or enforced. It also assumes, without strong evidence, that the isolation of the project area will naturally limit use. In reality, new road construction often facilitates incremental use by hunters, recreational users, and others over time, especially once a corridor is established.</p> <p>Given the permanent nature of the access road, the known relationship between road access and moose harvest pressure, and the low baseline moose densities in the region, the EA/IS's conclusion that the residual effect is "not significant" is flawed. Without stronger access controls and long-term management commitments, the project will likely result in a lasting and substantial effect on moose survival and reproduction in the study area.</p>	<p>A. The Proponent should reclassify the effect of increased public access on moose as significant.</p> <p>B. The Proponent should commit to developing a comprehensive Moose Access Management and Monitoring Plan in collaboration with CLFN. This plan should include enforceable access control measures, such as physical barriers and road-use restrictions, along with a strategy to monitor both authorized and unauthorized use of the corridor. Long-term monitoring of moose presence and hunting pressure should be conducted through community-based observations, camera traps, or observation stations.</p>
40.	Table 9-27: Summary of Residual Effects for Ungulates	<p>The assessment of vehicle collision risks to moose during the construction and operation of the MFCAR underestimates the likely significance of these effects. The conclusion that the residual impact on moose survival and reproduction due to collisions is "not significant" fails to account for broader regional development scenarios, particularly the anticipated industrial traffic associated with future mineral extraction in the Ring of Fire.</p>	<p>Potential increases in moose-vehicle collisions due to future industrial traffic should be assessed through subsequent environmental assessments for related projects, such as the Northern Road Link or specific mining developments. These future assessments should evaluate cumulative impacts and include appropriate mitigation and monitoring measures.</p>

		Increased heavy truck traffic from mining operations, exploration activity, and supply transport would dramatically elevate the risk of moose-vehicle collisions. Moose are known to be highly susceptible to road mortality, especially in areas with increased vehicle movement, early seral vegetation, and poor visibility.	
41.	Section 14.4 (Future Commitments)	CLFN acknowledges MFFN's commitment to developing a Terrestrial Biodiversity Offset Plan to provide a net positive increase in the following habitat types: wetland habitat, migratory bird habitat, myotis habitat, wolverine habitat, caribou habitat, and amphibian breeding habitat. However, it is crucial that this plan includes CLFN traditional knowledge to ensure the plan reflects the unique ecological and cultural context of the area. Without reviewing this plan, CLFN cannot fully and meaningfully comment on the outcome of these important habitat types.	CLFN requests to be actively involved in the development and implementation of the Terrestrial Biodiversity Offset Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, MFFN should provide appropriate financial resources to support CLFN involvement in this process.
42.	Section 14 (Monitoring Programs and Future Commitments)	CLFN acknowledges MFFN's commitment to developing an Environmental Protection Plan to mitigate impacts on wildlife, and vegetation. However, it is crucial that this plan includes CLFN traditional knowledge to ensure the plan reflects the unique ecological and cultural context of the area.	CLFN requests to be actively involved in the development and implementation of the Environmental Protection Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, MFFN should provide appropriate financial resources to support CLFN involvement in this process.
43.	Section 14 (Monitoring Programs and Future Commitments)	<p>Constance Lake First Nation has observed [REDACTED]</p> <p>[REDACTED]</p> <p>We are concerned that the level of effort to detect Arctic Fox within the study area was limited. The absence of detections in the EA/IS should not be interpreted as absence from the landscape. Survey timing, coverage, and methodology may not have been sufficient to detect this species, especially considering their elusive nature and wide-ranging behavior.</p>	Arctic Fox should be included in the ongoing and future wildlife monitoring programs for the MFCAR project. Monitoring should involve collaboration with Constance Lake First Nation and Marten Falls First Nation land users. Monitoring results should be regularly reviewed and used to inform adaptive management.

44.	Section 14 (Monitoring Programs and Future Commitments)	CLFN has a deep and enduring connection to the land and the animals that sustain our way of life, and we are gravely concerned about the potential loss of habitat and the decline of important species. The losses of wetland and upland habitats that support furbearers, moose, and other culturally significant species highlight the broader impacts of the project on the ecosystem that CLFN relies on. This loss, compounded by decades of legacy impacts, raises serious concerns about the long-term viability of these species and the health of our traditional lands. Monitoring is essential to accurately quantify these impacts and implement effective measures to address them, ensuring the sustainability of our lands and resources for future generations.	<p>A. CLFN requests to be actively involved in the follow-up and monitoring programs related to wildlife, birds, vegetation, and ungulates. This includes participation in targeted species surveys to track relative abundance and spatial distribution, as well as contributing traditional knowledge to ensure that monitoring efforts align with CLFN priorities and cultural values.</p> <p>B. CLFN further requests to be engaged in the development and implementation of adaptive management measures informed by these monitoring results, ensuring that mitigation strategies remain effective over time.</p>
45.	Section 10.3.3 (Reptiles and Amphibians)	<p>The conclusion in the Cumulative Effects Assessment (CEA) that cumulative impacts on reptiles and amphibians are “not significant” may underestimate potential risks associated with road mortality. Reptiles and amphibians are particularly vulnerable to vehicle collisions due to their slow movement, tendency to bask on road surfaces, seasonal migrations, and low visibility to drivers. These risks may be compounded by habitat fragmentation and increased vehicle traffic along the road over time—especially if traffic volumes rise due to future development in the region, including potential activities connected to the Ring of Fire.</p> <p>While the EA/IS acknowledges that mortality could occur, it does not clearly outline how mortality will be monitored or how mitigation measures will be adjusted if roadkill levels are higher than anticipated. There is also limited information on whether areas with high concentrations of reptiles and amphibians will be identified and managed accordingly.</p>	<p>A. The Proponent should design and commit to constructing wildlife crossing structures where feasible (e.g., amphibian tunnels, culverts, or overpasses), and install directional fencing to guide reptiles and amphibians toward these safe crossings.</p> <p>B. The Proponent should post wildlife crossing signage and reduce speed limits during key migration and breeding seasons in areas identified as high-risk for road mortality.</p> <p>C. The Proponent should commit to adaptive management measures (e.g., installation of additional crossing structures, fencing, reduced speed zones, new signage) if road mortality exceeds thresholds set in consultation with Indigenous Knowledge holders and species experts.</p>
46.	Section 10.3.3 (Reptiles and Amphibians)	The EA/IS concludes that no turtle species are present within the project area; however, this determination is not supported by adequate fieldwork or targeted survey effort. No turtle-focused surveys were conducted, and there is limited baseline data to justify this conclusion. The Western Midland Painted Turtle	A. CLFN requests that targeted herpetofauna surveys be conducted along the proposed road corridor, focusing on identifying turtle presence in suitable wetland and riparian habitats during appropriate seasonal windows. These surveys should prioritize the southern section of the corridor where

		<p>██████████ suggesting that suitable habitat conditions may exist within the region.</p> <p>Given the remote nature of the area and the overall lack of herpetofauna survey effort, the apparent absence of turtles may reflect data deficiency rather than true absence. Wetland and riparian habitats along the proposed road corridor could support turtle populations, particularly in under-surveyed areas. Additionally, with changing climatic conditions, turtle species may expand their range northward into this area over time, increasing the likelihood of future presence.</p>	<p>potential habitat overlaps with the known range of the Western Midland Painted Turtle is most likely.</p> <p>B. CLFN requests that ongoing monitoring should be implemented throughout the construction and operation of the road. If turtles are observed, mitigation measures (exclusion fencing, nest protection, or timing restrictions) must be developed and implemented in consultation with CLFN.</p>
47.	Appendix J – Vegetation Report; Table 7-15	<p>The impact of invasive species on vegetation in the local study area is of great concern to CLFN because the existing LSA has limited human disturbance and no invasive species were documented during field surveys. This pristine habitat will very likely have invasive species introduced because roads are major conduits for the spread of invasive plants into new areas as they create disturbed environments that favor invasives and provide a corridor for transmission of seeds on vehicles. One of the measures to mitigate the impact of invasive species propagation within the EA/IS is to use seed mixes with appropriate native species for all seeding and restoration works.</p>	<p>A. For all re-vegetation efforts, the Proponent must consult with CLFN, to select an appropriate seed mix that closely mimics the pre-construction plant community and includes plants of medicinal and traditional importance. This could be done by either sourcing seed mix from a local seed distributor, or using wild seeds propagated from plants collected from the project area.</p> <p>B. The Proponent should support the establishment of a regional road invasive species subcommittee that includes CLFN and other affected First Nations.</p>
48.	Section 8.2.4.9 Invasive Plant Species	<p>CLFN has already experienced significant impacts from terrestrial invasive species within our Traditional Territory, particularly in areas disturbed by past infrastructure and industrial development. These species have affected native plant communities, reduced the availability of traditional medicines, and altered habitat for culturally important wildlife. The construction of the MFCAR in a largely intact ecosystem increases the likelihood of invasive species introduction via vehicle traffic, contaminated soil, and construction activity. CLFN is particularly concerned about cumulative impacts across multiple projects and jurisdictions and emphasizes the need for coordinated proactive management.</p>	<p>The Proponent should support the establishment of a regional road invasive species subcommittee that includes CLFN and other affected First Nations. This subcommittee should be responsible for developing and coordinating terrestrial invasive species prevention measures, long-term monitoring programs, and response strategies. The EA/IS should explicitly recognize the role of this subcommittee as part of the Project’s regional mitigation framework, ensuring a consistent and Indigenous-led approach to invasive species management across northern road networks.</p>

Water Resources and Geochemistry

<p>49.</p>	<p>Appendix F – Draft Surface Water Technical Support Document – Section 5.1.2.2 (Hydropower Generation)</p>	<p>Section 5.1.2.2 of the Surface Water Technical Support Document (Appendix F) notes that the Waboose Diversion Dam on the Ogoki River, though located outside the defined RSA, directly influences flows within it, including at the proposed Ogoki River crossings. The dam is managed under the Nipigon River System Water Management Plan and is primarily regulated based on water levels in Lake Nipigon - not conditions within the Ogoki River system itself.</p> <p>This introduces significant uncertainty regarding seasonal and interannual flow variability in the Ogoki River, particularly during high-water events on Lake Nipigon when the dam may be opened to divert additional water north through the Ogoki basin and into the Albany River system. This is compounded by the fact that high flow periods in the Lake Nipigon System are very likely to coincide with high flow periods in the Ogoki River. This water management approach, focused on downstream hydropower optimization in the Lake Nipigon watershed, may lead to unpredictable, extreme changes in flow volume, velocity, and duration within the Ogoki River.</p> <p>These hydrological uncertainties raise serious concerns for the stability and long-term integrity of the proposed Ogoki River crossing, as well as other infrastructure located near the riverbanks (e.g., access routes, culverts, bridges, work pads). Fluctuations in flow may increase the risk of erosion, sedimentation, and scouring, particularly during extreme flow events or unanticipated dam releases. These risks are further compounded during the construction phase, where sequencing and work windows may be tightly constrained by hydrological conditions that are not easily forecasted under the current dam operating regime.</p>	<p>A. The Proponent should prepare a quantitative assessment of flow variability in the Ogoki River, including under multiple Lake Nipigon water level scenarios and potential releases at the Waboose Diversion Dam.</p> <p>B. The Proponent should commit to preparing a detailed hydraulic risk analysis for the Ogoki River crossings, including:</p> <ul style="list-style-type: none"> • Erosion and sedimentation modeling under high-flow conditions; • Infrastructure design tolerances for variable and sudden flow increases; • Emergency protocols in the event of unanticipated dam releases. <p>C. The Proponent should identify and assess construction sequencing risks related to hydrological variability, including potential delays or unsafe working conditions during high-flow periods influenced by dam operations.</p> <p>D. The Proponent should discuss how they will coordinate with Ontario Power Generation (OPG) and other regulatory authorities managing the Nipigon River System Water Management Plan to ensure advance notification of operational changes at the Waboose Diversion Dam that could affect flow levels in the Ogoki River during both construction and operation phases.</p> <p>E. The Proponent should incorporate design measures into water crossing infrastructure to accommodate long-term uncertainties in hydrology resulting from dam management priorities outside the project’s direct control. For example, the crossing could be designed for a 1 in 10,000 year flood event.</p> <p>F. The Waboose Dam should be included in the cumulative effects assessment.</p>
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Appendix F – Draft Surface Water Technical Support Document – Section 5.1.2.2 (Hydropower Generation)

Section 5.1.2.2 of the Surface Water Technical Support Document (Appendix F) does not discuss the Cedar Channels Control Dam (CCCD) on the Albany River despite being mentioned by MFFN members during community engagement for the Project. The CCCD directly influences flows within the Albany River, including at the proposed Albany River crossing. The dam is managed under the Lake of the Wood Control Board and is primarily regulated based on water levels in The English River System - not conditions within the Albany River system itself.

This introduces significant uncertainty regarding seasonal and interannual flow variability in the Albany River, particularly during high-water events on Lake St. Joseph when the dam may be opened to divert additional water north through the Albany basin and into the Albany River system. This is compounded by the fact that high flow periods in Lake St Joseph are very likely to coincide with high flow periods in the Albany River. This water management approach, focused on downstream hydropower optimization in the English River watershed, may lead to unpredictable, extreme changes in flow volume, velocity, and duration within the Albany River.

These hydrological uncertainties raise serious concerns for the stability and long-term integrity of the proposed Albany River crossing, as well as other infrastructure located near the riverbanks (e.g., access routes, culverts, bridges, work pads). Fluctuations in flow may increase the risk of erosion, sedimentation, and scouring, particularly during extreme flow events or unanticipated dam releases. These risks are further compounded during the construction phase, where sequencing and work windows may be tightly constrained by hydrological conditions that are not easily forecasted under the current dam operating regime.

- A. The Proponent should prepare a quantitative assessment of flow variability in the Albany River, including under multiple Lake St. Joseph water level scenarios and potential releases at the CCCD.
- B. The Proponent should commit to preparing a detailed hydraulic risk analysis for the Albany River crossing, including:
 - Erosion and sedimentation modeling under high-flow conditions;
 - Infrastructure design tolerances for variable and sudden flow increases;
 - Emergency protocols in the event of unanticipated dam releases.
- C. The Proponent should identify and assess construction sequencing risks related to hydrological variability, including potential delays or unsafe working conditions during high-flow periods influenced by dam operations.
- D. The Proponent should discuss how they will coordinate with the Lake of the Woods Control Board and other regulatory authorities managing the English River system to ensure advance notification of operational changes at the CCCD that could affect flow levels in the Albany River during both construction and operation phases.
- E. The Proponent should incorporate design measures into water crossing infrastructure to accommodate long-term uncertainties in hydrology resulting from dam management priorities outside the project's direct control. For example, the crossing could be designed for a 1 in 10,000 year flood event.
- F. The CCCD should be included in the cumulative effects assessment for the Project.

51.	Section 7.1.2.3 (Embankment Material Borrow Areas, and Aggregate Site Areas)	<p>Section 7.1.2.3 of the EA/IS states that only material that has been cleared through a geochemical verification process will be used to avoid acid rock drainage (ARD) or metal leaching, and that runoff will be monitored from an erosion and sediment control perspective. While this precautionary approach is appropriate, the details of the geochemical verification plan — including site selection, sampling protocols, and thresholds for exclusion — have not been made available for review.</p> <p>Given the proximity of many borrow and quarry areas to lakes, rivers, wetlands, and culturally significant areas, and the potential for ARD and metal leaching to result in long-term degradation of water quality and aquatic habitat, it is critical that potentially impacted Indigenous Nations have the opportunity to review, comment on, and influence the development and implementation of the geochemical verification plan.</p>	The Proponent must provide advanced review of the draft geochemical verification plan to CLFN.
52.	Section 7.2.2.1(Construction Phasing)	<p>Section 7.2.2.1 of the EA/IS describes a construction phasing approach in which road building could begin simultaneously at multiple locations — for example, both from the north near Marten Falls and the south near Painter Lake Road. While this may reduce the overall duration of construction, it introduces significant uncertainty regarding the environmental impacts of the construction phase, particularly with respect to:</p> <ul style="list-style-type: none"> • The creation of temporary access routes to reach remote segments; • Increased traffic and staging areas in multiple sensitive landscapes at once; • The potential duplication of environmental disturbances, such as clearing, blasting, sedimentation, and noise, in several places at the same time; • The ability to effectively monitor and enforce sensitive timing windows (e.g., for migratory birds, fish spawning, or cultural practices) when work is occurring concurrently at multiple locations. 	The Proponent should distinguish the differences in impacts from single-point and multi-point construction and factor this into their residual effects assessment and cumulative effects assessment.

		The lack of detail about how multi-point construction will be implemented leaves important questions unanswered about how residual and cumulative environmental effects will be avoided or minimized during construction.	
53.	Section 7.2.2 (Detailed Design)	The EA/IS indicates that embankment material borrow areas and aggregate site areas (e.g., sand, gravel, and rock) will be required for the construction of the MFCAR. However, the document lacks detailed information on the confirmed availability of borrow material sources along the proposed corridor. Without this information, it is difficult to evaluate the true scope of environmental and cultural impacts, particularly those related to land and water disturbance, wildlife habitat fragmentation, and sedimentation risk near water crossings.	<p>A. The Proponent should provide a comprehensive inventory of proposed borrow sources, including location maps, estimated volumes, material types, and confirmation of suitability through preliminary geotechnical investigations;</p> <p>B. The Proponent should prepare a contingency plan if local materials are found to be insufficient or geochemically unsuitable, including how alternate sites would be selected and assessed.</p>
54.	Section 8.1.7.2 (Groundwater Quality)	<p>Section 8.1.7.2 of the EA/IS presents groundwater sampling results that show numerous exceedances of Canadian and Ontario drinking water guidelines, as well as provincial water quality objectives and soil/groundwater/sediment standards, for a wide range of metals, volatile organic compounds (VOCs), and other contaminants. These include significant exceedances for arsenic, uranium, lead, chromium, cadmium, and toluene, among others.</p> <p>However, the Proponent does not offer any explanation for the source, significance, or implications of these exceedances, nor how these findings might impact construction planning, potential contamination pathways, or risks to human and ecological health. It is also unclear whether the results reflect natural background conditions, legacy contamination, or project-related disturbance.</p> <p>Given the potential for the project to interact with groundwater — particularly through excavation, dewatering, aggregate extraction, and water crossings — the absence of this analysis represents a significant gap to properly assess impacts of the Project.</p>	<p>A. The Proponent should provide a clear explanation for the observed exceedances, including whether these are believed to be naturally occurring or anthropogenic;</p> <p>B. The Proponent should assess the potential environmental and human health risks associated with the exceedances, especially in areas of planned construction or borrow material extraction;</p> <p>C. The Proponent should clarify whether any of the contaminated groundwater zones intersect with groundwater-surface water interaction zones, traditional land use areas, or potential drinking water sources that will be utilized by construction camps for the Project.</p>

55.

Table 9-6 (Summary of Residual Effects for Surface Water)

The residual effects assessment of water presented in the EA/IS suffers from several critical limitations that significantly undermine its credibility from the perspective of CLFN:

- The assessment is based solely on western scientific approaches, with minimal integration of Indigenous Knowledge or Indigenous-led indicators for measuring change and significance.
- It assumes that all mitigation measures and project components will operate as designed, without acknowledging the high likelihood of system failures, extreme weather events, or implementation challenges — particularly in remote and sensitive environments.
- The criteria used to determine significance are based entirely on compliance with federal and provincial regulatory thresholds and do not reflect Indigenous laws, protocols, or standards for environmental and cultural protection.
- The magnitude of local impacts is frequently minimized by evaluating them at a regional scale, which obscures site-specific or culturally important effects that may be significant to CLFN.

As a result of these methodological choices, nearly all residual effects are classified as “negligible” or “low” in significance — a conclusion that does not reflect how our Nation experiences environmental, cultural, and health-related changes on our lands.

Crucially, these flawed residual effects assessments are then used as the foundation for the cumulative effects assessment, meaning that cumulative impacts are also underestimated. By underestimating the significance and extent of individual effects, the cumulative effects assessment fails to identify the broader systemic risks posed to Indigenous lands, species (such as woodland caribou), water systems, and traditional practices.

- A. IAAC and the Proponent must acknowledge in the Final EA/IS and Impact Assessment Report that the current residual and cumulative effects assessments do not adequately reflect the impacts to rights as understood and experienced by Indigenous Nations. This recognition should be documented in the record of consultation and in any decision-making materials.
- B. IAAC must clarify how Indigenous definitions of significance and culturally specific impacts will be meaningfully considered in the environmental assessment process going forward — including in any conditions imposed or decisions made under the Impact Assessment Act.

56.	Table 10-4 (Summary of Predicted Cumulative Effects for Water Disciplines)	<p>Table 10-4 of the EA/IS concludes that the MFCAR will not result in any significant cumulative effects on surface water or groundwater. Given the scale and duration of the project, the number of water crossings, the presence of borrow and aggregate sites, and the potential interactions with other developments (such as the Northern Road Link and eventual Ring of Fire mining projects), this conclusion appears to reflect a limitation in methodology rather than a legitimate finding.</p> <p>This finding is especially concerning given that Indigenous Nations, including ours, have consistently raised concerns about changes to water quantity, quality, and flow patterns — not only from the Project but from the combined effects of historical and foreseeable developments. The exclusion of Indigenous Knowledge and culturally informed significance thresholds from the assessment of cumulative effects undermines the legitimacy and completeness of the results.</p> <p>As mentioned previously, CLFN is assessing the MFCAR EA/IS narrowly, scoped to the impacts from the use of the road by Marten Falls and not by future uses. As such our comments on cumulative effects are better addressed through future assessments for mining project in the Ring of Fire</p>	<p>A. The Proponent should work collaboratively with CLFN on the methodology and analysis of cumulative effects assessment on water for future environmental assessments for mining projects in the Ring of Fire. This should include the integration of Indigenous Knowledge systems, culturally appropriate indicators, and definitions of significance that reflect the lived experience and worldviews of CLFN..</p> <p>B. IAAC should require that any revisions to the EA/IS for the MFCAR that are made to incorporate Indigenous perspectives on significant cumulative effects are carried forward into conditions for approval, monitoring, and adaptive management, to ensure the rights and interests of CLFN are meaningfully addressed.</p>
57.	Table 9-6 (Summary of Residual Effects for Surface Water)	<p>The EA/IS does not adequately account for the significant challenges associated with managing fuel spills at water crossings in the remote environment where the MFCAR is proposed. According to the U.S. National Oceanic and Atmospheric Administration (NOAA), fuel and oil spills in river systems are especially difficult to contain and clean up due to fast-moving currents, limited access to shorelines, and the tendency for oil to strand in isolated floodplains or oxbows, oils tendency to coat riparian vegetation along its path and the potentially complex interactions of oil with riverine sediments (NOAA, 2015). These risks are further amplified in the case of the MFCAR due to its extreme remoteness, limited seasonal access, and the lack of</p>	<p>A. CLFN requests that the Proponent provide details on the special arrangements they will make to prevent spills and manage major spills into water bodies along the extremely remote and inaccessible route of the Project</p> <p>B. CLFN requests that the residual effects assessment incorporates the fact that a spill into a river along the route is likely (if not certain) to happen at some point over the life of the Project. This inevitably means that aspects of the residual effects assessment will deem certain effects to surface waters as significant.</p>

		<p>existing infrastructure that would facilitate rapid response efforts. The combination of these factors poses a serious risk to water quality, aquatic ecosystems, and the rights of Indigenous Nations that rely on these waters for sustenance and cultural practices. Given the particular challenges with managing spills on this remote road, the Proponent must have project-specific preparations to avoid and mitigate risks from major spills into rivers along the route.</p> <p>It is also important to add that the residual effects assessment does not incorporate the very high likelihood that a major spill will occur into one of the water crossings over the (indefinite) life of the Project.</p>	
58.	Appendix F Table 10-1 (Potential Effects Summary and Recommendations)	In the “Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance” Section of the Potential Effects Summary Table for surface water, no specific commitment is made to monitor during high-risk hydrological events like spring melt or major rainfall when erosion, sediment transport, and contaminant movement are most likely.	CLFN request a commitment from the Proponent to conduct targeted water quality sampling during spring melt and storm events at key waterbody crossings and sediment-sensitive areas, with details to be determined in the monitoring programs for all stages of the Project.
59.	Appendix F Table 10-1 (Potential Effects Summary and Recommendations)	In the “Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance” Section of the Potential Effects Summary Table for surface water, erosion and sediment control is mentioned, however there’s no clear requirement for real-time turbidity monitoring at active waterbody crossings during construction or dewatering activities, nor are there requirements for monitoring for spills other than visual observation of oil sheen on water.	<p>A. CLFN request that the Proponent commit to real-time turbidity monitoring at all waterbody crossings during in-stream work, with pre-defined action thresholds that trigger stop-work orders or adaptive measures.</p> <p>B. CLFN requests that the Proponent commit to best practices for monitoring fuel spills beyond mere visual observation (e.g. real time fuel level monitoring with alert systems that can indicate potential leaks).</p>
60.	Appendix F Table 10-1 (Potential Effects Summary and Recommendations)	In the “Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance” Section of the Potential Effects Summary Table for surface water, the Proponent does not indicate whether or not they	CLFN request a commitment from the Proponent to not use salt for de-icing along the road.

		intend to use road salt for deicing on the road during winter conditions. Road salt can have significant impacts on the ecology adjacent to the road and can attract wildlife (i.e. moose and caribou) to the road increasing the risk of collisions. Most dirt roads do not use salt for deicing and it is unnecessary to do so to maintain the road under winter conditions. Increased salt concentrations will also increase chloride ions concentrations in watercourses, which is known to be toxic to fish health.	
61.	Section 7.1.2.1 (Roads)	The Proponent has noted that the Project is located in an area of isolated permafrost. The construction and operation of the road in areas of permafrost would affect the stability of both the permafrost and the road. The Proponent has stated that “the design will primarily use fill along access roads to minimize permafrost degradation and will follow the recommendations outlined in a permafrost management plan.” The construction and operations monitoring plans make no mention of the development of permafrost monitoring at all. The monitoring of permafrost is challenging (especially in areas of discontinuous permafrost) and road design in areas of isolated permafrost is challenging from an engineering perspective due to the spatially variable effects of permafrost on the road.	<p>A. CLFN request that the Proponent develop a conceptual permafrost mitigation and monitoring plan for the Project at the EA/IS stage to understand potential impacts to permafrost from the Project.</p> <p>B. CLFN request that the Proponent provide details on how they will design the road to accommodate the somewhat unpredictable impacts of isolated permafrost on the road.</p>
62.	Appendix N Attachment B (Existing Conditions Detailed Mapping Figures)	The detailed figures in Appendix N show that quite substantial areas around the road are going to be subject to construction disturbance for sourcing aggregate materials. These large, disturbed areas can have significant impacts on nearby waterbodies. The figures in Appendix N do not show a buffer between construction disturbance and waterbodies, which creates a risk for waterbodies in the Project area from erosion, sedimentation, blast residues and fuel spills.	CLFN requests a commitment from the Proponent to avoid construction disturbance within 100m of any waterbody.
63.	Appendix I (Draft Peatlands Technical Support Document) General Comment	The EA/IS recognizes that 62.6% of the LSA is comprised of peatland, which are critical to the local hydrological and ecological function. The report further acknowledges that the loss of peatlands would be permanent and have negative effects,	A. The Proponent should reassess the significance determination, placing greater emphasis on the localized, permanent loss of peatland habitat within the LSA and avoid overreliance on RSA-level data, which may obscure the more concentrated

		<p>particularly where disturbances such as changes in drainage regimes and physical disturbance occur. However, despite the high magnitude of impact in localized areas, all residual effects on peatland ecosystems are classified as “not significant.” This assessment appears to rely heavily on the minimal peatland loss observed within the broader RSA, which downplays the concentrated and more ecologically significant impacts occurring within the LSA, where the majority of disturbances will be focused. Moreover, the report lacks clarity regarding the specific criteria or thresholds applied to determine significance in the context of peatland integrity, habitat loss, or ecological functionality.</p>	<p>impacts within the LSA.</p> <p>B. The Proponent should revise the significance determination process for peatlands to be based primarily on ecological, hydrological, and cultural valuation of peatland systems, and reassess the significance determination based on this updated process.</p>
64.	<p>Appendix I – Section 7.3.2.4 (Residual Effects on Peatland Ecosystems as a Result of Changes to Groundwater)</p>	<p>The EA/IS identifies significant uncertainty surrounding two critical residual effects on peatland ecosystems: (1) changes to groundwater regimes that could alter drainage patterns, and (2) changes in surface hydrology that could increase or decrease water flows and levels. This uncertainty is attributed to a limited understanding of local peatland hydrology and hydrogeology, compounded by the preliminary nature of the proposed mitigation measures, such as the floating road design.</p> <p>Despite acknowledging these uncertainties, the report concludes that residual effects will be “not significant,” basing this determination on the assumption that future studies will resolve current gaps in understanding and improve the mitigation measures. This approach is problematic, as it does not align with standard impact assessment protocols, which require significance determinations to be based on the best available data at the time of the assessment. It also fails to account for the precautionary principle, which should be applied when high uncertainty exists.</p>	<p>A. The Proponent should take a precautionary approach to their assessment of the effectiveness of mitigation measures, such as floating road designs in the absence of empirical data. This means that in circumstances that there is uncertainty around mitigation measures, they should assume that the mitigations will not be as effective as modeled and that the effects will thus be significant.</p> <p>B. The Proponent should provide updated data or performance studies on the effectiveness of floating road designs from comparable peatland settings.</p> <p>C. The Proponent should develop a comprehensive monitoring and adaptive management plan that includes contingency measures to address any unforeseen hydrological impacts.</p>
65.	<p>Appendix I (Draft Peatlands Technical Support Document) General Comment</p>	<p>The EA/IS acknowledges that there is insufficient detailed hydrological and hydrogeological information for both the LSA and RSA, despite identifying potential residual effects on peatland ecosystems due to changes in groundwater and surface water regimes. This lack of baseline data is a critical gap in the</p>	<p>A. The Proponent should complete comprehensive site-specific hydrological and hydrogeological baseline studies, accounting for seasonal variations, groundwater-surface water interactions, and water table mapping. The collected data should be used to develop predictive models for water flow, drainage patterns,</p>

		assessment, as peatlands are highly sensitive to hydrological changes, and even minor alterations in water flow, drainage, or water table levels could have long-lasting or irreversible effects on these ecosystems. The absence of robust data prevents the accurate modeling of potential impacts, the evaluation of mitigation effectiveness, and the assessment of cumulative effects across the broader wetland complex. As a result, the significance conclusions presented in the report are not sufficiently supported by evidence.	and water table changes resulting from road construction and long-term operations and assess the potential indirect hydrological effects extending beyond the project footprint, particularly on interconnected wetland systems. B. The Proponent should reassess the effectiveness of proposed mitigation measures, including floating road designs, based on updated data. C. Until the Proponent completes these studies and integrates them into the EA/IS, the EA/IS should clearly state that the findings related to peatland impacts are preliminary and subject to change.
66.	Appendix I – Section 5.3.5 (Carbon Storage and Flux)	<p>The proposed MFCAR poses a significant risk to the region’s extensive peatland carbon stores. The road corridor intersects peatlands that collectively hold up to 96 million tonnes of soil organic carbon, with over 1.38 million tonnes located within the immediate construction disturbance area. These ecosystems currently function as carbon sinks, with negative CO₂ fluxes observed across undisturbed areas. However, within the construction zone, carbon fluxes shift toward emissions—indicating that disturbed peatlands may become net sources of greenhouse gases.</p> <p>While the road footprint may appear narrow, the ecological consequences are not minor. Disturbance of peatlands through excavation, compaction, or altered hydrology can release long-stored carbon, disrupt sequestration processes, and contribute disproportionately to climate change—especially when considered over the full length of the road and its operational lifespan.</p>	The Proponent should prioritize design alternatives that minimize peatland disturbance. Where impacts are unavoidable, robust mitigation measures, including peatland restoration plans, hydrological protection strategies, and carbon offset commitments should be developed and transparently evaluated. Given the global significance of boreal peatlands for climate regulation, it is essential that peatland preservation is prioritized.
67.	Appendix I – Draft Peatlands Technical Support Document Section 7.3.2.6 and Table 7.5	Edge and fragmentation effects on peatland ecosystems were determined to be negligible in magnitude. The two studies referenced (Harper et. al., 2015; Franklin et al., 2021) within the Draft EA/IS investigate edge effects on boreal forest ecosystems,	Given that the studies used to support a negligible magnitude effect for edge effects on peatlands were focused on forest habitats (upland habitat), not peatlands (wetland habitat), the Proponent should provide scientifically defensible reasoning to

		which are very different from peatland ecosystems. Furthermore, the Draft Peatlands Technical Support Document states that “boreal forests are generally adapted to large-scale natural disturbances.” However, road development is not considered a natural disturbance. Therefore, we disagree with the assessment that the magnitude of edge effects on peatlands is negligible.	justify why edge effects to peatlands were determined to be negligible in magnitude.
68.	Appendix I – Table 3.1: (Indigenous Knowledge)	Peatlands are of utmost importance to CLFN as 46 of the 56 plants identified as traditional use plants grow in peatland ecosystems as stated in Table 3.1 of Appendix I. In addition, peatlands provide habitat for many animals that are hunted by our community members including moose. CLFN does not accept the conclusion that all predicted residual effects on peatlands are not significant considering 2,150.6 ha of peatland will be directly removed. CLFN is especially concerned because the peatland loss will be mostly irreversible considering how challenging peatlands are to restore to their natural composition and function.	<p>A. CLFN requests to be actively involved in the development and implementation of all plans and monitoring related to peatland restoration including the Vegetation Restoration Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, the Proponent should provide appropriate financial resources to support CLFN involvement in this process.</p> <p>B. For all impacted peatland that cannot be restored to its natural function and composition, the Proponent should provide accommodation measures to CLFN for the loss of Traditional Use Plant habitat within their Traditional Territory.</p>
Air, Noise, Vibration			
69.	Appendix S Section 4.4.3 (Methods for Predicting Future Conditions)	MFFN’s air dispersion model does not include any special receptor locations related to CLFN traditional land and resources use (TLRU) and Indigenous Knowledge (IK) sites. CLFN members use the lands and waters in the Project area for TLRU and ceremonial/spiritual purposes and will be exposed to project related air emissions.	CLFN TLRU and IK sites should be considered in the Proponent’s air quality assessment. The geographic locations for TLRU and IK should be inputted into the air dispersion model as special receptors. This will provide site specific data for CLFN land users who use the Project area so they can effectively assess the Project’s impact on land use and rights.
70.	Appendix S – Section 7.4 (Summary of the Assessment of Effects)	CLFN disagrees with the Proponents assessment of the significance determination for Volatile Organic Compounds (VOCs) and Polycyclic Aromatic Hydrocarbons (PAHs) as being considered insignificant. PAHs and VOCs are toxic at very low concentrations and in some cases (e.g. benzene, benzopyrene) they are known carcinogens.	A. CLFN strongly recommends that the assessment of the significance of VOCs and PAHs be revisited and updated to reflect the serious health risks associated with exposure to these substances, even at low concentrations. Given the potential for long-term exposure—especially for construction workers who could be on-site for up to 10 years—it is critical to reconsider their significance in the environmental assessment

		<p>Exposure to VOCs and PAHs, even for a short duration, can have negative health impacts on humans. CLFN is especially concerned about VOC and PAH exposure for CLFN members who may be working on the Project and/or using the land in close proximity to the Project. For construction workers they could be exposed to VOCs and PAHs for as long as 10 years.</p> <p>Further, there is no air quality sampling planned for any VOCs or PAHs during any phase of the Project. It will be impossible to know the concentrations without monitoring, which is a health risk for CLFN members who may be working on the Project or using the land nearby.</p>	<p>and conduct additional monitoring.</p> <p>B. The Proponent must implement air quality sampling and continuous monitoring for VOCs and PAHs during all phases of the Project. This is crucial to accurately assess the levels of these contaminants and understand their impact on air quality.</p> <p>C. The Proponent must conduct a detailed human health risk assessment specifically focused on VOCs and PAHs, particularly for those working on the construction phase and those living or using the land near the Project area. This should include long-term exposure scenarios.</p> <p>D. The Proponent must develop and implement targeted mitigation strategies to minimize VOC and PAH emissions. This should include both operational and construction phase controls, such as the use of safer construction materials, air filtration systems, and regular decontamination procedures for workers.</p>
71.	Appendix S Section 4.2.2 (Valued Components and Indicators)	<p>The Proponent did not include any metals in the list of air contaminants carried forward as indicators in the air quality assessment/air dispersion model. Particulate emissions would include numerous trace metals which would become airborne and deposit in the natural environment (e.g. on traditionally important vegetation or waterways) or be inhaled by humans or wildlife. This could have potential health impacts on CLFN members harvesting or using the land near the Project, or CLFN members employed by the Project.</p>	<p>The Proponent must assess trace metals as an indicator or potential contaminant of concern in the air quality assessment and the air dispersion model. This is required to ensure the Project is within regulatory compliance and does not pose any potential health threats to CLFN members.</p>
72.	Section 9.5.9.4 (Assessment of Significance - Atmospheric Environment)	<p>The Proponent predicts exceedances of provincial air quality criteria and significant residual effects related to particulates including PM 2.5 - Particulate Matter with a diameter of 2.5 micrometers or smaller, PM 10 - Particulate Matter with a diameter of 10 micrometers or smaller, and TSP - Total Suspended</p>	<p>A. CLFN strongly recommends that a more comprehensive and effective approach be adopted to address the potential exceedances of air quality criteria for particulates (PM 2.5, PM 10, TSP) and trace metals, as well as their associated health and environmental impacts. Given the predicted exceedances and the significant residual effects on air quality, it is crucial to</p>

Particulates. These particulates also contain trace metals, which is not discussed in the EIS or appendices.

Particulates (TSP, PM 10, PM 2.5) and trace metals will deposit on important vegetation communities, waterbodies, and wildlife habitat. Particulates will also be ingested by humans and wildlife. All of these pathways have the potential to cause adverse health impacts, especially on CLFN members who may be working in the Project.

The Proponent's mitigation measures (e.g. dust suppression, anti-idling, etc.) are unlikely to be effective given the extensive area of activities in the construction and operations phase. Applying dust suppressants to over 200 km of road is impractical, costly, and only effective for a short duration.

implement enhanced monitoring and mitigation strategies to minimize the adverse impacts on both the environment and human health, particularly for CLFN members who may be exposed during the construction and operation phases of the Project.

- B. The Proponent must implement a robust air quality monitoring program that tracks particulate levels (TSP, PM 10, PM 2.5) and the concentration of trace metals in real-time, throughout all phases of the Project. Monitoring should include both ambient air quality and potential deposition rates on vegetation, waterbodies, and wildlife habitat. The monitoring program should be designed to detect exceedances early and enable prompt corrective actions.
- C. The Proponent must conduct a more detailed health risk assessment that includes the potential long-term exposure of CLFN members, workers, and wildlife to particulates and trace metals. This assessment should account for various exposure pathways, including inhalation, ingestion, and contact with contaminated soil or vegetation. Special attention should be given to the vulnerable populations within the CLFN community.
- D. Given the extensive nature of the construction and operational activities, the current mitigation measures (such as dust suppression and anti-idling) will likely be insufficient. The Proponent must investigate the feasibility of enhanced measures such as:
 - Use of advanced dust suppression technologies (e.g., chemical dust suppressants with longer-lasting effects).
 - Establishment of physical barriers or windbreaks along critical areas to reduce particulate dispersion.
 - Implementation of a staged approach to dust control based on real-time air quality data, ensuring that mitigation efforts

			<p>are targeted to areas with the highest risk.</p> <p>E. After construction activities, the Proponent must ensure that a comprehensive land restoration and revegetation plan is in place to quickly stabilize soils and vegetation, reducing the potential for dust emissions over the long term. This plan should include the planting of dust-absorbing vegetation species along the construction route and key areas where sensitive ecosystems may be impacted.</p> <p>F. The Proponent must regularly engage with CLFN throughout the Project's lifecycle to ensure concerns related to air quality and health risks are addressed promptly. This includes providing CLFN members with access to air quality data and health information and supporting community-based monitoring efforts where feasible.</p>
73.	Appendix S – Section 7.1.1 (Potential Effects)	In Appendix S1, Section 7.1.1 the Proponent only looks at “Community Impacts” on MFFN, not of surrounding First Nations. The Project is likely to have impacts on communities other than MFFN, those impacts should also be discussed.	The Proponent must broaden the discussion of Community Impacts to include surrounding CLFN and areas of shared Territory that may be used for harvesting or cultural purposes.
74.	Section 6.5.1 (Temporal Boundaries)	<p>CLFN is concerned about the wide variance in the construction timeline for the Project (3 to 10 years), as this will significantly impact air quality and contaminant emissions. A longer construction period, especially up to 10 years, will lead to higher emissions, worsening air quality.</p> <p>From a human health perspective, prolonged exposure to elevated air contaminants, especially particulates, VOCs, and metals over up to 10 years— pose a risk to CLFN members working on the Project. The difference between 3 years and 10 years of exposure is considerable, with long-term health effects, particularly for those with respiratory or cardiovascular vulnerabilities.</p>	<p>A. CLFN recommends that the Proponent better refine construction timelines and model air contaminant emissions accordingly.</p> <p>B. The Proponent should include a thorough health impact assessment and implement robust mitigation measures to address air quality concerns, particularly if the construction timeline extends beyond 3 years. The health of CLFN community members and other construction workers should be prioritized in any decision regarding the construction duration.</p>

75.	Appendix S – Table 4-12: (Motor Vehicle Emission Simulator Model Parameters)	Diesel emissions associated with construction equipment, pickup trucks, crushing equipment, and other equipment are a major source of Project-related air contaminant emissions (particulates, VOCs, PAHs, GHGs). The Proponent must look to decrease the Project's reliance on diesel fuel and utilize Best Available Technology Economically Achievable (BATEA) for construction. Diesel combustion has a significant contribution to the Project's overall carbon footprint and local air quality that could be avoided using other technology (e.g., electric or LNG powered equipment). The GHG emissions and air pollutant emissions would be drastically decreased if alternative technology was implemented.	The Proponent must conduct a BATEA study to examine methods for reducing construction-related air contaminants and GHG emissions through the use of other technologies and equipment.
76.	Appendix S – Section 9.0 (Monitoring Programs and Future Commitments).	<p>The Proponent does not provide any commitments or details related to monitoring ambient air quality or specific emissions during the construction or operations phases of the Project. MFFN only commits to construction monitoring to ensure mitigation measures are in place. As discussed in the EA/IS there would be no mechanism to quantitatively monitor or track air contaminant emissions.</p> <p>The Proponent does not specify how CLFN will be involved in ambient air quality monitoring during construction and operations phases of the Project.</p>	<p>A. The Proponent must conduct ambient air quality monitoring for all contaminants of concern (including particulates and metals) for the construction and a reasonable portion of the operations phase. This is necessary to ensure regulatory compliance and verify the accuracy of air dispersion models and EA/IS predictions. Without quantitative data through ambient monitoring, it will be impossible to measure the Project's impact on air quality.</p> <p>B. CLFN requests the implementation of robust and long-term environmental monitoring to verify protection of the environment, including community-led ambient air quality monitoring during Construction and Operations of the Project. The Proponent must work with CLFN to identify appropriate contaminants for monitoring, sampling sites, methodology, etc.</p>
77.	Table 9-39: (Summary of Residual Effects for Atmospheric Environment)	A significant portion of the Project-related air contaminant emissions are related to burning of organic materials during the construction phase. Burning emits material concentrations of particulates (TSP, PM 10, PM 2.5), Nitrogen Dioxide, Acrolein, Acetaldehyde, Formaldehyde, Benzene, Toluene, Ethylbenzene, Xylene, Butadiene, Benzo[a]pyrene and other PAHs). Many of these substances are toxic at low concentrations and in some cases they are known carcinogens. Emissions from burning pose	To significantly reduce air contaminant emissions and protect the health of Project workers and local land users, it is recommended that the Proponent minimize or eliminate the open burning of organic materials during the construction phase. Alternative disposal methods such as mulching, chipping, composting, or off-site removal should be prioritized. In cases where burning is deemed necessary, it should be strictly controlled and subject to best practices for emission reduction, including use of clean-

		potential risks to CLFN members working on the Project or using the land in the area. MFFN could reduce air emissions greatly by reducing the amount of burning used in the construction phase.	burning equipment, scheduling burns under optimal meteorological conditions, and implementing air quality monitoring. This approach will help mitigate the release of toxic and carcinogenic substances such as particulate matter, NO ₂ , PAHs, and volatile organic compounds (VOCs), thereby reducing health risks and supporting environmental protection.
78.	Air Quality – General Comment	The Proponent does not discuss the potential impacts on air quality for the industrial users of the road – specifically mining. Since this MFCAR is closely linked to the development of the Ring of Fire, there is a high likelihood that the road will be used to transport ore or mineral concentrates to the south. Mining related hauling has the potential to exacerbate particulate and air contaminant emissions as larger mining vehicles would be used, which would create higher particulates and criteria air contaminant emissions (associated with burning more diesel). The ore or concentrate being hauled also has the potential to become airborne during transport. Mining related use of the MFCAR would greatly increase impacts to local air quality.	CLFN recognizes that future industrial activity could lead to increased emissions along the corridor, we believe it is more appropriate to assess those air quality impacts through future project-specific environmental assessments. Any subsequent proposals involving industrial use of the MFCAR must include a thorough evaluation of associated air emissions along the MFCAR section of the road to the RoF, and identify effective mitigation measures to protect community health and environmental quality
Climate Change			
79.	Chapter 12 (Our Changing Climate)	Climate change may shift the timing of sensitive periods for wildlife, such as breeding or migration. Construction planning and mitigation measures should be responsive to these changes and updated based on ongoing monitoring.	The Proponent should incorporate a dynamic construction and mitigation plan that accounts for potential shifts in the timing of sensitive wildlife periods due to climate change.
80.	Chapter 12 (Our Changing Climate)	Climate change is expected to create conditions that support the spread of invasive species. Equipment, construction materials, and workers can unintentionally introduce invasive species, requiring strict hygiene protocols and monitoring.	The Proponent should outline the pathways through which equipment, construction materials, and workers may inadvertently facilitate the spread of invasive species and clearly describe the proposed hygiene protocols and monitoring measures that will be implemented to prevent and manage the introduction and spread of invasive species.
81.	Chapter 12 (Our Changing Climate)	The EA/IS would benefit from a clearer discussion of cumulative climate risks—specifically, how multiple climate events may interact or compound one another. For example, the combination	The Proponent should enhance the EA/IS by providing a more detailed analysis of cumulative climate risks, specifically addressing how multiple climate events may interact with each

		<p>of extended heatwaves followed by intense storms, or the occurrence of wildfires during road construction and maintenance activities, could amplify both environmental and operational impacts.</p> <p>Addressing these scenarios is important for risk planning and ensuring that mitigation strategies are robust under increasingly complex climate conditions.</p>	<p>other. This analysis should explore scenarios where extended heatwaves, intense storms, or wildfires may overlap, particularly during critical periods such as road construction, operation, and maintenance activities. The assessment should incorporate strategies for managing these compounded risks, ensuring that mitigation measures are adaptable to increasingly complex climate conditions.</p>
82.	Chapter 12 (Our Changing Climate)	<p>Chapter 12 discusses high level technical assessments and risk analyses around climate change indicators and impacts but does not describe how impacted First Nations will be involved in ongoing climate monitoring and response. Climate change will have widespread and interconnected impacts across the region.</p> <p>As such, the EA/IS should outline a more inclusive and coordinated approach that actively involves regional First Nations in the monitoring, management, and adaptation process. Given that the MFCAR may become a critical link for more northern communities during climate-related emergencies, regional Indigenous engagement in climate planning is essential.</p>	<p>The Proponent should revise the EA/IS to outline a more coordinated approach that actively involves regional First Nations in climate monitoring, management, and adaptation processes. This should include specific mechanisms for engagement, such as establishing consultation frameworks, identifying key roles for CLFN in data collection and analysis, and ensuring CLFN participation in climate risk response and planning.</p>
83.	Section 12 (Our Changing Climate)	<p>Hotter, drier summers combined with more frequent lightning storms are expected to increase wildfire frequency and severity. This could result in more frequent road closures and a need for coordinated evacuation planning, particularly where the MFCAR will serve as the primary or sole route in and out.</p>	<p>CLFN request that the Proponent develop and include a detailed evacuation and community resilience plan in the EA/IS, addressing the potential for more frequent and severe wildfires. This plan should focus on ensuring safe, coordinated evacuations in the event of road closures, especially considering that the MFCAR may be the primary or only route for access to and from the community. The plan should involve collaboration with local authorities, First Nations, and emergency response teams to establish clear protocols, identify evacuation routes, and ensure that adequate resources are available for timely evacuations.</p>
84.	Section 12.3.2 (Adaptation Measures); Table 12-2	<p>There are several significant climate-related risks that are increasingly affecting infrastructure and community health but are missing from the current risk evaluation framework. These should</p>	<p>CLFN request that the Proponent revise the risk evaluation framework in Chapter 12 to explicitly include the following climate-related risks: freeze-thaw cycles and the expansion of invasive</p>

	(Climate Event Risk Rating, Justification and Impact)	<p>be explicitly included as individual rows in Table 12-2 and subsequently assessed in Tables 12-3 and 12-4 to ensure a more comprehensive understanding of potential impacts during both construction and operation of the MFCAR. Specifically:</p> <ul style="list-style-type: none"> • Freeze-Thaw Cycles: Increased temperature variability, particularly during shoulder seasons, is expected to result in unpredictable freeze thaw cycles. This may result in accelerated road and infrastructure degradation, heightened safety risks for vehicles, and significantly higher maintenance costs. • Expansion of invasive Species: Warmer temperatures associated with climate change support the northward and expansion of invasive species , resulting in elevated risk of illnesses, reduced safety for land users and workers, and potential disruption of traditional land use and outdoor activities. <p>Inclusion of these risks would strengthen the assessment’s relevance to real-world conditions and enhance climate resilience planning for the MFCAR.</p>	<p>species. These risks should be added as individual rows in Table 12-2, with a clear analysis of their potential impacts on road infrastructure, safety, and public health. The assessment in Tables 12-3 and 12-4 should also be updated to evaluate the implications of these risks during both construction and operation phases.</p>
85.	Section 12.4 (Conclusion)	<p>While Section 12.4 acknowledges that not all climate-related risks can be eliminated, there is limited discussion of adaptive management as a tool for addressing these evolving risks over time. Given the uncertainties surrounding long-term climate projections and their localized impacts, it is essential that adaptive management plans be developed, clearly articulated, and regularly re-evaluated throughout the construction and operational phases of the MFCAR. As new climate data and regional predictions become available, strategies and mitigation measures should be updated to reflect emerging risks and ensure the long-term resilience of the road, associated infrastructure, and surrounding ecosystems and communities.</p>	<p>CLFN requests that the Proponent develop a detailed adaptive management plan that explicitly addresses the evolving climate-related risks associated with the MFCAR. This plan should outline clear procedures for regularly monitoring and re-evaluating climate data and regional predictions throughout both the construction and operational phases, including specific mechanisms for adjusting strategies and mitigation measures as new information emerges.</p>
86.	Section 12 (Our Changing Climate) and Section	<p>While the EA/IS identifies various species at risk and references applicable federal obligations under the Species at Risk Act and</p>	<p>CLFN request that the Proponent provide greater clarity in linking the project to Canada's climate action and sustainability targets,</p>

	13.3 (Contributions to Sustainability)	<p>other legislation, it does not fully demonstrate how the MFCAR project aligns with Canada's broader climate change commitments, including Net-Zero Emissions by 2050 or the Sustainable Development Goals (SDGs). Although the EA/IS highlights some general sustainability practices, such as using recycled materials and rainwater harvesting, it lacks explicit mention of how the project will contribute to these national sustainability objectives.</p> <p>Additionally, there are no defined indicators or performance metrics to track and ensure accountability toward these goals over the project's lifecycle.</p>	alongside measurable indicators for monitoring and adaptive management, would enhance the EA/IS's alignment with national commitments.
87.	Section 13.3 (Contributions to Sustainability)	The EA/IS outlines the project's sustainability contributions primarily for Marten Falls First Nation, emphasizing social, economic, and cultural benefits. However, it overlooks the potential impacts on neighboring First Nations, who may also be affected by the MFCAR. A more comprehensive approach should consider how the project's sustainability efforts will benefit or impact surrounding communities.	<p>CLFN request that the Proponent provide a comprehensive evaluation of the potential impacts on neighboring First Nations, ensuring that the benefits and potential risks of the MFCAR are considered in a regional context. This should involve direct consultation with neighboring Indigenous communities to identify their concerns, needs, and expectations regarding social, economic, and environmental impacts.</p> <p>The EA/IS should clearly articulate how the project's sustainability efforts will support or address the needs of surrounding communities, both during construction and throughout the operational phase.</p>
88.	Section 14.3.3.5 (Atmospheric and Greenhouse Gas)	The EA/IS does not include any long-term monitoring or management commitments related to greenhouse gas emissions, climate resilience, or broader sustainability objectives during the operation phase of the MFCAR. This is a critical gap, particularly given the cumulative and evolving nature of climate change impacts. While the residual effects assessment concludes that there will be no significant GHG-related effects, this does not account for how the project may interact with other regional and long-term climate stressors.	CLFN request that the Proponent develop and include a climate and sustainability monitoring program to be implemented during the construction and operational phases of the MFCAR.

6.0 Conclusion

The Marten Falls Community Access Road, as described in the Environmental Assessment/Impact Statement, will cause permanent profound changes to the land, water and wildlife, as well as our Nation's ability to exercise our Treaty and Aboriginal rights. Through our technical review and community engagement, we have identified a range of concerns regarding the environmental and cultural impacts of the proposed road, as well as gaps in the assessment that must be addressed to uphold the rights and interests of our Nation and others in the region.

CLFN remains broadly supportive of Marten Falls First Nation's efforts to secure reliable road access to their community. Our Nation understands the importance of this infrastructure for accessing essential services and improving quality of life. However, that support does not mean our concerns should be minimized. We expect that Canada, Ontario, and the Proponent will take seriously the issues raised in this review and implement measures to mitigate environmental and cultural risks, increase accountability, and ensure that benefits are shared equitably with all impacted Nations.

The MFCAR is a major infrastructure undertaking in a relatively pristine, ecologically sensitive and culturally significant region. While our review has focused strictly on the MFCAR project as scoped in the EA/IS, we recognize that it may serve as a foundation for future development, including access to the Ring of Fire. CLFN therefore emphasizes that the findings and recommendations in this review must not be viewed in isolation. The long-term impacts of a regional access corridor will depend on how well the concerns raised now are addressed in future assessment for mining projects in the Ring of Fire, and how those future projects are evaluated with meaningful involvement from our Nation.

CLFN remains committed to constructive dialogue and regional collaboration. We are prepared to work alongside other Nations, governments, and proponents to ensure that development in our homelands proceeds in a way that is respectful, balanced, and aligned with our values, rights, and responsibilities to the land.

7.0 References

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B4.3 Community Specific Meeting Materials



MARTEN FALLS FIRST NATION ALL SEASON COMMUNITY ACCESS ROAD

Project Name: Marten Falls First Nation (MFFN) All Season Community Access Road (CAR)

Date of Meeting: February 19, 2025
Time: 1:00-2:00 pm EST

Attendees: Kimberly Jorgensen, Constance Lake First Nation Consultant (Four Rivers)
Shannon Costigan, Constance Lake First Nation Consultant (Four Rivers)
Wayne Neegan, Constance Lake First Nation CCLO
Phyllis Ineese, Constance Lake First Nation
Sarah Beamish, Fort Albany First Nation Legal Counsel
Ervin Waboose, Long Lake #58 First Nation CCLO
Amanda Misnakoshkang, Long Lake #58 First Nation Land Officer
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

Project #: [REDACTED]
Location: Thunder Bay, Three Road Projects Gathering and Expo

Prepared By: Gabbie Ratajczak (MFFN CAR Project Consultant)

Regarding: MFFN CAR Breakout Session at Three Road Projects Gathering and Expo – Constance Lake First Nation

Notes of Meeting

Meeting Summary

The MFFN CAR Project Team and representatives of Constance Lake First Nation, Fort Albany First Nation and Long Lake #58 First Nation privately met to discuss the CAR and the Draft Environmental Assessment / Impact Statement (EA / IS) during the Three Road Projects Gathering and Expo.

Summary of Meeting Action Items

- The Project Team to provide Fort Albany First Nation legal counsel with approximate translation timelines for the Assessment Summary (completed – translations were provided as they became available on June 3, June 26 and July 29, 2025).





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
1	General Project	<ul style="list-style-type: none"> Constance Lake First Nation is interested in how MFFN is supported and fostered during the road development, why they chose certain river crossing and landscape; and what kind of species are taken into account, particularly in relation to caribou. 	<ul style="list-style-type: none"> The Project Team explained the process for building a road, how it differs from Ministry of Natural Resources (MNR) forestry roads and how in this process the government needed to consult with MFFN community members and other Indigenous communities. Feedback from MFFN and Indigenous communities was used to choose the preferred route. Feedback included staying away from caribou calving areas, ensuring no pollution would occur in the rivers and not using the winter corridor route as an option. The Project Team indicated that detailed information is included in the Draft EA / IS. This includes the community's perspective and how the decision was driven by a holistic view of the project.
2	Climate Change	<ul style="list-style-type: none"> How is climate change factored into decisions for the CAR? 	<ul style="list-style-type: none"> The Project Team placed a lot of consideration into climate adaptation and how to design and construct the CAR considering climate change and to make it resilient to it. Considerations have been made regarding the construction process, the human environment, the physical environment and more. More information can be found in the Draft EA / IS.





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
3	Peatlands	<ul style="list-style-type: none"> Are there areas where bogs tend to be more watered? This type of landscape changes in cycles. How does it impact the CAR? 	<ul style="list-style-type: none"> The Project Team explained that the CAR will be constructed as a floating road and will have 1-metre-thick rock on top of peat and aggregate sites along it. This is blasted rock and will allow for water to pass through.
4	Peatlands	<ul style="list-style-type: none"> If there was a spill on the bog, how would it be cleaned up and who would be responsible? 	<ul style="list-style-type: none"> During the construction phase, each construction company will have to prepare a spill response plan and environmental protection plan. They will have spill kits ready on hand and will have the equipment and people trained to employ the means necessary for cleanup.
5	Atmospheric Environment	<ul style="list-style-type: none"> What are you doing for dust abatement? 	<ul style="list-style-type: none"> The current assumption is that water will be used for dust suppression. Ownership and operation of the road is currently unknown, and dust abatement is part of ongoing discussions of whoever becomes the owner of the CAR. Community members did not want salt on the road.
6	Consultation Methods	<ul style="list-style-type: none"> Fort Albany First Nation legal asked what Indigenous languages materials would be available in and the timelines for the translated materials to be available. Fort Albany First Nation legal counsel expressed concerns about not having translated materials available. Fort Albany First Nation legal counsel asked if there would be flexibility on 	<ul style="list-style-type: none"> The Assessment Summary will be available in Ojibway, Oji-Cree, Swampy Cree and French. However, very few translators are available to translate into Indigenous languages. The translators had given an overall estimate of 100-120 days from the day the document was received for translation. The Project Team





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		deadlines once translations are available.	<p>indicated that materials have been sent for translation as they have become available in an effort to have as many as possible available soon after the release of the Draft EA/IS.</p> <ul style="list-style-type: none"> • Action Item: Project Team to provide Fort Albany First Nation legal counsel an approximate translation timelines for Draft EA / IS documents.
7	Indigenous Knowledge, Consultation Methods	<ul style="list-style-type: none"> • Participants wondered about the Indigenous influence in the process and how Council was involved 	<ul style="list-style-type: none"> • In the past, MFFN were not consulted on development projects on their territory. • MFFN partnered with Land Use Planning in order to be involved in this process. • MFFN is consulting with 23 Indigenous Communities and tribal council's as required.
8	Consultation Methods	<ul style="list-style-type: none"> • Constance Lake First Nation asked about opportunities to have a presentation for their members on the results of the Draft EA / IS. They also wondered about it covering their members areas of interest and if a customized packaged could be prepared. 	<ul style="list-style-type: none"> • The Project Team noted that they would be glad to take requests to present high level findings and summary of results on a topic. The Project Team indicated that if Constance Lake First Nation provides information on what their members are interested in the Project Team would be able to customize a package/presentation for them.

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 ALL SEASON COMMUNITY ACCESS ROAD

Project Name:	Marten Falls First Nation (MFFN) All Season Community Access Road (CAR)	Date of Meeting:	February 22, 2025
		Time:	5:00-9:00 pm EST
Attendees:	Constance Lake First Nation Community Members (eight attendees) Roger Wesley, Constance Lake First Nation – Lands and Resource Department Manager (Community Representative) Bertha Sutherland, Constance Lake First Nation – CBLUP Land Use Planning Coordinator (Community Representative) Jennifer Bruin, MFFN CAR Project Team Ingrid Trimble, MFFN CAR Project Consultant Niki Angelis, MFFN CAR Project Consultant Gabbie Ratajczak, MFFN CAR Project Consultant	Project #:	██████████
		Location:	In-person, Constance Lake First Nation
Absent:	Bob Baxter, MFFN CAR Senior Community Member Advisor	Prepared By:	Gabbie Ratajczak (MFFN CAR Project Consultant)

Regarding: MFFN CAR Project Overview and Update on Draft Environmental Assessment / Impact Statement

Notes of Meeting

Meeting Summary

The Marten Falls First Nation (MFFN) Community Access Road (CAR) Project Team (the Project Team) and representatives and community members of Constance Lake First Nation met to discuss the Community Access Road, provide a general overview and present an update on the Draft Environmental Assessment / Impact Statement (EA / IS).

The meeting started with a presentation from the Project team to share general information on the CAR and the Draft EA / IS. There was an opportunity for discussion and questions throughout the meeting. A summary of comments, questions and action items are captured below.

The following materials were made available to Constance Lake First Nation during the meeting:

- Draft EA / IS Assessment Summary Package, which included:
 - Chief's Letter





Meeting Summary

- Plain Language Summaries
- Maps
- Executive Summary

The following action items were identified during the meeting:

- Constance Lake First Nation shared information about climate change, fish and blastomycosis, The Project team will share this information with the Climate Change Adaptation, Fish and Fish Habitat and Community Well Being teams. (Complete)

Item #	Topic / Theme	Comments / Questions	Response / Action Items
1	General Project	<ul style="list-style-type: none"> ● The Community Representative welcomed attendees and explained the purpose of the CAR, which is to provide MFFN with all-season access for health and social purposes. MFFN community members want this road for their own community, and are not involved in the Ring of Fire process. 	<ul style="list-style-type: none"> ● Comment acknowledged.
2	Fish and Fish Habitat, Surface Water	<ul style="list-style-type: none"> ● A Constance Lake First Nation community member expressed concern about the Albany River and what efforts will be made to protect it. They expressed that while they support MFFN and acknowledge that the CAR is needed for their prosperity, they (Constance Lake First Nation) are concerned about the long-term effects of the road on the river and tributaries that they rely on for fishing. 	<ul style="list-style-type: none"> ● The Project Consultant described that potential effects, mitigation measures and cumulative effects are considered in the Draft EA / IS. ● The information on surface water is summarized in Sections 8, 9, 10 of the Draft EA / IS, while a full technical report is appended.
3	Access	<ul style="list-style-type: none"> ● A Constance Lake First Nation community member asked who will own the road and will it be publicly accessible. ● A Constance Lake First Nation community member commented that people are coming up from southern Ontario and the United States and 	<ul style="list-style-type: none"> ● The Project Team confirmed that access concerns have been shared with them. They also confirmed that discussions regarding ownership and long-term operation and maintenance





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		<p>using their rivers. The community is worried if there are no measures put in place for the road.</p> <ul style="list-style-type: none"> The Community Representative explained that discussions surrounding access and control of the road are currently ongoing between MFFN and the province. However, once the road is established, the opportunity for access will open up to others. 	<p>are ongoing between MFFN and the province.</p>
4	Human Health	<ul style="list-style-type: none"> The Community Representative commented that the community has seen the presence of blastomycosis in the area. It used to occur only within Weenusk and has now spread to Constance Lake and the surrounding area. The Community Representative explained the illness of blastomycosis, the cause and the loss of five community members to the illness. 	<ul style="list-style-type: none"> Action: The Project Team will share the information with the Climate Change Adaptation and Community Well Being teams.
5	Climate Change, Fish and Fish Habitat	<ul style="list-style-type: none"> A Constance Lake First Nation community member commented that climate change is also affecting the community and noted that bass are now found in the rivers where there were none before. 	<ul style="list-style-type: none"> Action: The Project Team will share the information with the Climate Change Adaptation and Fish and Fish Habitat teams.
7	Indigenous Knowledge and Land Use, Aboriginal and Treaty Rights	<ul style="list-style-type: none"> A Constance Lake First Nation community member commented that Constance Lake has no say in this process. MFFN and Aroland are proponents on this road. However, there are things that occur that come into our river streams. The Albany River feeds into our stream. There is a fear of what will happen to the animals and fish. There are no more fish, and we can't go swimming anymore. 	<ul style="list-style-type: none"> The Project Team shared that MFFN members provided information about the impacts that damming had on their Community. MFFN Community members also provided information on surface water baseline conditions that informed our studies. <i>Post-Meeting Note: The Draft EA / IS contains information on the existing conditions of rivers, lakes and streams in the study area, as well as potential effects, mitigation</i>





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
			<i>measures and cumulative effects. Please see Sections 8, 9 and 10 for more information or the Surface Water Technical Support Document.</i>
8	Consultation Methods	<ul style="list-style-type: none"> A Constance Lake First Nation community member asked if Fort Albany and Kashechwan First Nations are also involved. The Albany River is a means of transportation for those communities as well. 	<ul style="list-style-type: none"> The Project Team confirmed that those communities are involved. MFFN is consulting with 22 other Indigenous communities and considering aspects that are important to them. The Record of Consultation and Engagement is available on the Draft EA / IS website. You can filter and see what comments we have received from neighbouring Indigenous Communities and our responses.
9	Aboriginal and / or Treaty Rights and Interests, Consultation Methods	<ul style="list-style-type: none"> A Constance Lake First Nation community member asked if it is just MFFN's decision on the road. Will they consider other communities? The Community Representative explained that the decision on the road itself will likely sit with MFFN, however, the community would likely respect Constance Lake First Nation's input on river crossings and take it into consideration. 	<ul style="list-style-type: none"> The Project Team added that feedback from 22 neighbouring Indigenous Communities has been sought since the start of the planning process and have incorporated feedback where appropriate.
10	General Project	<ul style="list-style-type: none"> A Constance Lake First Nation community member asked what has been happening with the winter access road. The Community Representative explained that the winter season for the winter road is becoming shorter each year due to climate change. Community members have to fly in and 	<ul style="list-style-type: none"> Comment confirmed.





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		out more often and it's costing more money.	
11	Crossing Structure, Consultation Methods	<ul style="list-style-type: none"> The Community Representative commented that the Albany River crossing and other river crossings affect other First Nations outside of MFFN. MFFN would likely respect our opinions regarding the crossings and consider it into their decision. 	<ul style="list-style-type: none"> The Project Team noted how MFFN feedback informed the selection of river crossings with the intend to minimize impacts. However, the detailed design phase is not yet complete and we have created buffer areas. This means that there is flexibility in the design and we are allowed to adjust the route design if issues arise.
12	Consultation Methods	<ul style="list-style-type: none"> A Constance Lake First Nation community member suggested that the Project team visit on a weekday next time instead of a weekend. The Community Representative clarified based on past community turnouts, Constance Lake First Nation invited the Project team to visit on a weekend. 	
13	Consultation Methods, Indigenous Knowledge and Land Use, Aboriginal and Treaty Rights	<ul style="list-style-type: none"> The Community Representative asked where the Indigenous Knowledge component is in this process. They indicated that in Australia and New Zealand they are using an Indigenous science approach in combination with western science. The Community Representative was wondering if something similar was being done for the CAR. All the information shared from Constance Lake First Nation is 	<ul style="list-style-type: none"> The Project Team explained the use of an Indigenous Knowledge that includes contributions from many communities. Other aspects include having MFFN Community Members Advisors on the Project Team providing Indigenous Knowledge, and input is constantly received from MFFN community members through participation in field programs. There is information in the Draft





MARTEN FALLS FIRST NATION
ALL SEASON COMMUNITY ACCESS ROAD

Item #	Topic / Theme	Comments / Questions	Response / Action Items
		processed in a western format. There is no recognition of our knowledge holders and the spiritual connection.	EA / IS that is written in the perspective of community members, has been reviewed by community members and captures their voice.
14	Provincial EA Process, Federal IA Process	<ul style="list-style-type: none"> The Community Representative commented that there is a lot of conversation outside of the environmental area. What are the key pillars of the EA? Was economic development part of it? 	<ul style="list-style-type: none"> The Project Team shared a physical copy of the Draft EA / IS assessment summary package and explained the components of it, displaying all the discipline plain language summaries.

**Post-meeting Notes are included above. Although the information referenced in the Post-meeting Notes was not explicitly discussed during the meeting, the intent is to include additional related information to improve information sharing and progress the discussion with Constance Lake First Nation.*

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.





Community Access Road

Constance Lake First Nation

February 22, 2025



Project Team



Bob Baxter
*MFFN Councillor and
Senior Community
Member Advisor*



Lawrence Baxter
*Senior Community Member
Advisor*



Project Team



Jennifer Bruin
Technical Advisor



Ingrid Trimble
Environmental Assessment



Gabbie Ratajczak
Consultation



Niki Angelis
Consultation



For Discussion Today

- Project Overview
- The Preferred Route
- What to expect with the Draft Environmental Assessment / Impact Statement
- Valued Components and Studies
- We want to hear from you!
- Next Steps





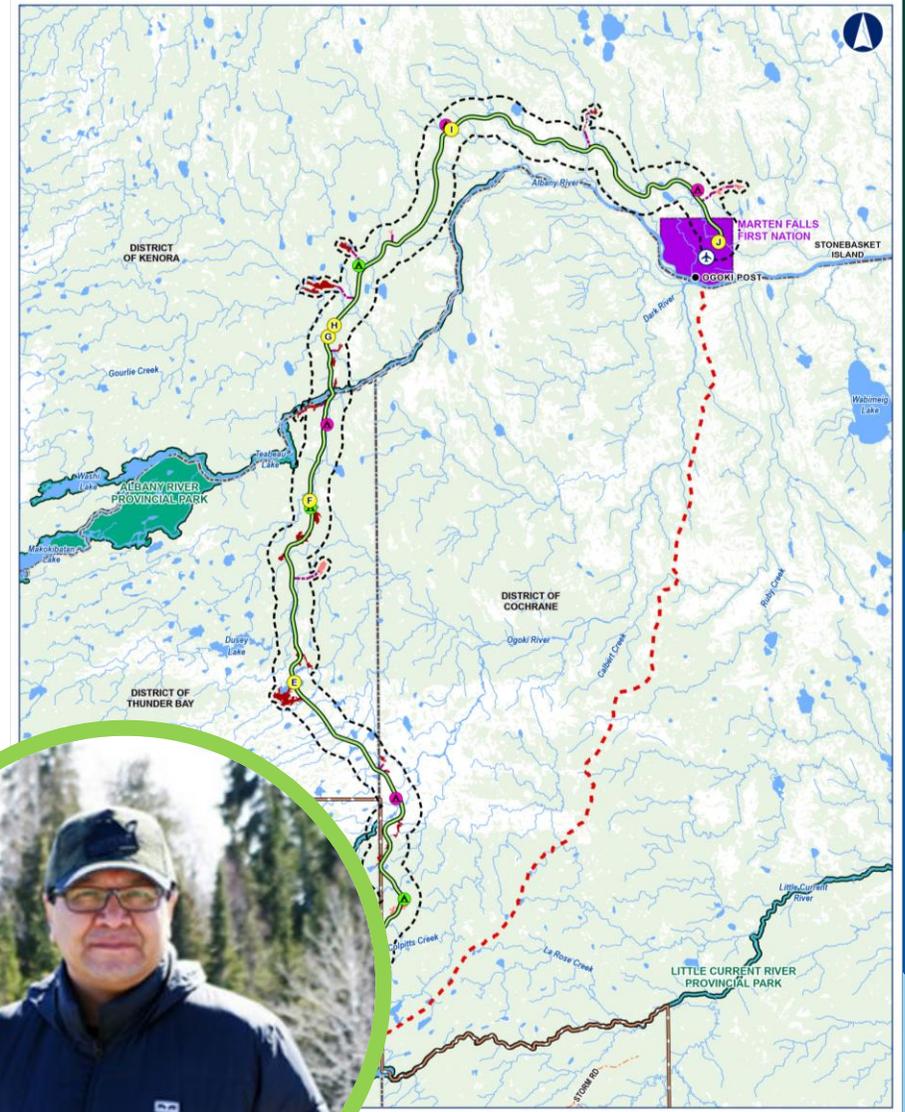
The Community Access Road

Marten Falls First Nation has a winter access road but it's not reliable and makes transportation of goods and people difficult.

An all-season road that connects to the existing provincial highway network is needed to improve the well-being of the community.

"The Community Access Road is more than infrastructure; it's about securing a better future for our people."

- Chief Bruce Achneepineskum

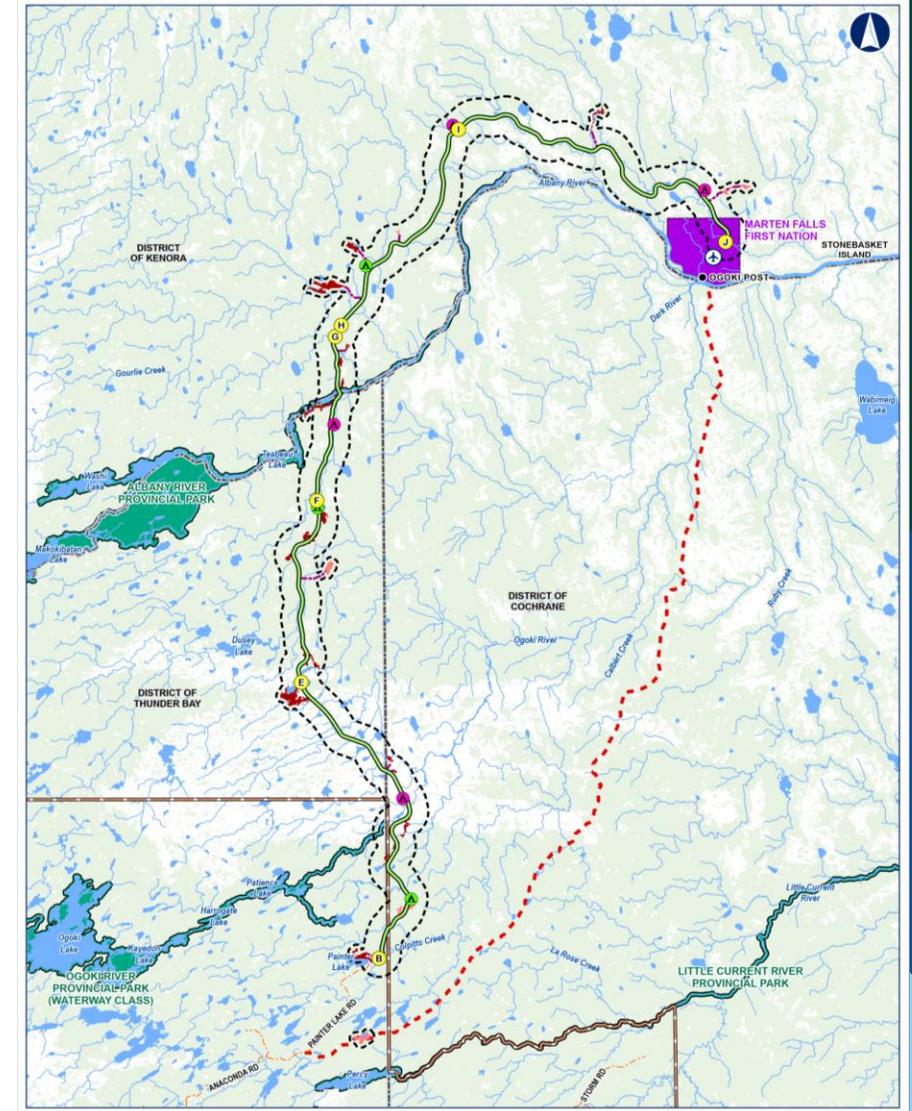




The Community Access Road

Components of the Community Access Road:

- Approximately 190 km of a two-lane gravel road;
- Quarries, borrow areas and aggregate sources;
- Bridges for river and stream crossings; and
- Temporary construction access roads, work areas and camps

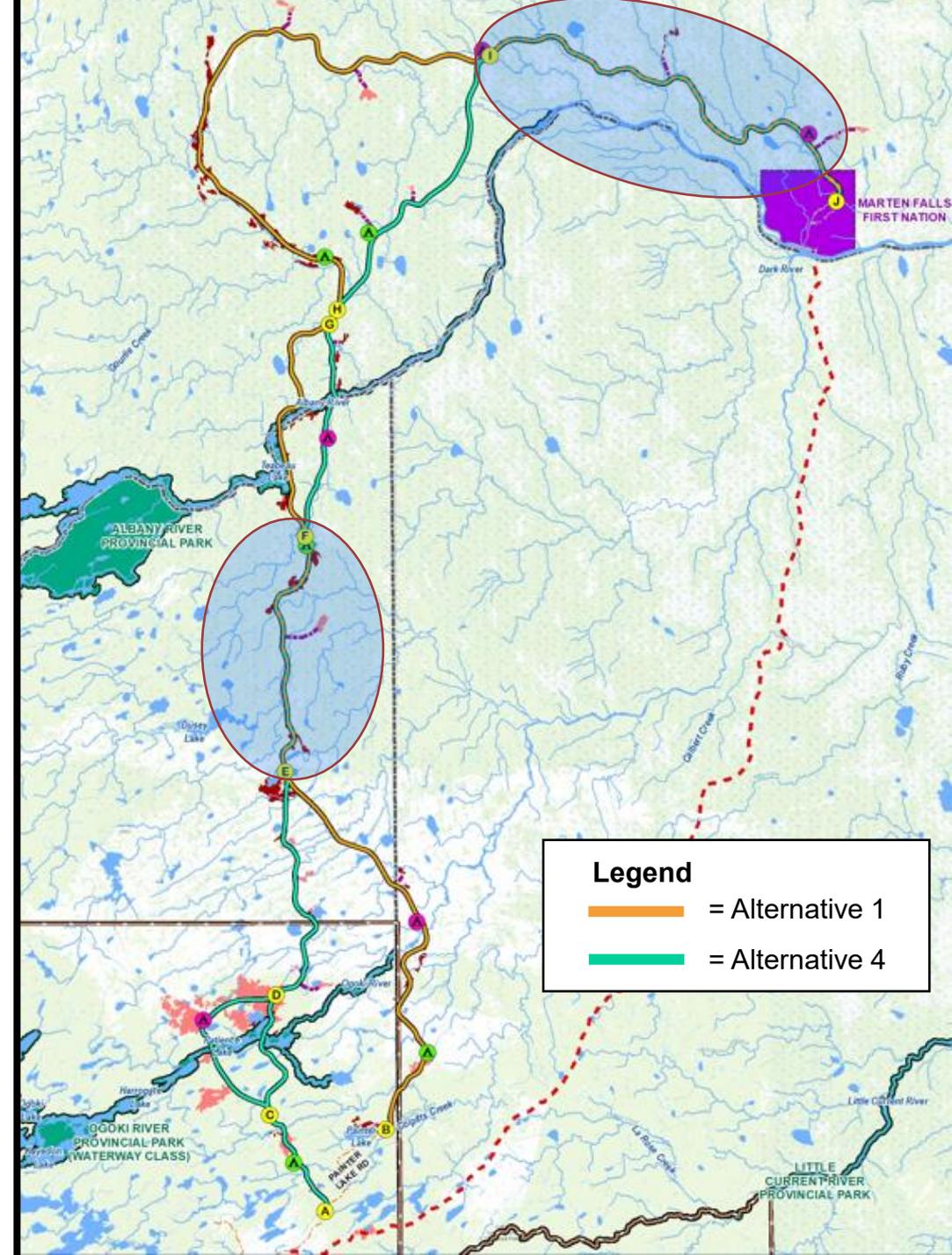




Selecting a Preferred Route

We did not start off with a set route in mind.

- In the process of selecting or assessing a preferred route, we looked at route options
- There were two alternatives being considered (**Alternative 1** and **Alternative 4**).
- Alternative 1 and Alternative 4 parallel, overlap and cross each other at multiple locations.



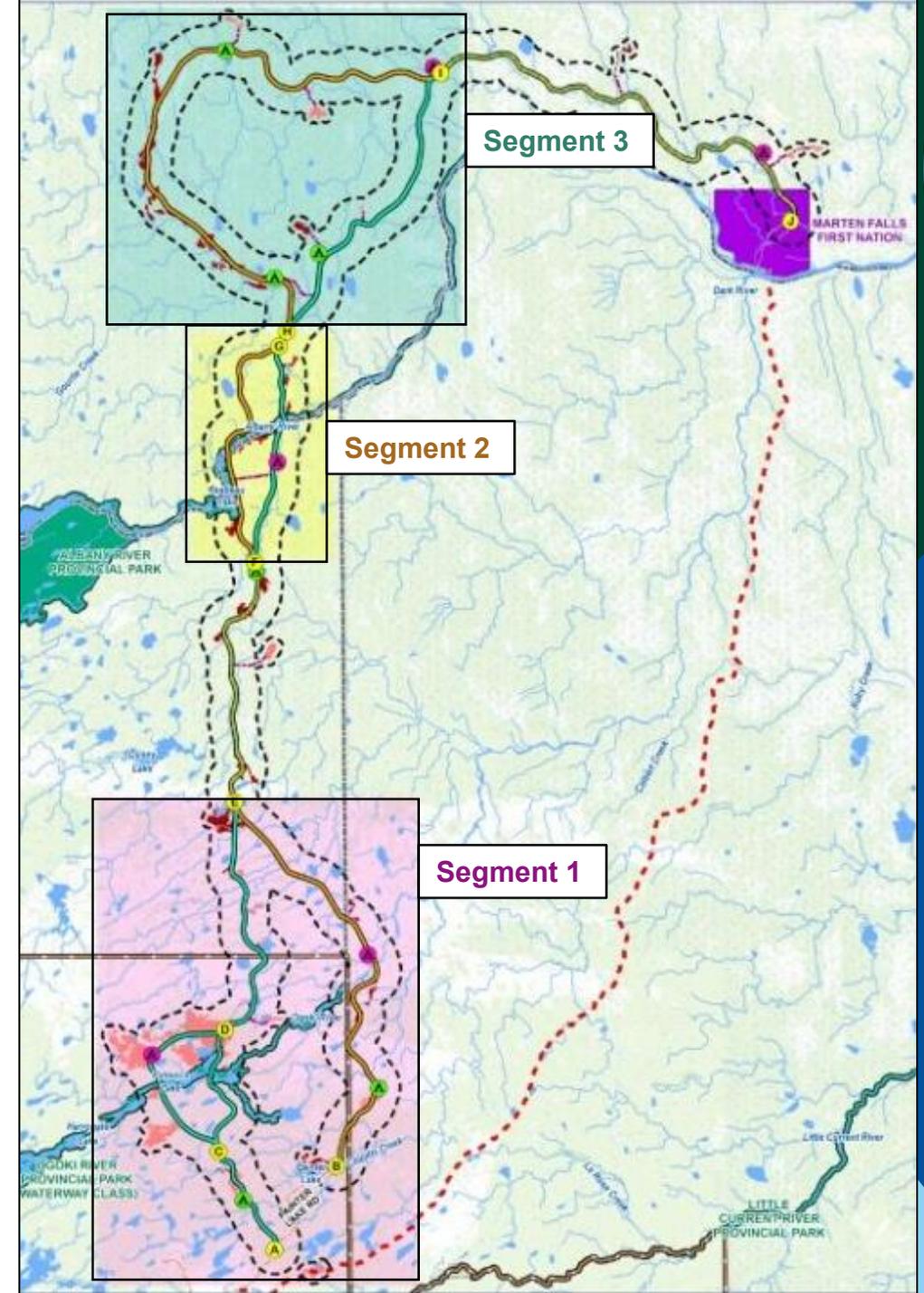


Selecting a Preferred Route

Where there were options an evaluation criteria was used to determine the best option.

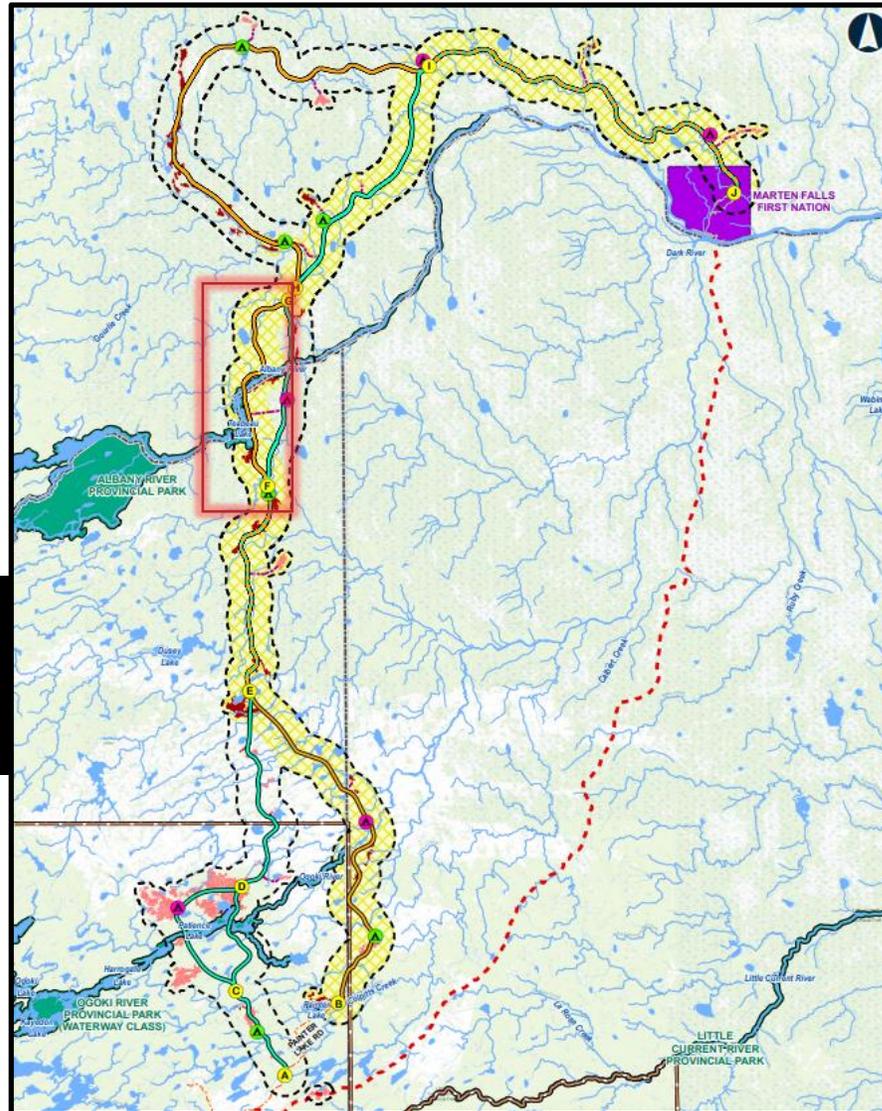
These segments were:

- Segment 1 – Ogoki Crossing
- Segment 2 – Albany Crossing
- Segment 3 – North of Albany

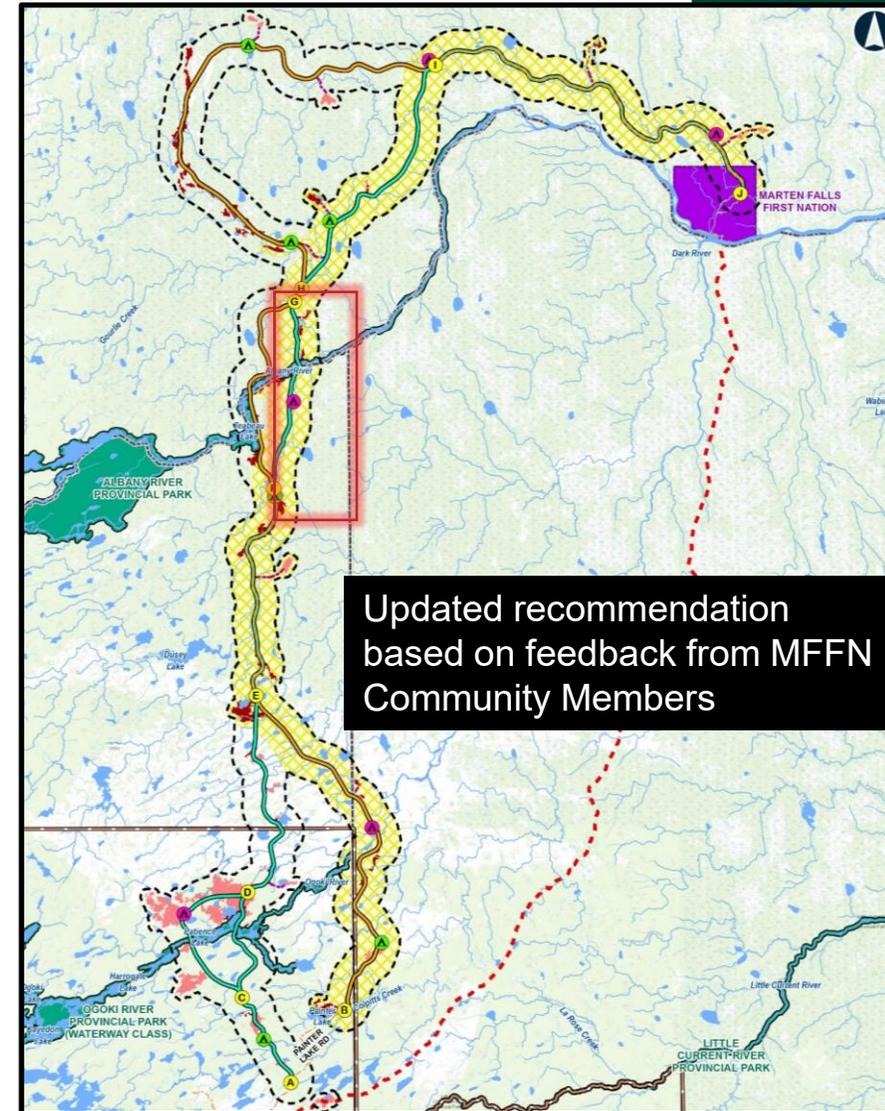




Selecting a Preferred Route

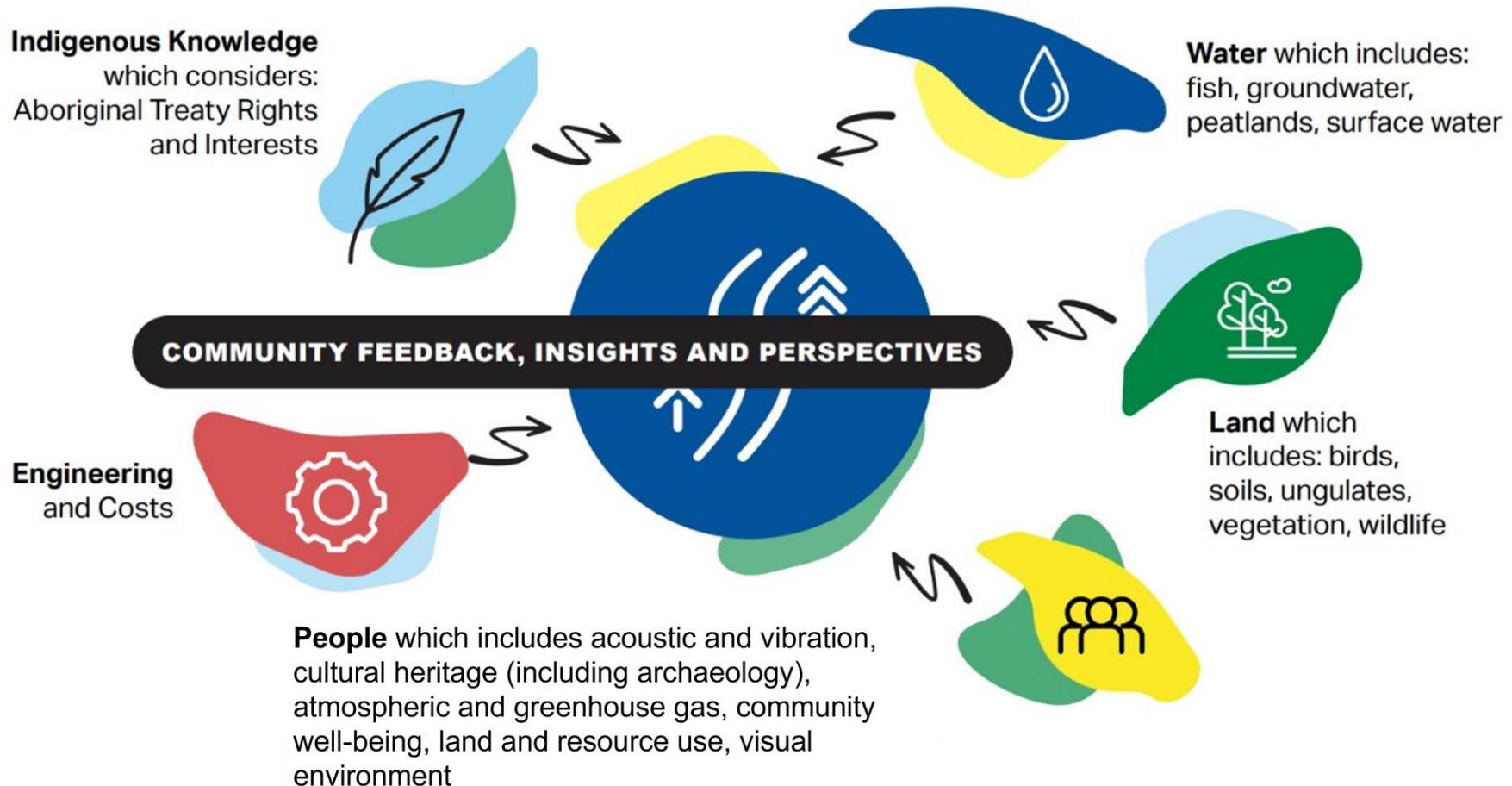


Recommendation presented to
Marten Falls Community
Members on October 23 & 24,
2023



Updated recommendation
based on feedback from MFFN
Community Members

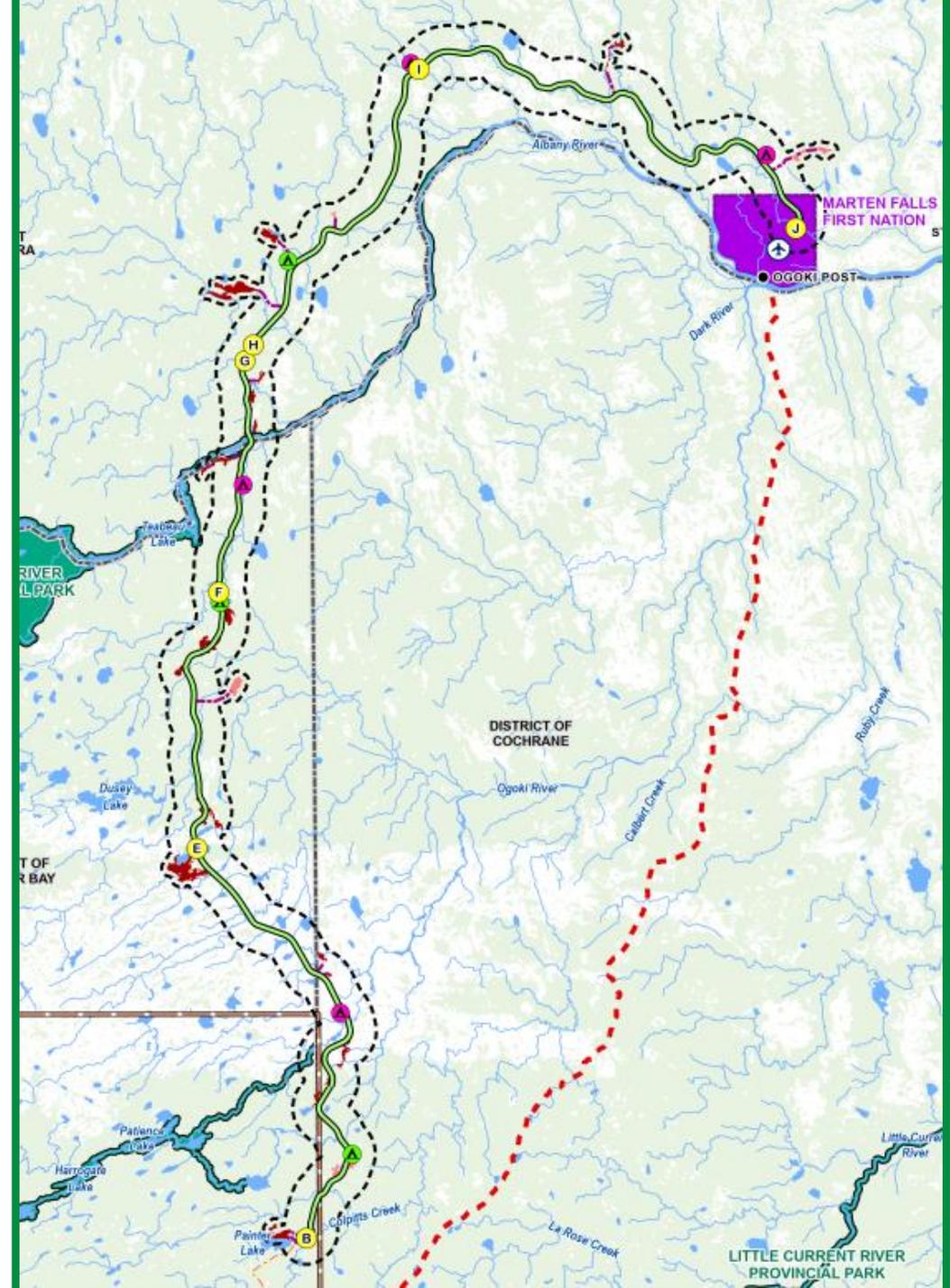
How was the Preferred Route Selected?





Preferred Route

- After many years of technical studies, and considering feedback from Marten Falls First Nation and other communities we are engaging, and at open houses, a preliminary route recommendation was made.
- Chief and Council passed a Band Council Resolution to confirm this preferred route recommendation on August 26, 2024.





Environmental Assessment / Impact Assessment Process

- We are conducting a coordinated provincial Environmental Assessment and federal Impact Assessment.
- This involves many years of planning, technical studies, data collection, meetings and interviews. We are now ready for the next phase—the release of the Draft Environmental Assessment / Impact Statement (EA / IS)

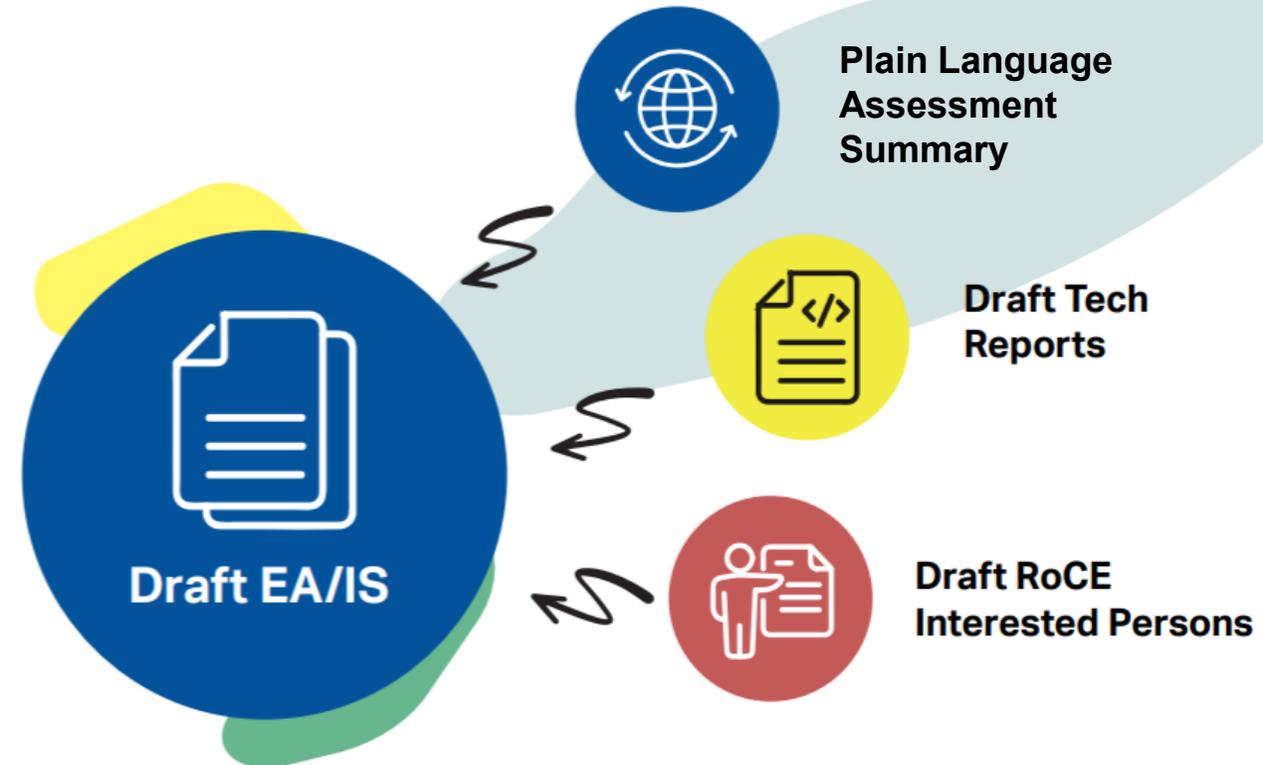


Draft EA / IS Review Process

Are you ready? The Draft EA / IS is a large document (approximately 500 - 1000 pages) which includes thousands of pages of supporting documents.

We are here to help in your review!

Indigenous communities have early access to the Draft EA / IS with a review period of 120 days.



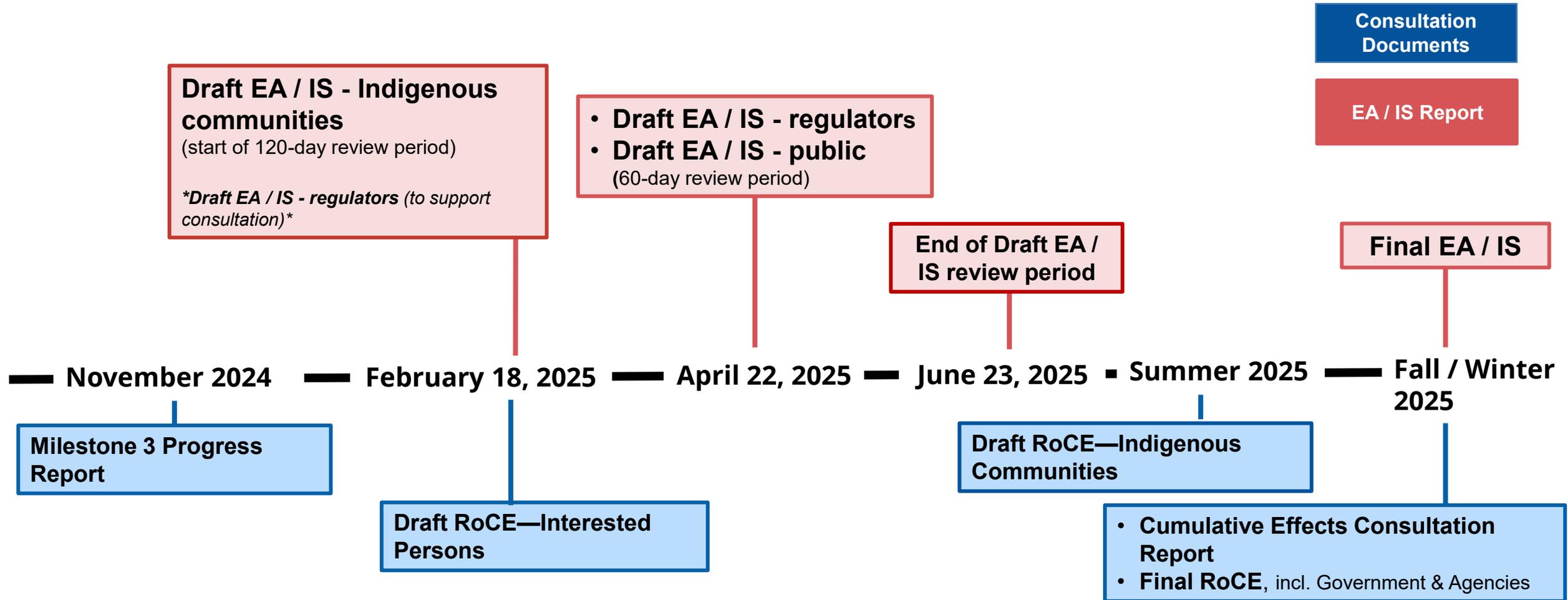
Delivering the Draft EA / IS to Marten Falls First Nation

Just last week, the Community Access Road Project Team delivered the Draft EA / IS to Marten Falls First Nation.





Draft Environmental Assessment / Impact Statement Schedule





Getting Ready for the Draft EA / IS Report

- The Draft EA contains the results of our field programs that have been conducted between 2019 and 2023.

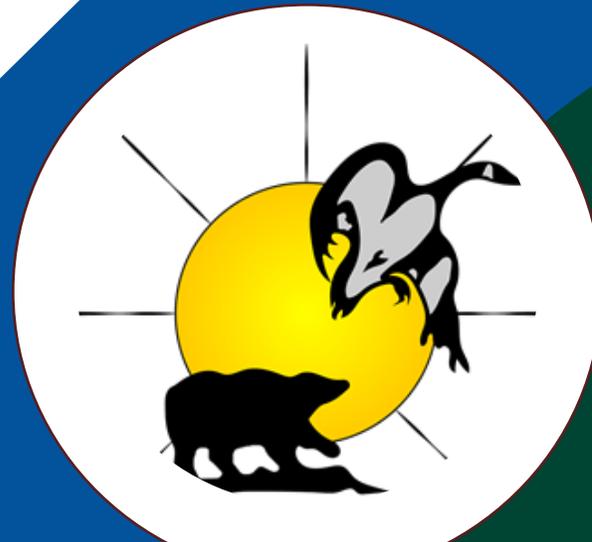
In addition to potential effects and mitigations for direct effects, it will also look at potential cumulative effects with other projects in the region.





Opportunities to get involved

- Participation in the Indigenous Knowledge Program
- Community Capacity Funding available to help with the review of the Draft EA / IS.
- Stay tuned for upcoming webinars on studies and findings related to the Draft EA / IS.





Next Steps

- Draft EA / IS Review Period for Indigenous Communities (120-days)
- Public Information Centre #6 in Geraldton and Thunder Bay (Spring 2025)
- End of Draft EA / IS Review Period:
June 23, 2025
- Final EA / IS will be submitted in the Fall / Winter

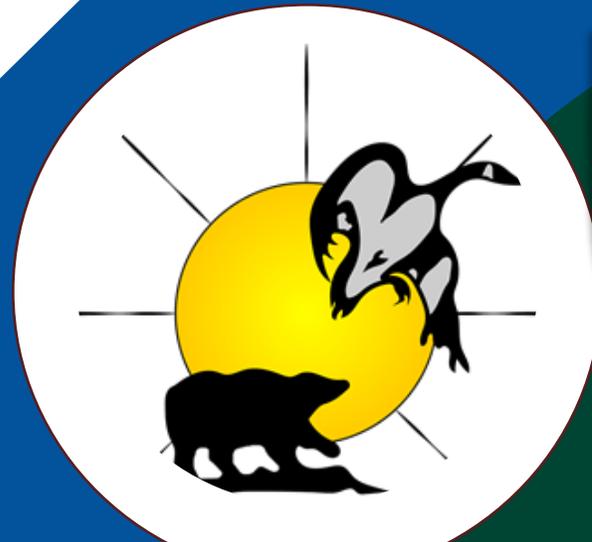




We want to hear from you!

Constance Lake First Nation has shown interests in:

- Water resources
- Fish and Fish Habitat
- Aboriginal Treaty Rights and / or Interests and Traditional Territory
- Archaeology
- Moose and Caribou
- Climate Change



Are there key areas of interest or studies that are important to you?



Miigwetch!

Contact Us

Email us at info@martenfallsaccessroad.ca or
call us at [REDACTED]

Visit our website:

<https://www.martenfallsaccessroad.ca/>

