Appendix C5

Feedback and Response Log - Indigenous Communities - Aroland First Nation

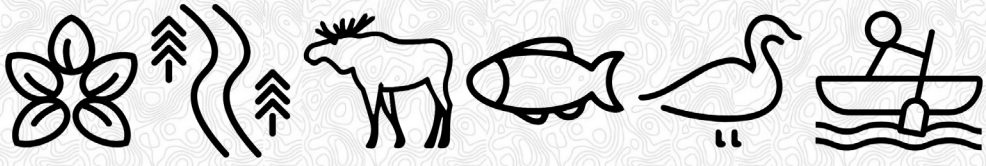

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	1	Cumulative impacts to AFN as a result of increased traffic from the MFCAR and additional proposed road segments are not adequately understood, evaluated, or considered. Context: Sections 3.2.2, 8.1, 11, 17.1, 17.5 and 18.4 of the TISG all outline requirements to contemplate the direct impacts increased traffic will have on the existing road network connecting to the MFCAR, however, traffic flow is reasonably expected to increase if other elements of the Ring of Fire are advanced. This may include up to an expected 700 additional vehicles per day moving through AFN whose impacts are not adequately assessed, considered, or understood. Recommendation: Based on the direction provided in Section 22 of the TISG, additional road segments (e.g., NRL, WSR), and mining development, must be considered in the assessment of cumulative effects.	We have carefully considered the TISG in development of the EA/IS, including the assessment of cumulative effects. As outlined in Section 10 of the Final EA/IS, "The Impact Assessment Act (Government of Canada, 2017a) requires that each Impact Statement of a project take into account any cumulative environmental effects that are likely to result from the project in combination with the environmental effects of other physical activities that have been or will be carried out." In alignment with this requirement, the cumulative effects assessment was prepared in accordance with the Terms of Reference Notice of Approval for the Community Access Road. Notably, Table 10.1-1 of the Final EA/IS identifies infrastructure projects with spatial or temporal overlap with the Community Access Road, based on publicly available sources that describe or predict specific effects for those projects. Relevant projects that fit these criteria, including other road segments (i.e., Northern Road Link, Webequie Supply Road), are included in the Final EA/IS to the extent possible. Although the Community Access Road is frequently linked to larger regional efforts	Comment noted; see response for details	188

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			such as the Ring of Fire, Marten Falls First Nation underscores that this Environmental Assessment / Impact Assessment process is focused solely on the advancement of the Community Access Road itself—an infrastructure project the Marten Falls community has been advocating for almost four decades. Cumulative effects assessments for future environmental assessments for mining projects in the Ring of Fire will be the responsibility of those projects proponents and is outside the scope of the Final EA/IS. As of January 20, 2026, the Regional Assessment for the Ring of Fire is not available to the public. The regional assessment working group submitted the interim report to the Chiefs of Partner First Nations and to the Minister of the Environment, Climate Change and Nature. We note that Appendix W: Traffic Data Review is meant to provide supplemental information related to estimating the future volumes, distribution, and composition of Community Access Road traffic; it is not subject to Section 22 TISG requirements. Appendix T: Community Well-Being Technical Support Document includes Public Safety as a Valued Component; this includes consideration		

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			of increased traffic. The cumulative effects for the Public Safety VC are described in Section 9 of Appendix T.		
Aroland First Nation	2	Data, impacts, limits, and other assumptions appear to be based on comparison to other developments occurring in parts of Ontario, but without justification of why these comparisons are appropriate. The Project is proposed for a very unique environment. As such, comparisons should be made to other projects in similarly undeveloped areas. Context: When making comparisons to existing developments for the purposes of identifying baseline circumstance or predicted effects, the Proponent should not utilize the standards and regulations geared towards areas with existing development. Comparisons should only be made to other examples of remote greenfield development in northern settings in order to capture the unique state and challenges of this development. Recommendation: We recommend that the applicant review standards related to similar projects, such as the Tlicho All Season Road and other northern road development programs and develop site	We acknowledge your concern that the Project is situated in a unique and undeveloped environment. We recognize the value of considering similar, remote projects such as the Tlicho All Season Road when evaluating the Project in the EA/IS. However, it is important to clarify that development of the EA/IS must follow provincial and federal requirements for environmental assessments / impact assessments and regulatory compliance. These standards are designed to ensure consistency, transparency, and accountability across all projects, regardless of location, and are informed by broad scientific, technical, and policy expertise. That said, we agree that the application of these standards must be context-sensitive. The EA/IS allows for the integration of site-specific data and traditional knowledge to supplement and refine baseline conditions and impact assessments. This approach aligns with regulatory requirements while also appropriately considering the unique environmental, cultural, and logistical	Comment noted; see response for details	189

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		specific standards that are more appropriate to the unique environment of the James Bay Lowlands than the general provincial and federal requirements.	aspects of the James Bay Lowlands.		
Aroland First Nation	3	AFN is concerned that while the road may be constructed for a designed speed of 100 km/h, with a posted speed of 80 km/h, the nature of this road which includes a remote setting, within known wildlife corridors, and constructed amongst soils which are dynamic and subject to flooding, isostatic rebound, and erosion/deposition, such a high posted speed may not support safe operation. Recommendation: AFN recommends that whatever speed limit is ultimately posted, it be informed by a range of factors including public safety and efforts to protect wildlife.	The Community Access Road speed limit of 80 km/hr is based on the the current road design speed of 100 km/hr. This design standard will allow year-round use by commercial and private vehicles, in accordance with size and weight limitations outlined in Ministry of Transportation regulations. Additional considerations noted by Aroland First Nation: road in remote setting, wildlife corridors, soil conditions and erosion will be further considered during the detail design phase.	Comment noted; see response for details	190
Aroland First Nation	4	AFN notes that in the construction of the road, significant aggregate and other building materials will be required. These materials may be difficult to source locally, and in sourcing them, the project may create other yet unforeseen adverse impacts or benefits.	The preliminary and detail designs will aim to achieve a material cut/fill balance at the project level and will consider material balances throughout the phased project length. We have noted Aroland First Nation's interest in working with Marten Falls First	Comment noted; see response for details.	191

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Recommendation: AFN is interested in working with the Proponent in identifying the location of aggregate materials as well as developing opportunities to benefit from the provision of building materials, including aggregates.	Nation in identifying the location of aggregate materials as well as developing opportunities to benefit from the provision of building materials. Engagement with Indigenous communities, including Aroland First Nation, will continue as the Community Access Road progresses to the next phase.		
Aroland First Nation	5	It is anticipated that the road will contain approximately 70 watercourse crossings, approximately 47 will be designed as bridges and the remainder as culverts. AFN seeks to ensure that all watercourse crossings are designed in a manner that promotes fish habitat and passage, while minimizing risks of flooding. Recommendation: AFN requests that where possible open-bottom box culverts be used in place of corrugated culverts, and that in all instances watercourse crossings be designed to maintain natural flows and substrate conditions.	Culvert design will be completed during the preliminary and detail design phases of the Community Access Road; culvert designs will be included for future permit applications to Fisheries and Oceans Canada and the Ministry of Natural Resources. Open-bottom box culverts will be considered where instances of watercourse crossings are to be designed to maintain natural flows and substrate conditions.	Comment noted; see response for details	192
Aroland First Nation	6	Figure 7-1 outlines the general phases of the project including 75 years of operational life. Within the scope of Operations the Proponent doesn't identify major reconstruction due to use or environmental conditions, additionally	Long term maintenance activities have been considered and additional information is included in Section 7.2.5.2 of the Final EA/IS. Some of these activities include culvert and bridge replacement.	Comment noted; see response for details.	193

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		routine activities such as culvert replacement are not described. Question: Does the Proponent contemplate long-term maintenance activities beyond what is listed within the scope of this assessment? Recommendation: If the Proponent has not contemplated the potential impacts associated with activities such as culvert replacement, or replacement of sections of the road which, although they may not constitute routine maintenance, are likely foreseeable over the lifespan of the project, it is requested that these activities be contemplated within the scope of the assessment.			
Aroland First Nation	7	Utilized City of Toronto for vibrations and potential damage to buildings and human disturbance. Context: Buildings in Toronto are extremely different than those in Northern Ontario. This is not a proper comparison as the building methodologies are extremely different. Recommendation: A study to understand the construction methodology of northern communities and vibration damage	The City of Toronto guidelines for construction vibrations are routinely used in Ontario where project or local vibration limits do not exist. The guidelines are intended to conservatively mitigate damage to the weakest elements of the residential structures during construction activities. The Final Environmental Assessment / Impact Statement and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines	Comment noted; see response for details	215

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		should be done to ensure damage does not occur	and the technical discipline-specific study plans. The development of a study to further understand construction methodology of northern communities and vibration damage is not a regulatory requirement, and as such was not developed as part of the Environmental Assessment / Impact Statement.		
Aroland First Nation	8	Limits are based on anthropological effects for an area with little to no anthropological influence. Further, it does not adequately contemplate impacts to wildlife or the aesthetic quality or psycho-spiritual relationship with the land that the LSA's inhabitants experience. Recommendation: Limits should be reviewed to determine what level of noise and vibration impact the environment around the Project can sustain, including an understanding of the unique relationship that inhabitants of the region have with their environment. The Proponent should clarify how it measures and understands the impacts of noise and vibration on wildlife. Mitigations for noise and vibration should be in place for construction activities, including blasting and aggregate resource development to minimize impacts to wildlife, including taxa-related	Guidelines and criteria discussed in the Appendix P Acoustic and Vibration Environment Technical Support Document are for human noise and vibration receptors. Project effects on wildlife, including wildlife-specific criteria, are assessed in Appendix K Wildlife Technical Support Document and Appendix M Ungulates Technical Support Document. The acoustic thresholds considered the application of established industry best practice guidance documents, including Health Canada's criteria for the change in percent highly annoyed (%HA) which considers the change due to the Project from existing noise levels. As described in Section 4.4.1 of Appendix P Acoustic and Vibration Environment Technical Supporting Document, a 10 dB penalty was included in the calculation of the %HA assessment to account for the	Comment noted; see response for details	216

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		timing restrictions and activity-specific pre-construction wildlife sweeps. AFN should be included in discussions about specific accommodations and monitoring especially during the permitting and construction phases.	heightened sensitivity to noise in quiet rural areas (i.e., in the absence of anthropogenic noise or vibration), which results in a greater calculated change in %HA. Mitigation measures and proposed monitoring related to noise and vibration are described in Sections 7.3 and 9 of Appendix P Acoustic and Vibration Environment Technical Support Document, respectively. As monitoring programs are further developed they will be shared with Aroland First Nation. The development and implementation of monitoring programs will, however, be undertaken solely by Marten Falls First Nation.		
Aroland First Nation	9	Magnitude levels utilizing provincial limits is potentially inappropriate. Context: The regulatory limits for noise and vibration may not be acceptable for a development in an area with little to no preexisting development, as they have been developed with the intention to be applied in less-than-pristine environments. Recommendation: As a result, the project should employ site-specific standards for	The magnitude criteria used in the Acoustic and Vibration Environment Technical Support Document of the EA / IS are defined using federal, provincial, and municipal limits. While we recognize that these limits are often developed with broader application in mind, including urban and mixed-use environments, it is important to underscore that these represent the minimum legal and technical thresholds established by regulatory authorities to protect public health and environmental quality across	Comment noted; see response for details.	217

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		more sensitive receivers (River crossings, ceremonial sites, etc.).	the province. The magnitude criteria were further developed based on comments received from the Impact Assessment Agency of Canada on the draft Acoustic and Vibration Environment Study Plan. Predicted noise levels were also compared to established industry best practice guidance documents, including Health Canada's criteria for the change in percent highly annoyed (%HA); these consider the change due to the Project from existing noise levels. As described in Section 4.4.1 of Appendix P Acoustic and Vibration Environment Technical Support Document, a 10 dB penalty was included in the calculation of the %HA assessment to account for the heightened sensitivity to noise in quiet rural areas (i.e., in the absence of anthropogenic noise or vibration), which results in a greater calculated change in %HA.		
Aroland First Nation	10	Despite AFN's concerns and requirements set out in the TISG, the Proponent has not engaged AFN to identify springs of spiritual importance, nor have they investigated potential changes to groundwater quality for springs.	A. We acknowledge the importance of springs to Aroland First Nation. Section 4 of the EA/IS includes a description of the approach to Project route planning. This process included broad engagement and consultation with Aroland First Nation on the comparative analysis between route	Appendix H	218

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		Furthermore, the TISG, Section 8.6 requires the Proponent: 1. “identify all springs and any other potable surface water resources within the local and regional project areas and describe their current use, potential for future use, and whether their consumption has Indigenous cultural importance;” Section 14.2 of the TISG requires the Proponent to: 2. “describe spatial and temporal (i.e., all project life cycle) changes to groundwater quality at potential receptor locations (e.g., existing or future drinking water wells and spring water sources), including traditional land users, due to effluents from the Project including changes to physicochemical parameters (temperature, pH, salinity, dissolved oxygen, dissolved organic carbon), chemical constituents (major and minor ions, trace metals, nutrients, organic compounds);” Recommendation: The Proponent must identify and quantify potential water quality impacts to springs. This process should include:	options. Since completion of the draft EA/IS, Aroland First Nation has provided an IK report that includes identified spring locations. This information has been reviewed and noted in Section 3 of Appendix H: Groundwater Technical Support Document; we confirm that the road route does not directly overlap identified springs. Additionally, Appendix H includes assessment of potential Community Access Road impacts to groundwater quantity and quality. These impacts were evaluated to be not significant, and therefore potential downstream impacts to areas of groundwater discharge (i.e., springs) are not expected. B. As noted in the response to part a), identified springs have been reviewed and considered in Appendix H: Groundwater Technical Support Document, and assessment of potential Community Access Road impacts to groundwater meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Further baseline characterization of springs is not proposed.		

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		a) Targeted engagement with AFN to identify springs with significant spiritual importance b) A baseline characterization of all springs identified by AFN including baseline water quality sampling and flowrate measurements Analysis and description of potential changes to groundwater quality at identified spring locations due to the Project, including changes to physicochemical parameters (temperature, pH, salinity, dissolved oxygen, dissolved organic carbon) and chemical constituents (major and minor ions, trace metals, nutrients, organic compounds).			
Aroland First Nation	11	The Proponent states that they will, "develop and implement a geochemical testing and monitoring program to assess the potential for acid rock drainage from any soils, or bedrock, which will be exposed during aggregate extraction;" Acid rock drainage and metal leaching could be the most significant risk to water quality that this Project poses. It is highly surprising that a geochemical testing and monitoring program has been left out of the Draft EA to be completed at another	Geochemical testing and analysis of existing subsurface conditions is outlined in Attachment B (Geochemistry Technical Support Document) of Appendix H Groundwater and Geochemistry Technical Support Document. This attachment outlines the testing and analysis of bedrock, soils, and organics along the road alignment that was completed in accordance with the Tailored Impact Statement Guidelines. As described in Section 7.2 of Attachment B,	Comment noted; see response for details	219

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		time. Without this information, it is not possible to fully evaluate potential impacts to groundwater and surface water quality. Recommendation: AFN recommends that the Proponent update the Draft EA to include the technical information outlined in Section 14.2, pg. 88 in the TISG, as quoted below. It is important to provide AFN with this information now so that the scope and magnitude of potential impacts associated with acid rock drainage and metal leaching can be properly evaluated. • "identify potential risks to surface and seepage water quality from the aggregate and overburden stockpiles and project infrastructure during construction, and operation, decommissioning and abandonment; • provide aggregate sources, volumes and tonnage, and extraction construction methods; • provide an acid rock drainage assessment and mitigation plan that describes the confirmatory monitoring of construction materials and potential mitigation strategies to prevent or control acid rock drainage and metal leaching during construction, operation, decommissioning and abandonment; and	all material types within the Construction Disturbance Area were classified as negligible for acid generation potential. A monitoring program consistent with the previous geochemical testing will be implemented during Community Access Road construction; this will include testing on exposed bedrock and soils to confirm the potential for acid rock drainage and / or metal leaching. If data indicates a potential for PAG/ML, further mitigation measures will be established, with a focus on avoiding disturbance to the material. The defined boundaries of aggregate sources, and associated volume and tonnages is not known at this time. This information will be developed further during detail design.		

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		• describe contingency plans, monitoring during operation, decommissioning and abandonment, and maintenance plans."			
Aroland First Nation	12	The Proponent references Figure 4-1 for the location of soil sampling locations but the sampling locations are not present on the Figure. It is unclear if sample locations are in suitable proximity to the proposed construction disturbance and aggregate areas, to confirm that the samples with noted acid-generating potential will not be disturbed. Furthermore, it is unclear whether all proposed construction disturbance areas and proposed aggregates sites had appropriate and sufficient sampling and analysis to confirm acid generating potential at those locations. Information Request: AFN requests that the Proponent provides the following: a) An updated Figure 4-1 with sampling locations added b) Methodology for selection of sample locations c) Methodology for ensuring that appropriate and sufficient sampling to identify acid-generating potential occurred at each proposed construction disturbance and aggregate area (i.e. was a model created? Are sampling locations	A. Figure 4-1 in Appendix H Groundwater and Geochemistry Technical Support Document has been corrected to include borehole sampling locations. B. Methodology related to selection of borehole sampling locations is provided in Section 4.3.2.2 of Appendix H. C. Attachment B (Geochemistry Technical Support Document) of Appendix H was prepared by accredited geochemists. The extent and scope of borehole sampling was considered appropriate for assessing the acid-generating potential of materials within the Construction Disturbance Area based on their experience and professional judgement.	Appendix H Figure 4-1	220

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		strategic to evenly calibrate the model?)			
Aroland First Nation	13	Results of the geochemical characterization include sulphate leachate concentrations within the "Goldilocks zone" for optimal methylation of naturally occurring mercury (sulphate concentrations in the range of 20-50 mg/L). It is unclear whether sulphate leachate has been adequately evaluated for the risk it poses to methylation of naturally occurring mercury in nearby environments. It is also unclear if samples with sulphate leachate concentrations in the Goldilocks Zone coincide with aggregates stockpiling sites adjacent to wetlands, and/or if any adjacent wetlands have been analyzed for natural sulphate concentrations. Elevated mercury methylation within adjacent wetlands/waterbodies and subsequent bioaccumulation in fish tissues could be devastating for AFN members who rely on fish as a traditional food source. Recommendation: AFN requests that the Proponent fully investigate, evaluate, and provide details regarding the risk of increased methylation of naturally occurring mercury due to this project including: a) Evidence supported	We acknowledge that some samples analyzed in the geochemical characterization included sulphur leachate concentrations in the range of 20 to 50 mg/L. However, as indicated in Section 5.1.4 of the Attachment B (Geochemical Characterization Technical Support Document) to Appendix H: Groundwater and Geochemistry Technical Support Document, the results of short-term leach tests (via shake flask extraction) do not directly measure the expected effluent chemistry of the test material under ambient conditions. In other words, the results of this testing does not directly correspond to the disturbed area runoff. Please refer to Section 7.1 in Attachment B for conclusions drawn from the geochemical analysis, which indicates that most samples have low acid rock drainage potential and, following leach testing, sulphate was not a parameter exceeding CCME guidelines. The scope of the geochemical characterization is considered to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans.	Comment noted; see response for details	221

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		prediction of potential increased sulphate loading causing sulphate concentrations within the “Goldilocks zone” in adjacent wetlands and waterways b) Identification of wetlands and waterways at higher risk (e.g., those adjacent to aggregate stockpiles and disturbance areas) c) Monitoring plan to capture any increase in methylation of naturally occurring mercury due to sulphate leachate	As described in Section 9.1 in Appendix H, a monitoring program consistent with the previous geochemical testing will be implemented during Community Access Road construction; this will include testing on exposed bedrock and soils to confirm the potential for acid rock drainage and / or metal leaching. If data indicates a potential for PAG/ML, further mitigation measures will be established, with a focus on avoiding disturbance to the material. This approach is considered to preclude the need for further baseline sampling of adjacent wetlands/waterbodies for natural sulphate concentrations.		
Aroland First Nation	14	It appears that only a subset of proposed water crossing locations were sampled over 2020-2022 with the intent to extrapolate the results over entire catchments. The methodology used to verify that this approach was indeed representative is missing (it seems no analysis or verification sampling was completed). The rationale to ensure that this approach captured seasonal and inter-annual variability is also missing. For example, it is unclear if the same location was sampled more than once over every season.	Please note that the main body of the Final EA/IS is intentionally written in plain language to make it accessible to a broader audience, while the technical details are provided in the appendices for those who wish to review them in depth. Refer to Appendix F Surface Water Technical Support Document for details regarding water crossings. Water samples collected during field visits were tested for general chemistry parameters (pH, electrical conductivity, turbidity, alkalinity, hardness, total	Comment noted; see response for details	222

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		Without proper characterization at each watercourse crossing that captures inter-annual and seasonal variability, the baseline water quality sampling results are essentially unusable in any future water quality monitoring program identified in Section 14 of the Draft EA/IS to identify impacts to water quality. As a standalone, it is inadequate for characterizing baseline water quality at the crossing locations. AFN has identified protection of water as one of their highest priorities. The protection of water begins with a complete baseline sampling program. Recommendation a: AFN requests that, before construction begins, the Proponent design, describe, and implement a surface water quality baseline characterization program, including sampling site selection, monitoring duration and frequency, sampling protocol, and analytical protocol, including quality assurance and quality control measures. Recommendation b: Prior to Project construction, the Proponent, at a minimum, should provide baseline surface water quality data for every proposed water crossing location over	suspended solids, organic carbon), metals, nutrients, volatile organic compounds, polycyclic aromatic hydrocarbons and radionuclides. Some crossing locations were revisited over multiple seasons or years to collected data on seasonal or inter-annual variations in surface water quantity and quality. Site access, including availability of suitable spot for helicopter landing, water levels, and vegetation, affected which water crossing locations were visited during the campaign, with priority given to unvisited sites and key waterbodies. Field water quality sampling results at waterbody crossing locations are provided in Tables F-2 through F-6 in Attachment F of Appendix F. Please also note that further field investigations will take place prior to construction for water crossing locations, specifically for those not already been assessed as part of field investigations (2019-2022) and at locations where work is proposed below the high-water mark. These pre-construction monitoring programs are summarized in Section 9.1 of Appendix F.		

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		two years on a quarterly basis to ensure the data illustrates the seasonal and inter-annual variability in baseline surface water quality. The Proponent should provide water quality results for the following physicochemical parameters and chemical constituents: • Temperature • pH • Electrical conductivity • Dissolved oxygen • Turbidity • Suspended solids • Major and minor ions • Trace metals (including dissolved) • Nutrients • Organic compounds (e.g. VOCs and PAHs) Uncertainties regarding indefinite operation of the road will be imposed on rights holders. The least that can be done is to establish a proper baseline so that impacts and subsequent adaptive management actions can be identified and implemented if needed			
Aroland First Nation	16	In general, there is very little information about how climate change may increase the scale and magnitude of the project's	Appendix Y Climate Adaptation and Resiliency Technical Support Document evaluates the risk of future climate on the	Comment noted; see response for	223

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		potential impacts. For example, water taking during drought conditions, and extreme weather events during construction and operation. Recommendation: AFN requests that the Proponent identify and evaluate how the impacts to surface water from this project may be exacerbated by climate change during the construction and operation phases. In particular: a) Extreme precipitation events and flooding b) Droughts c) Rapid snow/ice melt events	Community Access Road during the construction and operations phases. Extreme precipitation events and flooding, droughts, and rapid snow/ice melt events are all associated with the climate indicators described in Section 4.4. Our assessment does not include water taking during drought conditions as the need and extent of water taking would be determined during detail design and on a site-specific basis during construction. It is also noted that Attachment D of Appendix Y considers snow/ice melt in the context of the future useability of the winter road to Marten Falls. This risk evaluation approach is considered appropriate to inform Community Access Road planning (i.e., the development of mitigation measures and emergency response plans), and it addresses the "Effects of the Environment on the Project" component of the TSIG.	details	
Aroland First Nation	17	There are no quantifiable details regarding the scope and magnitude of water takings during the construction phase. Table 9-6, Summary of Residual Effects for Surface Water, presents the magnitude of water taking to be	A. Specific details regarding as water balances and water taking rates are unknown at this time, and will be calculated/estimated at the detail design stage of the Community Access Road. The magnitude rating presented in Table	Comment noted; see response for details.	224

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		"negligible" but there is no quantifiable evidence to support this. Information Request: AFN requests that the Proponent provide quantifiable information to support their assertion that the magnitude of water taking will be negligible. This information should include: a) Water balances for larger construction activities such as large quarry/aggregate extraction/stockpiles b) Rough estimates for total water volumes and diversion rates for larger water takings and how this adheres to the definition of "negligible" provided in the Draft EA	9.3-4 of the Final EA/IS (formerly Table 9-6 of the Draft EA/IS) has been primarily determined based on professional judgement related to typical water takings for road construction projects. B. Note that as discussed in Section 7.3.1.1 Appendix F Surface Water Technical Support Document and Table 9.3-4 of the Final EA/IS (formerly Table 9-6 of the Draft EA/IS), all short-term water takings from surface water and/or groundwater sources for construction purposes will be carried out in accordance with Ontario Regulation 387/04 as amended by Ontario Regulation 64/16 under the Ontario Water Resources Act (Government of Ontario, 1990) and industry best standards, recognizing that designated water taking activities will require registration on the Environmental Activity and Sector Registry or a Permit to Take Water from the Ministry of the Environment, Conservation and Parks. These regulatory requirements involve further assessment of water taking activities, and prohibit those activities from negatively affecting existing users, negatively affecting the environment, and removing water from a watershed that already has a high level of use. This		

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			regulatory process is expected to inherently limit the potential for a large volume of Project water takings, which also influences the magnitude rating of negligible.		
Aroland First Nation	18	The water quality results from the field sampling are not summarized in this section. Only the results from the desktop study are provided. This is surprising and gives the sense that this report section was rushed and not thought through with the care and attention that it deserves. The Draft EA/IS is an important document that should bring together information to provide a summary, not perpetuate the fragmentation of information. Information Request: The Proponent should summarize all available surface water quality baseline information in this section. Exceedances and trends should be summarized by watershed. Section 8.1.7.2 Groundwater Quality does a much better job at summarizing baseline water quality data. AFN suggests that the Proponent follow this format for presenting surface water baseline results.	Section 5.1.4 of Appendix F Surface Water Technical Support Document includes a summary of field sampling results broken down by size of watershed, and detailed results per sampling site are provided in Attachment F to Appendix F. The main body of the Final EA/IS is intentionally written in plain language to make it accessible to a broader audience, while the technical details are provided in the appendices for those who wish to review them in depth. Section 8.1.5 of the Final EA/IS is a high-level summary of the surface water assessment, and has not been updated with further details.	Comment noted; see response for details	225
Aroland First	19	AFN is concerned about road accidents	1: While we appreciate the intent to	Comment	226

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Nation		occurring on and around water crossings impacting water quality. The Proponent is estimating 700 vehicles a day using the access road. It is assumed that many of these vehicles will be transporting fuel. Given the large number of water crossings and all-season operation of the road, traffic controls should be used to mitigate spill risks. While it is encouraging that the Proponent has many mitigation measures in place for accidental spills, traffic controls are not discussed. Recommendation: AFN suggests the Proponent implement the following traffic controls: • Slowdown signage along the road 100 m before and after all watercourse and wetland crossings • Posted speed limit should be reduced from 80 km/h to 50 km/h to ensure safe travel across bridge decks in all seasons • All industrial vehicles and industry staff vehicles should be equipped with GPS to enforce adherence to the posted speed limit of 80 km/h and posted slow down zones around watercourse crossings and wetland areas	enhance driver awareness near sensitive environmental features, it is important to note that reduction of speed approaching bridge structures is not a common practice on highway networks. Standard highway design and operational guidelines typically do not include speed reductions solely based on proximity to watercourse or wetland crossings, unless there are specific safety concerns such as sharp curves, reduced sightlines, or known wildlife activity. 2: Safety will be a top priority in all implementation and design phases of the Community Access Road. The road leading to and from the bridges will be designed to be tangential for at least 150 metres in both directions. That will result in drivers having at least 300 metres of clear view ahead to see other vehicles or wildlife. In the event that standard sight distances cannot be achieved, roadway signage will be installed to warn the travelling public of advisory reductions in travelling speed. 3: While we have noted your concern regarding vehicle speed compliance around sensitive environmental areas, decisions about vehicle equipment—such as GPS installation—are outside	noted; see response for details.	

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			the scope of the Community Access Road. Enforcement and equipment decisions rest with the respective vehicle owners and operators.		
Aroland First Nation	20	The surface water monitoring plans proposed in this section are severely lacking in detail and are lumped together with fish and fish habitat monitoring. The groundwater monitoring commitments are significantly more detailed and systematic. Recommendation: AFN suggests that the Proponent create a separate sub section in Section 14.1.1 Water, for surface water. AFN requests that the Proponent revise every surface water sub section of Section 14, Monitoring Programs and Future Commitments and add the following information: a) A baseline monitoring program with similar elements to the groundwater baseline monitoring program (i.e. identifying strategic monitoring locations, monitoring frequency prior to a water taking, etc.). The baseline monitoring program should include locations identified by AFN as culturally significant. b) Section 14.3.1.1 Surface Water should include a commitment to continue surface water monitoring at sites where	The specific pre-construction monitoring program/requirements for surface water and fish and fish habitat are similar and therefore these were discussed together. A. Monitoring programs during pre-construction, construction, and operation and maintenance phases are discussed in Section 9 of Appendix F Surface Water Technical Support Document. Monitoring parameters, strategic locations, and frequency will depend on the type of activities and anticipated impacts based on site-specific conditions. The details of monitoring programs will be finalized at detail design stage prior to construction. As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs, including those described in Section 9 of Appendix F. The objective is to include Indigenous	Comment noted; see response for details	227

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		water quantity or quality has been impacted until a return to baseline is observed. It should also include a commitment to continue monitoring along with project activities. For example, in cases where water taking is intermittent, every water taking must be accompanied with monitoring as if it was the first time.	Community interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Aroland First Nation will be established. B. In the course of completing the description of existing conditions and effects assessment for surface water, information provided by Indigenous Knowledge holders, Indigenous community members, regulators, and public stakeholders was used to develop existing conditions and effects assessment for surface water. This information and how it informed the development of this report are described in Section 3.1 of Appendix F.		
Aroland First Nation	21	The Proponent states, “dissolved Metals will not be included in the parameter list as total metals are used for direct assessment against water quality guidelines.” Many water quality guidelines are specifically for dissolved metals as they relate to the protection of aquatic life. For example, zinc.	As discussed in Section 7.2.3 of Attachment A of Appendix F Surface Water Technical Support Document, total metals are generally used for direct assessment against water quality guidelines (Ontario Drinking Water Standards, Provincial Water Quality Objective, and / or Canadian Council of the Ministers of the Environment);	Comment noted; see response for details	228

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		AFN relies on fish as a traditional food source. To properly determine impacts, if any, to water quality and subsequently, aquatic life, the appropriate parameters must be evaluated. This begins with proper baseline sampling of parameters relevant to the protection of aquatic life (i.e. dissolved metals). Recommendation a: AFN suggests the Proponent conduct a thorough review of water quality criteria identified Section 9.3.2.3, Discipline-Specific Characteristics of the Draft EA/IS. The review should identify metals that are required to be sampled as dissolved metals according to the most stringent criteria to ensure relevant, comparable water quality results. Recommendation b: AFN suggests that the Proponent conduct more baseline water quality sampling. This expanded baseline water quality sampling program should include the applicable dissolved metals identified in the review as parameters.	therefore, water samples were tested for total metals and compared to guidelines to establish existing/baseline/background conditions. These provincial and federal guidelines represent stringent criterial and commonly used for characterizing existing conditions. With regard to the example of zinc, CCME guidelines states "where guideline users have only water sample concentrations of total zinc, they should first compare these samples to the dissolved benchmark, and where there is an exceedance, re-sample for a dissolved concentration". Section 5.2.2 of Appendix F summarizes water quality results and any guideline exceedances. If total metals are below guidelines, dissolved metals are expected to be below thresholds. A. The criteria in Section 9.3.2.3 of Appendix F refers to assessment criteria for characterization of predicted residual effects, not water quality. The selection and monitoring of site-specific water quality parameters (total or dissolved metals) will be established during detail design to satisfy the conditions of permitting/approvals and to confirm the effectiveness of mitigations measures.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			B. The EA/IS and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Conducting further baseline water quality baseline sampling is not a regulatory requirement and as such was not developed as part of the Final EA/IS.		
Aroland First Nation	22	The list of important fish species for AFN in this section is not fulsome. The Proponent listed brook trout, lake sturgeon, northern pike, sucker, walleye, and lake whitefish. Recommendation: The environmental impact assessment should also include assessment of impacts to AFN's rights and interests related to all species of cultural importance, not just those that overlap with MFFN. AFN presented a list of valued species of cultural importance including sustenance fish species that also includes lingcod (burbot), suckers/redhorse, lake trout, and sauger. These species must also be included in the impact assessment and monitoring commitments, in order to appropriately assess potential impacts to AFN's rights.	We would like to clarify that the Valued Components for the Fish and Fish Habitat assessment include Lake Sturgeon, Walleye, Brook Trout, Northern Pike, Lake Whitefish, and Burbot. The approach for selecting these Valued Components is described in Section 4.2.2 of Appendix G Fish and Fish Habitat Technical Support Document. All of the fish species recorded during baseline studies have a role in the ecosystem; however, the purpose for limiting the assessment to Valued Components is to focus on those species that were identified as most valuable based on the presence in the study area, importance to Indigenous users, government priorities (e.g., provincial or federal listed species), and life history requirements and role in the food web. The approach for selecting Valued	Comment noted; see response for details	229

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			Components is a common practice in environmental assessments (e.g., Impact Assessment Agency of Canada, 2024), and the Valued Component selection process incorporated feedback from regulators and Indigenous Groups. Additionally, Valued Components can be used as a proxy for other species of importance for which measurement and/or monitoring is more difficult. In other words, analysis of fish and fish habitat Valued Components can inherently capture effects to other species with similar habitat requirements and sensitivities that are not selected as Valued Components. A draft Aboriginal and/or Treaty Rights and Interests (ATRI): Impact Assessment Report was issued to Aroland First Nation on June 13; this report included identification of fish species of potential importance to Aroland First Nation. The habitat preferences for each life history stage (including spawning timing and habitat) and swim speeds for the species noted in the ATRI report overlap with those of the selected Valued Component species (Lake Sturgeon, Walleye, Brook Trout, Northern Pike, Lake Whitefish, Burbot). By using a suite of Valued		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			Components representing various aspects of the aquatic ecosystem, the EA / IS provides a reliable assessment of effects to fish and fish habitat and to the productivity of fisheries important to Aroland First Nation. In other words, the consideration of these fish species as Valued Components would not change the outcome of the assessment. The Fish and Fish Habitat assessment is therefore considered to appropriately address potential impacts to Aroland First Nation rights related to fish species of cultural importance.		
Aroland First Nation	23	The Proponent lists near identical rationale for Negligible and Low Magnitude level impacts to fish related to the death of fish. Negligible: “Potential incidental death of individual fish to a degree that is not likely to disrupt overall population dynamics or affect local productivity.” Low: “Potential incidental death of fish to a degree that is not likely to disrupt overall population dynamics or affect local productivity.” Recommendation: AFN does not recognize a difference between these statements and believes there needs to be differentiating factors in the definitions	We recognize that the definitions for low and negligible magnitude are fairly similar and may seem subjective. However, the definition for negligible is “Potential incidental death of individual fish to a degree that is not likely to disrupt overall population dynamics or affect local productivity”. This category would also include no fish mortality. An example for negligible may include where incidental fish mortality of a few individuals may occur as a result of a fish salvage. Under the low category, there may be more than a few individuals but overall population dynamics or affect local productivity would not be disrupted.	Comment noted; see response for details	282

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		in order to identify low-level effects. AFN suggests the Proponent edit the rationale for negligible to exclude the death of fish altogether. Any death of fish related to project activities should at minimum be seen as a low-level effect. The IA should take this into account.			
Aroland First Nation	24	Mitigation Measures for the Construction phase included actions if an unidentified watercourse was encountered during construction activities. Comment: AFN would prefer that activities should be suspended for a wider distance from the waterbody than the prescribed 30 m in order to protect the integrity of the water and its riparian area. Recommendation a: AFN suggests that the activity be suspended within 30 m of the high-water mark of the water body or at minimum 60 m from the water's edge on either side if the high-water mark cannot be identified by personnel on-site during the discovery of the waterbody or watercourse. As the Project lies within mapped critical habitat for both terrestrial and aquatic SAR, buffer zones around waterbodies and watercourses must provide sufficient protections from	a) As described in Section 2.1.1 of Attachment B of Appendix G Fish and Fish Habitat Technical Support Document, an initial water crossing list was developed though desktop review by overlaying the Community Access Road on the Ontario Hydro Network data layer to identify potential hydrology features that will be crossed. This crossing list was later refined through aerial reconnaissance and field assessments; it will be further refined through detail design and to support permit applications to Fisheries and Oceans Canada and the Ministry of Natural Resources. However, there is the potential that during construction activities along the right-of-way, small waterbodies may be identified in the field that were not present on the Ontario Hydro Network data layer. If identified, the waterbody will be flagged and activity will be suspended within 30 m of the location until an	Comment noted; see response for details	283

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		construction activities, while allowing access and egress for these species throughout critical life stages, in all seasons. Recommendation b: AFN requests the Proponent to commit to site-specific protection or management plans for construction, operation and maintenance phases, at (minimum) the large watercourse crossings (e.g., Ogoki and Albany rivers). This will include protections beyond 30 m from the high-water mark, due to the documented wildlife and traditional use of these areas (see comments below under Peatlands, and Wildlife sections). Recommendation c: AFN further requests involvement in the development and implementation of the plan(s).	Aquatic Specialist has assessed the waterbody and determined a suitable course of action, which may include contacting Fisheries and Oceans Canada and the Ministry of Natural Resources. The 30 m buffer is considered an appropriate setback for these newly identified waterbodies as it aligns with the Ontario Provincial Standard Specification General Specification for Environmental Protection for Construction in and Around Waterbodies and on Waterbody Banks. This buffer is also considered sufficient to reduce or avoid effects on bank stability, maintain benthic communities, and protect fish habitat. During detail design, the riparian buffer may be increased around certain waterbodies with a high slope if it is determined to be suitable or necessary to protect the waterbody from sediment mobilization. b) Through the permitting and detail design stage for the Community Access Road, a project-specific Environmental Protection Plan will be developed and implemented that will include site-specific mitigations where appropriate. These mitigations will include establishment of waterbody and watercourse setbacks.		

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			c) The Environmental Protection Plan will be shared with Aroland First Nation. The development and implementation of this plan will, however, be undertaken solely by Marten Falls First Nation.		
Aroland First Nation	25	Mitigation measures for reducing changes to fish habitat through changes to riparian vegetation include clearing and revegetating the riparian zone following specific guidance from a number of referenced documents but does not explicitly state what the riparian zone will be revegetated with. Recommendation: AFN would prefer to see changes to the riparian zone be mitigated with the planting of native species specific to the ecosystem in the ROW. The specific plants that are meant to grow in this area surrounding watercourses are key to supporting fish habitat and the wider ecosystem. Efforts should also be made to source plants and seeds from local populations to ensure their compatibility with the ecosystem for this mitigation measure to be successful in avoiding changes to fish habitat	A Vegetation Restoration Plan will be prepared during detail design. This plan will address vegetation loss in riparian ecosystems and will include only native species confirmed to occur in the landscape and compatible with the local site conditions. Efforts will be made to source plants and seeds from local populations. These additional details have been added to Section 9 in Appendix J Vegetation Technical Support Document of the Final EA/IS.	Appendix J: Section 9	284
Aroland First Nation	26	In the table the description of the potential effect was “changes to fish	A. As described in Section 7.3.2.8 of Appendix G Fish and Fish Habitat	Comment noted; see	285

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		survival and reproduction from improved public access to recreational angling areas. For construction and operations/maintenance phase activities related to this potential effect, AFN is concerned with added angling pressure on the waterbodies and lakes that will be more accessible to road crews and public traffic and doesn't feel that the listed mitigations are strong enough to address this concern. Recommendation a: To mitigate the additional harvesting pressure on fish populations during the construction phase crew members should be prohibited from fishing in the project area unless they have Aboriginal Rights to harvest in their territory that overlaps the project area. Recommendation b: To mitigate the additional harvesting pressure during the operations and maintenance phase fishing adjacent to the road should be limited to rights holding members exclusively. Permits for non-rights holding water users like boaters and anglers could be sold to the public for launching or fishing on particular days within the territory with proceeds from the	Technical Support Document, a policy will be developed for non-Indigenous Project personnel while on shift or at temporary construction camps in regards to any hunting, fishing, or trapping activities. B. Members of the public fishing from roadside areas during the operation and maintenance phase will be regulated through rules and regulations of the Ministry of Natural Resources. The regulation of public land use will not be the responsibility of the Community Access Road owner/operator. C. As noted in the response to B, the Community Access Road owner/operator will not be responsible for regulating public use of the road and adjacent areas, and therefore cannot hire enforcement officers for that purpose. Should the Community Access Road EA / IS be approved to proceed, a consultation and engagement program will be established to guide discussions with Aroland First Nation through detail design. These discussions could include other employment opportunities for Aroland First Nation members.	response for details	

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		permits to be dispersed to impacted Nations throughout the lifetime of the public road. Recommendation c: AFN would also be interested in opportunities to train and employ their members as enforcement officers to issue permits, check permits, and patrolling water-use areas to ensure road users are complying with fish protection regulations issued as a result of the public access road being built.			
Aroland First Nation	27	The Proponent suggests mitigations to prevent changes to fish survival and reproduction from spills of fuel or other materials, but the mitigation list is incomplete. Specifically, this mitigation is missing information “Store fuel and other materials for the machinery in [missing information] to prevent any deleterious substances from entering a waterbody (DFO, 2023). Recommendation: Please complete the mitigation in the final EA to include any refueling activities or storing of fuel or other deleterious substances 50 m from the high-water mark of any waterbody in level and signed/flagged areas that make them obvious to crew members. Fuels	The mitigation bullet in Table 9.3-7 of the Final EA/IS (formerly Table 9-10 of the Draft EA/IS) has been corrected to “Store fuel and other materials for the machinery to prevent any deleterious substances from entering a waterbody (DFO, 2025)” as per the bullets in Section 7.3.1.11.2 and Table 7-5 in Appendix G Fish and Fish Habitat Technical Support Document and Table 7-5 in Section 7.3.1.12. As described in Table 9.3-7 of the Final EA/IS (formerly Table 9-10 of the Draft EA/IS): - vehicles and equipment will be refueled, serviced, and maintained in designated areas at temporary construction camps and temporary laydown areas a minimum	Final EA/IS Table 9.3-7	286

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		and other deleterious substances should be stored in protective containers that are locked and stored on flat ground with spill prevention and clean up equipment/kits next to them. Inside of fuel storage containers, a copy of the Proponent's Spill Prevention and Adaptive Management Plan and Actions should be laminated and accessible for quick reference. Equipment that is not in active use should be parked at minimum 30 m away from a water body's high-water mark.	of 30 m from waterbodies. - a Spill Prevention and Emergency Response Plan will be prepared during the detail design phase and refined by the construction contractor. The Spill Prevention and Emergency Response Plan will describe specific measures that would be implemented if a spill occurs, and includes information on spill response procedures, equipment, safety, communications, and training. - spill response kits will be provided in fuel and hazardous materials storage and handling facilities at temporary construction camps and temporary laydown areas, in on-site work areas, and / or in vehicles and equipment, and personnel will be trained in spill response practices and procedures.		
Aroland First Nation	29	The Proponent reports that any changes to the morphology of a water body channel affecting fish habitat quality or quantity will be identified and addressed, as needed. AFN is concerned that channel changes will be made without sharing knowledge of those changes with members of AFN, which could impacts members' access to harvesting sites and fish. Recommendation: The Proponent should	We understand Aroland First Nation's concern that changes to channel morphology could affect fish habitat and potentially impact members' access to traditional harvesting sites. Monitoring programs related to fish and fish habitat are described in Section 9 of Appendix G Fish and Fish Habitat Technical Support Document. As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact	Comment noted; see response for details	287

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		notify AFN of any channel morphology changes as a result of project activities so that membership is aware of changes.	Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Aroland First Nation will be established. Monitoring results, including channel morphology changes at watercourse crossings, will be provided to the Ministry of Environment, Conservation and Parks (MECP) and the environmental advisory committees can request the results from MECP.		
Aroland First Nation	28	The Proponent suggests that DFO's Codes of Practice for debris removal will be followed for maintaining bridges and culverts to prevent blockages. Codes of practice cannot be used in place of a Fisheries Act authorization for activities in and around fish habitat when SAR habitat is present at the work site.	As per Section 7.3.2.1 of Appendix G Fish and Fish Habitat Technical Support Document, permit applications for bridge and culvert crossings will be prepared for the Ministry of Natural Resources under the Lakes and Rivers Improvement Act. A Request for Review under the Fisheries Act will also be submitted to Fisheries	Comment noted; see response	321

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		Since sturgeon is found throughout the waterway and unidentified mussels were found during site assessments for fish community, there is a high risk of project activities interacting with SAR. Recommendation: This section should be modified to indicate that fisheries authorizations will be applied for any debris removal activities in the project area to ensure protection for SAR sturgeon and mussels. Otherwise the predicted effects to these species must be increased to account for potentially harmful interactions with the project in the impact assessment.	and Oceans Canada. Based on Fisheries and Oceans Canada's review, an application for authorization under the Fisheries Act will be prepared, if required, which would include an offsetting plan. If required by Fisheries and Oceans Canada, the offsetting plan would include habitat enhancement measures or habitat creation to offset losses associated with the Project. Permit applications will consider potential for species at risk to be present at the site-specific crossing locations. As debris removal is assessed in Section 7.3.1.1 and 7.3.2.1 of Appendix G, with consideration to site-specific permitting under the Fisheries Act, Section 14.3.1.2 of the Final EA / IS has not been updated.		
Aroland First Nation	30	Sediment chemistry was not evaluated as part of the watercourse crossing fish community assessments. Impacts to fish and fish habitat cannot be fully evaluated without a comprehensive baseline sediment quality assessment. Recommendation: AFN requests that the Proponent evaluate sediment chemistry at all watercourse crossings to establish baseline sediment chemistry to allow for	We would like to clarify that sediment chemistry is reported on in Appendix F Surface Water Technical Support Document of the Final EA/IS, not Appendix G Fish and Fish Habitat Technical Support Document. Sediment quality monitoring was conducted at 38 waterbody crossing locations, and applicable sediment quality data from the Cliffs Chromite Project are also reported. The sampling program for sediment	Comment noted; see response for details	324

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		comparisons with future sediment chemistry monitoring as an avenue to understand potential changes to fish habitat and impacts to fish.	quality for the Community Access Road followed the All Season Community Access Road: Surface Water Study Plan. The key sediment quality results of field investigations are summarized in Section 5.2.2 of Appendix F and detailed in Attachment G – Sediment Quality Data. The monitoring program for surface water is outlined in Section 9 of Appendix F. As described in Section 9.3 of Appendix F, during Operation and Maintenance, the following monitoring programs will be required for surface water in the Local Study Area: • Monitoring / inspections of all new permanent water crossing structures (culverts and bridges) and roadside drainage features for physical function and condition in accordance with the Ministry of Transportation inspection guide and manual; and • Monitoring of water quality, sediment quality, and streamflow conditions at waterbodies that include greater sensitivity or implication to change from the standpoint of fish habitat, species at risk, channel stability, drainage pattern, or other environmental considerations. The specific monitoring locations will be determined during the permitting and		

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			design stages of the Project; however, it is expected that waterbodies of varying size (small, medium, large) would be captured, recognizing that this would allow the performance / effectiveness of mitigation and enhancement measures to be evaluated at a range of scales.		
Aroland First Nation	31	The proposed speed limit (80 km/h) is not protective enough of watercourse crossings and water quality in ditches that lead to other waterbodies surrounding the road. This speed is likely to cause dust issues and deposit fine particulates and loose gravel into waterways, impacting their water quality and fish habitat quality. Recommendation: AFN suggests the Proponent reduce speed limits near all watercourse crossings to be protective of habitat, especially those supporting sensitive life stages such as spawning or nursery of eggs or young fishes. The Proponent should implement slowdown signage along the road 100 m before and after all watercourse crossings. The posted speed limit should be reduced from 80 km/h to 50 km/h to reduce impacts on fish health, water quality, and fish habitat quality from high-speed traffic raising dust and causing roadway	1: The Community Access Road speed limit of 80 km/hr is based on the road design speed of 100 km/hr. This design standard will allow year-round use by commercial and private vehicles, in accordance with size and weight limitations outlined in Ministry of Transportation regulations. It is important to note that reduction of speed approaching watercourse crossings is not a common practice on highway networks. Standard highway design and operational guidelines typically do not include speed reductions solely based on proximity to watercourse or wetland crossings, unless there are specific safety concerns such as sharp curves, reduced sightlines, or known wildlife activity. 2: Safety will be a top priority in all implementation and design phases of the Community Access Road. Road design will implement provincial best practices in	Comment noted; see response for details	327

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		erosion at watercourse crossings. Recommendation: To improve traffic abidance of slowdown zones, the road should be narrowed on either side of all bridges at watercourse crossings to encourage traffic slow downs and reduce the crossing's impacts on fish habitat and riparian area impacts for watercourses. Recommendation: AFN suggests that any industrial traffic, construction equipment, and construction staff vehicles be equipped with GPS to track the speed of vehicles utilizing the roads to ensure that they abide by the posted speed limit of 80 km/h and posted slow down zones around watercourse crossings and wetland areas.	accordance with design standards. The use of erosion and sedimentation control measures and dust suppression are expected to reduce the potential effects of Project road traffic on watercourses, as described in Section 7 of Appendix G Fish and Fish Habitat Technical Support Document. 3: Commitments regarding the installation of GPS on industrial traffic is outside the scope of the Final EA/IS; equipment decisions rest with the respective vehicle owners and operators. Speed limits will be posted and enforced by the Royal Canadian Mounted Police (RCMP).		
Aroland First Nation	34	Fish habitat use was not well assessed at the majority of water course crossings. A subset of watercourse crossings were assessed for fish community and a rapid habitat assessment, but no fish were caught at many of the crossings that had single sampling events. AFN is concerned that single unsuccessful fish community sampling events will not be sufficient to compare fish habitat use after the road is constructed and in use. Fish habitat use may change as a result	Fish and fish habitat field investigations were carried out in accordance with the Fish and Fish Habitat Study Plan (Fish and Fish Habitat Study Plan; AECOM, 2021). The study plan and comments from the regulatory review can be found in Attachment A in Appendix G Fish and Fish Habitat Technical Support Document of the Final EA/IS. The study plan outlines the percentages of sites to be surveyed and seasonal considerations.	Comment noted; see response for details	328

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		of the project and insufficient quantitative baseline data has been collected to allow for future assessments of whether effects/impacts have occurred and how severely. Recommendation a: AFN requests that fish community and habitat use assessments are done at each watercourse crossing that has potential to be fish bearing, including collected wetlands, upstream and downstream of the watercourse to gather this quantitative data before construction. Recommendation b: AFN also requests that fish habitat monitoring is executed annually in the spring and fall to capture any fish spawning habitat use, however, AFN recognizes that MFFN may have limited capacity for conducting an ongoing annual aquatic monitoring program. Therefore AFN requests that the Proponent commit to monitoring at all water course crossings in the years 1, 2, 3, 5, 7, and 10 of operations. AFN also suggests that Ontario be responsible for monitoring every three years at all crossings starting after year 10 of operation in perpetuity , similar to the environmental effects monitoring for fish used to ensure mining development compliance with surface water and fish	For the EA/IS, fish sampling was conducted to document fish presence in the vicinity of the waterbody crossings and not for a quantitative assessment of the population. As described in Section 4.7.5 of Appendix G, fish species data were used in the context of each waterbody crossing's tertiary watershed (or Local Study Area and Regional Study Area) so that the potential presence of a species in the waterbody crossings is based on the fish known to occur in the watershed. The fish habitat present at each waterbody crossing was evaluated against the habitat preferences of fish species that could potentially inhabit the Local Study Area and Regional Study Area. The potential for a fish species to be present at a waterbody crossing was evaluated based on a comparison to species-specific habitat requirements for spawning, rearing, and feeding were compared to site-specific habitat information gathered during field surveys. If the habitat at the waterbody crossing met the criteria for a fish species' suitable habitat, it was assumed to inhabit the waterbody at the crossing location. Indigenous Knowledge, including Knowledge received from Aroland First Nation, of species documentation,		

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		habitat regulations. The Ring of Fire connector will bring about increased traffic associated with mine creation that will have cumulative impacts on fish and fish habitat.	traditional fish capture locations, and known spawning locations were also incorporated into the habitat evaluations at each waterbody crossing. A waterbody crossing's proximity to a historical fish capture location, including those documented near the crossing from the Cliffs Chromite Project (Golder, 2013) was considered in the determination of fish habitat potential. If there were any uncertainties about the ability of a waterbody to support a species of fish, a conservative approach was used, and it was assumed the species may be present in the waterbody. As indicated in Section 9 of Appendix G, fish and fish habitat surveys will be conducted before construction at any waterbody that has not been assessed and work is proposed below the high-water mark to meet expected permitting requirements (i.e., for the Fisheries and Oceans Canada Request for Review under the Fisheries Act and for permit applications to the Ministry of Natural Resources under the Lakes and Rivers Improvement Act). Section 9 also describes the monitoring programs for fish and fish habitat. During Operation and Maintenance, culverts and bridges will be regularly inspected and		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			maintained to prevent blockages from forming and causing ponding or backwater effects, and a program will be conducted to verify that erosion and sediment control measures have been successful (e.g., bank restoration and revegetation), and that the stability of each waterbody crossing is maintained (i.e., the channel has not washed out). Fish habitat monitoring during Operation and Maintenance is not proposed.		
Aroland First Nation	35	AFN is concerned that the predicted traffic utilizing the road may increase to 700 vehicles per day. This increase in traffic through AFN's community is concerning for member safety. Context: A bypass road will likely be necessary to meet AFN's safety needs and alleviate concerns considering an increase of 100 vehicles a day (the expectation of the MFCAR) is a significant increase to AFN's current traffic volume. Recommendation: AFN suggests that fish habitat baseline data is collected around AFN during the baseline data collection fish monitoring program for the construction of the MFCAR. This is needed in the case that a community	At this point in time, a bypass road around the Aroland First Nation community is not proposed as part of the Community Access Road. The Final EA/IS and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Additional baseline fish and fish habitat data for a bypass road is not a regulatory requirement and as such will not be collected as part of the EA/IS.	Comment noted; see response for details	329

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		bypass road is constructed in the future.			
Aroland First Nation	36	Potential pits and quarries have been identified for development in support of construction and operational maintenance. There is insufficient information presented in the Draft EA/IS to understand if any or all of these aggregate sites are planned for extraction below the water table. AFN is concerned with the potential impact of the pits and quarries on water quality so close to important fish habitat and the change in water regimes in those habitats should pits and quarries be extracted below the water table. AFN is further concerned with the potential impact from groundwater drawdown on the surrounding habitats (e.g., Peatlands, SAR habitats) within the Zone of Influence of groundwater drawdown for pits and quarries, should it be determined any of these are required below the water table. Question: AFN requests that the Proponent clarify if they are committed to only extraction above the water table to ensure impacts are adequately captured in this Draft EA/IS and mitigated with the required reclamation under permitted activities (e.g., ARA, MECP), so that the	We acknowledge that extraction may occur below the water table at certain quarry sites, and the potential effects have been evaluated in the Final EA/IS. The potential effects on surface water related to dewatering for quarry operations is considered in Section 7.3.1.1 of Appendix F Surface Water Technical Support Document under the pathway of Changes to Surface Water Quantity from Short-Term Water Taking during Construction. The mitigation, best practices and permitting considerations are discussed in Section 7.3.1.1.2, and the residual effects on surface water are assessed in Section 7.3.2.1. Further, Section 7.3.1.7 in Appendix G Fish and Fish Habitat Technical Support Document of the Final EA/IS considers the pathway of Changes to Fish Habitat Quantity and Quality due to Changes in Hydrology or Groundwater That May Alter Drainage Patterns and Increase or Decrease Drainage Flows and Surface Water Levels; residual effects on fish Valued Components are assessed in Section 7.3.2.7. The specific requirements for short-term	Comment noted; see response for details	330

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Project may verify the stated predictions. Recommendation: If the Proponent plans on extracting below the groundwater table, AFN requests that the Proponent follow the requirements for the Draft EA/IS outlined in the TISG on pg. 87-88. AFN is in alignment with these technical requirements for quarrying below the groundwater table.	water taking and discharge activities will be determined during the permitting and detail design stage of the Community Access Road, recognizing that a Permit to Take Water from the Ministry of the Environment, Conservation and Parks will be required (as noted in Section 7.3.1.1 in Appendix F). We consider these components of the Final EA/IS addresses the "Changes to groundwater and surface water" section of the TSIG.		
Aroland First Nation	37	The Proponent reports that two methods of fish community sampling occurred using backpack electrofishing in waters 70 cm or shallower (safe for wading) and minnow trapping in water deeper than 30 cm in streams, rivers, lakes, and ponds. AFN is concerned that this would not adequately capture fisheries data for waterbodies that contain valued components but have water deeper than 70 cm. Minnow traps can only capture juvenile large-bodied species, which would require the habitat be suitable for juvenile fish and may underrepresent habitat use and fish populations at baseline at watercourse crossings or watercourses in close proximity to the ROW.	As described in our response to Aroland First Nation comment #34, fish sampling was conducted to document fish presence in the vicinity of the waterbody crossings and not for a quantitative assessment of the population. A conservative approach was taken to determine species presence within individual waterbodies; if there were any uncertainties about the ability of a waterbody to support a species of fish, it was assumed the species may be present in the waterbody. Fish and fish habitat surveys will be conducted before construction at any waterbody that has not been assessed and work is proposed below the high-	Comment noted; see response for details	331

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Recommendation: AFN requests that fish habitat assessments are done in spring and summer. Sampling should be done over multiple days as necessary to quantitively capture the habitat use and fish community assemblages at all watercourse crossings. This data is critical to determine if there are changes to fish habitat use and the impacts the road may have had on fish. This quantitative data analysis is needed to determine when adaptive management is required to protect fish and fish habitat in the ROW. AFN also requests that the Proponent utilize a wider range of sampling gear to monitor fish, so as to not exclude large, bodied fish habitat in deeper waters.	water mark. These surveys, including seasonal timing, will be conducted to meet Fisheries and Oceans Canada and Ministry of Natural Resources permitting requirements.		
Aroland First Nation	38	AFN is concerned with the lack of detail in the mitigations around monitoring erosion and sediment controls during the construction phase and believe the Proponent should commit to more specific actions. Recommendation: To help protect water and fish habitat, AFN requests that the Proponent include erosion and sediment control monitoring and checks at regular intervals during construction. This should	Monitoring programs for surface water and fish and fish habitat are outlined in Section 9 in Appendix F Surface Water Technical Support Document and Section 9 in Appendix G Fish and Fish Habitat Technical Support Document, respectively, of the Final EA/IS. The following mitigation measures relate to sediment and erosion control during Construction: • Monitoring / inspecting will be	Comment noted; see response for details	332

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		include monitoring at all temporary crossings, as well as additional checks during/after precipitation events to maintain or replace any damaged or dysfunctional erosion and sediment controls.	conducted of all erosion and sediment management measures, bank stabilization features, and cofferdams during Construction Phase to verify the performance and effectiveness of mitigation and enhancement measures • Appropriate erosion and sedimentation control measures will be installed, monitored, and managed to minimize or avoid sediment mobilization from the disturbed area to drainages or waterbodies. Adequate and appropriate erosion and sedimentation control materials will be on site and available prior to commencement of construction The following mitigation measures relate to sediment and erosion control during Operation and Maintenance: • Monitoring / inspections of all new permanent water crossing structures (culverts and bridges) and roadside drainage features for physical function and condition in accordance with the Ministry of Transportation inspection guide and manual; • A program will be conducted to verify that erosion and sediment control measures have been successful (e.g., bank restoration and revegetation), and that the stability of each waterbody crossing is maintained (i.e., the channel		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			has not washed out). The post construction monitoring will occur within one full growing season after the completion of construction, but timing may be extended if needed. The integrity of the permanent crossing structures will be inspected regularly (i.e., annually in spring). Any changes to the morphology of the waterbody channel affecting fish habitat quality or quantity will be identified and addressed, as needed.		
Aroland First Nation	39	The Proponent reports that any new water bodies identified prior to construction will be assessed by an aquatic specialist. Recommendation: AFN requests that the Proponent include instructions that if water bodies are found prior to or during construction, activities will halt and an aquatics specialist and a monitor from AFN will assess the water body as a team to ensure proper mitigations and enhancement measures are implemented to reduce or avoid effects on habitat quantity and quality. Any fish rescues or relocations should also be done in the presence or with the assistance of AFN Monitors.	As described in Section 7.3.1.1.2 in Appendix G Fish and Fish Habitat Technical Support Document, if new waterbodies are identified prior to construction, an Aquatics Specialist will be contracted to assess the waterbody. Depending on the nature of the waterbody, recommendations for construction methods, appropriate mitigation and enhancement measures, and permitting requirements will be made by the Aquatics Specialist. As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development	Comment noted; see response for details	333

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to MFFN, a Terms of Reference between relevant agencies and Aroland First Nation will be established.		
Aroland First Nation	40	The Proponent suggests that erosion and sediment control measures and the water crossing infrastructure will be monitored during operations. AFN is concerned that there are no written commitments for habitat quality monitoring to ensure the road is not causing ongoing impacts to fish and fish habitat. Recommendation a: AFN requests that quarterly water quality monitoring be done at the crossings for the first three years after construction. Recommendation b: AFN would also like quarterly water quality monitoring to continue in perpetuity as traffic increases with the connector to the Ring of Fire and the potential for road-associated contaminants such as dust, spills, or sediments increases with it. To ensure	A: As described in Section 9 of Appendix G Fish and Fish Habitat Technical Support Document, monitoring of water quality, sediment quality, and streamflow conditions will be conducted at waterbodies that include greater sensitivity or implication to change from the standpoint of fish habitat, species at risk, channel stability, drainage pattern, or other environmental considerations. The specific monitoring locations and frequency will be determined during the permitting and design stages of the Community Access Road; however, it is expected that waterbodies of varying size (small, medium, large) would be captured, recognizing that this would allow the performance / effectiveness of mitigation and enhancement measures to be evaluated at a range of scales.	Comment noted; see response for details	334

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the impact assessment remains comprehensive and accurate.	B: As noted in the response to recommendation A, the frequency and duration of water quality monitoring will be determined during permitting and design stages of the Community Access Road.		
Aroland First Nation	41	Table 7-2 in the Fish and Fish Habitat Study Plan suggests that a variety of methods were proposed to be used in fish community assessments but in the Fish and Fish Habitat technical support document only backpack electrofishing and minnow trapping were reported, which would have excluded the majority of harvested and culturally important large-bodied fish from the assessments. Recommendation: AFN requests that the Proponent utilize a wider range of sampling gear to monitor fish, so as to not exclude large-, bodied fish habitat in deeper waters.	As described in the responses to #34 and #37, fish sampling for the Environmental Assessment / Impact Statement was conducted to document fish presence in the vicinity of the waterbody crossings. A conservative approach was taken to determine species presence within individual waterbodies; if there were any uncertainties about the ability of a waterbody to support a species of fish, it was assumed the species may be present in the waterbody. Fish sampling was based on the habitat present at the site, but primarily consisted of minnow trapping and backpack electrofishing. The vast majority of sites were only accessible by helicopter and the crew conducted fish sampling in addition to collecting habitat information. Fish sampling was conducting according to the Licence to Fish for Scientific Purposes obtained by from the Ministry of Natural Resources	Comment noted; see response for details	335

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			(which generally included backpack electrofishing, minor trapping, seine netting, and dip netting). Larger waterbodies also had historical information and Indigenous Knowledge which were used to develop a list of fish species present.		
Aroland First Nation	42	There are noted concerns by AFN members around community and road safety. Localized subsidence and potential infrastructure failure is a risk in permafrost areas at local and regional levels, caused by thaw. Section 14.3 of the TISG requires the IS to describe changes to permafrost conditions as a result of the Project, but this is not limited to general degradation as currently described in the Draft EA/IS. Although no frozen ground was found during field investigations in 2022, field investigations for permafrost have been recommended to be completed in advance of detailed design and construction. AFN requests the Proponent commit to: Recommendation a: Collaboration with MTO, A/PL Roads Upgrades, NRL, Rapid Lynx Broadband, and WSR Project Teams to develop a coordinated approach to the Permafrost Assessment prior to construction (for comparison	A: As described in Table 9-1 in Appendix N Physiography, Terrain and Soils Technical Support Document, Marten Falls First Nation (MFFN) will work with the Ministry of Transportation, and the Northern Road Link and Webequie Supply Road Project Teams to develop a coordinated approach to permafrost assessment. The scope of this assessment will be established during detail design. B: We confirm the Permafrost Management Plan will be reviewed, informed, and verified by qualified professionals. The scope of the Permafrost Management Plan will be established during future project stages. C: As noted in Section 9.1 in Appendix N, the Soil Management Plan could include: - Slope stability monitoring during land clearing, site preparation, and construction of facilities, especially road	Comment noted; see response for details	343

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		post- construction and during operations/maintenance phases, to assess the effectiveness of mitigation measures and accuracy of assessment predictions, or inform adaptive management measures) Recommendation b: The Permafrost Management Plan must be reviewed, informed, and verified by a geotechnical engineer and hydrogeologist in advance of implementation. The specialists' response must include recommendations and contingency measures for construction and operations/maintenance phases. This must include reference to potential effects relating to climate change and the cumulative effects of other foreseeable future developments in the Ring of Fire Area. Recommendation c: The Soils Management Plan must include appropriate mitigation measures and measurable indicators for cryosolic soils identified through the Permafrost Assessment, in addition to appropriate monitoring/testing to ensure rehabilitation and restoration measures consider cumulative degradation of permafrost soils from soil enhancements/modifications to improve suitability, installation and eventual decommissioning or abandonment of	components adjacent to rivers, creeks, and streams; - Monitoring for admixing of soil, compaction, and erosion during clearing, contouring, and excavation activities; - Monitoring of transportation of soil and stockpiling activities for signs of erosion; - Monitoring of erosion and sedimentation control measures to avoid and minimize sediment mobilization from disturbed areas to drainages, wetlands, or watercourses; - Monitoring of soil stockpiles and the Construction Disturbance Area for invasive species such as weeds. If invasive species are identified within the Construction Disturbance Area, a response plan will be prepared; - Monitoring and managing reclamation concerns pertaining to soil erosion, revegetation, and slope stability; and - Monitoring of aggregate rehabilitation to fully assess the effectiveness of rehabilitation and detect any unintended effects. This plan will incorporate measures related to Cryosolic soils as necessary. D: We confirm the Environmental Protection Plan, Revegetation Plan, Appendix AB Preliminary Biodiversity		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		temporary ancillary facilities, and/or permanent infrastructure - Recommendation d: The Environmental Protection Plan, Revegetation Plan, Terrestrial Biodiversity Offsetting Plan, Wetland Offsetting Plan, and site-specific rehabilitation plans (required under the ARA for pits/quarries), must adhere to recommendations of, and maintain consistency with, the requirements outlined in the Permafrost Management Plan (e.g., demonstrate overall net benefit for SAR wildlife or plant species that use habitat within intermittent permafrost areas).	Offset Plan, Wetland Offsetting Plan, and site-specific rehabilitation plans will incorporate the relevant recommendations and requirements established in the Permafrost Management Plan, where possible. It should be noted that the development timing of these plans may vary, and complete consistency among all plans may not be achievable.		
Aroland First Nation	43	Concerns and uncertainty remain that there is insufficient information provided regarding reclamation material suitability and resilience, to justify the conclusions presented in the Draft EA/IS regarding final soil quality. If soil sample testing can reliably be inferred to suggest less than 10% of soils are even marginally suitable for reclamation, AFN is concerned by a potential deficit in available soils required for rehabilitation of temporary facilities used for construction. This is a total area of at least 700 ha, which may be unfeasible to import suitable material to achieve successful reclamation. Delays in reestablishing material suitability will	A: A reclamation suitability assessment has been undertaken (Appendix N: Physiography, Terrain, and Soils Technical Support Document) by calculating reclamation suitability based on the Soil Quality Criteria Relative to Disturbance and Reclamation document. These suitability ratings were spatially assigned as part of the 1:5,000 scale soil mapping based on representative sampled soil profiles being assigned to each soil map unit. Although only approximately 6.7% of the mineral soil in the Construction Disturbance Area has been rated as	Comment noted; see response for details	348

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		likely extend the timeline required for successful progressive/final rehabilitation of temporary infrastructure. This factor carries significant weight and requires careful evaluation, due to its profound implications to AFN Traditional Territory, related practices, and spiritual connection to the lands and waters. Recommendation a: A reclamation suitability assessment must be undertaken in the CDA during detailed design and ongoing field investigations (e.g., completed to support siting of infrastructure within the ROW), and inform the Environmental Protection Plan, Erosion and Sediment Control Plan, Soil Management Plan, Revegetation Plan, Terrestrial Biodiversity Offsetting Plan, and Wetlands Offsetting Plan required for the Project. The assessment should integrate both measured and qualitative parameters related specifically to plant growth (e.g., vegetation growth classes used to rank soil material suitability for revegetation). Additional indicators include soil chemical properties (e.g., ARD/ML potential, as confirmed through soil testing), admixing materials to enhance capability of poorer rated soils, compaction and rutting sensitivities, soil	"Good" or "Fair", it does not mean "Poor" or even "Unsuitable" rated soil are exempt from being salvaged and used in reclamation. Soil with poor or unsuitable ratings can still be used for reclamation, but will need careful planning, good management, and possibly soil amendments to improve suitability. This reclamation suitability assessment is considered acceptable for the purposes of the EA/IS and development of future environmental management plans. B: At this time there are no plans for post-construction reclamation suitability assessment. If required, the development and implementation of this assessment will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		moisture conditions, and/or quantity of soil losses (e.g., by wind/water erosion) during soil handling or reclamation activities, etc., as indicated. The pre-construction reclamation suitability assessment within the CDA will inform site-specific mitigation measures and trigger/threshold values for implementation (e.g., to evaluate effectiveness of mitigation measures, inform adaptive management measures, and accuracy of Draft EA/IS predictions, etc.) during construction, operation, and maintenance, especially as it relates to metrics for vegetation growth. This will help to reduce the existing uncertainty relating to successful reclamation at the Project. Recommendation b: Soil and reclamation material suitability criteria must be evaluated throughout construction, post-construction, and operations/maintenance phases to ensure successful progressive/final rehabilitation of temporary facilities and roads, establish effective mitigation and offsetting measures, identify opportunities for adaptive management, and ultimately evaluate the predictions of the Draft EA/IS for other VCs that interact with the Physiography, Terrain & Soils VC.			

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	44	Comment: The Peatlands Effects Assessment information was not included in the Draft EA/IS. Peatlands have a significant and complex role in the hydrologic cycle. Peatlands interact with both surface water and groundwater. Context: If traditionally used wildlife and vegetation species are unavailable to AFN because of direct or indirect disturbance resulting from the Project, this may lead to further cascading impacts, including: a) Risks loss of intergenerational transfer of Traditional Ecological Knowledge (TEK) and Indigenous Knowledge (IK) of the landscape, waterways, travel routes, and species of the region. b) Rights-bearing land users and harvesters/gatherers will need to travel further in the region to acquire what is currently available locally. This may further risk safety to individual community members that actively use the land. c) Competition or conflict with licensed hunters/anglers or uneducated members of the public (i.e., poachers). Recommendation: AFN suggests that the Proponent revise the Draft EA/IS to include the Peatlands Effects Assessment. Subsequent impacts to	A peatlands effects assessment has been included as Appendix I Peatlands Technical Support Document, and the content from this assessment has been incorporated into the Final EA/IS. We note that effects on peatland functions are difficult to quantify based on the data collected and the sizes of the effects assessment Local Study Area and Regional Study Area. Therefore, a reasoned narrative was used to discuss the relative effects on function based on the assessments of other disciplines, including vegetation, surface water, groundwater,		380

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		groundwater and surface water should be quantified and woven into the different VC sections, including appropriate assessment of indirect effects for all VCs which intersect or otherwise are impacted along an effects pathway. It is important to consider the interactions between surface water, groundwater and peatlands to ensure the effects assessment adequately captures impacts on water in a meaningful and holistic way.			
Aroland First Nation	45	Areas of surface seepage are noted adjacent to the preferred route tie-in required from Section 1 of the MFCAR into the A/PL Roads. Further, the primary mitigation for peatland ecosystems in the CDA is to use a “floating road” construction methodology to allow for groundwater movement. Noted information for the road tie-ins (e.g., location, transition information, etc.), maintenance facilities, rest stops and pull outs required for the Project, is pending detailed design and not provided in the Draft EA/IS. Context: Project impacts to peatlands are unavoidable during construction and operation/maintenance, with high uncertainty associated with effects	A. The Final EA/IS assesses residual effects of the Community Access Road at the current stage of routing and design, and the Community Access Road components are considered to the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. B. Traditional Ecological Knowledge and Indigenous Knowledge provided by Aroland First Nation has been taken into consideration to develop the Final EA/IS, as described in Section 6.1. Incorporation of Traditional Ecological Knowledge and Indigenous Knowledge into the Land and Resource Use assessment is described in Section 3 of	Comment noted; see response for details	381

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		related to changes in groundwater quantity and flow. Forty-six of 56 plants identified as traditionally significant to Indigenous and First Nations communities were observed growing in peatland communities during field investigations supporting the Project baseline, and other locations are well documented by AFN within the Traditional Territory. Upgrades to the A/PL Roads are required to complete the MFCAR Project and are planned to tie-into the southernmost portion of the Project (Section 1), in AFN Traditional Territory. Required modifications/realignments of portions of these access roads to construct the Project, may create new disturbance in areas considered significant to AFN, alter or contribute to the loss of ecosystems that support traditional uses and/or culturally significant species, or result in surplus cumulative effects beyond current predictions. AFN therefore requests the Proponent commit to: • Recommendation a: Updating the residual effects assessment for the final EA/IS integrating this context (i.e., required upgrades and/or realignments to A/PL Roads to complete construction/operations of the MFCAR) for the Peatlands, Physiography, Terrain	Appendix U Land and Resource Use Technical Support Document. Section 7 of the Aroland First Nations Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report assesses impacts of the Community Access Road on Indigenous Current Use of Lands and Resources for Traditional Purposes. Information Request Response: Preliminary design information and general locations for tie-ins and ancillary infrastructure will be shared with Aroland First Nation as it becomes available; however, these are not included in the project assessed in the Final EA/IS. C. Section 3 of Appendix H Groundwater Technical Support Document describes how Aroland First Nation feedback has been incorporated into the groundwater assessment. As noted in Aroland First Nations Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		& Soils, Vegetation, Birds, Ungulates, and Wildlife VCs, as this is a critical element to understanding potential cumulative effects associated with traditional use species and other important species (such as SAR) to AFN. Many species-project interactions are not well understood in the southernmost portion of the PSAs (overlapping AFN Traditional Territory), or there is not sufficient existing or current data to verify the predictions of the Draft EA/IS. • Recommendation b: Historic and current land use by AFN must inform baseline conditions in the EA/IS, while working toward shared objectives of AFN in the future. The Draft EA/IS presents information that does not highlight AFN Traditional Territory has been previously impacted by development activities, which may represent priority areas for AFN to restore and reclaim. Information Request: It is also important for AFN to know (at minimum) general location and preliminary design information for the tie-in and ancillary facilities for the Project, in addition to any available upgrade information for A/PL Roads within AFN Traditional Territory. Given the limited human disturbances and fragmentation of existing peatlands	Nation, a Terms of Reference between relevant agencies and Aroland First Nations will be established. This process would allow for further input from Aroland First Nation into groundwater-related monitoring. D. We acknowledge the importance of springs to Aroland First Nation. Section 4 of the Final EA/IS includes a description of the approach to Project route planning. This process included broad engagement and consultation with Aroland First Nation on the comparative analysis between route options. Since completion of the draft EA/IS, Aroland First Nation has provided an IK report that includes identified spring locations. This information has been reviewed and noted in Section 3 of Appendix H Groundwater Technical Support Document; we confirm that the Community Access Road Preferred Route does not directly overlap identified springs. Additionally, Appendix H includes assessment of potential Community Access Road impacts to groundwater quantity and quality. These impacts were evaluated to be not significant, and therefore potential downstream impacts		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		in the PSAs, required upgrades to the A/PL Roads, and pending data associated with peatlands (e.g., groundwater flow, permafrost investigations, including AFN TEK and IK into the Draft EA/IS, etc.) required to complete detailed design and sighting of Project infrastructure, this information is integral to fully understand potential existing, residual ,and/or cumulative risks and effects to AFN Rights and interests. AFN further requests the Proponent commit to: • Recommendation c: Including AFN concerns related to potential effects of the Project on groundwater. • Recommendation d: Include AFN TEK and IK in the Draft EA/IS that identify springs near the Ogoki River, and along A/PL Roads which may be impacted by associated required upgrades. Groundwater springs hold spiritual value for AFN land users. • Recommendation e: Collaborating with AFN to develop appropriate siting for the southernmost tie-in of the MFCAR to the A/PL Road network, and ancillary facilities for the Project within the planned ROW. • Recommendation f: Co-management and co-development/ implementation of required plans with AFN to complete the	to areas of groundwater discharge (i.e., springs) are not expected. E. We recognize that the southernmost portion of the Community Access Road intersects with areas of high ecological and cultural significance within Aroland First Nation's Traditional Territory. Aroland First Nation will be engaged in the preliminary and detail design phases, particularly where realignments or upgrades to the Anaconda and Painter Lake Roads are being considered. F. As described in response to E, we acknowledge Aroland First Nation will be engaged during the preliminary and detail design phases where it relates to tie-in with the Anaconda and Painter Lake Roads. The development of environmental management plans will be the responsibility of the owner/operator of the Community Access Road. These plans will be shared with Aroland First Nation.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Project and align with other future foreseeable projects/Ring of Fire Regional Assessment.			
Aroland First Nation	46	To estimate the quantity and distribution of organic swamps and organic marshes in the RSA, all marsh and swamp communities from the Ontario Land Classification mapping were included. Manual corrections were completed in an iterative process during field investigations. While organic marshes account for a small percentage of peatlands in the PSAs, organic swamps were determined to be a source of CO2, and account for the largest daily and seasonal releases of methane of peatland groups in the LSA, representing 23% of peatlands in the LSA. It is unclear if limitations to the estimation of carbon storage in select peatland groups have been accounted for in the Draft EA/IS. Context: Although this represents a conservative approach to evaluating potential Project impacts to wetlands, this method may overrepresent these ecosite types on the landscape. This may lead to misclassifications in the carbon accounting, and result in underestimating soil organic carbon storage (e.g., forested wetlands are difficult to	We acknowledge the Carbon Storage and Flux Assessment, like all assessments and studies associated with the EA/IS, have inherent limitations. However, the objective is to estimate the carbon storage and flux potential of peatlands for the purpose of assessing Community Access Road residual effects; our approach is considered appropriate for meeting that objective in accordance with the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Prediction confidence and uncertainty regarding residual effects to peatlands are described in Section 7.3.3. of Appendix I Peatlands Technical Support Document. As described in Section 9, pre-construction monitoring programs will be implemented to refine vegetation community mapping; however, updates to carbon accounting are not proposed.	Comment noted; see response for details	382

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		differentiate from forested uplands unless ground verification has been completed; forested wetlands store significantly more carbon than forested uplands). Question: Please clarify if these limitations have been captured in the Carbon Storage and Flux assessment, and if these data gaps will be closed by information gathered in the pre-construction siting surveys.			
Aroland First Nation	47	Plates 2 through 7 are missing from the Figures within the Appendix. Information Request: Please provide the remaining plates for review and consideration in the updated Draft EA/IS.	We confirm that all required figures are accounted for in the latest version of Appendix I Peatlands Technical Support Document.	Appendix I	383
Aroland First Nation	48	Availability of peatlands in Section 5.3.1 indicates the RSA is 40- 60% bog cover. This is inconsistent with the 2% bog cover in the RSA noted in Table 5-5. There are several broken links/references to tables and figures throughout the report. Recommendation a: Please update Section 5.3.1 to be consistent with information presented in Table 5-5. Recommendation b: Please also correct broken links and references throughout	A: We would like to clarify that values in Table 5-5 are based on the project-specific mapping of the Existing Conditions study areas. The description 40 to 60% bog cover is based on Peatlands of Canada mapping, which is reported for context/comparison. B: We confirm that links and references have been corrected in Appendix I Peatlands Technical Support Document.	Appendix I	384

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the document for clarity and ease of reference.			
Aroland First Nation	49	Invasive species were not observed during field surveys. While mechanical removal is the preferred approach for the Project, chemical herbicides will be reserved for select management conditions; although the Draft EA/IS state herbicides will not be used during construction and operations/maintenance phases. Context: AFN maintains concerns regarding invasive species that have the potential to contribute to native and traditional use species declines in the CDA and LSA, especially considering the relatively remote nature of the Project and the current lack of observations during supporting surveys. AFN does not support the use of chemical controls for invasive species, which can further exacerbate secondary effects on peatland community composition and function. Similar secondary impacts to vegetation and wildlife VCs can be expected in the CDA/LSA. Recommendation: AFN requests the Proponent commit to further engagement with AFN, in the planning/development	We understand that while invasive species were not observed during field surveys, there remains a high level of concern regarding their potential introduction and spread, particularly given the remote and relatively undisturbed nature of the Project Study Area. We also recognize Aroland First Nation's position on the use of chemical herbicides and the potential for secondary impacts on peatland ecosystems, traditional use species and wildlife. The development and implementation of the Environmental Protection Plan will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road. The Environmental Protection Plan will be shared with Aroland First Nation. As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local	Comment noted; see response for details	385

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		and implementation of the post-construction invasive species monitoring program and Environmental Protection Plan for the Project.	existing environmental advisory committees to support the development and implementation of all environmental monitoring programs, including those related to post-construction invasive species management. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Aroland First Nation will be established.		
Aroland First Nation	50	The Ogoki River crossing (preferred route alternative 1), and the Albany River crossing (preferred route alternative 4), are noted areas of cultural significance to AFN (wild rice/other subsidence and medicinal plant harvesting areas). Access to healthy lands and waters is integral to the continuation of AFN culture, way of life, and capacity to transfer TK from one generation to the next. This is evident from baseline investigations, where fragmentation and invasive species are generally absent in the Project study areas and the primary influence on the landscape is natural	We acknowledge the importance of protecting key Aroland First Nation harvesting and cultural areas. Appendix J Vegetation Technical Support Document evaluates potential Community Access Road effects on habitat fragmentation, loss of wetland function, and establishment or spread of invasive species. This assessment has been conducted in accordance with the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans, and considers feedback from Aroland First Nation and Indigenous Knowledge (IK) data received to date.	Comment noted; see response for details	386

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		disturbance related to wildfire Context: Particular care must be taken to avoid disturbance of key harvesting and cultural areas that have not been clearly captured in the assessment. It is clear there are substantial knowledge gaps in the Draft EA/IS that limit AFN's ability to identify interactions and potential effects, thereby restricting our collective ability to determine mitigation and management programming and understand whether the predicted Project impacts are considered acceptable. This would include whether the Project and associated infrastructure will result in habitat fragmentation, loss of wetland function, and be susceptible to the establishment or spread of invasive species. Recommendation: AFN requests further collaboration to complete detailed design/sighting in these sensitive and culturally significant areas (especially referring to the Ogoki and Albany River crossing locations): - To ensure an inclusive and holistic approach to environmental management by incorporating meaningful site-specific mitigation measures informed by AFN (e.g., monitor and prioritize control of	A Vegetation Restoration Plan, Vegetation Management Plan, and Environmental Protection Plan will be developed for the Community Access Road. The Vegetation Management Plan will reassess the status of Black Ash and incorporate additional studies and mitigation measures, if deemed necessary. These plans will be shared with Aroland First Nation. The development and implementation of the Vegetation Restoration Plan, Vegetation Management Plan, and Environmental Protection Plan will, however, be undertaken solely by Marten Falls First Nation. Marten Falls First Nation acknowledges Aroland First Nation's comments regarding future engagement related to meeting the needs of Aroland First Nation land users and harvesters, and for maintaining safe and undisturbed access to river crossing locations. After the release of the Final EA /IS, consultation and engagement activities will be led by the provincial and federal government agencies with the Community Access Road Project Team providing support, where needed. In addition, should the Community Access Road EA/IS be		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		invasive species using mechanical methods/hand pulling or culturally appropriate means) in the Environmental Protection Plan - Commit to incorporate recommendations that reassess the status of black ash protections under a proactive study in the Vegetation Management Plan (see comment below). - Construct and operate the Project in a manner that meets the needs of AFN land users and harvesters (e.g., include opportunities to support, retain and enhance education and transfer of knowledge around the importance/significance of traditional use species, provide offset or compensation support for areas in adjacent/accessible locations, implement adaptive management, monitoring and follow-up programs, provide notifications/access in advance of construction, etc.) - Maintain safe and undisturbed access to river crossing locations during construction to the extent feasible; AFN requests advanced notification and use of these areas, if they will be publicly inaccessible during any time of the year. This will ensure AFN citizens have adequate time, access, and space for harvesting and gathering at important sites adjacent to planned river crossings	approved to proceed, a consultation and engagement program will be established to guide discussions through detail design.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		in advance of Project disturbance.			
Aroland First Nation	51	Fifty-six traditional use vegetation species were identified, but no invasive plant species were observed during field investigations. Invasive species are known to reduce local biodiversity, alter ecosystems, directly compete with native species, and change habitat structure (making ecosystems less suitable for SAR). One vegetation SAR (black ash) was confirmed in the Study Area overlapping AFN traditional territory during field surveys: “One known location of Black Ash is within the Construction Disturbance Area. There is good potential that Black Ash is found in other locations within the Construction Disturbance Area” (PDF pp. 236; Page 161). Context: Despite “conditional exemptions” that severely limit black ash protections under the Ontario Endangered Species Act in the Project area, the species is critically endangered globally, with Ontario representing approximately 25% of the global range, and is a species of great cultural significance to First Nations in the area. The Project also overlaps the areas assessed by the province to be	As described in Section 7.3.1.1.2 of Appendix J Vegetation Technical Support Document, black ash will be reassessed during future phases and regulatory agencies (Ministry of the Environment, Conservation and Parks, Environment Canada and Climate Change) shall be consulted on next steps. Specific mitigations for the protection of black ash, including transplanting and/or replacement, will be determined at that time. The Final EA/IS has been updated to include a Appendix AB Preliminary Biodiversity Offset Plan which describes how the loss of upland, wetland, and riparian ecosystems will be offset (where feasible), along with a long-term monitoring plan to validate success of the offsetting measures. The Preliminary Terrestrial Biodiversity Offset Plan will be finalized during detail design and shared with Aroland First Nation. The development and implementation of the plan will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and	Final EA/IS; Appendix AB	411

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		susceptible to emerald ash borer. Habitat supporting black ash is crucial for the survival and recovery of other SAR (e.g., by providing forage, shelter, ecosystem functions, biodiversity, stability of wetland/upland forests, etc.), benefit species of traditional importance that share habitat with black ash, and the recovery strategy for the species recommends ecosite-level wetland protections where one or more black ash trees are present (including young/regenerating trees). Recommendation: The Project, regardless of approval conditions, must include offsetting, assessment/transplantation of healthy individuals, and/or 10:1 planted sapling replacement of removed mature black ash (to suitable habitat at appropriate times of year). In addition, the co-development of acceptable performance metrics with AFN is requested, to meaningfully evaluate success and determine adaptive management actions during operations, per the requirements of the post-construction monitoring commitments (TISG). Planning and implementation of offsetting, transplantation, and/or replacement measures for vegetation (or wildlife) SAR	operations for the Community Access Road.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		will require ongoing consultation and engagement with AFN.			
Aroland First Nation	52	Fugitive dust emissions are expected to be produced during Project construction activities. Construction-related dust effects are considered irreversible. Project phasing anticipates construction occurring in multiple locations simultaneously to expedite construction activities for completion within three to ten years. The number of construction locations will be determined as part of detailed design. Water is anticipated to be used for dust control at temporary construction camps, but water use will be subject to a PTTW. AFN maintains concerns about dust and noise from construction and operation of the MFCAR, that will have a negative impact on human health and terrestrial systems. Context: Residual effects from fugitive dust emissions (i.e., after mitigation measures have been applied) are predicted to degrade vegetation immediately adjacent to the Project (e.g., impede natural processes, degrade plant health, alter species composition, structure, and/or biomass, etc.). AFN recommends an ongoing proactive study to determine potential effects to humans	We acknowledge the importance of looking at dust deposition generated due to construction and operations and maintenance activities and its potential effects on human health. Data related to dust deposition has been incorporated in Attachment A (Problem Formulation for Human Health Risk Assessment) of the Appendix T Community Well-being Technical Support Document. This report represents the initial step to Human Health Risk Assessment as required in the Tailored Impact Statement Guidelines. The objective of the Problem Formulation is to provide an estimate of the potential risks to human health from all Community Access Road phases and to respond to government and public concerns related to those projected effects. A: A country foods sampling study is also described in Attachment A. Laboratory analysis of tissues and berries was conducted for substances of interest. A total of 37 samples were collected in Aroland First Nation and Marten Falls First Nation, including 14 samples of blueberries, 5 samples of Canada goose,	Comment noted; see response for details	413

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		that ingest or use vegetation in the CDA that may be impacted by fugitive dust emissions, including: - Recommendation a: Tissue analysis of (at minimum) a subset of the 56 identified traditional use vegetation species noted for the Project, that identifies heavy metal content or other potential cumulative effects to human health through consumption or use of vegetation in impacted areas (e.g., within 100 m of CDA or ROW). Rationale must be provided for species selection in the program. Measurable indicators/threshold values must be included and tied to adaptive management requirements; rationale must also be provided for threshold/indicator values. This may be used to assess the effectiveness of fugitive dust emission mitigation measures during construction; and/or modify or enhance mitigation measures as necessary through adaptive management during operations/maintenance. Recommendation b: Evaluate seasonal implications as it relates to First Nations plant harvesting seasons; incorporate findings into a construction-specific adaptive management program that may include temporary traffic or activity-	8 samples of moose, and 10 samples of walleye. The results of this study provide the baseline indicator/threshold values to evaluate changes to concentrations of potential contaminants in blueberries over the course of the Community Access Road's construction and operations and maintenance phases. This program is considered appropriate for the purposes of completing the Problem Formulation Report in accordance with the Tailored Impact Statement Guidelines and Terms of Reference. Further baseline sampling is not proposed. B: Mitigation measures related to potential dust effects are described in Section 7.2.2 of Appendix S Atmospheric Environment Technical Support Document, and Section 7.1.1.26 of Appendix T describes mitigation measures related to the access, availability, and quality of traditional foods. The owner / operator will establish a working group with Marten Falls First Nation and Aroland First Nation, and other affected Indigenous communities, to meet regularly to discuss community-proposed topics in relation to the construction of the Community Access Road to identify key harvesting areas to		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		specific limitations, access or site-specific speed restrictions, and/or inform siting of ancillary facilities during detailed design (as required). This is consistent with the final TOR for the Ring of Fire Area, that take into consideration the timing of traditional practices. - Recommendation c: Consider testing environmentally friendly dust suppressant options (e.g., plant-derived applications) during construction, that minimize requirements for water withdrawal and usage through all phases of the Project.	implement measures that can minimize construction disturbances and contamination to traditional food resources during harvesting seasons. This may include adjusting construction activities to avoid peak harvesting periods. C: Further evaluation and selection of dust suppressant options will be undertaken by the owner/operator of the Community Access before construction.		
Aroland First Nation	53	The Project intends to prepare and implement a Vegetation Restoration Plan that incorporates the seeding/planting of traditional use plants. The Project impacts will be largely mitigated based on the Proponent's plans for minimal disturbance construction techniques, rehabilitation of disturbed land and offsetting habitats, with the expectation that this will be successful to replace healthy and functioning habitat. The Proponent does not provide sufficient detail in the Draft EA/IS on the rehabilitation plans, monitoring plans to determine success, and what criteria and indicators will be used to evaluate this, or what will be done if the rehabilitation	A: The development and implementation of the Vegetation Restoration Plan will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road. B: As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental	Comment noted; see response for details	414

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		trajectories are not being met. Context: Passive reclamation (e.g., natural revegetation) is not guaranteed to restore ecological function. AFN is concerned that the Draft EA/IS approach to revegetation (e.g., natural succession, seeding) will not effectively re-establish habitat along most of the ROW on completion of construction; as a result, this may lead to unintentional delays in reclamation and restoration efforts of temporary facilities/roads. Recommendation a: AFN expects further consultation and engagement to develop and implement the Vegetation Restoration Plan that aligns with AFNs vision for end-land use restoration trajectories. The full understanding of pre-disturbance site conditions must incorporate AFN TEK and IK, and proposed reclamation methods in the Draft EA/IS must discuss: • Nature of the disturbance (i.e., watercourse crossing impacting riparian areas, temporary disturbances, ROW clearing, etc.). For example: o Guidelines for developing road corridors in the known range for SAR will need to be adhered to, such that these species will not be further threatened by	monitoring programs, including those related to Land Water VCs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to MFFN, a Terms of Reference between relevant agencies and Aroland First Nation will be established.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the proposed Project activities. • Detailed assessment of pre-disturbance soil quality, vegetation, and hydrology (including implementing mitigation and planning contingency measures/adaptive management actions to ensure restoration trajectories, evaluating the potential for residual impacts, etc.). For example: o AFN encourages and approves of the Proponent's commitment to use traditional/cultural use vegetation species for plantings and seeding disturbed areas in the Vegetation Restoration Plan. o Active mitigations should be applied, including limiting topsoil storage, monitoring for effective invasive species management, hydrological restoration after material placement, and enhancing disturbed areas for wildlife use, etc. o Reclamation requirements for disturbed areas within critical habitat of species at risk (i.e., caribou) and/or other planning requirements for the Project (e.g., ARA permitting and closure requirements), must demonstrate an inventory of pre-existing site conditions that will help establish triggers and criteria (metrics) for comparison where vegetation treatments are required. • Identification of environmental sensitivities (e.g., springs, active bird			

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		nests, amphibian breeding pools, etc.) o This will help determine success and use of species sharing reclaimed areas, develop and implement meaningful mitigation, monitoring, protection and/or accommodation measures, in consultation with AFN. Context: Long-term monitoring of ecosystems and terrestrial species is important to AFN members, as this works towards the shared objectives of conservation, protection, and restoration of ecosystems for species and areas of traditional or cultural importance. Recommendation b: AFN requests a commitment from the Proponent to further engage AFN on the development and implementation of all monitoring activities for the Land and Water VC groups that interact with the Project. Monitoring results should be validated through a First Nations lens, reducing potential impacts on the ability of disturbed lands to contribute to traditional land uses. A monitoring program that meaningfully ensures AFN is involved to adequately address community concerns is vital to the acceptance of the Project by AFN.			

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	54	Section 8.2.3 of the Draft EA/IS defines the spatial boundary of the LSA for the Vegetation VC, as 3 km from the Project centreline (e.g., 6- km-wide effects study area); whereas the technical support document identifies the LSA (Project Study Area) as both 2.5 km from the Project centreline (e.g., 5-km-wide effects study area) and 3 km from the Project centreline (e.g., consistent with the Draft EA/IS). Context: The LSA spatial boundary defines the area where most of the direct effects of the Project are likely to occur and must be consistent for each VC throughout all documentation provided in the application. While it appears the assessment and evaluation of impacts consider the 3-km buffer from Project centreline (e.g., 6-km-wide LSA), only Appendix J clarifies the original 2.5 km assessment area for all VCs when the assessments began in 2019. Recommendation: Please incorporate this information into the Draft EA/IS for clarity and ease of reference throughout the sections referring to the vegetation VC.	The documents refer to different spatial boundaries. The Project Study Area referenced in Section 6.5.2 of the Final EA/IS consists of the corridor area 2.5 kilometres from the centreline of Alternative 1 and Alternative 4. The referenced area in Section 8.2.3 of the Final EA/IS refers specifically to the vegetation Local Study Area. As noted in Section 6.5.2 of the Final EA/IS, each technical discipline has their own local study area; this area represents the expected limit of direct effects from the Community Access Road.	Comment noted; see response for details	415
Aroland First	56	A total of 90 Vegetation ground-based	We confirm that specific forest health	Comment	416

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Nation		field investigations and 316 aerial visual checks occurred between 2021–2023 during the appropriate season (i.e., leaf-on season), specifically: - September 19, 21-29, 2021 (10 days) - July 13-18, 22, 2022 (7 days) - June 15, 17, 18; August 3-5, 2023 (6 days) Visual photo interpretation was completed for 75 locations, with photographs taken June 1-10, 2022, and August 10-13, 2022. Context: The Draft EA/IS identifies that approximately 19% of mapped ecosite types were verified through ground investigations in CDA and LSA; with the remainder of the verification process estimated through aerial/photo interpretation. AFN notes the mapping exercise has indicated the presence of “diseases” and ”pests.” which have not been assessed or verified during ground-based investigations; yet is a valuable indicator to determine existing conditions for forest and vegetation health. Please clarify if these forest health indicators have been assessed during any ground verification survey efforts, and/or if this will be included in the long- term monitoring programs. AFN stresses the importance of forest health as a crucial indicator of a thriving environment and stability in regulating vital ecosystem	indicators were not assessed during the baseline surveys for the Community Access Road. Baseline surveys were conducted in accordance with the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Additional field verification will occur during detail design to inform micro-siting of temporary work areas as well as the centreline of the Community Access Road, as noted in Section 9.1 in Appendix J Vegetation Technical Support Document of the Final EA/IS.	noted; see response for details	

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		processes/functions required for First Nations land use and occupancy, in addition to providing the appropriate baseline context for assessing residual effects of the Project. Recommendation: AFN recognizes the slight deviations from the TISG study plan requirements for field verification due to limitations outside of the control of the Project team; however, every effort must be made to ensure habitat/species' sensitivities have been mapped, and mitigation has been developed, in advance of final sighting and detailed design phases.			
Aroland First Nation	57	MFFN contributed knowledge paths and locations that were considered in determining how accessible each of the mapped ecosites were for traditional use plant harvest. "Any ecosite that intersected or was within 500 m of any Indigenous Knowledge point or path received a score of 1. Ecosites that did not intersect with any Indigenous Knowledge location, or the 500 m buffer scored 0 in terms of habitat accessibility." (PDF pp. 64; Page 43) Information Request: It is unclear if only	The traditional use plant habitat suitability assessment in Appendix J Vegetation Technical Support Document of the draft EA/IS was completed using information available at the time of analysis. This assessment was based on species identified by MFFN; however, it also included many species identified as important to Aroland First Nation, including birch, blueberry, cedar, cattail, cranberry, fireweed, willow, and sweetgrass. Other species of importance to Aroland First Nation were noted in Section 5.7.1 of Appendix J; however, spatial	Comment noted; see response for details	417

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the original 43 species provided by MFFN were used to identify candidate traditional use plant habitat suitability in the assessment. Please clarify if additional species provided by AFN were included in the traditional use plant habitat suitability assessment, as these have not been incorporated into Table C-1 (PDF pp. 600; Page 291). The habitat accessibility assessment does not explicitly include the expansive Indigenous and TEK of AFN land users and Knowledge Holders. This is a significant concern, as one of the Project mitigation measures commits to locate infrastructure away from known traditional use plant harvesting areas. Several traditional use harvesting areas have been mapped by AFN in the PSAs, that require further protections and mitigation measures to adequately address community concerns around access and availability of traditional use vegetation species.	information regarding where Aroland First Nation observe or harvest these plants has not been received to date. For this reason, the Vegetation Technical Support Document of the Final EA/IS considers Aroland First Nation vegetation species of importance, but does not incorporate them into an updated traditional use plant habitat suitability assessment.		
Aroland First Nation	58	Figure 7-6 identifies existing natural disturbances such as “disease” and “insects” that were not summarized in the baseline information for the Draft EA/IS or Vegetation Technical Support Document (Table 7-9: Anthropogenic and Natural Disturbances in the Effects	The “disease” and “insects” categories mapped on Figure 7-6 of Appendix J Vegetation Technical Support Document are from a provincial data set and represent large-scale infestations mapped by the province. None of these infestations fall within the local or	Comment noted; see response for details	418

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Assessment Local and Regional Study Areas). Predicted conditions indicate future climate warming may bring forest pests (e.g., defoliators like emerald ash borer), further north; future conditions may also encourage vegetation diseases (e.g., root or leaf diseases) and intensify severe weather effects (e.g., drought or snow damage). Information Request: Indicators of existing forest health (such as forest diseases and/or pests identified in the terrestrial mapping exercise) must be summarized and examined in the Draft EA/IS and technical support documents to fully understand the implications of the proposed Project on the existing and future conditions surrounding environment, ensure adequate mitigation measures and adaptive management thresholds are established, and appropriate monitoring is planned for/implemented to maintain habitat functions under future operating conditions. “Disease” and “insects” can impact both vegetation/forest health and wildlife health (e.g., ticks, chronic wasting disease, etc.). This information must be included in the existing conditions assessment for identified VCs	regional study areas based on the source data used (Ontario Fire Disturbance Area and Forest Resources Inventory).		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	59	Context: “Approximately 8.1% of the riparian zone within the existing conditions Local Study Area and 32% of the riparian zone within the existing conditions Regional Study Area are mapped as Water. The presence of water within the riparian zone is a mapping anomaly as the Ontario Hydro Network Waterbody layer, which was one of the layers used to create the 30 m riparian buffer, does not correspond directly to the polygons mapped as “Water” during desktop vegetation community mapping.” (PDF pp. 118; Page 85) Comment: Environment Canada recommends maintaining a minimum 30-m-wide naturally vegetated riparian area on both sides of watercourses and waterbodies to protect aquatic habitat along at least 75% of the length of the watercourse, though wider areas may be needed for highly functional wildlife habitat. Context: While the landscape level approach to the Draft EA/IS recognizes cultural importance and the connectivity of wetland and riparian ecosystems at a regional scale, the riparian areas associated with major watercourse crossings along the preferred route at a	We appreciate and acknowledge your comment highlighting the importance of riparian ecosystems at a local scale, particularly in providing opportunities for traditional use and harvest. A: The importance of riparian habitats to wildlife have been considered in the Appendix K Wildlife Technical Support Document, Appendix L Birds Technical Support Document, and Appendix M Ungulates Technical Support Document. Using a precautionary approach, species specific and site specific design mitigations are being incorporated into the preliminary design of some bridges (e.g. at the Albany River). Bridge crossing design will meet the requirements for ungulates (i.e. moose and caribou) by allowing them to go under the bridge instead of being forced up and onto the road. Protections for sensitive vegetation communities at these locations are also something that was carefully considered during mitigation planning with a range of activities set back at 100 m (terrain grading and stripping, soil stockpiles) from watercourses and 120 m setback from watercourses for refueling, service, and maintenance of vehicles and equipment. Also, a minimum setback of	Comment noted; see response for details	419

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		local effects scale must be weighted differently, especially considering the water budget studies still required in advance of detailed design and construction. For example, the riparian areas and associated habitat (supports species of traditional use and harvest) along both the Albany and Ogoki rivers overlapping the PSAs are significant to AFN. There are potential aggregate sources for the Project located on both south and north sides of the Albany River (adjacent to the preferred crossing location), and 5.7 ha of Albany River Provincial Park is proposed to be directly impacted by the Project. Recommendation a: AFN recommends updating the local-scale effects assessment of riparian habitats for the preferred route existing conditions, to include sufficient boundaries that provide adequate protections for wildlife and sensitive vegetation habitat known to overlap the LSA and CDA. Recommendation b: Taking into consideration the uncertainty with mapping data and sensitivity of species known to occur in these areas, AFN recommends establishing a 100-m buffer around each water body, in line with the Birds VC Study Plan (i.e., distinguished	120 m was established for aggregate pits and quarries. It is also noteworthy that we have identified Protected Areas associated with traditional, cultural and ecological valued areas, such as major watercourses like the Albany River, wherein certain development activities are prohibited or are permitted but protection of the environment is a priority. The Albany River also has the protections of a Provincial Park in the Project Study Area. Local-scale effects are considered to be appropriately captured in Appendices K, L, and M, and these reports have not been updated. B: Riparian zones are defined in Section 5.5 of Appendix J Vegetation Technical Support Document as “the vegetation assemblage that falls within 30 m of a watercourse or waterbody (e.g. stream or lake) edge”. This definition was established in the Vegetation Study Plan (Attachment A of Appendix J) and is based on federal and provincial guidance. This approach is considered appropriate for the purposes of the Vegetation assessment.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		riparian habitats by establishing a 100-m buffer surrounding each water body using the Ontario Hydro Network 1:100,000 scale watercourse and water body data set). Context: Given the prevalent AFN traditional use and documented wildlife use (including VCs identified for the project) around the Ogoki and Albany AROLAND FIRST NATION Technical Review Report on the Draft Environmental Assessment/ Impact Statement for the Marten Falls Community Access Road 1381-8770-8184, v. 1 66 river crossings along the MFCAR preferred route, and the inherent uncertainty around if Project-related pits/quarries will be completed above or below the water table, a standard minimum 30-m buffer used to define the riparian areas at the Project is not appropriate to characterize the baseline, determine potential impacts or put forward effective mitigation measures to important wildlife habitat availability and use at these crossing locations.			
Aroland First Nation	60	“Other” ecosystem type is not explained under the availability of upland and wetland ecosystems within the existing conditions Study Areas.	The term "other" comes from the base data used to classify vegetation communities in the RSA. Ontario Land Cover Compilation v.2.0 was used, which	Final EA/IS Tables 8.2-12 and 8.2-15	420

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Question: Please clarify in Section 8.2.4.2, Table 8-16 and Table 8-21, what habitats the "Other" ecosystem type is comprised of. Although this ecosystem type is only present in small amounts in the RSA, without additional context it is difficult to understand potential regional impacts.	is an aggregate of Far North Land Cover v1.4, Southern Ontario Land Resource Information System (SOLRIS) v1.2, and Provincial Land Cover 2000 Edition. After reviewing the source data, the Far North Land Cover Data Specification Version 1.4 document (MNRF 2014) describes "Other" as: "and cover features that were not classified for a variety of reasons". This small area (~2 ha) likely represents a gap in the provincial data set or a portion of land that was not classifiable. A footnote has been added to Tables 8.2-12 and 8.2-15 of the Final EA/IS (formerly Tables 8-16 and 8-21 of the Draft EA/IS) with this information.		
Aroland First Nation	61	"For easier mapping and analysis, ecosites have been grouped into four upland vegetation community groupings." Recommendation: This section relates to wetland ecosystems. Please update the statement to reflect this.	Section 8.2.4.4 in the Final EA/IS has been corrected with the term wetland ecosystems instead of ecosites.	Section 8.2.4.4	421
Aroland First Nation	62	Table 8-19 summarizes wetland function and performance within existing conditions study areas. "Low", "Moderate", "Variable" and "High"	A: We confirm the general assessment of wetland function was completed based on wetland type, not on a site-by-site basis.	Comment noted; see response for details	422

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		function ratings have not been defined. "The ability of each wetland vegetation community (i.e., swamp, marsh, fen, bog) to perform the associated function varies depending on characteristics such as landscape position (e.g., riparian, basin), soil type (i.e., mineral or organic), and size. The relative importance of each function also varies and may be related to the type and proximity of other vegetation communities." (PDF pp. 113; Page 80) Context: Without understanding what metrics are used to understand the assessment rankings of wetland functions, it is unclear how the Project evaluated these and the associated potential impacts for each wetland type. Question a: Please clarify if the assessment of wetland function was completed on a site-by-site basis or regional scale. Question b: Please also clarify any limitations associated with the method of analysis and update the residual effects assessment to reflect any updated context. Recommendation: Finally, please update	B: The residual effects assessment considered wetland functions using a reasoned narrative to discuss relative impacts on function based on the assessment of other disciplines including physiography, surface water, groundwater, fish and fish habitat, wildlife, birds and ungulates. The limitation of this approach to wetland function assessment is it is a general assessment based on wetland type; it does not consider site-specific details due to the scale of the Community Access Road. This limitation is considered in the context of predicting Community Access Road residual effects, as described in Section 7.3.3. of Appendix J Vegetation Technical Support Document. C: As noted above, wetland function rankings were developed using a using a reasoned narrative to discuss relative impacts based on the assessment of other disciplines. Additional details and supporting literature regarding wetland function rating are provided in Section 5.4.3 of Appendix J; however, specific definitions are not included.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the Draft EA/IS (and corresponding sections of Appendix J), to include this information and the definitions of wetland function ratings used in the assessment.			
Aroland First Nation	63	Vegetation clearing and grubbing will occur at construction laydowns, staging areas, and temporary construction camps. Clearing, grubbing, and soil material stripping is anticipated to occur as part of the CDA site preparation along the ROW. Although these Project activities are planned for execution outside of sensitive timing windows for birds, fish and wildlife, with a preference for winter clearing, the Draft EA/IS notes that if seasonal windows cannot be adhered to, additional permitting and mitigation measures will be required. Based on the information provided in the Draft EA/IS, it is not possible for the Project to adhere to all sensitive species timing windows with preference for winter construction.Construction and site preparation activities will result in direct and indirect effects to birds, fish and wildlife. Recommendation a: AFN recommends, upon completion of further studies required for detailed design and siting of Project infrastructure (e.g., groundwater	A: We acknowledges that a detailed construction schedule will need to be prepared as Project planning moves forward. We also confirm that the Environmental Protection Plan, when developed, will include mapping of sensitive features for consideration during construction. B: The schedule will be shared with Aroland First Nation. The development and implementation of the schedule will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation (MFFN) continues to have discussions with the Province regarding the ownership and operations for the Community Access Road. C: MFFN understands the implications of not adhering to sensitive timing windows and commits to meeting the associated regulatory and consultation obligations.	Comment noted; see response for details	423

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		studies), the Project Team must incorporate scheduling of all Project activities by planned segment and phased locations into a Gantt chart, overlapping any and all mapped site-specific sensitivities (i.e., SAR, critical habitat, wetlands, beaver lodges, etc.). Maps of the preferred route alternative should be included and incorporate boundaries of sensitive features that reference recommended environmental protection/mitigation measures for contractor use. This should be a central part of the Environmental Protection Plan. Recommendation b: AFN further requests an initial review of Project scheduling to ensure appropriate site-specific protections and mitigation measures are in place for birds, fish, and wildlife, and to ensure Project activities do not interrupt AFN cultural and spiritual interactions with the lands and waters in the Project CDA. Recommendation c: If sensitive timing windows for wildlife, bird, or fish SAR cannot be strictly adhered to during disruptive Project activities, further permitting and consultation/engagement with AFN and other jurisdictional			

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		authorities will be required.			
Aroland First Nation	64	Brush and timber disposal is proposed for non- merchantable or unusable timber and material will be collected and burned at designated sites. A wildfire prevention and response plan for construction works is an identified mitigation measure. Context: The Project must prioritize engagement and collaboration with AFN in the development and implementation of the wildfire prevention and response plan, prior to any site preparation activities. Community and road safety remains a priority for AFN. Recommendation: Although the wildfire prevention/response plan is a commitment of the Project, AFN discourages burning as a disposal method for unusable timber byproducts resulting from Project activities. This is due to the potential for uncontrollable conditions contributing to natural wildfire disturbance at scale, and uncertainty regarding the management of designated sites presented in the Draft EA/IS. Instead, AFN requests the Project make excess unusable timber available for use by AFN community members as a priority, before expected burning at	Specific plans for brush disposal during Community Access Road construction will be developed by the owner/operator during future phases. The potential for providing unusable timber to Aroland First Nation will be discussed at that time.	Comment noted; see response for details	424

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		designated sites. A time limit must be incorporated if materials are stockpiled at select times of year, such to discourage wildlife use while still allowing opportunities for AFN.			
Aroland First Nation	65	"If seasonal windows cannot be adhered to, additional permitting and mitigation measures will be required." (PDF pp. 130; Page 82) Bat VCs as described, do not include all SAR bats with potential to occur in the PSAs. "Suitable" maternity roosting habitat is not defined or described in the Draft EA/IS for each species, but is calculated in Table 8-24, and mapped on Figure 8-16. Analysis of the distribution of little brown myotis and northern myotis notes suitable maternity roost habitat is uncommon and unevenly distributed in the LSA/RSA, but concentrated around the Ogoki and Albany river crossings. Information Request a: Please confirm if the Project has submitted an Information Gathering Form (IGF) to MECP, otherwise all sensitive timing windows specified for SAR bats overlapping the Project that have potential to occur must be adhered to for all Project activities, and compensation habitat is recommended (e.g., rocket boxes) to be	The Regional Study Area is outside of the known ranges of eastern small-footed myotis (Myotis leibii) and tri-colored bat (Perimyotis subflavus). Three species of migrant bats were documented in the Local Study Area during the baseline bat acoustic surveys: silver-haired bat (Lasionycteris noctivagans), eastern red bat (Lasiurus borealis), and hoary bat (Lasiurus cinereus). The objectives, methods, and results of the bat acoustic surveys are described in Attachment B of Appendix K Wildlife Technical Support Document. Suitable bat maternity roost habitat is described in Attachment C of Appendix K. A: An Information Gathering Form for the Community Access Road has not been completed or submitted to the Ministry of Environment, Conservation and Parks (MECP). If tree clearing is required during the sensitive timing windows for species at risk (SAR) bats, including little brown myotis, northern myotis, and the migrant bat species, the MECP will be	Final EA/IS; Section 9.4.3	425

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		in place at least one year in advance of clearing or site preparation efforts. Information Request b: Please include suitable maternity roosting habitat descriptions for each species in the Draft EA/IS for clarity in understanding potential impacts to bat SAR. Information Request c: Please also include rationale for not including endangered migratory species in the assessment, or update the Draft EA/IS to include these species for a more fulsome assessment of SAR overlapping the Project area. Recommendation: AFN further recommends appropriate ongoing surveys and monitoring in collaboration with AFN, in areas with potential for bat hibernacula/maternity roost sites (e.g., activity observed near Ogoki and Albany river crossings), to demonstrate the Project results in no negative impacts to SAR wildlife habitat. Approaches to determine presence/absence of SAR bat species and potential habitat areas along the preferred route should be included in the pre-construction field investigations. If disturbance is required in identified sensitive hibernacula/maternity roost	consulted to determine the permitting or registration requirements. The installation of compensation habitat (e.g., artificial roosting structures) will be considered during the permitting/registration process. B: The description of suitable bat maternity roost habitat is provided in Attachment B in Appendix K. For clarity, Section 9.4.3 of the Final EA/IS has been updated to include this habitat description. C: Little brown myotis and northern myotis were selected as representative species for the bat Valued Component. At the time the selection was made, the migrant bats were not protected under the provincial Endangered Species Act, or the federal Species at Risk Act. The baseline bat acoustic study describes the activity levels and distribution for all bat species and is discussed in Attachment B in Appendix K. D: Monitoring commitments related to wildlife Valued Components are presented in Section 9 in Appendix K. Monitoring programs will verify effects on wildlife and wildlife habitat, including SAR bat species, and apply adaptive		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		areas, an Overall Benefit Permit and offsetting plan to provide overall benefit to the species will be required. Further engagement and collaboration with AFN on offsetting measures will also be required.	management where necessary. Monitoring results would be used to adjust or adapt mitigation measures or reclamation approaches used to limit Project effects on wildlife (i.e., adaptive management). Ground-based pre-clearing surveys ("wildlife sweeps") will be completed along the Construction Disturbance Area under the direction of the Environmental Monitor and Indigenous Environmental Monitor, prior to any clearing or grubbing. The wildlife sweeps will include surveys to identify potential SAR bat maternity roost habitat within the Construction Disturbance Area to determine the presence of potential bat habitat prior to any tree clearing to be conducted during the bat maternity roost season. If potential maternity roosting habitat is identified and planned to be removed during the roosting period, bat exit surveys may be conducted depending on the outcome of consultation and Endangered Species Act/Species Conservation Act permitting or registration with the MECP Species at Risk Branch. The environmental monitoring plans will be shared with Aroland First Nation. The		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			development and implementation of the these plans will, however, be undertaken solely by owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road		
Aroland First Nation	66	"The only reptile species known to occur in the wildlife existing conditions Local Study Area and Regional Study Area is eastern gartersnake." (PDF pp. 262; Page 214) Comment: The reptiles and amphibians cited in the Draft EA/IS do not include snake/turtle species observed by AFN members within the Traditional Territory. Snakes and turtles are considered species of traditional and cultural importance to AFN. Table 8-27 and Figure 8-21 summarize only amphibian habitat availability overlapping the PSAs. Context: Snake habitat availability is influenced by a variety of factors that include availability of open/semi-open areas (particularly in spring/summer seasons), in proximity to water bodies, forests and suitable overwintering sites. A limiting factor for snakes tends to be the	We appreciate this information on turtle observations made in the area where the Anaconda and Painter Lake Road will be upgraded. At the time of the preparation of the draft Appendix K Wildlife Technical Support Document, publicly available occurrence records were reviewed and there were no observations within the Regional Study Area (RSA). All known turtle observations were located south and west of the RSA. Based on the review of publicly available occurrence records, the nearest known Painted Turtle observation was located near Nakina along Esnagami Road, and the nearest known Snapping Turtle observation was located between Geraldton and Nakina. Although no observations of turtles were made during the baseline field studies conducted for the EA/IS, it is certainly plausible that the northern extent of the ranges of these turtle species extends beyond the known	Appendix K	426

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		availability and suitability of hibernacula sites. Snakes have been observed by AFN land users near where the upgrades to A/PL Roads are required to occur in advance of Project construction/operations. These upgrades will be required before the Project can proceed. Turtle habitat availability is also influenced by various factors that include appropriate substrate for nesting/overwintering, in proximity to foraging and basking locations. Limiting factors for turtle species tend to be the availability and suitability of nesting and overwintering sites. Northern map turtles in particular (among other species), and their nesting sites, have been observed by AFN land users near where the upgrades to A/PL Roads are required to occur in advance of Project construction/operations. This species requires large, slow-moving water bodies like those that occur in the PSAs, is listed federally and provincially as a species of Special Concern (SARA, Ontario ESA), and a Specially Protected Reptile under the Ontario Fish and Wildlife Conservation Act. Recommendation a: As garter snakes were observed during field surveys in	occurrence records obtained during the preparation of the baseline study. At northern latitudes, the distribution of turtle populations are constrained by climate rather than habitat availability. A certain number of warm days are required to allow eggs to develop and hatch. The two species with the northern most distribution in Ontario are Western Painted Turtle and Snapping Turtle. Although the northern extent of the ranges of Western Painted Turtle and Snapping Turtle may extend into the wildlife RSA, it is less likely that Northern Map Turtles are present in the area. Based on the current understanding of the range of this species, the nearest known population is located near Sault Ste. Marie over 400 km to the southeast. This conspicuous species frequently basks in the open making it less likely than some other turtle species to go overlooked. Appendix K has been updated to include the acknowledgement that the northern extent of the ranges of Snapping Turtle and Western Painted Turtle are uncertain and may extend into the wildlife RSA. Appendix K has also been updated to include the Aroland First Nation		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		support of characterizing the baseline conditions for the Project, and both snakes/turtles have been observed by AFN land users in the area, AFN recommends appropriate pre-construction and ongoing surveys/monitoring, targeting reptiles in collaboration with AFN: - In areas with potential for snake hibernacula, complete Visual Encounter Surveys and targeted habitat surveys at suitable times of year, on days with appropriate weather conditions - In areas with potential for turtle nesting and overwintering, complete Basking surveys and Visual Encounter Surveys that target breeding and emergence periods for local species, on days with appropriate weather conditions. Recommendation b: Further, AFN requests the Project commit to completing a reptile habitat availability assessment in the wildlife VC PSAs for an accurate and fulsome assessment in the Draft EA/IS. Relocation is discussed in other comments. Ongoing surveys for amphibians during construction is recommended to take place, as the Project denotes breeding habitat as "sensitive," warranting further protection/mitigation.	observations of turtles along the Anaconda and Painter Lake Roads. A: We consider existing conditions for reptiles and amphibians to be adequately characterized through the baseline surveys described in Appendix K. The assessment of amphibian breeding habitat sufficiently addresses the effects of the Community Access Road effects on turtle overwintering, basking, and foraging habitat. Turtle nesting habitat consists of open areas with friable substrates; this is covered by the snake habitat assessment. Additional surveys for turtles and snakes would collect presence/non-detect data and these would not be more inclusive than the conservative approach taken for a project of this size. The identification of some locations to confirm turtle and snake use, would not be expected to change the residual effects assessment, project-wide mitigations or conclusions for reptiles and amphibians. As described in Section 9 of Appendix K, wildlife sweeps and construction monitoring are proposed; these will help to further identify and protect reptile and amphibians. Any reptiles or amphibians		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			found within work areas will be relocated to suitable habitat nearby. Safe handling practices will be used to move turtles, snakes and other herpetofauna to areas away from the construction (e.g., Ontario Species at Risk Handling Manual: For Endangered Species Act Authorization Holders). As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Aroland First Nation will be established. B: A habitat suitability model has not developed for eastern gartersnake because this species is a habitat generalist that can be found in virtually all		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			habitat types within the Local Study Area. A habitat suitability model was not developed for turtles because no turtle species are currently known to occur in the LSA. As discussed above, the ranges of Western Painted Turtle and Snapping Turtle may extend into the LSA, although they were not observed during the baseline studies and there are no known observations records. The Aroland First Nation observations of turtles along the Anaconda and Painter Lake Roads are likely south of the Study Area. Although the Anaconda and Painter Lake Roads extend into the south end of the LSA, the majority of the length of these roads are located outside of the LSA. Because it has not been confirmed that turtles occur in the LSA, no habitat suitability model is warranted.		
Aroland First Nation	67	Wolverine is a species of traditional and cultural importance for AFN. There is no General Habitat Description (GHD) available for wolverine to describe the habitat required to carry out the species' life processes, as required under the Ontario Endangered Species Act. GHDs clarify a species' required habitat(s) and delineate boundaries for habitat protections, ensuring project activities do not negatively impact a designated	Recommendation A: We acknowledge the importance of wolverine to Aroland First Nation. We appreciate your feedback and the time you have taken to share your perspective. However, this comments is directed at a government agency and outside the scope of the Community Access Road. We would therefore encourage you to direct these to the regulators, as they will be best positioned	Comment noted; see response for details.	427

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		species or its habitat. Context: Disturbance to active wolverine dens is in contravention of the Fish and Wildlife Conservation Act and Ontario Endangered Species Act unless a licensed trapper is employed. Recommendation a: Because the GHD remains unavailable, MECP should work with the Project Team and future foreseeable project teams, in collaboration with AFN and other local First Nations communities, to incorporate all available records from the region for the Project assessment of wolverine. Information must be included in associated wildlife management/monitoring plans (as it becomes available), based on the commitments noted in the Draft EA/IS. Consideration should also be given to include any records for suitability, territory size, etc., and apply site-specific protections for wolverine based on this. The Ontario Recovery Strategy for wolverine indicates that all habitat associations, including den selection, are correlated to distance from roads and logging. Den selection for wolverine will likely consider proximity and connectivity between preferred/suitable natal den	to address them. Recommendation B: It is acknowledged that wolverines have two types of denning periods, natal (mid-February to mid-March) and maternal (mid-March to the end of April). The wolverine denning period described in Section 9.4.3.5 of the Final EA/IS and Appendix K Wildlife Technical Support Document encompasses both denning periods (February 1 to May 1). Recommendation C: The wolverine denning period described in Section 9.4.3.5 of the Final EA/IS and Appendix K is considered conservative, as it is larger than the combination of two denning periods described in the response to part A. Additional extensions to this sensitive denning period are not currently being considered. Recommendation D: The description of the availability and distribution of suitable wolverine habitats was developed based on a literature review, analysis of regional landscape characteristics, and Project Study Area vegetation community types. This description is provided in Section 5.2.1 of Appendix K, and includes characteristics		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		areas and maternal den areas, in addition to other habitat factors necessary for the species' life processes. AFN requests the Project commit to: - Recommendation b: Separating natal and maternal den timing windows (i.e., mid-February to mid-March: natal dens; mid-March to end-April: maternal dens) as currently defined in the Draft EA/IS. - Recommendation c: Incorporate a conservative (e.g., at minimum, month-long) extension to the sensitive period for wolverine to ensure gravid females are able to find suitable denning habitat before giving birth, and effectively rear kits postpartum (e.g. extend defined sensitive window from beginning of January until early April). - Recommendation d:Include appropriate habitat descriptions and availability of high-quality habitat areas for both den types used by wolverine in the PSAs. - Recommendation e: Should the updated information resulting from the request above identify sensitive denning area habitat (e.g., either for maternal or natal dens) within (minimum) 1.5 km of either side of the CDA, a wolverine management plan must be developed and implemented under the Environmental Protection Plan for the Project, in consultation with AFN.	of previously found maternal dens in the Red Lake area of Ontario (Scrafford et al. 2022). Recommendation E: Areas with potential to support wolverine denning will be identified through a review of plant community mapping (looking for communities that may contain the microhabitat features [e.g., fallen trees and blowdown, boulders and variable terrain] that wolverine require for denning), and targeted aerial site reconnaissance during the denning period to survey for signs of potential denning areas well prior to the initiation of construction activities (e.g., clearing and grubbing). If clearing or grubbing are required during the wolverine denning period (February 1 to May 1 inclusive) in habitat suitable for wolverine denning, surveys for the presence of wolverine dens will be conducted prior to clearing. Surveys will be conducted from helicopters or drones. The survey extent will include all potentially suitable denning habitat within 4 km of the disturbance. The methods of the surveys will be determined in consultation with the Ministry of Environment, Conservation and Parks Species at Risk Branch. If a wolverine		

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			den is identified, Project activity within 4 km of the den will stop immediately. Should this timing not be able to be maintained within the buffer widths identified, local Ministry of Environment, Conservation, and Parks' Species at Risk Branch offices will be contacted to develop a den management plan and appropriate Indigenous communities including AFN will be notified as requested.		
Aroland First Nation	69	It is unclear why Wildlife (ungulates) have both potential and no potential pathways for indirect effects as it relates to the visual environment, resulting from Project interactions between VCs. Similarly, wildlife are expected to interact with each other, resulting in indirect effects to other focal wildlife VCs, as a result of the Project. Information Request: Please clarify both potential and no potential pathways indicated for indirect effects between wildlife (ungulates) VCs and the visual environment in the Draft EA/IS. Context: Indirect interactions between wildlife VCs may result from Project activities due to noise/sensory disturbance that deter select species into	The inclusion of both symbols representing a potential pathway and no pathway between Ungulates and Visual Environment was an error. Table 9.1-1 of the Final EA/IS (formerly Table 9-2 of the Draft EA/IS) has been updated to correctly include only one interaction. We would like to clarify that the intent of Table 9.1-1 is to demonstrate potential interactions between discipline assessments as differentiated in the Final EA/IS. The potential interactions between wildlife Valued Components are understood and considered within the Wildlife assessment directly, where appropriate.	Final EA/IS Table 9.1-1	433

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		surrounding habitats, attractants in localized areas, creation of preferred habitat characteristics for select species that encroach into surrounding habitats, etc. Recommendation: Please update the Draft EA/IS for same, or provide additional context or rationale explaining why wildlife VCs are not expected to interact indirectly with each other as a result of the Project.			
Aroland First Nation	70	It is unclear if permanent lighting will be installed as part of the infrastructure required for the Project. Question: Will permanent lighting be installed for the Project during construction or operations phases? Permanent lighting will result in cumulative sensory disturbance to wildlife (e.g., attractant or deterrent), which may be mitigated by appropriate siting and directional shielding; however, this may also result in improved safety conditions during operations and maintenance phases considering there are currently no operational timing restrictions identified for commercial or passenger vehicles.	Main road lighting will not be provided along the roadway corridor. Select locations of partial lighting will be considered during detail design; these locations will be limited to rest stops.	Comment noted; see response for details	434

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Aroland First Nation	71	Developing a mandatory protocol/system for reporting incidental wildlife interactions and collisions at the Project, in addition to Terrestrial Biodiversity Offset Plans, are identified as a mitigation and enhancement measure for wildlife. Recommendation: AFN requests the Project commit to further engagement and collaboration in the development and implementation of the Environmental Protection Plan, Terrestrial Biodiversity Offsetting Plans, Cleanup and Reclamation Plans, and reporting protocol/systems to benefit and track wildlife, especially traditional use species and SAR.	The Environmental Protection Plan, Cleanup and Reclamation Plans, and associated reporting protocol/systems will be shared with Aroland First Nation; the Preliminary Biodiversity Offset Plan is available in Appendix AB. The development and implementation of the these plans and protocols will, however, be undertaken solely by the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road.	Comment noted; see response for details	435
Aroland First Nation	72	Project-environmental interactions do not consider the potential for Project activities/construction to result in habitat sinks for reptiles and amphibians. Reptile and amphibian eco-passages and exclusion fencing have been proposed as potential mitigation measures. Context: The loss or alteration of habitats required for reptiles and amphibians can lead to physical harm of individuals, change reproduction habits, reduce habitat quality, and/or disrupt habitat	A. We contend that the existing conditions for reptiles and amphibians has been adequately characterized through the baseline surveys. The assessment of project impacts on amphibian breeding habitat sufficiently addresses the effects of the project effects on turtle overwintering, basking, and foraging habitat. Turtle nesting habitat consists of open areas with friable substrates; this is covered off by the snake habitat assessment.	Comment noted; see response for details	436

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		connectivity, which would make these habitats less suitable for these species or result in potential localized habitat sinks. As noted in earlier comments, it appears that not all species of reptiles/amphibians (including SAR, and important traditional or cultural use species) have been considered in the assessment. Recommendation a: In the absence of species-specific baseline information relating to TEK of reptile and amphibian species from AFN land users and Knowledge Holders, AFN recommends the Proponent commit to the development and implementation of pre-construction surveys and an ongoing monitoring program targeting reptile and amphibian habitats along the preferred route. This will also help to validate and site reptile passages/tunnels as an effective/successful mitigation measure for reptiles/amphibians, and identify areas for wildlife exclusion fencing or relocations. Relocations, as a proposed mitigation measure for herpetofauna, will potentially require an overall benefit permit (e.g., for SAR), wildlife handling permits, and relocation plans. Recommendation b: AFN requests the	There are no pathways of effects of how the Community Access Road could impact turtles and turtle habitat that have not been assessed through the assessment on reptiles and amphibian. Additional surveys for turtles and snakes would show presence/non-detect data and would not be any more inclusive than the conservative approach taken for a project of this size. The identification of some locations of confirmed turtle and snake use would not be expected to change the residual effects assessment, project wide mitigations or conclusions for reptiles and amphibians. B. As described in Appendix I Wildlife Technical Support Document, pre-construction wildlife sweeps include surveys for reptiles and amphibian. Any reptiles or amphibians found within work areas will be relocated to suitable habitat nearby. Safe handling practices will be used to move turtles, snakes and other herpetofauna to areas away from the construction (e.g., Ontario Species at Risk Handling Manual: For Endangered Species Act Authorization Holders). C. As noted in Aroland First Nation's Aboriginal and/or Treaty Rights and Interests: Draft Impact Assessment		

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		following are included in any Relocation Plans: a) Permit conditions and wildlife reporting requirements b) Weave overall Project wildlife tracking approach and results from preconstruction and ongoing survey efforts targeting reptiles and amphibians, into adaptive management actions that ensure likelihood of success and resilience of relocated populations c) Salvage must be completed under appropriate weather conditions and at appropriate time(s) of year d) The salvaged individual(s) are treated with appropriate husbandry and handling requirements that ensure likelihood of survival e) Relocation to adequate, and sufficiently sized habitat during appropriate time(s) of year, and under appropriate weather conditions f) Monitor for, and manage, potential disease transfer during salvage operations g) Complete ongoing monitoring of salvage and relocation habitats to ensure overall success. Recommendation c: AFN requests the Proponent commit to further engagement and consultation regarding salvages and	Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs, including salvages and relocations. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Aroland First Nation will be established.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		relocations that involve wildlife or vegetation, to develop and implement appropriate plans that protect, and benefit wildlife and vegetation species impacted by the Project.			
Aroland First Nation	74	Mitigation and enhancement measures for beaver during construction and operations and maintenance phases include only beaver guards installed on culverts as a preventative measure to discourage beaver activity along the preferred route. Measures to remove beaver dams and lodges will also require alignment with Fisheries Act Authorizations required for the Project, as the standard conditions for DFO Codes of Practice (COP) do not apply. This has not been identified in the Draft EA/IS (wildlife-specific sections). A healthy and productive aquatic and riparian habitat is required for community members to exercise rights and interests in AFN Traditional Territory. Recommendation a: AFN requests the Proponent commit to further collaboration and engagement to develop and implement the Environmental Protection Plan (EPP) and Cleanup and Reclamation Plan for the Project. The EPP must include a beaver management	A: An Environmental Protection Plan (EPP) will be developed that will include beaver management considerations and will align with Fisheries and Oceans Canada (DFO) requirements. The EPP will be shared with Aroland First Nation. The development and implementation of the EPP will, however, be undertaken solely by the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road. B: We agree that preventative/deterrence measures are important in addition to ongoing monitoring for beaver activities. Section 7.3.1.5 and Table 7-1 of Appendix K Wildlife Technical Support Document has been updated to reference the Fisheries Act with the following: - Measures to reduce the need to remove beaver dams and lodges will be employed during construction and	Appendix K	437

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		plan developed in consultation with AFN, which outlines how construction and operations will align with the requirements of DFO Authorizations, in addition to current commitments (e.g., beaver lodges identified as sensitive habitats, affording them additional protection). This should also include specific provisions to restore and revegetate riparian areas disturbed by Project works/activities, installation of ESC measures, monitoring for effectiveness of ESC, prevention and response for deleterious releases to waterbodies/watercourses, timing of activities to avoid sensitive periods, etc. Reference to Fisheries Act requirements in the beaver-specific sections of the Draft EA/IS and Appendix K must be updated for a fulsome assessment of potential impacts. Context: Beaver dam removal is known to impact dissolved oxygen content in water, with impacts to fish survival. The management plan must further include monitoring and response actions for potential changes in dissolved oxygen content during dam, and major debris removals. Repeated removal of beaver dams at a watercourse may result in cumulative stressors in the aquatic	operations and will include appropriate screening of culverts to prevent access by beavers, regular monitoring of water crossings for beaver activity, and the early removal of log jams from water crossings and nearby waterways. - The loss and alteration of beaver habitat will be minimized to the extent possible and will be undertaken in compliance with the requirements of the Fisheries Act.		

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		environment that may require additional offsetting, or accommodation plans to prevent long-term impacts. Recommendation b: AFN recommends the Project include preventative/deterrence measures, in addition to ongoing monitoring for beaver activities at both temporary (during construction) and permanent (during construction/operations) crossing locations. This will help to maintain flow/connectivity at these locations while minimizing the need for extensive debris removal.			
Aroland First Nation	75	Many birds selected as focal species are also considered priority species under BCR Strategies available for Regions 7 and 8 (e.g., Project overlaps these BCR Regions). Context: The conservation objectives and recommendations under the BCR strategies are to be used as the basis to develop guidelines and BMPs that adhere to the MBCA. To better align the Draft EA/IS with ECCCs management strategies for BCR 7 and BCR 8, as well as the ToR for the Ring of Fire Area, AFN emphasizes the thorough evaluation of cumulative effects on the focal species	As described in Section 7.3 in Appendix L Birds Technical Support Document, an Environmental Protection Plan will be developed for the Community Access Road and Appendix AB Preliminary Biodiversity Offset Plan of the Final EA/IS has been drafted; these include mitigation measures to reduce potential effects on birds, including those identified as priority species under Bird Conservation Region Strategies. A cumulative effects assessment that includes bird Valued Components is included in Section 10.3.4 of the Final EA/IS and Section 8 of Appendix L. This assessment has been prepared to meet	Comment noted; see response for details	438

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		chosen for the Bird VC at a regional scale. Recommendation: AFN recommends the Environmental Protection Plan includes a Bird Management Plan, outlining specific measures implemented to minimize or mitigate potential Project impacts (i.e., direct, indirect, residual) to the BCRs associated with the Project. To thoroughly assess cumulative impacts of the Project, all potential sources of environmental change in these regions must be considered.	the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans.		
Aroland First Nation	76	Various bird species selected for focus to represent the Bird VC are adaptive and resilient to human disturbances. AFN is concerned that these selected focal species may not represent the most conservative species and habitat assumptions for the assessment, as the proxy species were assumed to occur in sufficient numbers within the PSAs to support model validation. The cumulative effects assessment for the Birds VC does not consider focal species separately, such as SAR and species of traditional and cultural importance for AFN. This is a requirement of the TISG. Context: One or a few representative	A: A total of 26 bird Valued Components were selected during the design of the TISG, which were then carried forward throughout the environmental assessment in Appendix L Birds Technical Support Document. This number represents close to 25% of all species of birds documented during fieldwork conducted in support of the Community Access Road. This amount of VCs is relatively large for one taxa, and is understood to be higher than most other environmental assessments of bird VCs completed in Ontario. The justification for bird VC selection is provided in Section 4.2.2 of Appendix L.	Comment noted; see response for details	439

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		species from each habitat-type may not be sufficient for the analysis of wide-ranging effects to the Birds VC. It is unclear, as there is no rationale provided, how the potential effects of the Project would be better determined for birds through a small number of selected proxy species, prior to incorporating IK and TEK from local First Nations. Information Request a: Please clarify this with justification. Context: It is also unclear how any bird species likely to be directly or indirectly affected by the activities taking place in the LSA, will be identified. Information Request b: Please clarify if the tracking and reporting approach (anticipated as a mitigation measure for Wildlife VCs) will also be used for the Birds VC.	Bird VCs were selected based on their associated habitats so that all habitat and ecosites found throughout the Project Study Area were represented. In addition, all SAR bird species were also included as bird VCs in the assessment. Inclusion of SAR provided a comprehensive assessment of Community Access Road effects on the most common and widespread species (and their habitats) and the rarest and potentially the most affected species. Feedback received from Aroland First Nation was also considered during assessment development, and species of cultural significance (e.g., waterfowl, birds of prey/raptors) were confirmed to be captured in selected VCs (Mallard and Bald Eagle). Bird VC selection has been conducted in accordance with the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. B: Section 9 of Appendix L outlines monitoring programs (in addition to off-setting and compensation), so that bird VCs and birds in general are monitored during construction and during the post-construction periods.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	77	Species listed as Specially Protected Wildlife under the Ontario Fish and Wildlife Conservation Act have not been denoted or discussed throughout the Draft EA/IS. This is applicable (at minimum) to focal/proxy species representing wildlife, bird, and ungulate VCs. Context: Specially Protected Raptors under Schedule 7 include osprey, boreal owl, bald eagle, peregrine falcon, and short eared owl. Specially Protected Birds under Schedule 8 include rusty blackbird. There is several other focal wildlife species presented under other Schedules within the Act (e.g., Schedule 6 - mammals). Recommendation: Please update the Draft EA/IS to include this extra context, or provide rationale as to why the Act and its supporting Schedules are not applicable to the Project. The assessment of effects should reconsider sensitivity weightings as context for applicable species.	The Environmental Assessment / Impact Statement and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. The TISG provides an overview on the discussion requirements for all taxa, including birds, in the EA/IS. The TISG has not identified requirements for discussion related to the Ontario Fish and Wildlife Conservation Act (FWCA). However, concurrent to the FWCA, discussion in Appendix L Birds Technical Support Document is provided for birds, including discussion related to the Migratory Birds Convention Act, Species at Risk Act, and Endangered Species Act. These acts provide greater protection to bird species, including SAR.	Comment noted; see response for details	440
Aroland First Nation	78	There is no standard deviation provided for boreal owl, Wilson's snipe, mallard, sora, common nighthawk and eastern whip-poor-will, eastern wood-pewee,	Population estimates for all bird VCs were based on density estimates from the 2nd Ontario Breeding Bird Atlas - Regions 37 and 44, which overlap the	Comment noted; see response for details	441

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		short-eared owl, black tern, lesser yellowlegs, and yellow rail density estimates. Some error calculations were not able to be completed due to low sample size. No density estimate was provided because ARUs represent unlimited distance point counts. Context: Providing estimates of abundance and distribution of proxy species for the Bird VC, in addition to predicted confidence or error approximations, are a requirement of the TISG (Section 8.9). Published studies may not be able to provide sufficient information to replace data collection, analysis and area-specific modelling for the PSAs that contribute to estimates provided in the Draft EA/IS. Question: Please provide rationale as to why this was only completed for select proxy species identified for the Birds VC, or (preferably) include this information in the updated final report.	Community Access Road. These estimates were then extrapolated to the vegetation community assessment that was completed for the Project to develop a population estimate. Data from the 2nd Ontario Breeding Bird Atlas was used because it has the most current information in proximity to the Community Access Road as possible. For most of the bird VCs, density estimates from both Atlas Regions 37 and 44 were used to provide a range of population/abundance. However, in the cases of Boreal Owl, Wilson's Snipe, Mallard, Sora, Common Nighthawk, Eastern Whip-poor-will, Eastern Wood-Pewee, Short-eared Owl, Black Tern, Lesser Yellowlegs, and Yellow Rail, density estimates were either only available from one of the Atlas Regions that overlap with the Community Access Road, or the best available literature on population density was used to extrapolate these densities to the moderate and high value habitats to provide a population estimate. This approach is considered appropriate to address Section 8.9 in the TSIG.		
Aroland First Nation	79	Existing conditions in the PSAs do not show modelled habitat availability for	A: Data collected during the pre-construction phase of the Project	Final EA/IS Section	442

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		SAR birds (e.g., figures), as is the case for all other Bird VC focal species, and per noted commitments of the Study Plan for Bird VCs. The Draft EA/IS notes that additional pre-construction monitoring for the Birds VC is not required. The Study Plan and TISG requirements for Birds VCs note point count recordings will be taken during ground-based point count surveys with human observers; however, paired ARU and breeding bird surveys were not completed for the Project. It is unclear how the data will be analyzed to reduce potential human observer bias. Context: Surveys in 2018 and 2019 were completed prior to the development of the TISG, with noted differences in methods across years. Baseline data collected for breeding birds, nightjars (such as, common nighthawk and eastern whip-poor will), and marsh birds during point count and autonomous recording unit surveys from 2018 to 2022 are assumed to be adequate for pre-construction monitoring; however, the TISG (Section 8.9, Section 8.11) notes that rare species often require additional survey effort and rarity should be accounted for in the survey design, increasing number or duration of surveys, and the design/implementation	occurred between 2018 and 2022. As described in the Final EA/IS, including Appendix L Birds Technical Support Document, extensive pre-construction surveys were completed. Deviations from the Study Design and TISG are provided in Section 4.1 of Appendix L. Due to logistical demands, paired ARU and in-person point counts were not completed; rather it was determined that greater effort should be made to provide as much coverage as possible of the Project Study Area. Additional surveys were completed in 2022 to provide adequate survey coverage of the Project Study Area for all bird VCs. To provide sufficient coverage, the study team used several different survey methods that targeted all known and anticipated species of interest, including rare species. B: Modelled habitat for all bird VCs, including SAR, are described in Section 5 of Appendix L: Birds Technical Support Document. Figures for modelled habitat have been included in Section 8.2.6.6 in the Final EA/IS. C: Section 9 of Appendix L outlines	8.2.6.6	

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		of the study plan occurred before the integration of IK and TEK from local affected First Nations. Although scheduled recording timeframes for ARUs deployed in 2022 provided more frequent data collection (i.e., valuable for detecting rare species), it is unclear if all requirements from Section 15.4 of the TISG will be met for all SAR. Information Request a: Please provide additional information and clarification into same. Information Request b: Please also provide justification for omitting the modelled habitat availability for SAR Bird VC proxy species, or (preferably) include same in the Final Draft EA/IS. Recommendation: AFN requests the Project commit to additional pre-construction and ongoing monitoring of birds at the Project, as indicated further in the comment below. Information Request c: Lastly, please clarify ARU analysis to reduce observer bias, as noted in the Study Plan; and if this information will be included in the BACI study plan to verify the post-construction predictions of the assessment.	recommended monitoring during the active and post-construction stages of the Project, including a before-after control study with targeted surveys for SAR among others. These surveys include both autonomous recording unit and point count surveys.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	80	Mitigation measures for the bird VC include preclearing bird nesting surveys during the migratory bird breeding season (April 28 – August 14; corresponding to the General Nesting Period [GNP] for migratory birds in Zone C5 and C6); in addition, wildlife sweeps for pileated woodpecker nests and raptor stick nests prior to clearing is recommended at any time of year in select habitat types. The GNP is established by ECCC as a guide and establishes when the highest number of birds are likely to be nesting in a given zone. However, birds may nest outside of the GNP and disturbance of active nests is prohibited by the MBCA regardless of timing. Nest sweeps should be conducted in the weeks leading up to and following the GNP. Context: Detectability of migratory birds may change over the course of a survey, varies with type and quality of habitat, density of vegetation growth, and surveyor experience. Given the extent of the areas to be cleared, it is highly likely that nest sweeps may not identify all active nests in advance of clearing efforts Recommendation a: Active nests should not only be located, but the nesting	A: It is important to note that ECCC has developed the General Nesting Period taking into account the variation in breeding bird nesting phenology. The nesting calendar provides a percentage overview of nesting species by date. In Regions C5 and C6 (where the Community Access Road overlaps), there is <5% of all species anticipated to be nesting in these regions during this period. Based on the number of known species in these regions, this accounts for <4 species potentially nesting outside of the recommended dates. Recommendations to the Project schedule have assumed that most construction would occur outside of the General Nesting Periods for Regions C5 and C6 (i.e. construction would occur from August 15 to April 27) so that incidental take is not realized and minimized to the extent possible (if it occurs). Staff and contractors identified to complete nest sweeps will be required to demonstrate proficiency and experience completing bird surveys, in addition to nest sweeps, specifically. In addition, the Biodiversity Offsetting Strategy is being developed so that there is a net gain in terms of benefits for migratory birds, including habitat	Final EA/IS Table 9.4-12 Appendix L	447

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		species should be identified so that appropriate mitigations can be applied. The Guideline to Reduce Risk to Migratory Birds recommends two benchmark measurements that should be applied to determine appropriate setback distance from an active nest: alert distance and flush distance (ECCC, 2021). Recommendation b: Identified nests will require species-specific no work areas (i.e., buffers) and ongoing monitoring to ensure adequate protection is established around active bird nests, or ensure the nests are determined inactive, prior to vegetation clearing during the GNP (e.g., complete sweep within 48 hours prior to disturbance vs. within 3- to 10-days, as breeding birds can construct a nest and lay eggs in as little as two to three days). Bird species have varying tolerances to disturbance; as such, species- specific buffers must be sufficient to mitigate Project-related effects to sensitive species. Operational restrictions must be applied within the buffer; no disturbance is preferred. Recommendation c: Nest sweeps conducted ahead of vegetation clearing must have a validation period. This	restoration and land protection. MFFN confirms nest sweep protocol includes species identification to the extent possible so that protective buffers can be applied that correspond to the species involved. For example, a sensitive species requires a larger protective buffer vs. a species known to tolerate human activity having a smaller protective buffer. B: Protective buffers are flagged in the field so that construction activity does not encroach into this area and field ornithologists will follow-up on the nest to assess when the young have fledged. Additional information has been provided in Table 9.4-12 of the Final EA/IS (formerly Table 9-25 of the Draft EA/IS) that clarifies this procedure. Additional information regarding the pre-construction monitoring for Pileated Woodpecker have been included in Section 9 of Appendix L Birds Technical Support Document. C: We agree timing of nest sweeps is important. During the peak migratory bird nesting season (May 19 through July 30) non-intrusive pre-clearing nest surveys will be completed a maximum of 3 days		

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		validation period must be short enough to ensure new nests will likely not be constructed, or no new eggs are laid between sweeps and the start of construction; but also be long enough to not disturb the nest being monitored. Limited details are provided on the methods or conditions for these surveys (e.g., additional information pending to understand search effort, size of areas, weather conditions, surveyor qualifications, etc.). Sweeps do not supersede the requirements and rigor of survey efforts, especially for sensitive or at-risk species. AFN further recommends (at minimum): - Recommendation d: Annual call playback surveys targeting inconspicuous nesters/cavity-dwelling bird species (e.g., pileated woodpecker, owls), during appropriate times of year, and under appropriate weather conditions. The Migratory Birds Regulations (MBR) under MBCA, protect pileated woodpecker nests year-round, and require surveys to identify the presence of nests, assess their condition, and determine avoidance actions or minimize impacts. If avoidance is not possible, permitting and installation of compensation habitat may be required. - Recommendation e: Commitment to	ahead of vegetation clearing. During non-peak nesting periods (April 28 through May 18 and July 31 through August 14), non-intrusive pre-clearing nest surveys will be completed a maximum of 7 days ahead of vegetation clearing (per Section 14.2.2.3 of the Final EA/IS). D: We agree with Aroland First Nation's recommendation regarding annual call playback surveys. Additional input for call playback surveys on owls and woodpeckers has been added in Sections 14.2.2.3 of the Final EA/IS and Section 9 of Appendix L Birds Technical Support Document so that these species' nests are avoided. E: Commitments outlined in Section 9 describe the follow-up monitoring proposed in the construction and post-construction phases of the Community Access Road. As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		further engagement with AFN to develop and implement ongoing monitoring programs for wildlife, birds and ungulates at the Project.	ensure the inclusion of Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, work with relevant agencies and Indigenous Peoples to establish a Terms of Reference for one.		
Aroland First Nation	81	The evaluation of residual effects to the Birds VC, anticipate sensory disturbance to most species in proximity to the CDA, with varying levels of spatial tolerance. Mallard, chimney swift, barn swallow, and bank swallow do not have identified sensory disturbance limitations like other focal Bird VCs. Context: As noted in the comment above, The Guideline to Reduce Risk to Migratory Birds recommends two benchmark measurements that should be applied to determine appropriate setback distance from an active nest: alert distance and flush distance (ECCC, 2021). The MBR denote other setback distance recommendations. Recommendation: A species-specific guide to Project activity setback distances should be included in the Environmental Protection Plan for the	Rationale is provided in Appendix L Birds Technical Support Document, related to each of the species identified (Mallard, Barn Swallow, Bank Swallow, and Chimney Swift), which explains that these species are not considered sensitive to sensory disturbance and therefore a zone of influence was not identified (e.g., refer to Section 7.3.1.8.2.1 for discussion related to Mallard in Appendix L). Species-specific and environmental protection measures will be implemented as described in Sections 8.2, 9.2, 9.4 in Appendix L and Sections 14.2, 14.3, and 14.4 of the Final EA/IS. Collaboration and alignment with other future projects on mitigation measures will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have	Comment noted; see response for details	449

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Project to ensure consistent protections for all birds. There must also be a commitment from the Project Team to ensure appropriate collaboration and alignment with other future foreseeable Projects. Many focal species evaluated under the Birds VC for the Project are considered species of traditional or cultural importance to AFN.	discussions with the Province regarding the ownership and operations for the Community Access Road. It is expected that future developments would implement similar best management and mitigation practices to avoid and minimize cumulative effects on bird VCs and other taxa.		
Aroland First Nation	82	Eastern whip-poor-will call playback survey locations identified in the study plan note only one existing and one additional proposed station along the preferred route alternative. All stations targeting this species in the Study Plan are located south of Dusey Lake. Sampling effort for eastern whip-poor-will in 2022 placed 8 ARUs in the same locations as those sampled in 2019 (i.e., only one location on the preferred route alternative was sampled). Context: AFN notes IK and information on Indigenous land and resource use/cultural values were not available at the time of the design/implementation of bird field programs supporting the baseline characterization of Bird VC proxy species at the Project. AFN has identified eastern whip-poor-will (among other proxy species chosen for the Draft	The study plan for birds considered IK, where possible, and other datasets to determine suitable survey conditions for all bird communities, species, and SAR. The surveys proposed for bird Valued Components and SAR were largely influenced by the best available datasets, scientific literature, professional knowledge and IK available at that time. In the case of Eastern Whip-poor-will (EWPW), the northern two thirds portion of the Project study area is located north of the known species range in Ontario. This is based on several sources, including but not limited to eBird (2025), the Ontario Breeding Bird Atlases (1st – 1981-1985, 2nd – 2001-2005; and 3rd – 2021-2025), and COSEWIC species status report. Survey coverage for Eastern whip-poor-will was therefore limited to the southern portion of the	Comment noted; see response for details	450

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		EA/IS), as a species of traditional and cultural importance, with observations in the Traditional Territory. Despite increased ARU sampling effort in the PSA, there are minimal results available for eastern whip-poor-will along the preferred route alternative. Similarly, there were no ARUs deployed for short-eared owl within the preferred route alternative LSA. No targeted surveys were completed for these SAR, and no ARUs were deployed in the RSA to use as comparison to verify the predictions of the Draft EA/IS. The limited results presented for these species does not necessarily indicate their lack of presence or occurrence within the PSAs. It is unacceptable to AFN that the Project has noted baseline surveys are sufficient to describe pre-construction conditions for the Birds VC (including SAR proxy species) and no further pre-construction surveys are required to validate the predictions in the assessment. Recommendation: Please refer to the comments above for AFNs recommendations and requirements for monitoring the Birds VC during all phases of the Project, so satisfy AFN rights and interests.	Project study area based on the species known range. For Short-eared Owl, habitat considerations (i.e., areas large enough to support individuals and pairs) were reviewed in correlation to the Project Study Area, along with known data on the extent and occurrence of species records from the general area, using sources such as eBird (2025), the Ontario Breeding Bird Atlases (1st – 1981-1985, 2nd – 2001-2005; and 3rd – 2021-2025), and COSEWIC species status report. Locations for targeted EWPW surveys were based on the suitability of habitat for EWPW (open forests) and is outlined in greater detail in Appendix L Birds Technical Support Document (refer to Attachment B, Sections 4.2.3 and 4.2.4). A total of 54 ARU survey plots were positioned to detect nocturnal breeding birds, and an additional 13 ARU survey plots were positioned to detect targeted SAR birds. All ARUs, regardless of program, were screened for the presence of EWPW and SAR; these were positioned across the Project Study Area with an objective to maximize detection for all breeding birds, including EWPW.		

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			The ARU program was designed to capture SAR; however, we acknowledge coverage was not sufficient or targeted for Short-eared Owl. Regardless, breeding bird programs in addition to aerial flights provided the opportunity to detect Short-eared Owl, if present. Additional monitoring programs (Section 9.3 in Appendix L) outline the proposed post-construction monitoring that will be implemented, including targeted surveys for nightjar (Eastern Whip-poor-will) and owl (Short-eared Owl).		
Aroland First Nation	83	Annexure A: Bird Species List Comment: Although a comprehensive listing of species observed during baseline surveys has been provided in Annexure A, it appears several species denoted as not observed during baseline surveys were actually observed (e.g., short-eared owl detected on deployed ARU in 2022). Information Request: Please review and correct Annexure A to reflect all positive detections in the PSAs for listed species. For those confirmed “Yes”, please include the method of detection (e.g., ARU, point count, aerial, etc.), and year (i.e., unless observed in all years).	Short-eared Owl was not detected during field data collection in support of the Community Access Road. Table 4-9 of Appendix L Birds Technical Support Document indicates that one acoustic recording unit was set-up to target the species, given the habitat it was placed in. However, as stated throughout Appendix L, Short-eared Owl was not documented on the ARU detectors or other surveys that were completed as part of the broader birds program. The species list has been thoroughly re-reviewed to confirm species that were and were not observed during the	Comment noted; see response for details	452

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			baseline surveys. The method of detection and year observed have not been included. Annex A is complete and up-to-date in the existing format.		
Aroland First Nation	84	The figures in the Draft EA/IS indicate large portions of the region are “Federal Lands”. Corresponding figures in the Appendix also suggest large portions of the region are “Federal Lands”. There are several copy/paste errors (e.g., table numbers, misspelled words) and incomplete sentences throughout the Appendix and Draft EA/IS, making it difficult to fully understand the information provided. Recommendation a: Please update the figures for accuracy and consistency with other sections of the Draft EA/IS. The clear delineation of federal and non-federal lands relating to SAR is another requirement of the TISG (Section 15.4). Recommendation b: Please correct typographic errors throughout the Draft EA/IS and Appendix M for clarity.	A: The reference to federal lands has been removed from Figures 8-34, 8-35, 8-36, 8-37 and 8-38 of the Draft EA/IS (Figures 8.2-28, Figure 8.2-29, Figure 8.2-30, Figures 8.2-31, and Figure 8.2-32 in the Final EA/IS) as well as from the figures in Appendix M. B: A review of table numbers and spell check on the Final EA/IS and Appendix M has been completed for clarity.	Final EA/IS Figures 8-34, 8-35, 8-36, 8-37 and 8-38 Appendix M	522
Aroland First Nation	85	While boreal woodland caribou and eastern migratory caribou share many similarities, they differ significantly in their migratory patterns and seasonal use of	A: MFFN acknowledges the request by Aroland First Nation to be involved in the development and implementation of programs that benefit caribou. Refer to	Comment noted; see response for details	523

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		habitats. Ontario has developed a General Habitat Description for boreal woodland caribou but not eastern migratory caribou; as such, similar habitat protections are not applicable for eastern migratory populations. Overall, there appears to be uncertainty about population trends in the caribou RSA. There is clearly a need for more data to fully understand potential Project impacts to woodland and eastern migratory caribou, in the southern and northernmost portions (respectively) of the RSA. Recommendation a: AFN requests involvement in the development and implementation of any programs that provide overall benefit to caribou within the Traditional Territory. Context: Suitability of habitat for caribou may be altered or isolated from preferred baseline habitat existing conditions as a result of the Project (i.e., northern portions of the PSAs). Given the current lack of fragmentation and disturbance in the northern portions of the RSA, preference or use of this habitat by caribou (boreal woodland or eastern migratory) is likely to change as a result of the Project; however, the magnitude of these changes is unknown due to the	Section 9 of Appendix M: Ungulates Technical Supporting Document for a description of monitoring studies and offset programs developed for caribou and their habitat. As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, work with relevant agencies and Indigenous Peoples to establish a Terms of Reference for one. B: Refer to Section 9 of Appendix M: Ungulates Technical Supporting Document for a description of monitoring studies and offset programs developed for caribou and their habitat. Further development and implementation of ongoing studies to fill caribou information gaps is not proposed.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		current lack of data available for all subpopulations. These changes also represent potential alteration to the availability and harvest of traditional use species, such as caribou; and ultimately the transition of Traditional Ecological Knowledge and Indigenous Knowledge of the lands and waters within the Traditional Territory to future generations. Recommendation b: AFN further requests the Proponent collaborate with AFN on the development and implementation of an ongoing study to fill information gaps relating to caribou in the southern portions of the PSAs within AFN Traditional Territory, especially considering the entire Project is within critical habitat for caribou, biophysical attributes and objectives to maintain 65% undisturbed habitat are priorities for the provincial and federal governments (Agreement for the Conservation of Caribou, Boreal Population in Ontario, 2022), and caribou are considered a species of traditional and cultural significance for AFN.			
Aroland First Nation	86	Cervid Ecological Zones defined in the framework by MNR, and used to characterize the baseline conditions for moose, provide broad management	We understand that the Cervid Ecological Framework (CEF) underlines management strategies for caribou in Ontario. Section 5.1.3.3.2 of the	Comment noted; see response for details	524

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		guidance for other focused ungulate valued components (e.g., caribou). This was not identified in the Draft EA/IS. Context: The Cervid Ecological Framework (CEF) also underlines broad management strategies for caribou in Ontario, and is focused on species and population recovery through landscape-scale habitat management and minimization of stressors. The CEF uses a tiered approach to establish requirements and conditions for caribou that would ensure no net loss of undisturbed habitat resulting from the Project. It emphasizes the importance of maintaining large and undisturbed natural habitats (as these factors are crucial for caribou survival and movement), and includes the potential establishment of new management areas for caribou. The framework also integrates the management of caribou with other cervids (e.g., moose, deer) across seasons, and addresses threats like human activities that alter hydrological patterns. Recommendation: This information should be included in the Draft EA/IS mitigation measures and baseline management information for caribou and	Appendix M: Ungulates Technical Supporting Document identifies that the Community Access Road occurs in Cervid Ecological Zone A, and this zone is managed with caribou as the focus species while moose and white-tailed deer are maintained at low densities.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		not just moose.			
Aroland First Nation	87	In the southern portion of the RSA, there are moose aquatic feeding areas, calving sites, and mineral licks. None have been documented in the LSA, but they likely exist and just have not been documented yet. Similarly, significant wildlife habitat (SWH) has been described only for moose but also apply to other wildlife and plants. This information was not provided in other applicable sections of the Draft EA/IS. Context: SWH in Ontario is divided into four broad categories, including: seasonal concentration areas, rare vegetation communities or specialized habitats for wildlife, habitats of species of conservation concern (excluding habitats of endangered/threatened species), and animal movement corridors. SWH may be applicable to several other focused VC species/habitats included in the characterization of the baseline for the Project, but this was not assessed outside of the potential impacts to SWH of moose, likely due to the lack of information available for the 2E and 3W ecoregions (i.e., where the project is situated). As a result, potential SWH for other species may be overlooked (e.g.,	There are no Ecoregional Criteria Schedules available for identifying significant wildlife habitat in the ecoregions 2E and 2W where the Community Access Road occurs. However, the guidance from the nearest available ecoregion (3E) was considered in the development of EA/IS habitat modelling which evaluated the availability and distribution of important habitat / suitable habitats for the following valued components: bats (little brown myotis and northern myotis), American marten, and amphibians. The habitat suitability models are based upon the known habitat preferences informed by a literature review. For example, bat hibernacula and bat maternity roost habitat, American marten denning habitat, amphibian breeding habitat are SWH in Ecoregion 3E (and elsewhere). These habitats assessed in the characterization of existing conditions in Appendix K: Wildlife Technical Support Document. For habitat generalists, such as eastern gartersnake, wolverine, and pollinating insects, habitat models were not developed. However, the requirements of	Comment noted; see response for details	525

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		failing to identify and protect SWH during construction or operations and maintenance phases may lead to habitat loss, fragmentation, degradation, etc.) or significance may be underrepresented in the impact assessment (e.g., AFN identified areas of turtle nesting SWH that were not captured in the Draft EA/IS, noting eastern gartersnake is the only reptile in the PSAs). Recommendation: Please provide a fulsome assessment of potential SWH for all focal species identified in the Draft EA/IS as the most conservative approach to the assessment or include rationale as to why SWH was only considered for moose.	important habitat features (e.g., snake hibernacula) were described qualitatively in the assessment of existing condition informed by a literature review. Habitat assessments conducted in Appendix K are considered to meet the requirements the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans.		
Aroland First Nation	88	Existing information describes moose populations in Ontario in decline, particularly in the northern portions of their range; with at least one management unit overlapping the PSAs below the 2030 population objectives. There appears to be overall uncertainty around the population trends of moose in the ungulate existing condition PSAs. Similarly, there is uncertainty around population trends of caribou in the PSAs. Moose and caribou are among other ungulate species of traditional and	We note that draft EA/IS was completed using AFN IK information received at that time. Since completion of the draft EA/IS, AFN has provided a September 2024 report that includes additional IK data, including those related to moose and caribou. Section 3 in Appendix M: Ungulates Technical Supporting Document describes how this information has been incorporated into the assessment. We confirm the Environmental Protection	Comment noted; see response for details	526

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		cultural importance to AFN, and it is of utmost importance that ungulate species are managed appropriately throughout the duration of the Project. Context: AFN notes that TEK and IK from AFN, was not included in the Ungulates Technical Support Document. There is extensive data collected by AFN harvesters and land users that can contribute to the Project's characterization of existing conditions for the Ungulates VC, and potential sensitive locations that require additional protections by the Project. Recommendation: AFN requests specific provisions for traditionally important ungulates that include an Ungulate Management Plan as part of the overall Environmental Protection Plan. The Ungulate Management Plan must include (at minimum): - Collaboration with Proponent and future foreseeable Project Teams that ensure consistent and adequate protections for focal species representing the Ungulates VC in the long-term. - Expanding riparian buffer zone protections to 100m around waterbodies or wetlands providing moderate-high	Plan will be comprehensive in consideration to ungulate mitigation measures and management. The EPP will include measures reported in Appendix M; however, a distinct Ungulate Management Plan is not proposed at this time.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		quality habitat (i.e., equal to riparian area assessment for birds). - Wildlife policy must include a temporary 'stop work' requirement for incidentally encountered ungulates - that would allow individuals time and space to pass through the CDA without expending valuable energy to avoid sensory disturbances (i.e., stop work for 15-30 minutes allowing individuals to pass through area undisturbed). Incidentally encountered wildlife must be identified and reported during all phases of the Project, and data will inform adaptive management measures and monitoring efforts moving forward. - Mortality investigations involving ungulates must include tissue sampling for factors affecting human health and/or to improve baseline information (i.e., Chronic wasting disease, heavy metals, pregnancy, etc.), if decomposition or conditions do not compromise testing. This information must be used to inform adaptive management measures and monitoring efforts moving forward. - Progressive and final rehabilitation and reclamation measures must include targeted habitat enhancements and/or replacement measures that provide overall benefit to ungulates at the Project. This should also include ways to			

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		mitigate line of sight issues (i.e., deters predation), forage accessibility (i.e., lichen-dominated habitat replacement), and strategic plantings or vegetation management measures to encourage or discourage habitat use in select areas that benefit ungulates for use by AFN. - Signage along the CDAs must inform vehicle traffic of high-risk wildlife crossing areas and reduce speed limits within 50km of identified sensitive areas. Regular security should patrol constructed road networks in collaboration with future foreseeable Projects in the PSAs, to enforce limitations or access restrictions, and report collisions/conduct testing, as required. - Limitations on the use of air breaks must be considered as a sensory disturbance mitigation measure during critical sensitive timeframes while the road is in the operations and maintenance phase			
Aroland First Nation	89	ECCC has identified caribou habitat overlapping the Project PSAs and must therefore be subject to the bilateral Sections 10 and 11 SARA agreement (2022) between Canada and Ontario, that includes collaboration with Indigenous communities. AFN is deeply	The Agreement for the Conservation of Caribou, Boreal Population in Ontario (2022), pursuant to Sections 10 and 11 of the Species at Risk Act, is an agreement between the federal and provincial governments. The purpose of the agreement is to support the	Final EA/IS, Section 9.4.5.1	527

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		concerned that this information was omitted from the Draft EA/IS and supporting Appendix M (Draft Ungulates Technical Support Document) yet remains directly applicable to the species' management at the Project. Recommendation: AFN requests the Draft EA/IS and Appendix M be updated with the requirements of the Sections 10 and 11 SARA bilateral Agreement. The Project must adhere to various conservation measures and objectives of the agreement, including the implementation of caribou-specific Range Management Policy principles, Recovery Zones (based on ecoregion boundaries, known caribou use, and regional threats), and action plans that focus on specific needs of caribou. This is especially important to AFN because of the potential cumulative effects associated with the future foreseeable developments and linear disturbances predicted to occur with the approval of the MFCAR, and the continued uncertainty around residual effects to populations of focal species representing the Ungulates VC assessed by the Project.	implementation of conservation measures by the two signatories on the Agreement: Environment and Climate Change Canada (ECCC) and the Ministry of Environment, Conservation and Parks (MECP). The additional recommended text acknowledging the Agreement has been added to Section 9.4.5 of the Final EA/IS. However, as a proponent proposing development in caribou range, we cannot make commitments to develop and implement Range Management policies and principles and identify recovery zone as it is the responsibility of the provincial government. It is also the responsibility of the signatories of the Agreement (ECCC and MECP) to provide guidance and requirements to the Project team for mitigations and offsetting (through permitting processes) that align with the principles outlined in the Agreement.		
Aroland First Nation	90	Indicates there "may be" dust suppression activities. A road of this	We understand your concern about dust from the Community Access Road	Comment noted; see	528

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		speed, construction, and traffic levels will create dust that will not only impact the safety of users but the surrounding environment. Covering localized vegetation in dust makes it unavailable for use or the collection of plants for cultural purposes. Recommendation a: Dust mitigation plan should ensure that dust is controlled to the 100-m ROW and does not extend past the ROW, impacting sites identified by AFN or other communities. Recommendation b: AFN recommends that, as a condition of approval for this Project (if approved), the Proponent be required to develop a dust management plan that identifies how dust will be minimized through construction and operation of the road, expected levels of acceptable dust suspension and dust fall, and monitoring and management approaches for intervening if dust exceeds acceptable limits. This can be modelled after existing gravel highways with similar speeds from across Canada in remote areas (e.g. Robert Campbell Hwy in the Yukon).	affecting safety, the environment, and culturally important plants. The Final EA/IS includes the development of a fugitive dust management plan prior to construction as a mitigation and enhancement measure. Please refer to Table 9.5-19 of the Final EA/IS for more information.	response for details.	
Aroland First Nation	91	Lacks monitoring plan details.	The Environmental Assessment / Impact Statement and the Technical Support	Comment noted; see	529

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Context: The construction and operation phase will increase air, dust, noise, and vibration increase on AFN, serving as access to the construction area. Recommendation: AFN recommends that the proponent develop a base plan to monitor impacts on the community and any identified sites along the route.	Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. The development of a base plan is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.	response for details.	
Aroland First Nation	92	The draft EA states that AFN is continuing the planning process to develop a Community Based Land Use Plan under the Far North Act. This is incorrect as the province withdrew funding for AFN in 2020 and ended AFN's participation in this process. Were AFN allowed by Ontario to continue this process, the LSA would fall within lands under jurisdiction of AFN's Community-Based Land Use Plan and it is possible that adverse effects to Land Use Compatibility VCs would be identified. Recommendation a: Please update the wording to accurately reflect the current status that AFN is not continuing the planning process because Ontario withdrew funding for AFN's participation. Recommendation b: Furthermore, as	A: Appendix U: Land and Resource Use Technical Support Document has been updated to indicate that: The Crown Land Use Policy Atlas identified permitted or authorized public land use for the areas that fall outside of the Far North (Painter Lake Road) and the 'Draft' Marten Falls First Nation Community Based Land Use Plan assisted in identifying current and future land uses in the Area identified within the Far North. B: We acknowledge Aroland First Nation's request to be engaged and participate in the development of Marten Falls First Nation's Community Based Land Use Plan. However, the CBLUP process is outside the scope of the EA/IS.	Appendix U	530

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		expressed in the Draft EA/IS, AFN would like to resume their participation in the Community-Based Land Use Planning process, including through participation and engagement with MFFN in their planning process. AFN and MFFN share a significant portion of their territories, including a significant portion within the SA, and AFN would like to be engaged and included in MFFN's planning process, including in the final decision-making process about the final plan.			
Aroland First Nation	93	The Proponent recommends that MFFN be involved in planning activities related to new developments in the RSA that may occur because of the Project, with justification due to MFFN's CBLUP. AFN is not included in this recommendation, despite significant overlapping territory with MFFN in the RSA. Recommendation: AFN believes that due to the significant overlap in AFN and MFFN's territory within the RSA, and that AFN's own CBLUP was defunded by Ontario that the Proponent should also recommend that AFN be involved in land and resource use planning activities to manage new development that may occur due to the Project, at least within AFN and MFFN's shared territory.	Marten Falls First Nation acknowledges Aroland First Nation's interest in land and resource use planning, and we appreciate your feedback and the time you have taken to share your perspective. However, the comments are directed at the provincial government and outside the scope of the Community Access Road and EA/IS. We would therefore encourage you to direct these to the regulators, as they will be best positioned to address them.	Comment noted; see response for details.	531

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	94	Section claims that trapping is less common due to decline in fur prices and rising cost of inputs and then states, “Trapping is now largely recognized as a pastime and a way to preserve Indigenous culture and not a commercial activity.” This framing could be interpreted to undermine AFN band members Aboriginal and treaty rights, and the importance of trapping as a method of cultural expression, continuity and education. Context: Trapping, like hunting, fishing and gathering, is a way of life for AFN band members and is enshrined in their Aboriginal and treaty rights. The current decline in the economic value of trapping should have no bearing on the Crown’s duty to ensure that trapping is protected and that any potential impacts to trapping by the Project are understood and mitigated. Recommendation: The section should be rewritten to emphasize the importance of trapping as a way of life for First Nation peoples in the region, and to recognize the potential land use incompatibility between the Project and trapping.	We acknowledge the importance of trapping to Aroland First Nation. Section 8.3.9 in the Final EA/IS has been updated to further reflect the cultural importance of trapping for Indigenous Communities in the region. We note that this section is related to "Life on our Land". In other words, this section describes existing conditions within the established spatial boundaries; commentary on compatibility of the Community Access Road with trapping is presented in Section 9.5.7.	Final EA/IS Section 8.3.9.6	532
Aroland First	95	Draft EA/IS states “the total area	We note that consultation with trapline	Comment	533

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Nation		removed/potentially disturbed by the combined projects is still relatively small compared to the size of the trapping tenure. As such, the cumulative effect is low to moderate in magnitude and considered to be non-significant." However, the Draft Land and Resource Technical Support Document states that for each trapline that intersects the LSA, specific information from the trapline holder was unavailable, with no comment about if or how the Proponent attempted to engage trappers. Context: AFN does not agree that the Proponent can make the assertion that impacts to trapping will be "non-significant" without conducting meaningful consultation with trapline holders in the LSA. Consultation to determine the level of significance of impacts must consider where trappers set up their traplines within their tenure, and other factors that influence this geography, including quality of the area for the purpose of trapping, location of furbearing animals, travel and transportation routes, overnight locations and areas of cultural significance. Furthermore, the opening up of the area to other travelers and land users by the Project indicates a significant potential	holders is managed through MNR, and this process can make obtaining specific information difficult. No direct concerns or feedback from trapline holders has been received for inclusion in the Land and Resource Use assessment. Section 11 of the Final EA/IS and Appendix X: Consultation Record provides extensive documentation on engagement efforts to solicit information and feedback related to the Community Access Road. For example, on May 28 and 29, 2025, MFFN held meetings for Aroland First Nation members as part of PIC #6. At these meetings information and maps related to Land and Resource Use were provided, and community members noted general areas of known traplines. Section 3 in Appendix U: Land and Resource Use Technical Support Document has been updated to document the additional information received. Section 8.3 in Appendix U notes that the area disturbed by the combined projects is relatively small compared to the size of the trapping tenure, which is a key factor influencing the significance rating in the absence of feedback from the tenure holder. Cumulative effects to trapping remain to be considered not significant.	noted; see response for details	

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		for cumulative impacts that could put stress on furbearing animal populations. Recommendation: AFN asks that the Proponent provide a detailed rationale as to how they have determined that cumulative impacts to trapping will be non-significant, provide further opportunities to consult with trapline holders, particularly AFN band members who are the trapline holders for GE148 and GE 153, and to commit to a follow-up monitoring program to capture the ebb and flow of furbearing population sizes over at least the			
Aroland First Nation	96	An Environmental Protection Plan will be implemented, in part, to address and mitigate potential impacts to trapping in the LSA during the construction phase. Recommendation: AFN would like to be included in the development of any Environmental Protection Plan for the LSA, especially as it pertains to access restrictions and operational considerations such as speed limits. AFN would also like these measures, or similar, to pertain to the operations and maintenance phase of the project.	The development and implementation of the Environmental Protection Plan (EPP) will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road. The EPP will be shared with Aroland First Nation. The content of the EPP will be established during detail design; however, it is expected to focus on environmental mitigations and management related to construction. Relevant content will be carried forward into the operations and maintenance	Comment noted; see response for details	534

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			phase of the Community Access Road.		
Aroland First Nation	97	In determining potential effects on trapping during the operations and maintenance phase, impacts from dust were not considered. Recommendation: Consideration of potential impacts to trapping should include effects from dust to trapping, including impacts directly to trappers on the land and to the populations of furbearing mammals.	The potential for Community Access Road construction and operations to release dust and affect furbearer habitat quality, and subsequently trapping, was considered in the development of the Land and Resource Use assessment. However, the wildlife assessment in Appendix K: Wildlife Technical Support Document includes an assessment of fugitive dust emissions on all wildlife valued components; the effect was rated as negligible in magnitude and not significant. As a result, further assessment of dust impacts on furbearers and trapping in Appendix U is not required.	Comment noted; see response for details	535
Aroland First Nation	98	Traditional foods is listed as a VC, with the rationale for selection being the potential for contamination due to construction and operations activities, and availability changes due to habitat disturbance or increased harvesting pressure. The potential for changes in availability of traditional foods as a result of behavioural shifts from perceived contamination has not been considered. Recommendation: AFN requests that the community well-being study assess the	A baseline country foods sampling program was conducted during the In Community Meeting held at the end of May 2025. Thirty seven samples including blueberries, moose, goose and walleye were submitted for laboratory analysis. Detailed results will be presented to the Marten Falls and Aroland communities. A summary of the program and the results has been included in Attachment A Problem Formulation Report in Appendix T: Community Well- Being Technical	Appendix T	536

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		potential for changes in consumption of traditional foods due to behavioural shifts related to perceived contamination. The assessment should include a current baseline of traditional food consumption patterns for AFN members, with regular future monitoring of consumption patterns and attitudes towards harvesting traditional foods to appropriately determine if shifts in behaviour have occurred as a result of the Project, and/or as a cumulative effect from multiple future projects within AFN's Traditional Territory.	Support Document. The Environmental Assessment / Impact Statement and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. The development of a traditional foods consumption study is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.		
Aroland First Nation	99	The magnitude definitions for the "Consumption of Traditional Foods" VC is based on only improved access to traditional harvesting sites and the potential positive effects that may arise from the Project. The definitions do not consider the potential for negative effects to the consumption of traditional foods. Recommendation: In order to properly and fully assess the potential impacts of the Project on AFN, it is important that both positive and negative effects are discussed and defined in the IA process. The magnitude definitions for the "Consumption of Traditional Foods" VC should include the possibility for potential	We agree the potential for negative effects should be considered for the Consumption of Traditional Foods VC. The definitions in Table 4-8 of Appendix T: Community Well-Being Technical Support Document have been updated to reflect the potential decreased availability of traditional foods.	Appendix T, Table 4-8	537

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		decreased availability of traditional foods as a result of increased external pressures, perceived and/or actual contamination and food quality risks, decreased availability of traditional foods because of direct project impacts to the quantity of harvested species, etc.			
Aroland First Nation	100	AFN members have expressed concerns about contamination in traditional foods, however no contaminant analyses have taken place to form a baseline of existing conditions for traditional food contaminant concentrations. Context: Despite the concerns that have been expressed by AFN members regarding contamination of traditional foods from glyphosate and various industries, no baseline data on existing conditions has been collected for tissue concentrations for key harvested species, nor has a baseline traditional foods consumption survey been completed. Recommendation: AFN requests that these traditional foods assessments take place, so that appropriate mitigation measures can be implemented, if necessary, to minimize potential cumulative effects on AFN member	A country foods sampling study conducted in support of the Community Access Road EA/IS is described in Attachment A (Problem Formulation Report for Human Health Risk Assessment) to Appendix T: Community Well-being Technical Support Document. Laboratory analysis of tissues and berries was conducted for substances of interest. A total of 37 samples were collected in Aroland First Nation and Marten Falls First Nation, including 14 samples of blueberries, 5 samples of Canada goose, 8 samples of moose, and 10 samples of walleye. Section 5.4.6 in Attachment T lists the chemicals of potential concern analyzed for the program and the rationale for their selection. This section also identifies the relevant feedback and Indigenous Knowledge received by Aroland First Nation to date, which does not include concerns related to glyphosphate. We	Comment noted; see response for details	538

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		concerns with traditional foods and further shift consumption patterns away from traditional foods to purchased foods.	note that herbicide use is not proposed during Community Access Road operation; the Final EA/IS has been updated for clarity around use of herbicides. The country foods sampling and analytical program is considered appropriate for the purposes of completing the Problem Formulation Report in accordance with the Tailored Impact Statement Guidelines and Terms of Reference. Further baseline sampling and analysis is not proposed.		
Aroland First Nation	101	No screening of available field study data against human-health risk-based standards has been completed for inclusion in the problem formulation, nor has a country food sampling program and accompanying traditional food consumption survey taken place. Context: It is imperative that the existing baseline conditions are appropriately characterized prior to Project approval decisions, so that risks can be fully understood and mitigated against. Prior to any approval decisions being issued for the Project, AFN requires that: • Recommendation a: Available field	A: An updated Problem Formulation Report for Human Health Risk Assessment has been included as Attachment A to Appendix T: Community Well-being Technical Support Document. This report describes the country foods sampling study conducted in support of the Community Access Road EA/IS. Analytical results from this program have been screened against human health risk based standards, as described in Section 5 in Attachment A. B. A country foods sampling study is also described in Attachment A. Laboratory analysis of tissues and berries was	Appendix T; Attachment A	539

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		study data is screened against human health risk-based standards and included in the problem formulation, with a corresponding quantitative human health risk assessment if deemed appropriate based on the screening. AFN requests an opportunity to review and provide input and comment to the screening outcomes and potentially accompanying risk assessment. • Recommendation b: A country food sampling program is undertaken, with meaningful input from AFN on its design and implementation, to determine a baseline for contaminant concentrations in the tissues of traditional foods harvested by AFN members. The sampling program must consider the specific parts of the plants and animals that are consumed by AFN members, be adequately representative of the species consumed (e.g., statistically significant sample sizes for the species being analyzed), and appropriately reflect the seasons in which they are harvested and consumed. The data resulting from the country food sampling program must be assessed as part of the problem formulation, and be used as a baseline of conditions for comparison in future, ongoing monitoring programs aimed at assessing potential impacts of the	conducted for substances of interest. A total of 37 samples were collected in Aroland First Nation and Marten Falls First Nation, including 14 samples of blueberries, 5 samples of Canada goose, 8 samples of moose, and 10 samples of walleye. The results obtained are treated as Indigenous Knowledge and subject to confidentially agreements; however, detailed analytical results have been compiled in a separate Country Foods and Water Use Assessment report and will be provided to Aroland First Nation. The country foods sampling program is considered appropriate for the purposes of completing the Problem Formulation Report in accordance with the Tailored Impact Statement Guidelines and Terms of Reference. Further baseline sampling is not proposed. C. Section 5.1.9 in Appendix T provides a description of Aroland First Nation access to and consumption of traditional foods, based on information received via engagement with Aroland First Nation. This information was used to develop the country foods sampling program, and we note that some samples such as goose were provided directly from Aroland First Nation members. This approach is		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Project. • Recommendation c: A household dietary survey is undertaken, with appropriate representation from AFN members, that is used to assess potential exposures in the human health risk assessment. The survey must be designed such that it can be replicated in the future, to monitor potential shifts in traditional food consumption patterns resulting from the Project, its contribution to cumulative effects within AFN's Traditional Territories, and potential behavioural shifts from perceived effects to traditional food quality.	considered to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. A household dietary survey is not proposed.		
Aroland First Nation	102	Table 9-1 suggests that a quantitative human health risk assessment should take place for the inhalation of vapours and/or suspended particles in the air. There is no mention of if and when such a risk assessment will take place. Recommendation a: As per the recommendation in Table 9-1, AFN requires that a quantitative human health risk assessment for inhalation of vapours and/or suspended particulates in air be completed, prior to a Project approval decision. Recommendation b: AFN requests	Attachment A of the Community Well-Being Technical Supporting Document (Appendix T) included the draft problem formulation (Attachment A to Appendix T). The paragraph before Table 9-1 of Attachment A noted the following: "The pathways detailed in Table 9-1 were deemed potentially complete. Based on the results of the recommendations above, further refinements of this table will occur with subsequent drafts". The problem formulation was refined for the Final EA/IS. The pathways detailed in Table 9-1 of the Final Attachment A were deemed complete. The recommendation	Appendix T	540

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		sufficient time and opportunity to review and provide comment on future human health risk assessments that will be completed as part of the EA process for this Project.	has been updated to: "No additional risk assessment has been completed at time of writing. Conservative models indicate potential exceedances of air criteria. Gravels and quarry materials for road construction should be chemical characterized for metal contaminants (e.g. arsenic, cobalt, vanadium and others)." The Community Well-Being Technical Support Document was prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. The completion of a quantitative human health risk assessment is not a regulatory requirement and as such was not completed as part of the Final EA/IS.		
Aroland First Nation	103	There is no information on how climate change may contribute to the Project's potential impacts to human health. Recommendation: AFN requests that the assessment of community well- being, and in particular the assessment of biophysical determinants of health, explicitly identify and evaluate potential impacts or exacerbation of predicted effects to human health due to climate	The Community Well-Being Technical Support Document (Appendix T) was prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Assessing biophysical determinants of human health, explicitly identifying and evaluating potential impacts or exacerbation of predicted effects to human health due to climate	Comment noted; see response for details	541

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		change.	change is not a regulatory requirement and as such was not assessed as part of the Final EA/IS.		
Aroland First Nation	104	Table lists Cultural Heritage Sensitive Receptors by segments throughout the proposed right of way within the PSA and CDA. The table does not include sites identified by AFN's IKLU study. Recommendation: The final report must include any cultural heritage values identified in AFN's IKLU study that may be within the CDA or PSA and evaluate for magnitude of impact. Edits to this table must be identified to AFN.	Table 3-1 of Appendix V: Visual Environment Technical Support Document has been revised to incorporate Aroland First Nation's identified cultural heritage values related to the visual environment, as documented through the IKLU study. This information includes the numerous traditional use areas and the broader sense of place tied to the remote wilderness character of the Study Areas. These values have been fully integrated into the Visual Environment effects assessment (Section 7 in Appendix V). Furthermore, a new Valued Component— Cultural Heritage Resources and Indigenous Experience and Sense of Place—has been added where these perspectives are explicitly assessed in relation to visual change. The existing conditions for this Valued Component are described in Section 5.2, and the corresponding effects assessment is presented in Section 7.3.	Appendix V	542
Aroland First Nation	105	Mitigation measures for Cultural Heritage Resources includes ground truthing	Should the Community Access Road EA / IS be approved to proceed, a	Comment noted; see	543

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		sensitive receptors within CDA. Recommendation: The Proponent must invite AFN monitors in any work related to ground truthing to identify potential effects to sensitive receptors, including the provision of adequate capacity funding for AFN participation.	consultation and engagement program will be established to guide discussions through detail design. Future field programs, including ground truthing cultural heritage receptors, will be the responsibility of the owner/operator of the Community Access Road. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road. The owner/operator will reach out to Aroland First Nation for opportunities to be involved in future cultural heritage field work as appropriate. At this time, there are no funding provisions associated with Indigenous Community participation in development of the Community Access Road. Future funding requests and opportunities will be addressed by the owner/operator.	response for details	
Aroland First Nation	106	The Draft Cultural Heritage Technical Support Document has identified one site of cultural significance for AFN. This is not accurate or reflective of the information that AFN provided in the MFCAR IK report in September 2024 It is expected that the information from AFN is included and an updated comprehensive assessment will be	We note that the IK report from Aroland First Nation (September 2024) was received in the late stages of draft EA/IS, and could not be incorporated into the draft EA/IS at that time. Section 3 of Appendix Q: Cultural Heritage Technical Support Document has been updated to describe how all IK information received to date has been incorporated into the	Appendix Q	544

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		completed prior to the final EA being released. Recommendation: The Proponent must consider all information provided in the AFN as it relates to sites of cultural heritage as identified in the Draft Cultural Heritage Technical Support Document (harvest areas, travel routes, habitation areas, and cultural, spiritual, and sacred sites.	cultural heritage assessment.		
Aroland First Nation	107	The report presents the notion that the current environment is the same as it would have been 2,000 – 5,000 years ago and does not account for changes to the landscape, especially as a result of human disturbance through damn construction and the fluctuation of water levels. Recommendation: The report should be updated to reflect how the environment would have looked in the past, and must consider the impacts of human disturbances on the landscape.	The intent of Section 1.3 of Appendix R (Archaeological Assessments) is to provide a general overview of the history of the study area for archaeological context; not to provide a detailed historical discussion. The current description, which includes direct references to recent human disturbances such as dams and the resulting fluctuation in water levels, is considered appropriate to address the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans.	Comment noted; see response for details	545
Aroland First Nation	108	The use of LiDAR is not discussed. The assessment relied on Satellite Imagery but neither the source of the imagery nor the resolution is disclosed.	All available mapping resources—including high resolution LiDAR data—were reviewed and incorporated into the evaluation of archaeological potential for	Comment noted; see response for details	546

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Information Request: The Proponent must explain why LiDAR, which is more reliable than satellite imagery and topographical maps was not used. Regarding the use of satellite imagery, the Proponent must disclose the source of the imagery and the resolution of the images.	the archaeological assessments presented in Appendix R. This information was analyzed alongside detailed topographic mapping, satellite imagery, and historical documentary sources to make sure that historic waterways, glacial shorelines, and other landscape features associated with archaeological potential were fully considered. Through the combined use of LiDAR, historical mapping, Indigenous Knowledge, satellite imagery, and in-person fieldwork, we have fully assessed the potential for archaeological sites along historic waterways and other key landforms within the project area.		
Aroland First Nation	109	The report only lists four registered archaeological sites within 50 km of the Study Area. The rationale for the low number of sites is the lack of development in the area as well as the effects of fluvial processes that could have washed sites away. However, consideration is not given that these areas have just not been examined extensively for archaeological resources because of the lack of development. This should be considered a bias- the lack of sites does not mean that there aren't	We acknowledge that the low number of registered sites may be due to the lack of archaeological resource studies in the region. As described in Section 2.1 of the Stage 1 Archaeological Assessment report, archaeological potential for the local study area was determined using several criteria, only one of which is consideration of previously identified sites. This approach is used to focus field studies within areas with a relatively low amount of previously collected data. The Stage 2 Archaeological Assessment for	Comment noted; see response for details	547

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		many more that have not been discovered and/or documented. Recommendation: The Proponent needs to clarify how they have considered the potential for archaeological sites that have not yet been identified within the LSA. The Proponent must include AFN and AFN band members in the identification of additional potential sites and must describe how AFN's IK data has been considered in site identification.	the Community Access Road considered areas of higher archaeological potential to scope fieldwork and establish beach surveys and test pit locations. We note that further archaeological investigations (Stage 2 Archaeological Assessments) will be required for the seven additional river crossings along the preferred route, and a Stage 3 Archaeological Assessment may be conducted for the Caviar (Elip-1) site. If further archaeological investigations occur within Aroland First Nation territory, Aroland First Nation will be invited to participate and the report will be shared with Aroland First Nation. Furthermore, under Section 48(1) of the Ontario Heritage Act, if previously undocumented archaeological resources are discovered during construction, work must cease and further archaeological assessment must be conducted. This requirement will help during construction to further prevent potential impacts to archaeological resources not identified during the permitting process.		
Aroland First Nation	110	The report does not give consideration for navigable waterways, nor does it include discussion about how lands were used in the past and what might be	As described in Sections 3 and 2 of the Stage 1 and Stage 2 Archaeological Assessments, respectively, field assessment locations primarily target	Comment noted; see response for details	548

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		important to Indigenous peoples as they travelled the landscape. Recommendation: The Proponent should conduct physical inspection of all areas that require shovel testing as a means to narrow down what needs to be tested in greater detail. Not every water body would have been used in the past and may not be appropriate for testing, but must be considered with regards to how Indigenous people utilized the landscape and waterways.	proposed road crossings of both modern and historic water sources. This approach aligns with Ontario Heritage Act requirements. We note that further archaeological investigations (Stage 2 Archaeological Assessments) will be required for the seven additional river crossings along the preferred route.		
Aroland First Nation	111	The report does not explain efforts to include Indigenous participation in the field assessment. AFN members have a vast amount of information of the area that could be vital to the interpretation of archaeological potential. Recommendation: The Proponent must explain how AFN band members' knowledge and information of the LSA has been incorporated into identifying sites of archaeological potential	Aroland First Nation was invited to participate in a flyover with the archaeology team in 2019, and again in subsequent years. A draft Aboriginal and/or Treaty Rights and Interests: Impact Assessment Report was issued to AFN on June 13. The information in this report related to Cultural, Spiritual, and Historical Sites and Areas is heavily focused on shore areas along lakes and rivers; this aligns with the Stage 2 Archaeological Assessment approach which targeted watercourse crossings for field assessment locations. The updated Stage 2 Archaeological Assessment in Appendix R incorporates and considers IK data provided by Aroland First Nation.	Appendix R	549

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	112	The report states that an artifact was found during a beach survey but does not specify what type of survey or follow up testing was conducted. Was it a pedestrian surface find? Was it found in a shovel test pit? If it was found on a beach was there subsequent shovel testing? The report stats that investigators walked the area- was that all that was done? Question: Please provide more detail about the manner in which the artifact was discovered and the tests that were conducted as a result of the find.	Section 3 of the Stage 2 Archaeological Assessment in Appendix R has been updated to include further data collection details for each location.	Appendix R, Section 3	550
Aroland First Nation	113	Section 12.1.4 speaks about leveraging an Indigenous climate lens and the importance of Indigenous Knowledge in understanding climate change and associated potential impacts. However, it remains unclear how the Indigenous Knowledge related to climate change documented as part of this assessment and summarized in Section 12.1.4 was integrated in the process of characterizing impacts and developing adaptation measures related to the Project. Recommendation: Indigenous Knowledge, including that shared by	We recognize the importance of applying Indigenous Knowledge meaningfully to inform the assessment of climate change impacts and the development of adaptation measures. Section 3 in Appendix Y: Climate Adaptation and Resiliency Technical Support Document has been updated to identify how IK received to date, including from Aroland First Nation, has been incorporated. The development and implementation of the climate adaptation measures during detail design will be the responsibility of the owner/operator of the Community Access Road; these will be shared with	Appendix Y: Section 3	551

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		AFN, should be integrated alongside western scientific data in characterizing what impacts of climate change are already occurring or being experienced in the area, determining what areas or elements of the land surrounding the Project are vulnerable to further impacts of climate change, and developing appropriate adaptation measures. The assessment should clearly outline where and to what extent Indigenous Knowledge was used to draw conclusions and develop the recommended adaptation measures. If gaps exist where additional Indigenous Knowledge is needed to truly leverage an Indigenous climate lens for the MFCAR, the assessment should clearly identify these gaps and appropriate follow-up measures to address them in partnership with AFN.	Aroland First Nation. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road.		
Aroland First Nation	114	Table 12-3 and Table 12-4 identify climate change adaptation measures, but the assessment overall lacks detail surrounding how these measures might impact the land and environment (e.g. fire breaks, oversized culverts, vegetation trimming). Further, it does not consider how these measures might interact with ongoing changes already being experienced in the region and	Section 10 of Appendix Y: Climate Adaptation and Resiliency Technical Support Document summarizes the proposed climate change adaptation measures and their anticipated implementation timeframe. At this stage, the Community Access Road design is conceptual, and specific decisions regarding adaptation measures will be made during the detail design phase.	Comment noted; see response for details	552

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		documented through Indigenous Knowledge. Context: AFN supports the development of climate change adaptations to support the resilience of the MFCAR. It is AFN's view that such measures must be designed and implemented in a way that does not create additional impacts to the land and/or wildlife, or exacerbate impacts and changes already being experienced by community members in the region. For example, changes in stream flows and vegetation were identified as ongoing changes being experienced by Indigenous communities in the region in Section 12.1.4, which could be exacerbated by adaptation measures such as oversized culverts and vegetation control, respectively. Recommendation: The Proponent should identify how decisions surrounding the implementation of adaptation measures will be made, and what steps will be taken both prior to construction and on an ongoing basis to ensure potential impacts as a result of these adaptation measures are avoided or mitigated appropriately. Decisions surrounding their design and implementation should be made in partnership with AFN and	The development and implementation of the climate adaptation measures will be the responsibility of the owner/operator of the Community Access Road; these will be shared with Aroland First Nation. Marten Falls First Nation continues to have discussions with the Province regarding the ownership and operations for the Community Access Road.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		draw on Indigenous Knowledge as appropriate.			
Aroland First Nation	115	Climate change is anticipated to impact winter access roads to northern communities throughout the region. In combination with the development of the Project, this has significant potential to change patterns of travel and access throughout AFN's territory. The assessment largely focuses on direct impacts to the MFCAR as a result of climate change and does not consider this broader context. Context: AFN recognizes the importance of the MFCAR in the context of climate change and reduced reliability of winter access roads throughout the region. However, AFN has outstanding questions surrounding how climate change is projected to impact existing winter access roads, and how this in combination with the creation of the MFCAR might change or redirect patterns of travel and harvest throughout their territory. For example, unreliable winter roads preventing access to some areas may redirect harvesters to those more easily accessed via the MFCAR in AFN territory.	Climate change is negatively affecting the winter access road by shortening the season and causing more frequent mid-winter melting events due to rising temperatures. Both aspects are discussed in Attachment D (Future Usability of the Winter Road) to Appendix Y: Climate Adaptation and Resiliency Technical Support Document. The start of winter access road construction is determined by freezing-degree days, while the end of the season is determined by melting-degree days. Calculations for historical and future climate periods indicate a later start and an earlier end to the season. Additionally, the number of days with temperatures above 0°C during winter has been analyzed, and—as expected under climate change—the frequency of reduced stability is projected to increase. A summary of these impacts is provided in Section 12 of the Final EA/IS. As noted in Aroland First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local	Final EA/IS Section 12	553

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Recommendation: AFN seeks to better understand how climate change and associated impacts to surrounding winter access roads are anticipated to change patterns of access and use of the MFCAR in their territory. Ultimately, this should inform the development of appropriate mitigation, monitoring, and management plans in partnership with AFN to address potential issues related to increased access or use of AFN territory by non-AFN members facilitated by the MFCAR.	existing environmental advisory committees to support the development and implementation of all environmental monitoring programs, including those related to climate change. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Aroland First Nation will be established.		
Aroland First Nation	116	The assessment of potential impacts to the MFCAR as a result of climate change, and development of associated adaptation measures, does not include clear plans or frameworks for follow-up, monitoring, or ongoing decision-making. Context: AFN appreciates that adaptive management will be required to ensure the resilience of the MFCAR in the long-term and in the context of climate change. It is likely that the adaptation measures conceived of at this stage will need to change over time to account for new conditions and events. This will require follow-up and monitoring initiatives, as well as ongoing decision-	A: The Project Team began communicating with Indigenous Communities in December 2019, and Project funding support for those communities who have expressed an interest in participating in the Indigenous Knowledge (IK) Program began in the summer of 2021 and was on-going up until 2025. Aroland First Nation's IK Report was received in September 2024 and was incorporated into the Final EA/IS and Supporting Technical Reports, including Climate Adaptation and Resiliency, as appropriate. The Draft EA/IS and Draft Climate Adaptation and Resiliency Technical Support Document were shared with Indigenous	Comment noted; see response for details.	554

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		making processes as new information emerges. Recommendation: AFN must be appropriately and meaningfully included in decision-making as it relates to climate change adaptation measures and the resiliency of the MFCAR on an ongoing basis. The Proponent should develop plans that include: • Pathways for AFN to collect and share IK of climate change and climate change impacts as they relate to the MFCAR to inform operations and maintenance decisions. • AFN involvement in ongoing monitoring and inspections related to climate change adaptation measures. • Processes for AFN to be included in decision-making related to the adjustment of existing adaptation measures, or development of new ones as climate and weather conditions change.	Communities in February 2025 for comment and feedback. The preparation of an additional plan to focus on collecting and sharing IK on climate change and climate change impacts as they relate to the Community Access Road to inform operations and maintenance decisions is outside the scope of the Final EA/IS. B: As noted in Aroland First Nation's Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and Aroland First Nation will be established. C: Refer to response B.		

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	117	The Existing Conditions and Effects Assessment does not consider climate impacts from a cumulative perspective, or those that are spatially and/or temporally co-occurring: “The underlying assumption for this assessment was singularity – the events occur independently, successively, and without impacting one another.” Context: Climate events do not occur in isolation, often interacting with or preconditioning one another and/or spatially and temporally co-occurring. Assuming that events occur in singularity does not create a holistic or accurate picture of how climate change and associated events are likely to occur as they relate to the MFCAR. Recommendation: AFN requests additional information surrounding how climate events are likely to occur from a cumulative perspective, and how this might impact the MFCAR. The Proponent should detail in the assessment how and to what extent the results of their analysis can be applied to the Project even with the understanding that climate events are likely to be preconditioned or co-occur spatially and temporally.	Due to the lack of data, incorporating compound or successive events into the risk assessment is challenging. However, a general discussion of such events and their potential consequences has been included in Section 8 of Appendix Y Climate Adaptation and Resiliency Technical Support Document. Climate change considerations have been incorporated into the Final EA/IS and Technical Support Documents are considered to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans.	Appendix Y	555

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Aroland First Nation	118	The Existing Conditions and Effects Assessment acknowledges that the results of the risk assessment must be reviewed again as scientific findings, human behaviour, and site characteristics are altered. However, it does not identify any measures for monitoring programs, follow-up, or future commitments. Recommendation: Due to the evolving nature of climate change and associated impacts, it is critical that the Proponent develop appropriate follow- up and monitoring measures to ensure that climate change data related to the MFCAR remains up to date. This will serve to ensure that mitigation adaptation measures are adjusted to account for changing conditions over time on a proactive basis (i.e. looking ahead) rather than reactively (i.e. in response to events that have already occurred) to the extent possible. Follow-up and monitoring measures should include: • Revisiting climate projections and associated potential impacts from climate change as they relate to the MFCAR at regular intervals • Reviewing relevant scientific findings and new insights related to climate change adaptation measures for the	Section 9 of Appendix Y: Climate Adaptation and Resiliency Technical Support Document has been amended to include "Nonetheless, reviewing relevant scientific findings and revisiting climate projections and associated potential impacts from climate change is recommended. Furthermore, the ongoing inclusion of Indigenous observations through collaboration with local existing environmental advisory committees regarding the experienced effects of climate change is advised."	Appendix Y	556

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		MFCAR at regular intervals • Development of long-term climate monitoring initiatives with a focus on IK in partnership with AFN			
Aroland First Nation	73	The summary of residual effects for wildlife, indicates several species with only “net residual effect” identified (e.g., no assessment of magnitude, direction, geographic extent, etc.) in the Draft EA/IS. For example, Bats (little brown myotis and northern myotis) VC during operations and maintenance phases, related to potential incidental take; Furbearer (wolverine) VCs during operations and maintenance phases, related to habitat loss and alteration, and incidental take. Please incorporate the evaluation information from Table 8-10 (Appendix K) into the characterization of predicted residual effects and determination of significance for wildlife VCs in the Draft EA/IS for clarity and ease of reference.	The residual effects summary table in the Final EA/IS (Table 9-26) has been updated to include the complete evaluation information for wildlife Valued Components.	Final EA/IS; Table 9-26	1618
Aroland First Nation	15	Comment: Overall, the methodology for the Surface Water Effects Assessment is lacking structure and meaningful evaluation of potential impacts. A significant amount of information is missing and the information that is	The Surface Water Effects Assessment was prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. We have provided direct	Comment noted; see response for details	2007

Table: Summary of Feedback Received and Response / Action – Aroland First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		provided does not quantify potential impacts. The following comments will identify the missing information. Information Request: AFN requests that the Proponent provide the information identified in the following comments and revise the surface water subsections to include the requested information.	responses to your surface water-related comments.		