Appendix C5

Feedback and Response Log - Indigenous Communities - Constance Lake First Nation

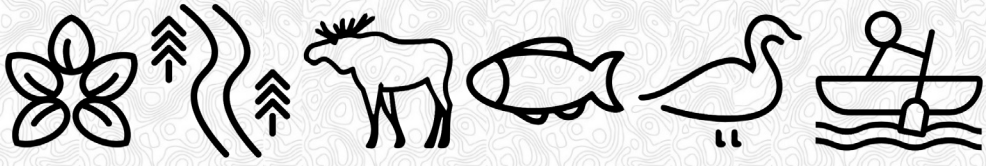

Table: Summary of Feedback Received and Response / Action – Constance Lake First Nation

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Constance Lake First Nation	1	CLFN's support for the MFCAR as a community road for Marten Falls does not and must not be interpreted to imply our consent for future projects that may be connected to this road, including the Northern Road Link or mining developments in the Ring of Fire region. Any future project that extends from or builds upon the MFCAR must be subject to separate and robust environmental assessments, consultation processes, and decision-making protocols. Our Nation's consent must be sought independently for each project based on full information, clear purpose, and meaningful engagement. Recommendation: A. The Crown, including both federal and provincial governments, must clearly recognize that CLFN's support for the Marten Falls Community Access Road is limited to its stated function as a community access initiative. This position must be documented in all decision-making materials related to the Project. B. CLFN's support for the MFCAR does not constitute or imply consent for future projects that may rely on or be enabled by this road. Each of those projects must be subject to their own environmental assessment processes, with full and	A. This recommendation is directed at government agencies. We would therefore encourage you to direct this to the regulators, as they will be best positioned to address it. B. It should be noted that the Community Access Road is undergoing its own and separate regulatory process. The EA/IS is limited to the Community Access Road and does not include requesting approval for other projects. C. Refer to response for B.	Comment noted; see response for details.	633

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		early consultation, accommodation, and the requirement for free, prior, and informed consent from CLFN. C. The Proponent must not reference CLFN's support for the MFCAR as an endorsement of broader regional development. Public communications and project documentation should clearly distinguish CLFN's support for the road from any position on future development in the Ring of Fire.			
Constance Lake First Nation	2	The introduction of Ontario's proposed Bill 5 (2025) raises significant concerns about the future permitting framework for the MFCAR project. This legislation enables exemptions from critical provincial permitting processes, including those under the Aggregate Resources Act, Permits to Take Water, and Environmental Compliance Approvals. These permitting pathways currently serve as key mechanisms for technical review, environmental protection, and Indigenous consultation. Exemptions under Bill 5 would introduce substantial regulatory uncertainty and elevate environmental and rights-based risks, particularly in a region of high ecological sensitivity and cultural importance to our Nation. The EA/IS does not acknowledge or evaluate these emerging risks, despite	A: Marten Falls First Nation (MFFN) has been working on the Community Access Road since 2019, released the Draft EA/IS in February 2025 and submitted the Final EA/IS in February 2026. The issuing of Bill 5 does not void the requirements outlined under the Terms of Reference, the Tailored Impact Statement Guideline or the commitments within the Final EA/IS. B: Bill 5 does not revoke the commitments made in the Final EA/IS or to Indigenous Communities as part of its consultation and engagements efforts to date. MFFN has and continues to be committed to meaningful consultation with neighbouring Indigenous Communities.	Comment noted; see response for details.	636

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		their potential to fundamentally alter how the project is reviewed, approved, and monitored. Recommendation: A. The Proponent should commit to upholding existing environmental and permitting standards, even if future changes to legislation (such as under Bill 5) provide exemptions. This includes a commitment to continue seeking Permits to Take Water, Environmental Compliance Approvals, and approvals under the Aggregate Resources Act regardless of any exemption status. B. The Proponent should formally commit to meaningful consultation with CLFN throughout all permitting and regulatory phases of the project, regardless of the requirements imposed (or waived) by the Province. These commitments should be documented and reflected in the Impact Statement and any subsequent agreements to ensure accountability, transparency, and trust. Recognizing the heightened risk posed by legislative uncertainty, the EA/IS should be revised to include a detailed risk assessment of potential regulatory changes and their implications for the project and Indigenous rights.	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. The development of a detailed risk assessment of potential regulatory changes and their implications is not a regulatory requirement and as such was not developed as part of the EA/IS.		

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Constance Lake First Nation	3	The EA/IS for the MFCAR is being fully funded by the Government of Ontario, which also serves as the primary regulatory authority responsible for approving the EA/IS and issuing associated permits. Public statements from Premier Doug Ford and other senior provincial officials have made it unequivocally clear that the Ontario Government views the MFCAR and the Northern Road Link as strategic infrastructure to accelerate access to the Ring of Fire and facilitate the extraction of both critical and conventional minerals. Given this dual role as both project funder and regulator—and the Province's stated objective of expediting mining development - CLFN asserts that the Government of Ontario is in a clear conflict of interest. This conflict undermines the integrity of the EA/IS process, particularly in relation to its obligations to uphold environmental protection and ensure meaningful, good-faith consultation with First Nations whose rights and lands are directly impacted by the project. Recommendation: A. To address the clear conflict of interest posed by the Ontario Government's dual role as both project funder and regulatory	A. We appreciate your feedback and the time you have taken to share your perspective. However, the comments are directed at government agencies 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 to address them. B. As the Proponent, Marten Falls First Nation has engaged 22 neighbouring Indigenous communities, including Constance Lake First Nation on this Project since 2021. In addition to regular monthly outreach, information sharing and offers to meet, the Proponent has sought involvement from Indigenous communities via the Indigenous Knowledge, Community Coordinator and the Community Capacity Funding programs. Marten Falls First Nation would be happy to reconnect and re-engage with Constance Lake First Nation in the hope of achieving a relationship building meeting between the two Nations. The involvement of Indigenous communities in this process will be determined during the detail design phase. At that time, engagement	Comment noted; see response for details.	637

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		authority for the MFCAR EA/IS, IAAC must establish independent oversight for the Project that is joint with CLFN First Nation. B. IAAC should exercise its authority to ensure that meaningful consultation with CLFN First Nation is upheld in accordance with the Honour of the Crown, and that cumulative impacts of industrial development in the region are fully assessed through other proposed environmental assessments that are specific to the Ring of Fire, including through the RoF RA.	processes will be further defined to enable appropriate participation and representation.		
Constance Lake First Nation	4	Section 4.5 of the EA/IS states that the Preferred Route was not the engineers' preferred option, and that the Project Team worked with engineers to ensure that the selected route is "constructable and safe" for long-term use. However, the EA/IS provides no detailed explanation of the engineering rationale, the specific concerns raised about constructability, or the trade-offs between engineering feasibility, cost, and environmental or cultural considerations. There is also no information provided on the cost implications of selecting a less technically preferred route. Without this information, reviewers cannot evaluate: • Whether the Preferred Route is truly	A: Please refer to Appendix A Metrics to Help Identify a Preferred Route for the metric tables used in the route evaluation, including the engineering metrics considered. B: The Final EA/IS was prepared to meet the requirements outlined in the Terms of Reference and the Tailored Impact Statement Guidelines. Disclosure of construction cost estimates is not a requirement of the Final EA/IS and as such will not be provided. C: The objectives of Section 4 of the Final EA/IS, Appendix A and Appendix B Route Selection Methodology are to	Comment noted; see response for details.	645

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		sustainable and economically viable; • What long-term risks may be introduced due to terrain, hydrology, or maintenance challenges; • How engineering mitigation will be applied to address those risks. Given the complexity of northern infrastructure development — including challenging soil conditions, sensitive waterways, wetlands, and potential permafrost — it is essential to understand not only how the route balances environmental and cultural values, but what the technical and financial costs are of those decisions. Recommendation: A. The Proponent should include a summary of the engineers' comparative assessment of all routes, identifying: • The engineering reasons why certain routes were preferred or not preferred; • The specific challenges associated with the selected route; • How those challenges will be mitigated through design, construction, and long-term maintenance. B. The Proponent should disclose cost comparisons between the Preferred Route and other technically preferred alternatives, including: • Estimated construction costs;	provide information on how the Preferred Route was selected. Providing detailed explanations on concerns raised by engineers and how these were addressed are not a requirement of the Final EA/IS.		

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		• Projected lifecycle maintenance costs; • Any known increased risks to durability or access resulting from site conditions (e.g., unstable soils, flood-prone areas, water crossings). C. The Proponent should explain how constructability concerns raised by engineers have been fully addressed, and whether additional study or contingency planning will be required prior to detailed design.			
Constance Lake First Nation	5	Section 6.8.2 of the EA/IS reveals that: • “Construction of the MFCAR is anticipated to start within 2 to 5 years of Environmental Assessment / Impact Statement approval, depending on funding and permit acquisition; and, • construction duration is anticipated to last between 3 and 10 years.” This extended window — up to 15 years from approval to completion — points to significant uncertainty regarding the practical feasibility of building the MFCAR. Such a broad timeline suggests unresolved issues related to permitting, engineering challenges, and seasonal construction limits. This long construction period suggests that it will still be quite an extended period of time before the cost of living and quality of life in Marten Falls improves.	We appreciate your feedback and the time you have taken to share your perspective. However, the comments are directed at government agencies 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 to address them.	Comment noted; see response for details	652

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Recommendation: A. Ontario should disclose cost estimates for the MFCAR under a range of construction durations, including worst-case scenarios for cost overruns and delays. B. Ontario and Canada should push to have the road to Marten Falls built as quickly as possible.			
Constance Lake First Nation	6	The EA/IS appears to place significant emphasis on the perspectives and interests of Marten Falls First Nation and Aroland First Nation, particularly in relation to route selection, project design, environmental monitoring and Proponent collaboration. This is understandable given their geographic proximity to the project and as directly affected communities with strong, well-established rights and interests in the area. However, CLFN also holds a strong and well-established relationship to the lands and waters affected by the MFCAR. The rights, interests, and responsibilities of CLFN — including under Section 35 of the Constitution — are clearly engaged by the project, yet the EA/IS does not appear to reflect the Nation's perspectives or concerns with the same	A: As noted in Constance Lake 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 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. B: We appreciate your feedback and the time you have taken to share your	Comment noted; see response for details.	666

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		level of attention or integration as those of Marten Falls and Aroland. While it is appropriate for the EA/IS to highlight the role of Nations geographically closest to the project, a more balanced and inclusive approach that reflects the knowledge, governance, and stewardship responsibilities of all impacted Nations — including CLFN — is essential to ensure the assessment process is fair, comprehensive, and credible. Recommendations: A. CLFN requests that Ontario, Canada and the Proponent includes our Nation in the proposed environmental monitoring programs and through the working groups that are established to ensure benefits are accrued to all Nations that are commensurate to the impacts from the Project on impacted Nations. The socio-economic working groups should have a wide mandate both on equitable distribution of project benefits but also supporting member employment and skill building as well as work around managing socioeconomic risks such as the transport of illicit substances along the road. B. CLFN requests that IAAC impose a condition of approval for the Project for	perspective. However, the comments are directed at government agencies 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 to address them. C: See response to B.		

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		environmental monitoring that is inclusive of all impacted Nations. C. CLFN requests that IAAC impose a condition of approval for the Project for the socio-economic working groups that is inclusive of all impacted Nations. CLFN would like to co-draft the condition with IAAC.			
Constance Lake First Nation	7	The approach to assessing cumulative effects outlined in the EA/IS is overly narrow and methodologically insufficient given the complexity of the environmental, cultural, and ecological systems potentially affected by the MFCAR project. This assessment is also being carried out in parallel with the RoF RA, a process designed explicitly to examine cumulative effects at the regional scale — including cumulative biodiversity loss, Indigenous land-use fragmentation, and ecological tipping points. While Table 11-9 of the EA/IS asserts that the RA is “outside the scope” of the MFCAR, this interpretation limits the value of that important work and ignores the significant overlap in purpose and geographic relevance between the two processes. CLFN notes that we are supportive of Marten Falls acquiring road access, so we do not wish to unnecessarily delay	A. We acknowledge the importance of the Regional Assessment and the broader context in which the Community Access Road project exists. However, it is important to clarify that the Regional Assessment is being led by the Impact Assessment Agency of Canada (IAAC) and is outside the scope of the Community Access Road, which is being conducted under a separate and established regulatory process. While we recognize that the Community Access Road is one of the components of potential future development in the region, the draft Terms of Reference for the Regional Assessment were only released in September 2024. The draft EA/IS for the Community Access Road was released in February 2025, and at that time, the Regional Assessment process was in its very early stages. There was no practical or procedural	Comment noted; see response for details.	671

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		this Project to incorporate a more rigorous cumulative effects assessment. Rather our strong preference is to defer a more fulsome cumulative effects assessment to the environmental assessments that are directly tied the development of the RoF, especially the environmental assessments for the mine developments. Recommendation: A. Canada and Ontario must require all project assessments for proposed mines in the RoF to be delayed until the issuance of the final report on the RoF Regional Assessment is released. This will allow the RoF mines to incorporate emerging regional- scale data, thresholds, and Indigenous-defined values and indicators. B. For mines in the RoF, Canada and Ontario should require the Project proponents employ a scenario-based, regionally integrated assessment approach, using multiple development futures (e.g., full build-out of MFCAR, Northern Road Link, and Ring of Fire mines) to model cumulative effects on key values such as water, caribou, and Indigenous cultural continuity. C. For mines in the RoF, Canada and Ontario should require the Project	basis to incorporate the Regional Assessment into the scope of the Community Access Road project. 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. It will be the responsibility of the IAAC, as the lead for the Regional Assessment, to consider the Community Access Road and other related projects within the broader cumulative effects framework of the Ring of Fire. Marten Falls First Nation remains committed to transparency and collaboration and will continue to share relevant information with the IAAC to support their work. B. The Community Access Road is intended to improve access, foster economic development and improve the overall quality of life for Marten Falls First Nation members. Although the Community Access Road is frequently linked to larger regional efforts such as the Ring of Fire, Marten Falls First Nation underscores that this Environmental		

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		proponents expand the scope of the cumulative effects assessment to include non-project stressors such as: • Climate change; • Regional hydrological shifts; • Long-range pollution (e.g., mercury transport); • Landscape-level fire suppression and forestry legacies. • Long-term habitat fragmentation trends; • Disturbance buffers beyond the road right-of-way; • Thresholds for population viability under the federal Boreal Caribou Recovery Strategy.	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. The cumulative effects assessment considered traffic for all reasonably foreseeable projects as outline in Table 10-1 of the Final EA/IS. The full build-out of the Ring of Fire is not understood and adequate information is not available to determine the potential cumulative effects from all potential Ring of Fire developments, and therefore cannot be considered reasonably foreseeable. C: The cumulative effects assessment included considerations for non-project stressors as outlined below: • Climate change: see Appendix Y Climate Adaptation and Resiliency Technical Support Document • Regional hydrological shifts: see Appendix F Surface Water Technical Support Document • Long-range pollution (e.g., mercury transport): see the problem formulation provided in Appendix T Community Well-Being Technical Support Document • Landscape-level fire suppression and		

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			forestry legacies: see Appendix Y Climate Adaptation and Resiliency Technical Support Document • Long-term habitat fragmentation trends: see Appendix K Wildlife Technical Support Document, Appendix L Birds Technical Support Document and Appendix M Ungulates Technical Support Document • Disturbance buffers beyond the road right-of-way: see buffers identified as mitigation measures in Appendix AA Summary and Recommendations Tables • Thresholds for population viability under the federal Boreal Caribou Recovery Strategy: see Appendix M Ungulates Technical Support Document		
Constance Lake First Nation	8	CLFN would like to better understand how Marten Falls First Nation (MFFN) selected the proposed road corridor and determined that the MFCAR project had community support. It remains unclear whether decisions were made by leadership alone or with broad input from MFFN members, including those living off-reserve. The EA/IS does not explain who within MFFN was consulted or how consensus was reached. Given that this project will have major long-term environmental and cultural impacts across a shared region, CLFN must have	A: Marten Falls First Nation (MFFN) community members have been involved throughout the EA/IS process but the desire for a road to Marten Falls began well before the EA/IS process with Elders from MFFN indicating that they have been waiting for a road for over 40 years. The Proponent held over 12 in-person and virtual meetings with Chief and Council and MFFN community members. The insights shared by MFFN (for example, Indigenous Knowledge, Indigenous land and resource use information, reviews / comments on	Comment noted; see response for details.	672

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		confidence that MFFN's process reflects meaningful internal consultation and informed community support. Recommendation: A. CLFN requests a meeting with representatives from MFFN leadership to better understand how engagement with MFFN membership was conducted in relation to the MFCAR. This meeting would provide an opportunity to learn more about how members were informed about the Project, how their input was gathered and considered, and how MFFN ensured that the views of its broader membership were incorporated into project planning and decision-making. B. CLFN recommends that the EA/IS be updated to clearly document the internal engagement and decision-making process undertaken by MFFN. Specifically, the EA/IS should: • Describe the methods used by MFFN to engage its members (e.g., meetings, mailouts, surveys, voting processes).Indicate the level of participation and key feedback themes raised by members. • Summarize how this feedback informed project components such as route selection, community benefit planning,	existing conditions and areas of concern) have been instrumental in shaping decisions throughout the planning process. The Preferred Route was presented to MFFN members in October 2023 for in-community and off-reserve community members. These sessions provided opportunities for members to learn about the Preferred Route, ask questions, challenge assertions and share their feedback. Input received during these meetings, as well as through ongoing dialogue with the Project Team, played an important role in informing the route selection process. Regarding your request to meet with the MFFN leadership, we have informed the Chief and Council of your interest to meet. B: Section 4 of the Final EA/IS provides an overview of how the Preferred Route was selected. Appendix A Metrics to Help Identify a Preferred Route and Appendix B Route Selection Methodology provide detailed information on the metrics used to support the selection and the methodology. Sections 4.3.4 and 4.4 of the Final EA/IS include information on		

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		and environmental mitigation. • Distinguish between leadership-level decisions and broader community involvement.	what was shared with MFFN community members, other Indigenous communities and the public, as well as how their feedback guided the selection process.		
Constance Lake First Nation	9	CLFN has experienced the long-term consequences of improperly managed industrial activity across our Traditional Territory. Our Nation carries the legacy of centuries of mistrust due to past development decisions that were made without our oversight or consent, often resulting in harm to our lands, waters, and community well-being. In the context of the MFCAR, the remoteness of the proposed road corridor significantly increases the risk that materials may be dumped or abandoned without detection. For our Nation, the absence of proper safeguards is not a hypothetical risk, it reflects a pattern we have already lived through. Recommendation: CLFN recommends that the EA/IS include a long-term, enforceable Road Monitoring and Dumping Prevention Plan developed in collaboration with CLFN. This plan should clearly outline how the road will be actively monitored, how incidents will be reported and addressed, and how CLFN, impacted Indigenous	We acknowledge the lasting impacts of past industrial activity on CLFN's Traditional Territory and the community, and we recognize that the risks you have identified are grounded in lived experience. 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. The development of a road monitoring and dumping prevention plan are not regulatory requirements and as such were not developed as part of the EA/IS. We have noted your recommendation regarding the development of a road monitoring and dumping prevention plan, and we will take it into consideration in the next planning phase of the Community Access Road.	Comment noted; see response for details	673

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		Nations and provincial law enforcement will be involved in ongoing oversight to ensure the road does not become a source of further harm to our lands, waters, and rights.			
Constance Lake First Nation	10	CLFN has observed cumulative impacts across our Traditional Territory from decades of industrial activity, including forestry, mining, and road development. Our Territory sustained our traditional way of life for generations, but it is now heavily fragmented and degraded in many areas due to overlapping disturbances. The proposed MFCAR would cut through one of the few remaining areas of relatively undisturbed wilderness in our Territory. For this reason, CLFN considers any further development in this landscape to be significant, regardless of footprint size or project type. The Proponent's assertion that the impacts on water, fish, and wildlife species are "not significant" does not align with our lived experience over the past century of industrial development since the signing of Treaty 9. We have witnessed how successive projects have led to widespread degradation of ecosystems and loss of culturally important species.	A: We acknowledge the cumulative impacts that Constance Lake First Nation (CLFN) have observed across the CLFN's Traditional Territory. The determination of significance for the fish and fish habitat assessment was based on the approach outlined in Section 4.4.2.6 of Appendix G Fish and Fish Habitat Technical Support Document. Significance was generally as follows: - Significant: Residual effects, after applying mitigations, were generally considered to be significant if the residual effects were classified as high in magnitude, a geographic extent greater than the Construction Disturbance Area, and a longer term in duration, or they represent a substantial management concern; and - Not Significant: Residual effects were generally considered not significant if they demonstrated any other combination. Effects criteria considered the physical characteristics of an effect (e.g., magnitude, geographical extent, timing,	Comment noted; see response for details.	674

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		Recommendation: A. CLFN requests that the Proponent revise the residual effects assessment and cumulative effects assessment to take a more conservative approach to the determination of significance. Almost all impacts should be deemed significant. B. CLFN recommends that Canada approve the Project for construction, with the increased assessment of significance of impacts addressed through conditions of approval imposed on the Project.	and duration) as well as the context-specific value characteristics (e.g., environmental, health, social and economic conditions). Context is considered one of the most critical factors when evaluating effects, and the effects assessment has considered potential or existing effects or pressures on social, economic, and health conditions affecting the sensitivity or resilience of a Valued Component. Residual effects on the fish Valued Component were considered not significant as the residual effects were assessed negligible to medium in magnitude and they do not represent a substantial management concern. There is the potential for management concerns through an increased public access leading to changes in angler pressure and fish harvest; however, the resources are expected to continue to be managed through the Ministry of Natural Resources (MNR) and local communities for recreational and Indigenous harvest, respectively. Residual effects on aquatic biodiversity were also considered not significant. Overall, the Valued Component fish populations are expected to remain self sustaining and ecologically effective; therefore, the		

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			predicted residual effects on fish and fish habitat are assessed as not significant. The cumulative effects assessment in Section 8 of Appendix G considers the residual effects of the Community Access Road along with other past, present, and reasonably foreseeable activities with effects likely to overlap in type of effect (i.e., Valued Component), temporally, and spatially with the predicted residual effects of the Community Access Road. The cumulative effects assessment builds on the results of the residual effects assessment for the Community Access Road. Cumulative effects from changes to fish habitat quantity from physical alteration of waterbodies where work is below the high-water mark on the fish Valued Components were considered not significant as the residual effects were assessed low in magnitude. B: The Final EA/IS will be submitted to the Ontario Ministry of Environment, Conservation and Parks (MECP) who will review and potentially approve the Community Access Road.		
Constance Lake First Nation	11	CLFN has not seen meaningful capacity-building opportunities associated with the MFCAR process to date. Despite the	We acknowledge Constance Lake First Nation's request for capacity building funding and resources through all	Comment noted; see response for	675

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		scale and duration of this Project, and the known long-term implications for our lands, waters, and rights, there has been little effort to support CLFN in building the internal expertise, staffing, and infrastructure needed to fully participate in environmental review, monitoring, and decision-making. This limits our ability to engage in the process on equal footing with the Proponent, government, and consultants. CLFN views capacity building not as a benefit, but as a prerequisite for respectful, informed, and equitable involvement in the planning and governance of infrastructure projects within our Traditional Territory. Recommendation: CLFN recommends that the Proponent and Crown commit dedicated funding and resources to support capacity building for CLFN throughout all phases of the Project. This should include training, staffing support, technical assistance, and funding for community-based monitoring, environmental governance, and participation in regulatory processes. Capacity building must begin immediately and continue through construction, operation, and long-term monitoring, ensuring CLFN can fully and equitably participate in decision-	phases of the Community Access Road. We have made genuine efforts in engaging and including neighbouring Indigenous communities in the Environmental Assessment / Impact Assessment process since the start of the Environmental Assessment milestone in October 2021. Efforts to support the 22 neighbouring Indigenous communities identified in the Terms of Reference have included funding opportunities through the Indigenous Knowledge Program, the Community Coordinator role and more recently the Community Capacity Funding Program, of which Constance Lake First Nation took part in. Funding for capacity building during the next phase of the Community Access Road falls within the responsibilities of the future 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.	details	

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		making and oversight of the MFCAR within our Traditional Territory.			
Constance Lake First Nation	12	CLFN has lived through the long-term impacts of road development. The construction of Highway 11 in the 1930s and 1940s has had lasting consequences for our Nation. It led to increased access to our territory, habitat loss, and enduring disruptions to our way of life. CLFN would welcome the opportunity to meet with MFFN to share our stories and experiences, and to speak openly about how roads have impacted our land, our people, and our rights. Recommendation: CLFN requests a meeting with MFFN membership and leadership (not consultants) to share our experiences with the impacts of Highway 11. We believe it would be meaningful to sit down together, share stories, and learn from one another about how road development has affected our communities.	The request for a meeting with MFFN membership and leadership to share Information and experience regarding the impacts of Highway 11 on your community have been shared with MFFN Chief and Council.	Comment noted; see response for details	676
Constance Lake First Nation	13	CLFN has been significantly and negatively impacted by unrestricted road access in our traditional lands. The construction of roads without sufficient	Marten Falls First Nation continues to engage in discussions with the Province regarding the ownership and future operations of the Community Access	Comment noted; see response for details	677

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		access control has led to numerous adverse effects including increased poaching, unregulated hunting, unauthorized industrial activity, and disturbances to our cultural and spiritual sites. These impacts have degraded our lands and infringed on our rights. Given these past experiences, we are deeply concerned that the MFCAR could result in similar impacts for MFFN if appropriate access controls are not implemented. Recommendation: CLFN recommends that gates be installed at both the southern and northern ends of the MFCAR to prevent unrestricted access. Marten Falls First Nation should retain full authority to determine who is permitted to use the road. The road must be actively monitored to deter unauthorized activity and enable enforcement.	Road. At this stage of the process, Marten Falls First Nation is not in a position to commit to restricting access to the Community Access Road. Access and ownership including gates is outside the scope of the EA/IS and will require further dialogue between the communities and the Province.		
Constance Lake First Nation	14	CLFN is concerned that the remote nature of the MFCAR, combined with frequent harsh weather conditions (e.g., extreme cold, heavy snow, wildfires, flooding, and limited visibility), poses serious safety risks for road users. Given the lack of nearby emergency services and long distances between communities, travelers could become	A: We recognize the importance of traveler safety and emergency preparedness, particularly in remote areas. To support this, the Community Access Road includes rest areas/pull-out relief points approximately every 12.5 km, staggered on alternating sides of the road. This means travelers will encounter a rest area on the same side of the road	Comment noted; see response for details.	678

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		stranded without access to assistance, putting lives at risk. Recommendations: A. CLFN recommends that the Proponent install survival stations at regular intervals along the road, stocked with emergency supplies such as blankets, food, water, heat sources, and communication tools. B. CLFN recommends that the Proponent provide two-way radios or satellite phones at each gate for travellers to borrow, ensuring they have a reliable means of emergency communication in areas without cell coverage.	approximately every 25 km. These areas are intended to provide safe stopping points and basic relief for road users. In addition, signage will be installed along the route to encourage all travelers to carry essential survival items—such as blankets, food, water, and communication tools—in their vehicles. These signs will also indicate the distance to the nearest gas stations and supply points, helping travelers plan accordingly and remain aware of available services. While fixed survival stations are not currently proposed, the combination of regular rest areas and proactive signage is intended to promote preparedness and enhance safety for all road users. B: We acknowledges the importance of ensuring traveler safety in areas with limited or no cell coverage. Details regarding emergency communication will be confirmed during the next stage of the project during detail design.		
Constance Lake First Nation	15	The current monitoring program for sedimentation control is insufficient because there is only mention of monitors being present prior and during	Turbidity and suspended solids (sedimentation) will be monitored according to the requirements of the anticipated Fisheries and Oceans	Comment noted; see response for details.	679

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		construction of the MFCAR. Recommendation: CLFN urges the Proponent to have a monitoring team evaluate streams for sedimentation and turbidity after the first 2 rainfalls, as loose gravel and sediment from newly graded roads are more prone to runoff during heavy precipitation events. It's imperative to have benchmark measurements for turbidity and percentage of fine sediment before road construction begins. For turbidity, a common water quality probe (i.e. YSI) will suffice, while a fine sediment analysis is recommended for determining baseline substrate composition.	Canada (DFO) and Ministry of Natural Resources (MNR) permits to determine sediment control measures are effective. Turbidity and suspended solids (sedimentation) monitoring will follow the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for the Protection of Aquatic Life (CCME, 1999). Turbidity will be measured using a water quality meter and samples will be collected for laboratory analysis of total suspended solids and are expected to be requirements of the anticipated DFO and MNR permits. Timing of monitoring and baseline characterization will be determined during monitoring plan development in the next phase of the project during detail design.		
Constance Lake First Nation	16	The report primarily discusses benthic macroinvertebrate collection using kick netting in water crossings with smaller substrates such as cobble, gravel, fine sediments, and organic matter. However, it does not mention any assessment of benthic invertebrates in habitats with larger substrates like boulders, bedrock, and larger cobble. Recommendation: A. CLFN recommends that benthic	Benthic invertebrate assessments were completed in accordance with Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007) and are described in Appendix G Fish and Fish Habitat Technical Support Document. The provincial protocol manual (Jones et al., 2007) is considered rigorous and protective of the environment and appropriate for use in this assessment. A: Sampling sites were selected to target	Comment noted; see response for details.	680

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		invertebrate studies be conducted at water crossings where larger substrate was present. B. A common practice used in the Canadian Aquatic Biomonitoring Network when investigating invertebrate richness is to use the rock grab method. 100 coarse rocks (selected at random) are lifted and inspected. Documenting macroinvertebrate counts and species diversity for these habitat types are imperative for gathering a holistic understanding of benthic invertebrates across the project's watersheds. CLFN recommend that the Proponent employ the rock grab method as part of the benthic invertebrate baseline monitoring program.	representative waterbody types and habitat to provide a baseline of diversity and abundance. Site selection considered factors such as flow and thermal regime, watershed representation and waterbody type, and health and safety and logistical constraints. Sampling sites were generally located in moderate to large watercourses, in slow flowing depositional environments with substrates composed predominantly of fine sediments and organics which was consistent across the route alternatives. A small proportion of sites were classified as erosional habitat, dominated by coarse substrates (2 of 17 stations in Route Alternative 1 and 6 of 16 stations in Route Alternative 4). B: Benthic invertebrate community samples were collected following Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007) using one of two pieces of equipment: • In lotic / erosional environments (i.e., watercourses with predominantly coarse substrates), samples were collected using a Surber sampler (sample area = 0.093 square metres [m2]) where there were suitable coarse substrates (i.e., cobble or boulder); and		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			• In lentic / depositional environments (i.e., waterbodies with sediments that are predominantly silt / sand), samples were collected using a grab sampler (i.e., Ekman or petite Ponar) (sample area = 0.023 m2). The Surber method is the standard for benthic collection in Ontario as outlined in the Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007). The "rock grab" method originated from the US EPA's Rapid Bioassessment Protocols and is not considered part of Ontario Benthic Biomonitoring Network: Protocol Manual (Jones et al., 2007).		
Constance Lake First Nation	17	CLFN reviewed the desktop information available in the EA/IS and Appendix B (Route Selection Methodology) evaluated the alternative routes. From this information, a route was selected that would reduce the overall length of road in proximity to watercourses, limit the number of watercourse crossings, and reduce the overlap with existing provincial parks or other sensitive areas. Based on the information provided, it appears the preferred route would be: • Alternative 1 for southern section (Segment 1) • Alternative 4 for central section (Segment 2)	A: We appreciate Constance Lake First Nation's general support for the Preferred Route. The design of the Community Access Road will be further refined during the detail design phase. Should the Community Access Road EA / IS be approved to proceed, a consultation and engagement program will be established to guide discussions through detail design. B: The Final EA/IS was conducted on the Project Study Area as shown on Figure ES 4-1 of the Final EA/IS. As stated in Section 6.5.2 of the Final EA/IS the Local Study Area consists of a corridor area 2.5	Comment noted; see response for details.	681

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		• Alternative 4 for northern section (Segment 3) For greater clarity, this would involve constructing using the following segment node pathway: B→E→F→G→H→I→J This route aligns with the Preferred Route (Figure ES 4-1 and Figure 4-7) selected by the Proponent. Recommendation: A. Based on the information provided, CLFN is generally supportive of the approach taken for determining the Preferred Route and the route itself. However, there must be an opportunity for further refinement of the preferred route. For example, the route could be adjusted slightly to minimize proximity to watercourses and identify preferred crossing locations. For this reason, CLFN requests that the Proponent invite CLFN to provide input on the final route. We are open to how this can be achieved, for example, written correspondence, community meetings, and/or workshops. B. Secondly, CLFN requests clarification on the flexibility to modify the Preferred Route once the EA/IS is complete. For example, will it be possible to choose a route outside of the 100 m Right of Way?	km from the centreline. Minor adjustments within the area are generally permissible during detail design within the Construction Disturbance Area. However, any significant deviation beyond it may require additional assessment and regulatory review. It should be noted that there are currently no plans for the Preferred Route to be outside the Construction Disturbance Area.		
Constance	18	The Proponent has only completed	Fish and fish habitat field investigations	Comment	682

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Lake First Nation		detailed fish habitat, fish community sampling, and benthic invertebrate sampling at a subset of 50% (55 locations), 50% (46 locations), and 25% of proposed watercourse crossings, respectively. These were completed in 2019-2022. Fish sampling was conducted primarily with backpack electro-fisher and minnow traps. This level of effort is far below what is considered best practice. It is typical to conduct multi-season multi-year baseline studies to adequately characterize natural variability and the habitat use by different species based on their unique life histories. Recommendation: CLFN requests additional baseline sampling to adequately characterize the aquatic habitat within the LSA. While multi-season sampling at each location is standard, it is recognized that the potential impacts of road are well understood and can be managed with appropriate mitigation measures. Therefore a more practical approach would be to complete a minimum of one baseline sampling event to characterize detailed fish habitat characteristics at all crossing sites of the selected route, in advance of construction (i.e. not just the	were conducted in accordance with the Draft Fish and Fish Habitat Study Plan (AECOM 2001) which outlines the percentages of sites to be surveyed as well as seasonal considerations. A copy of the study plan and regulatory review comments on the study plan are included in Attachment A in Appendix G Fish and Fish Habitat Technical Support Document. As indicated in Section 9 of Appendix G Fish and Fish Habitat Technical Support Document, fish and fish habitat, and surface water surveys will be conducted before construction on any waterbody that has not been assessed. Additional surveys will be conducted below high-water mark to meet anticipated permitting requirements (i.e., Fisheries and Oceans Canada (DFO) Request for Review under the Fisheries Act, permit applications to the Ministry of Natural Resources under the Lakes and Rivers Improvement Act).	noted; see response for details.	

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		50% subset). Of these, areas with high potential for high value habitat (of the selected VC species) should be targeted for fish community sampling as well. This sampling can occur as part of pre-construction monitoring and is not required for completion of the Impact Assessment.			
Constance Lake First Nation	19	The Proponent has not presented any detailed mapping information on locations of spawning habitats for the selected fish VCs. In particular, the absence of thorough assessments of spawning habitat for lake sturgeon (Acipenser fulvescens) and brook trout (Salvelinus fontinalis) presents a significant concern. Both species rely on specialized environmental conditions for successful reproduction, including specific substrate types, water temperature ranges, flow dynamics, and oxygen levels. Without proper evaluation and identification of these habitats, several risks arise, including the possibility of degrading and/or destroying those habitats which may overlap with crossings. Recommendation: CLFN recommends that additional efforts be undertaken to evaluate all crossings	Habitat information was collected at each of the crossing locations surveyed as described in Section 2.2.1 of Attachment B in Appendix G Fish and Fish Habitat Technical Support Document. Habitat potential for spawning for fish species, such as lake sturgeon (Acipenser fulvescens) and brook Trout (Salvenlinus fontinalis) were considered and described during surveys. A summary of spawning habitat potential is included in the Final EA/IS in Section 3.3 of Attachment B in Appendix G Fish and Fish Habitat Technical Support Document. As indicated in Section 9 of Appendix G Fish and Fish Habitat Technical Support Document, fish and fish habitat, and surface water surveys will be conducted before construction on any waterbody that has not been assessed. Additional surveys will be conducted below high-	Comment noted; see response for details.	683

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		with potential spawning habitat for lake sturgeon and brook trout. This information should be presented in the EA/IS. Then based on this information, the identification of crossing locations can be optimized to avoid any impacts to spawning areas.	water mark to meet anticipated permitting requirements (i.e., Fisheries and Oceans Canada (DFO) Request for Review under the Fisheries Act, permit applications to the Ministry of Natural Resources under the Lakes and Rivers Improvement Act).		
Constance Lake First Nation	20	The Proponent has stated that an Erosion and Sediment Control Plan will be developed for the Project. This is a critical measure that must be rigorously developed and implemented to adequately mitigate the potential impacts of the road. Recommendation: CLFN requests the opportunity to review and provide input on the Erosion and Sediment Control Plan once available.	The Erosion and Sediment Control Plan will be shared with Constance Lake First Nation. The development and implementation of the Erosion and Sediment Control 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.	Comment noted; see response for details.	684
Constance Lake First Nation	21	The Proponent states that there will be at least 45 major waterbody crossings along the Preferred Route. This includes 13 culverts, 22 clear-span bridges, and 10 multi-span bridges along permanent crossings. For temporary access roads, there will be 24 temporary waterbody crossings, including 6 culverts, 12 clear-span bridges, and 6 multi-span bridges. However, there is not sufficient details on crossing types and whether they will	The Erosion and Sediment Control Plan will be developed during detail design and will include site-specific plans for all watercourse crossings to address setback distances, ice-damming and erosion.	Comment noted; see response for details	750

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		require site-specific mitigation measures. Given the potential risk of erosion and sedimentation at these important points, there must be additional information on watercourse crossings. This is especially important for areas with potential spawning habitat of all VCs, potential for lake sturgeon, or other environmental sensitivities. Recommendation: CLFN requests additional information on existing crossings and whether there is a need for site-specific mitigation measures to limit the effects of sedimentation and erosion. For example, it is not clear whether existing crossings provide adequate freeboard or setback distances to avoid effects to watercourse banks and/or prevent ice-damming and associated erosion. Where necessary, the Erosion and Sediment Control Plan should include site-specific plans for sensitive watercourse crossings.			
Constance Lake First Nation	22	Ensuring that watercourse crossings are adequately designed (e.g. to meet depth and flow velocity requirements) is essential for maintaining fish passage and reducing potential effects of erosion and sedimentation. Many fish species rely on specific water conditions to	As described in Section 7.3.1.1.2 of Appendix G - Fish Habitat Technical Support Document, site-specific fish and fish habitat, and surface water surveys will be completed during detail design to support engineering and permitting (i.e., Fisheries and Oceans Canada (DFO),	Comment noted; see response for details	751

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		migrate, access spawning habitats, and complete their life cycles. If crossings create barriers—such as shallow water, excessive velocity, or obstructions—fish may struggle to move upstream or downstream, leading to habitat fragmentation. Recommendation: CLFN requests that the Proponent include a commitment that crossings installed will ensure that minimum/maximum flow velocities and depths will be maintained to ensure adequate fish passage for the species present at each crossing. Where possible, this should include: • Ensuring crossings are adequately sized to pass normal range of water (i.e. 1000-year return period for permanent crossings, and 10-year return period for temporary crossings). • Use open-bottom structures or embedded culverts wherever possible to allow natural sediment transport and habitat continuity. • Design crossings to maintain adequate water depth and manageable flow velocities to support fish passage. • Avoid excessive water speeds that could impede movement, particularly for juvenile or species with low burst speeds.	Ministry of Natural Resources (MNR)) at water crossings where work below the high water mark is proposed. During the detail design, the bridge and culvert designs for each crossing (temporary and permanent) will be developed. Water crossings will be designed in accordance with regulatory requirements and design standards. Designs of water crossings will be submitted as required in DFO and MNR permit applications.		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Constance Lake First Nation	23	The Proponent has identified that rock bass and smallmouth bass have been documented in the Albany River and some other locations with the RSA. They have stated that they will “Implement best management practices and regulations outlined by the Ministry of Natural Resources to reduce the spread of invasive species” (Table 9-10). However, they have otherwise not assessed the potential impacts of invasive species on aquatic ecosystems or meaningfully planned any associated mitigation measures. This is a significant oversight. Northern Ontario's aquatic ecosystems remain relatively unimpacted by invasive species, providing native fish populations with stable environmental conditions. However, the construction of new roads in the region may inadvertently introduce aquatic invasive species, posing a serious threat to local biodiversity and ecosystem health. Recommendation: A. CLFN requires that the Proponent evaluate the potential pathways of introduction and potential impacts of aquatic invasive species as part of the EA/IS. B. The Proponent must prepare an invasive species management plan that	A: Potential pathways of introduction and potential impacts of aquatic invasive species were assessed as part of the potential project effects and residual effects in Section 7 of Appendix G Fish and Fish Habitat Technical Support Document. The introduction of invasive species with increased public access was recognized and identified as a potential effect (i.e., effect before mitigation). The spread of aquatic invasive species from the Project was captured in the residual effects assessment for increased public access to recreational fishing areas (Section 7.3.2.8 of Appendix G). B: 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 an Invasive Species Management Plan is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement. Protocols for the prevention of aquatic invasive species introduction and spread during construction will be developed by	Comment noted; see response for details.	752

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		includes details on how they plan to prevent and manage the accidental introduction of invasive species through all phases of the Project. C. The Proponent should share this plan with the CLFN for review and comment prior to finalization or approval. D. The Proponent should support the establishment of a regional road invasive species subcommittee that includes CLFN and other impacted Nations. This body should coordinate monitoring, prevention protocols, and response measures across all road-linked developments in the region to address the cumulative risk of invasive species introduction and spread.	the contractor and included in the Project-specific Environmental Protection Plan (EPP). A key mitigation to reduce the potential spread of invasive species to be included in the EPP is to follow best management practices and the regulations outlined by the Ministry of Natural Resources (e.g., Invasive Species Act) to reduce the spread of invasive species. C. The EPP will be shared with Constance Lake First Nation. D. As noted in Constance Lake 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 Constance Lake 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
Constance Lake First Nation	24	The layout for Table 9-10 is confusing and makes understanding the information difficult. There are many items that are duplicated, except for the final column. For example, the first two items appear identical (Table 9-10 pp 407 and Table 9-10 pp 410), with the exception of the predicted residual effect. It appears that the difference here is between the project activities being evaluated above high water mark and below high water mark) but that is only clear when looking at the residual effect. Recommendation: A. CLFN requests that Table 9-10 be updated to improve clarity on what project activities are being considered. Potential improvements include; • Adding additional description to clarify the activities and/or effects being considered (e.g. include description about whether the effect is above or below the high water mark) • List mitigation and enhancement measures in a separate table with associated numbers for each. This will help avoid the duplication of text in the table. B. Similar updates should be made to the tables for all valued components of the project.	A. Table 9.3-7 in the Final EA/IS is a high-level summary of the fish and fish habitat assessment. Full details are provided in Appendix G Fish and Fish Habitat Technical Support Document. - Activities and effects considered are provided in Appendix G, Table 7-4: Project–Environment Interactions. - Mitigation and enhancement measures are provided in Appendix G, Table 7-5: Summary of Potential Effects, Mitigation and Enhancement Measures, and Predicted Residual Effects on Fish and Fish Habitat. - A summary of the results of the residual effects characterization and determination of significant is provided in Table 7-6: Characterization of Predicted Residual Effects and Determination of Significance for Fish and Fish Habitat Valued Components. B. Additional clarity on the project activities, effects, mitigations and enhancement measures for each valued components can be found in the Technical Support Documents.	Comment noted; see response for details	753

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Constance Lake First Nation	25	The Proponent has identified that they will "Avoid placing soil stockpiles near waterbodies or drainage features" (Table 9-30, pp 667). However, this language is vague and is not a useful measure for planning (or for contractors in the future). As stockpiles of overburden and soils are an important source of sediment, it is important that there is a sufficient setback/buffer to prevent potential erosion and sedimentation, especially during periods of high rainfall and/or melting snow. Recommendation: CLFN requests that excavated materials and stockpiles be placed at a minimum distance of 100m from watercourses. Furthermore, efforts should be made to ensure that stockpiles are covered, revegetated, or otherwise stabilized prior to spring freshet. This should be included as a mitigation measure in Table 9-10.	The Final EA/IS has been updated to include the mitigation that soil stockpiles will be located more than 100 m from watercourses. Detailed soil management and soil handling procedures, including erosion and sediment control will be developed during the detail design stage.	Final EA/IS Table 9-10	754
Constance Lake First Nation	26	The Proponent has stated that they will "Locate temporary access roads, staging areas, camps, and debris and / or timber stockpiles a minimum of 30 meters away from the ordinary high-water mark of a waterbody, where possible" (Table 9-10 pp 408). One of the major potential impacts of the Project during construction	The 30 m setback from the ordinary high-water mark was selected based on the Ontario Provincial Standard Specification (OPSS.PROV 182) General Specification for Environmental Protection for Construction In and Around Waterbodies and on Waterbody Banks (OPSS 2021). The recommended riparian buffer to	Comment noted; see response for details	755

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		is the risk of sediment and erosion from stockpiles, camps, and staging areas. It is important that there is a sufficient setback/buffer to prevent potential erosion and sedimentation, especially during periods of high rainfall and/or melting snow. Recommendation: CLFN requests that a minimum distance of 100m from watercourses be applied to all temporary camps, staging areas, and stockpiles of overburden, aggregates, and soil. Furthermore, efforts should be made to ensure that stockpiles are covered, revegetated, or otherwise stabilized prior to spring freshet. This should be included as a mitigation measure in Table 9-10. It is understood that temporary access roads, debris, and timber stockpiles may need to be within 30 m, therefore the 30m buffer for those activities may be appropriate, depending on the circumstances.	maintain aquatic resources and functions varies in literature; however, a 30 m riparian buffer is considered sufficient to reduce or avoid effects on bank stability, maintain benthic communities, and protect fish habitat as outlined in How Much Habitat is Enough? Third Edition. (Environment Canada, 2013), Shoreline Vegetative Buffers (The District of Muskoka Planning and Economic Development Department, 2003) and the references cited within. 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.		
Constance Lake First Nation	27	CLFN's Traditional Territory has been increasingly impacted by aquatic invasive species which pose a serious threat to native fish populations, aquatic vegetation, and culturally important harvesting sites. The construction of the MFCAR will increase the risk of	As noted in Constance Lake 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	756

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		introduction and spread of invasive species through contaminated equipment, vehicles, and expanded public access to previously isolated waterways. This risk is cumulative when considered alongside other road and industrial developments in the region. Given the connectivity of northern water systems, CLFN emphasizes the need for a coordinated, regional approach to aquatic invasive species management. Recommendation: The Proponent should support the creation of a regional road invasive species subcommittee with representation from CLFN and other impacted Nations. This group should coordinate aquatic invasive species monitoring, equipment hygiene protocols, public awareness initiatives, and rapid response strategies across all regional access roads. This subcommittee should be formally recognized in the EA/IS as a long-term governance mechanism for managing aquatic invasive species introduced or exacerbated by road construction and use.	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.		
Constance Lake First Nation	28	The project will result in the direct loss of approximately 116.7 hectares of riparian vegetation—1% of riparian ecosystems	A: The Final Environmental Assessment / Impact Statement has been updated to include Appendix AB Preliminary	Final EA/IS Table 9-17	757

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		within the Regional Study Area. Although this may seem numerically small, riparian areas provide disproportionately important ecosystem services making them uniquely important. These areas are especially sensitive to disturbance, and even those portions that remain physically intact may experience functional degradation as a result of adjacent clearing and fragmentation. As noted in the assessment, the loss of riparian area could reduce the ability of the remaining ecosystems to carry out their natural functions, emphasizing the need for stronger commitments to protection, restoration, and long-term monitoring. Recommendation: A. The Proponent must commit to offsetting residual functional losses to riparian ecosystems through the adoption a no-net- loss approach—an established ecological principle that seeks to ensure that the total area and function of a habitat type are maintained or enhanced over time. In practice, this means that when impacts to a habitat cannot be entirely avoided or fully restored, they must be offset through equivalent or greater ecological gains elsewhere. B. The Proponent should commit to	Biodiversity Offset Plan. The Preliminary Biodiversity Offset Plan will be finalized during detail design. B: Vegetation clearing will be limited within 30 m of waterbodies to the extent possible and to the requirement of the access road and alignment clearing width only. C: The Final EA/IS has been updated to include a commitment to develop a Vegetation Restoration Plan during detail design which will include a monitoring and adaptive management framework, as well as performance benchmarks and thresholds to trigger corrective actions, as recommended.		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		limiting clearing of vegetation within 100m of waterbodies. C. The Proponent must strengthen the monitoring and adaptive management framework within the Vegetation Restoration Plan to ensure riparian ecosystem recovery. A long-term, riparian- specific monitoring program must be included in the Vegetation Restoration Plan. Performance benchmarks must be clearly defined, and thresholds should be set to trigger corrective actions if restoration is not proceeding as expected.			
Constance Lake First Nation	29	The project currently falls outside the regulated zone for Black Ash (Fraxinus nigra) established under Ontario Regulation 6/24 (Endangered Species Act, 2007); however, the proposed project creates a clear and significant pathway for the introduction of invasive species, especially the Emerald Ash Borer (Agrilus planipennis). Construction activities such as equipment mobilization, timber handling, and increased public access along the permanent access road increase the risk of Emerald Ash Borer being introduced into areas where it is not yet present. The risk is magnified by the permanent nature of the road, which facilitates	A. We acknowledge the cultural significance of Black Ash (Fraxinus nigra) and the potential impacts from the introduction of Emerald Ash Corer (Agrilus planipennis). B. The Final EA/IS has been updated to include Emerald Ash Borer prevention and long-term surveillance. C. The Final EA/IS has been updated to include a commitment to developing a Vegetation Management Plan during detail design which will include Black Ash-specific protocols.	Final EA/IS Table 9-17 Appendix J Section 7.3.1	759

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		ongoing vehicle movement and human activity into relatively intact northern ecosystems. Furthermore, the Emerald Ash Borer's known range has been steadily expanding northward, and this trend is expected to continue as shorter, milder winters and increased growing degree days under climate change create conditions suitable for the insect's survival and reproduction in more northern latitudes. Importantly, Black Ash holds deep cultural significance for Indigenous communities, particularly in basketry and traditional knowledge practices. The loss of Black Ash due to Emerald Ash Borer infestation would not only have ecological consequences but would also represent a profound cultural and intergenerational loss for communities that rely on this species for cultural expression, education, and identity. The current mitigation measures—limited to re-evaluating Black Ash status under future regulatory updates and conducting localized surveys if its listing changes—are reactive and insufficient given the foreseeable threat trajectory. Recommendation: A. The Proponent must recognize and proactively manage Black Ash as a			

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		culturally significant and ecologically vulnerable species, regardless of current regulatory status. B. The Proponent must integrate Emerald Ash Borer prevention and long-term surveillance into invasive species mitigation. C. The Proponent must update the Vegetation Management Plan to include Black Ash-specific protocols that reflect both its cultural value and the emerging ecological risks.			
Constance Lake First Nation	30	The Environmental Assessment acknowledges that the project will result in a permanent loss of approximately 4,700 hectares of wolverine habitat and indirect alteration to an additional 189,145 hectares through habitat fragmentation, sensory disturbance, and edge effects. Despite concluding that the net residual effect on wolverines is significant, the current mitigation strategy does not include any offsetting or compensation to address this large-scale, irreversible loss. Without compensating for the permanent loss of core habitat and planning for long-term landscape permeability, the project risks contributing to the functional isolation of wolverine populations and undermining regional conservation	A: The Final Environmental Assessment / Impact Statement has been updated to include Appendix AB Preliminary Biodiversity Offset Plan which will include a plan for offsetting the loss of wolverine habitat and indirect alteration of additional habitat through habitat fragmentation, sensory disturbance, and edge effects. A long-term monitoring plan will also be included to validate success of the offsetting measures. The Preliminary Biodiversity Offset Plan will be finalized during detail design. B: A Preliminary Biodiversity Offset Plan will be developed in the next phase of the Community Access Road. It will be shared with Constance Lake First Nation. As noted in Constance Lake First Nation	Appendix AB	763

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		objectives for this sensitive species. The absence of offsetting and connectivity planning represents a significant gap in the mitigation strategy for a species already facing pressure from habitat fragmentation across its southern range. Recommendation: A. The Proponent must commit to habitat offsetting to compensate for the permanent loss of 4,700 hectares of core habitat within the biodiversity offsetting and compensation plan. The offsetting strategy should be informed by a regional connectivity assessment to ensure that compensation efforts support landscape-level ecological function and align with known wolverine movement corridors. The connectivity assessment should also include maintaining permeability across the road corridor through measures such as wildlife overpasses, or underpasses informed by local and regional wolverine movement data. B. CLFN would like to have input into the development of the biodiversity offsetting and compensation plan, specifically regarding wolverine habitat restoration and connectivity. Our Nation has important knowledge to share about the land and would like to be involved in	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 the long-term monitoring program associated with the Preliminary Biodiversity Offset Plan. 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.		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		planning how habitat will be restored and protected over the long term.			
Constance Lake First Nation	31	The assessment of increased public access as a pathway for wolverine mortality contains several key flaws and understatements that diminish the importance of this effect. While the residual effect is described as “not significant,” the assessment itself acknowledges that the duration is permanent, the reversibility is irreversible, and the likelihood of impact is possible. Despite these admissions, the frequency is incorrectly characterized as “continuous until the Construction Phase is over,” which contradicts the permanent nature of the road and its associated access infrastructure. Additionally, the conclusion of “not significant” fails to adequately account for the vulnerability of wolverines to human encroachment and incidental trapping. As a wide-ranging, low-density species already subject to multiple project stressors (e.g., habitat loss, fragmentation, den disturbance), even low levels of increased mortality from trapping could have population-level consequences (Scrafford et al. 2025) (Krebs et al. 2004), particularly in the absence of population monitoring.	A. The assessment in the Final EA/IS acknowledges that impacts to wolverine from increased public access is permanent and continuous in frequency during the operation and maintenance phase. No revision is warranted. B. Although the different residual effects are assessed separately (i.e., habitat loss and alteration, sensory disturbance, increase in public access), and each effect is assessed for significance, the overall assessment of the project on wolverine was assessed as significant. We acknowledge that even a small increase in mortality may have a significant effect on the sustainability of the regional wolverine population. Our assessment concluded that mortality from collisions with vehicles will have a moderate magnitude compared to a low magnitude from increased public access. C. We appreciate the recommended mitigation measures provided. Trap-Free Buffer Areas and Trap Design: It is acknowledged that trap-free buffer areas around sensitive wolverine habitat,	Comment noted; see response for details.	764

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Recommendation: A. The Proponent should acknowledge that increased public access and its associated impacts on wolverine are permanent in duration and ongoing in frequency, not limited to the construction phase. B. Given the species' sensitivity to human disturbance and the cumulative effects of habitat loss and fragmentation, the residual effect should be re-evaluated as significant. C. The following measures to mitigate for the residual effect of increased public access should be incorporated into the project to protect the regional wolverine population: • Establish designated trap-free buffer zones around key wolverine habitats, movement corridors, and denning areas in consultation with local first nation trappers. • Consult with local trappers on the feasibility of using modified trap designs or exclusion devices that reduce the risk of incidental capture of wolverines in areas where trapping remains permitted, rather than requiring their use. • Implement a program to monitor wolverine presence, movements, and mortality incidents using remote	and the requirement for modified traps to reduce incidental capture of wolverines may be effective mitigation measures for minimizing an increase in wolverine mortality resulting from an increase in public access. The decision to implement special regulations on trapping including trap-free buffer zones, the requirement for modified trap designs or exclusion devices is the responsibility of the Ministry of Natural Resources to be made in consultation with the Indigenous communities. Monitoring: As noted in Constance Lake 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 Constance Lake 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
		cameras, genetic sampling, and collaring where feasible. • Develop a centralized system to report and analyze all known or suspected mortalities (e.g., trapping, roadkill) in cooperation with local first nation communities, trappers, and enforcement agencies. • Establish clear mortality thresholds that, if exceeded, would trigger enhanced mitigation or project operational changes.	Centralized Reporting System: As described in Section 9 of Appendix K, reporting protocols for wildlife-vehicle collisions and incidental observations of Species at Risk will be developed and incorporated into the Environmental Protection Plan. Wildlife Crossing Structures: Discussions are ongoing regarding potential modifications to the preliminary engineering design to facilitate safe wildlife crossing and final decisions will be made during detail design. As wolverine are known to use watercourses and waterbodies as travel corridors, many of the site specific design mitigations for the road are associated with watercourse crossings to accommodate movement of wildlife and maintain some habitat connectivity under the road.		
Constance Lake First Nation	32	The EA/IS does not include a strategy for addressing potential beaver-related conflicts at culverts, bridges, or other water control structures. While incidental take procedures are outlined and active lodges will be flagged during construction, the plan does not anticipate or address the high likelihood of	Section 7.3.1.5.4.2 of Appendix K Wildlife Technical Support Document outlines mitigation measures to address potential beaver related conflicts at culverts, bridges, and/or other water crossing structures. Mitigation measures include: - appropriate screening of culverts to prevent access by beavers	Appendix K Section 7.3.1.5.4.2	765

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		damming activity at culverts, which is a common and predictable outcome in beaver- inhabited landscapes. Without a proactive conflict management strategy, this gap may lead to future flooding, infrastructure damage, and unnecessary lethal control measures, undermining both environmental performance and the project's stated mitigation objectives. Recommendation: The Proponent should develop and implement a Beaver Conflict Management Plan to proactively address the risk of damming and flooding at culverts, bridges, and other water crossings. This plan should identify high-risk water crossings during detailed design and incorporate non-lethal mitigation measures, such as flow devices and exclusion fencing. The plan should also establish a routine monitoring and maintenance protocol for water crossings during both construction and operation phases.	- regular monitoring of water crossings for beaver activity - early removal of log jams from crossings and nearby waterways. Final monitoring programs will be developed through consultation with Indigenous communities, and federal and provincial regulators, and will incorporate requirements outlined in federal and provincial permits and/or authorizations. As noted in Constance Lake 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 beaver conflict monitoring. 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.		
Constance	33	The conclusion in the Cumulative Effects	The Environmental Assessment / Impact	Appendix K	766

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Lake First Nation		Assessment (CEA) that cumulative impacts on wolverines are “not significant” is not scientifically defensible due to a critical omission of the Ring of Fire development and associated industrial expansion. The MFCAR is not an isolated project; it is explicitly intended to enable access to Ontario’s most significant undeveloped mineral deposit, the Ring of Fire, and to catalyze broader industrial activity in the region. The Eagle’s Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to facilitate mineral extraction at a much broader scale than the Eagle’s Nest mine alone. By omitting this context, the CEA adopts an artificially narrow spatial and temporal scope, which results in a significant underestimation of cumulative habitat loss and fragmentation. Recommendation: A. CLFN acknowledges that the current Environmental Assessment is limited in scope and does not fully account for the broader regional impacts associated with the MFCAR, particularly the full extent of foreseeable development in the Ring of	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. Inclusion of projects in the cumulative effects assessment (CEA) that do not meet the criteria of reasonably foreseeable is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement. For a project to be considered reasonably foreseeable, sufficient information about the activity must have been available to make a reasonable assessment of its potential effects (i.e., in the planning / approvals / design stage). It is the responsibility of future projects to include developments that are certain or reasonably foreseeable in their CEAs.	Executive Summary	

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Fire. As a result, the assessment likely underestimates the potential impacts on wolverines, a species highly sensitive to habitat loss and fragmentation. While this represents a gap in the cumulative effects analysis, it can be addressed through future project-specific environmental assessments that consider the full range of anticipated development and their implications for wolverine habitat, movement, and long-term population viability.			
Constance Lake First Nation	34	The EA/IS concludes that the cumulative effects of the Project and other reasonably foreseeable developments on wolverine are "not significant,". However, this assessment does not adequately account for climate change as a compounding stressor on wolverine populations, despite acknowledging its influence as "mostly assumed to have an adverse effect" with "low" prediction confidence. Wolverine survival and reproduction are closely tied to cold, structured microhabitats that allow for food caching and denning, both of which are threatened by rising temperatures and diminishing spring snow cover. Wolverines rely on these microhabitats to cache food that supports lactation during February–April, a period of high	The determination of significance of the cumulative effects assessment (CEA) on wolverine is provided in Section 8.2.3.6 of Appendix K Wildlife Technical Support Document as significant. However, an error was made in the drafting of the Executive Summary of Appendix K, where the cumulative effects on wolverine were stated as not significant. The Final EA/IS and Appendix K have been updated to confirm cumulative effects on wolverine is determined to be significant. A: Section 8.2.3.1.1 of Appendix K has been updated to include a detailed discussion of the long-term effects of climate change on the persistence of wolverine in the region.	Final EA/IS Section 10.3.3 Section 8.2.3.6 of Appendix K Section 8.2.3.1.1 of Appendix K	767

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		energetic demand and low prey availability. This concern is especially pronounced in northern Ontario, where the project is situated within the Hudson Bay Lowlands (HBL)—a subarctic zone that, until recently, was among the last Arctic refugia from global warming, buffered by the cooling influence of Hudson Bay Sea ice (Smol et al. 2013). However, detailed climate and lake sediment records now show that the region crossed a climatic tipping point in the 1990s, transitioning abruptly into a phase of rapid warming, particularly during winter and autumn (Smol et al. 2013). This warming is directly linked to shorter snow seasons and earlier ice melt, conditions that undermine the persistent spring snow cover critical to wolverine denning and food caching. The EA/IS fails to meaningfully assess these climate-sensitive behaviors, particularly the species' reliance on persistent spring snow for denning and the strategic use of winter food caches to bridge periods of scarcity. These adaptations are central to the species' reproductive success in a low-productivity, cold-niche environment, and are known to be highly vulnerable to climate warming (Inman, Magoun,	B: The impacts from climate change on wolverine habitat is uncertain because of the variability in climate projection models; as such, potential impacts from climate change, including how natural factors (e.g., fire, snowpack duration) may be altered are qualitatively discussed in the cumulative effects assessment. Section 8.2.3.1.1 of Appendix K has been updated to integrate the findings of additional scientific literature of regional climate predictions into the assessment of snowpack duration, and the potential implications of how reduced snowpack duration may influence natal and maternal den quality and wolverine reproductive success and wolverine distribution. C: The literature cited in this comment (Smol et al., 2013) has been reviewed and Section 8.2.3.1.1 of Appendix K has been updated to include a more in-depth discussion of regional warming trends and the predicted impacts of reduced snowpack on wolverine survival and reproduction. D: As described in Section 9 of Appendix K, engagement and consultation with		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Persson, & Mattisson, 2012). As such, the interaction between habitat alteration from the Project and climate-induced stressors could produce non-linear cumulative effects that are not captured by habitat area metrics alone. Recommendation: A. Any assessment of effects on wolverine must account for the ongoing loss of persistent spring snow cover and cold microhabitats that are essential for successful denning and food caching. These features are fundamental to wolverine reproductive success, and their decline due to climate warming, when combined with project-related disturbances, may heighten reproductive failure risks. The CEA should be evaluate the long-term implications of climate change for wolverine persistence in the region. B. The Proponent should integrate region-specific climate models into the CEA to assess projected changes in snowpack duration, depth, and spring persistence, particularly during the wolverine denning period (February–April). C. The Proponent should incorporate observed regional warming trends (e.g., Smol et al. 2013) into the assessment	Indigenous communities and federal and provincial regulators, as well as requirements outlined in federal and provincial permits or authorizations, will confirm the final monitoring programs for furbearers during construction, operation and maintenance. The monitoring of climate-sensitive indicators such as spring snow duration, den occupancy, and reproductive success will be considered. The environmental monitoring program will be implemented to verify effects on wildlife and adaptive management will be applied where necessary.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		framework to better evaluate the interaction between anthropogenic habitat alteration and climate-driven loss of suitable denning and caching habitat. D. The Proponent should commit to long-term monitoring of climate-sensitive indicators, such as spring snow duration, den occupancy, and reproductive success, to inform adaptive mitigation and management responses.			
Constance Lake First Nation	35	The Proponent estimates that 21% (98,417 ha) of the ungulate effects assessment LSA is disturbed, based on a 500-meter buffer around anthropogenic features, in accordance with Environment and Climate Change Canada (2023) guidance (ECCC, 2023). However, this buffer distance represents the low end of the scientific consensus and does not align with current understanding of caribou behavior or jurisdictional best practices. Woodland caribou are known to avoid both physical and sensory disturbances at significantly greater distances than 500m (Vors et al., 2007). Ontario's guidance reflects this by recommending that project proponents minimize sensory disturbance within ten kilometers of known or potential high use areas. These avoidance behaviors are well-documented and underscore	A: Functionally lost caribou habitat (i.e., indirect habitat loss) was calculated using a 500 m buffer, which aligns with guidance from the federal recovery strategy and was shown to influence calf recruitment (ECCC 2020). Some literature as referenced in the comment suggest larger zones of influence (ZOIs) better reflect caribou avoidance behaviour of anthropogenic disturbances, there is uncertainty in the literature about the measurable demographic consequence for caribou. Although caribou (boreal and barren-ground) have been shown to modify their movement behaviour and distribution at distances of 5 to 15 km from development, an effect to survival and reproduction has not been demonstrated. B: The Final Environmental Assessment /	Appendix AB	768

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		growing concerns about the persistent underestimation of disturbance effects in environmental assessments (Collard, Dempsey, & Mollie, 2020) (Cameron & Kennedy, 2023). A 500-meter buffer does not capture the ecological sensitivity of these areas, nor the full spatial extent of functional habitat loss experienced by caribou. Assuming a 1-kilometer buffer—which remains at the lower end of scientifically supported avoidance distances—the total disturbed area in the LSA would increase to approximately 196,834 hectares, or 42% of the study area. This would reduce the proportion of undisturbed habitat from the reported 73.5% to approximately 58%, falling well below the 65% threshold identified by Environment and Climate Change Canada (2023) as necessary to support self-sustaining local caribou populations. This shift is particularly concerning in the context of broader cumulative effects, especially given this project's potential to enable large- scale resource development across the Ring of Fire region. Recommendation: A. The Proponent must recalculate functionally lost caribou habitat using a range of buffer distances—from 500	Impact Statement has been updated to include Appendix AB Preliminary Biodiversity Offset Plan which will include a plan for offsetting the loss of functional caribou habitat, (habitat restoration, enhancement, long-term protection) along with a long-term monitoring plan to validate success of the offsetting measures. The Preliminary Biodiversity Offset Plan will be finalized during detail design. C: See response to A.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		meters to 15 kilometers—based on proximity to known or potential high-use areas and ecologically sensitive locations such as calving grounds, wintering habitat, and key travel corridors. This approach reflects well-documented variability in caribou responses to disturbance and aligns with both jurisdictional guidance and peer-reviewed literature demonstrating that avoidance can occur at distances far greater than 500 meters. B. The Proponent should use the updated analysis of functional habitat loss to inform the assessment of project impacts, and to guide the development of effective mitigation and offsetting strategies.			
Constance Lake First Nation	36	The CEA for caribou fails to incorporate all the foreseeable industrial expansion associated with the Ring of Fire. The MFCAR is not an isolated project; it serves as the enabling infrastructure for one of Canada's largest undeveloped mineral deposits. The Eagle's Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to facilitate mineral extraction at a much broader scale than the Eagle's Nest mine	As stated in Section 4.4.3.2.3 in Appendix M Ungulates Technical Support Document, for an activity to be considered foreseeable and included in the cumulative effects assessment (CEA), sufficient information about the activity must have been available to make a reasonable assessment of its potential effects (i.e., in the planning / approvals / design stage). This included development that is certain or reasonably foreseeable and activities with additive effects, where appropriate (Canadian	Comment noted; see response for details	769

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		alone. By omitting this context, the CEA adopts an artificially narrow spatial and temporal scope, which results in a significant underestimation of cumulative habitat loss and fragmentation. The assessment does not consider the full footprint of anticipated mining operations, secondary access roads, transmission corridors, and permanent industrial infrastructure, all of which are reasonably foreseeable outcomes of the MFCAR. This omission critically undermines the validity of the CEA's conclusions regarding the long-term impacts on caribou habitat and population viability. Recommendation: CLFN recommends that the cumulative impacts on caribou associated with future Ring of Fire development be addressed through future project-specific environmental assessments. These assessments should consider the full range of anticipated activities and their implications for caribou habitat, movement, and long-term population health.	Environmental Assessment Agency, 2018). Reasonably foreseeable activities that were not considered are those that have no publicly disclosed development plan or other information regarding the location and type of project/activity. For a potential future project to be considered in the CEA, preliminary information such as the location and type of activity, extent of the footprint, project components, and anticipated timelines are needed to evaluate if effects from the Project and the potential future project will overlap. It is the responsibility of future projects to include developments that are certain or reasonably foreseeable in their CEAs.		
Constance Lake First Nation	37	The CEA does not account for wildfire as a major and increasing source of disturbance in the boreal forest. Scientific evidence indicates that wildfires are	Climate change and the associated potential for increase in wildfire frequency and severity were considered in the Cumulative Effects Assessment	Comment noted; see response for details	770

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		expected to increase in both frequency and intensity due to a combination of rising temperatures, increased lightning activity, and prolonged periods of drought associated with climate change. These factors are altering fire regimes across Northern Ontario, making larger and more severe fires increasingly common. This is highly relevant for caribou, as wildfire removes mature conifer forests that provide essential winter forage in the form of terrestrial lichens. Following fire, the landscape regenerates into early successional forest types dominated by shrubs and young deciduous growth. These habitats are more supportive of moose, which thrive in areas with dense browse and regenerating vegetation. As moose populations increase, wolf densities also rise, since wolves rely on moose as a primary prey species. This leads to elevated predation pressure on caribou, which are more vulnerable in areas where they overlap with high densities of both moose and wolves. The exclusion of wildfire from the CEA represents a significant gap, particularly given its compounding interaction with anthropogenic disturbances. Wildfire contributes not only to the direct loss of caribou habitat, but also to long-term changes in predator-prey dynamics and	(CEA) of Appendix M Ungulates Technical Support Document. Wildfires are anticipated to contribute cumulatively to reduce habitat availability and distribution and have an adverse influence on survival and reproduction of caribou in the CEA. The magnitude of change is uncertain because of variability in climate projection models. The combined residual cumulative effects from the Project, reasonably foreseeable developments, forest harvest activities and climate change led to a determination of a significant adverse effect on caribou in the Caribou Regional Study Area as described in Section 8 of Appendix M.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		range connectivity. For a comprehensive assessment of impacts to caribou, wildfire must be included as an interacting disturbance factor alongside development and infrastructure. Recommendation: The CEA should incorporate wildfire as a major and increasing source of disturbance in the boreal forest. The assessment must account for the expected rise in wildfire frequency and severity due to climate change and evaluate how wildfire interacts with anthropogenic disturbances to impact caribou habitat, predator- prey dynamics, and range connectivity.			
Constance Lake First Nation	38	The CEA for moose fails to fully incorporate foreseeable industrial expansion associated with the Ring of Fire. The Eagle's Nest Mine is included in the CEA; however, it is the only mine site associated with the Ring of Fire that has been considered. The development of this road is anticipated to facilitate mineral extraction at a much broader scale than the Eagle's Nest mine alone. By omitting this reasonably foreseeable development, the Proponent cannot credibly conclude that the project will not have significant impacts on moose.	As stated in Section 4.4.3.2.3 in Appendix M Ungulates Technical Support Document, for an activity to be considered foreseeable and included in the cumulative effects assessment (CEA), sufficient information about the activity must have been available to make a reasonable assessment of its potential effects (i.e., in the planning / approvals / design stage). This included induced development that is certain or reasonably foreseeable and activities with additive effects, where appropriate (Canadian Environmental Assessment	Comment noted; see response for details	771

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Without accounting for cumulative habitat loss, fragmentation, and increased access pressures tied to broader regional development, the assessment underestimates the risk to moose populations and their long-term viability in the region. Recommendation: CLFN considers the impacts of the Project on moose and moose habitat to be significant. While the current assessment may not fully capture the broader scope of foreseeable development in the Ring of Fire, CLFN expects that the cumulative impacts of access, habitat loss, and disturbance on moose populations will need to be addressed through future Environmental Assessments associated with subsequent mining projects in the region.	Agency, 2018). Reasonably foreseeable activities that were not considered are those that have no publicly disclosed development plan or other information regarding the location and type of project/activity. For a potential future project to be considered in the CEA, preliminary information such as the location and type of activity, extent of the footprint, project components, and anticipated timelines are needed to evaluate if effects from the Project and the potential future project will overlap. 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. The inclusion of not reasonably foreseeable projects is not a regulatory requirement and as such was not included as part of the EA/IS. It is the responsibility of future projects to include developments that are certain or reasonably foreseeable in their CEAs.		
Constance Lake First Nation	39	The EA/IS underestimates the long-term effects of increased public access on moose populations associated with the MFCAR. While the assessment	A: Given the uncertainty in the magnitude of potential increase in moose harvest from increased public access due to the Community Access Road and the limited	Final EA/IS Section 9.4.7.4.2 Appendix M	772

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		acknowledges that new roads and trails can lead to greater access by hunters and therefore increase harvest pressure, it ultimately concludes that the resulting effects on moose survival and reproduction will be moderate in magnitude and not significant. This conclusion is not well-supported. The permanent introduction of a year-round access corridor into a largely roadless landscape represents a substantial change to the existing conditions. The EA/IS does not provide details on how unauthorized use of access roads or off-highway vehicles will be monitored or enforced. It also assumes, without strong evidence, that the isolation of the project area will naturally limit use. In reality, new road construction often facilitates incremental use by hunters, recreational users, and others over time, especially once a corridor is established. Given the permanent nature of the access road, the known relationship between road access and moose harvest pressure, and the low baseline moose densities in the region, the EA/IS's conclusion that the residual effect is "not significant" is flawed. Recommendation: A. The Proponent should reclassify the effect of increased public access on	data on current harvest levels, the residual effects assessment for moose, the Final EA/IS has been updated to precautionarily assume that the increase in hunter harvest could reach unsustainable levels and lead to decreased resilience and maintenance of the self-sustaining and ecologically effective regional moose population. As such, the Final EA/IS has been updated to clarify that residual effects on moose from an increase in public access are precautionarily considered significant. B: A comprehensive Moose Access and Monitoring Plan will be developed for the Community Access Road. The Moose Access and Monitoring Plan will be shared with Constance Lake First Nation. The plan will include long-term monitoring of moose presence, hunting pressure, identification of high-risk moose collision zones, and moose-vehicle collisions. The plan will be developed to protect the safety of people and moose. Potential monitoring approaches are described in Section 9 of Appendix M Ungulates Technical Support Document including the implementation of several monitoring plans that will include the following actions and adaptive management triggers or action		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		moose as significant. B. The Proponent should commit to developing a comprehensive Moose Access Management and Monitoring Plan in collaboration with CLFN. This plan should include enforceable access control measures, such as physical barriers and road- use restrictions, along with a strategy to monitor both authorized and unauthorized use of the corridor. Long-term monitoring of moose presence and hunting pressure should be conducted through community-based observations, camera traps, or observation stations.	levels: - Monitor moose presence, population trends, and regulated harvest through remote cameras, aerial surveys, and community-based programs - Monitor Indigenous harvest through community-based programs - Monitor the effectiveness of access mitigation measures and success of reclamation and revegetation of decommissioned roads - Monitor moose habitat use and distribution with GPS collars before and after construction of the road - Action levels or triggers for implementing adaptive management measures would be determined through collaboration with Indigenous communities and Ministry of Natural Resources		
Constance Lake First Nation	40	The assessment of vehicle collision risks to moose during the construction and operation of the MFCAR underestimates the likely significance of these effects. The conclusion that the residual impact on moose survival and reproduction due to collisions is “not significant” fails to account for broader regional development scenarios, particularly the anticipated industrial traffic associated with future mineral extraction in the Ring	As stated in Section 4.4.3.2.3 in Appendix M Ungulates Technical Support Document, for an activity to be considered foreseeable and included in the cumulative effects assessment (CEA), sufficient information about the activity must have been available to make a reasonable assessment of its potential effects (i.e., in the planning / approvals / design stage). This included induced development that is certain or	Comment noted; see response for details	773

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		of Fire. Increased heavy truck traffic from mining operations, exploration activity, and supply transport would dramatically elevate the risk of moose-vehicle collisions. Moose are known to be highly susceptible to road mortality, especially in areas with increased vehicle movement, early seral vegetation, and poor visibility. Recommendation: Potential increases in moose-vehicle collisions due to future industrial traffic should be assessed through subsequent environmental assessments for related projects, such as the Northern Road Link or specific mining developments. These future assessments should evaluate cumulative impacts and include appropriate mitigation and monitoring measures.	reasonably foreseeable and activities with additive effects, where appropriate (Canadian Environmental Assessment Agency, 2018). Reasonably foreseeable activities that were not considered are those that have no publicly disclosed development plan or other information regarding the location and type of project/activity. For a potential future project to be considered in the CEA, preliminary information such as the location and type of activity, extent of the footprint, project components, and anticipated timelines are needed to evaluate if effects from the Project and the potential future project will overlap. 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. Inclusion of not reasonably foreseeable projects is not a regulatory requirement and as such were not included as part of the EA/IS. It is the responsibility of future projects to include developments that are certain or reasonably foreseeable in their CEAs including potential moose-vehicle collisions.		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Constance Lake First Nation	41	CLFN acknowledges MFFN's commitment to developing a Terrestrial Biodiversity Offset Plan to provide a net positive increase in the following habitat types: wetland habitat, migratory bird habitat, myotis habitat, wolverine habitat, caribou habitat, and amphibian breeding habitat. However, it is crucial that this plan includes CLFN traditional knowledge to ensure the plan reflects the unique ecological and cultural context of the area. Without reviewing this plan, CLFN cannot fully and meaningfully comment on the outcome of these important habitat types. Recommendation: CLFN requests to be actively involved in the development and implementation of the Terrestrial Biodiversity Offset Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, MFFN should provide appropriate financial resources to support CLFN involvement in this process.	The Final Environmental Assessment / Impact Statement has been updated to include Appendix AB Preliminary Biodiversity Offset Plan and will be finalized during detail design. The development and implementation of the Preliminary Biodiversity Offset 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.	Comment noted; see response for details	774
Constance Lake First Nation	42	CLFN acknowledges MFFN's commitment to developing an Environmental Protection Plan to mitigate impacts on wildlife, and vegetation. However, it is crucial that this plan	The Environmental Protection Plan will be shared with Constance Lake First Nation. The development and implementation of the Environmental Protection Plan will be the responsibility	Comment noted; see response for details	775

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		includes CLFN traditional knowledge to ensure the plan reflects the unique ecological and cultural context of the area. Recommendation: CLFN requests to be actively involved in the development and implementation of the Environmental Protection Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, MFFN should provide appropriate financial resources to support CLFN involvement in this process.	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.		
Constance Lake First Nation	43	Constance Lake First Nation has observed Arctic Fox within our Traditional Territory. These observations are based on local land use and community knowledge, and they represent notable occurrences given that this species is typically found much farther north. The presence of Arctic Fox in our area suggests they may be expanding or shifting their range southward—an ecological change that should be documented and better understood. We are concerned that the level of effort to detect Arctic Fox within the study area was limited. The absence of detections in the EA/IS should not be interpreted as	Section 3.1 of Appendix K Wildlife Technical Support Document has been updated to include this information provided related to Arctic Fox occurrences within Constance Lake First Nation's Traditional Territory. As noted in Constance Lake 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 future	Section 3.1 of Appendix K Wildlife Technical Support Document	776

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		absence from the landscape. Survey timing, coverage, and methodology may not have been sufficient to detect this species, especially considering their elusive nature and wide-ranging behavior. Recommendation: Arctic Fox should be included in the ongoing and future wildlife monitoring programs for the MFCAR project. Monitoring should involve collaboration with Constance Lake First Nation and Marten Falls First Nation land users. Monitoring results should be regularly reviewed and used to inform adaptive management.	wildlife monitoring programs and Arctic Fox. 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. Monitoring results will be provided to MECP and the environmental advisory committees can request the results from MECP.		
Constance Lake First Nation	44	CLFN has a deep and enduring connection to the land and the animals that sustain our way of life, and we are gravely concerned about the potential loss of habitat and the decline of important species. The losses of wetland and upland habitats that support furbearers, moose, and other culturally significant species highlight the broader impacts of the project on the ecosystem that CLFN relies on. This loss, compounded by decades of legacy impacts, raises serious concerns about the long-term viability of these species	A: As noted in Constance Lake 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	Comment noted; see response for details	777

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		and the health of our traditional lands. Monitoring is essential to accurately quantify these impacts and implement effective measures to address them, ensuring the sustainability of our lands and resources for future generations. Recommendation: A. CLFN requests to be actively involved in the follow-up and monitoring programs related to wildlife, birds, vegetation, and ungulates. This includes participation in targeted species surveys to track relative abundance and spatial distribution, as well as contributing traditional knowledge to ensure that monitoring efforts align with CLFN priorities and cultural values. B. CLFN further requests to be engaged in the development and implementation of adaptive management measures informed by these monitoring results, ensuring that mitigation strategies remain effective over time.	mandate to Marten Falls First Nation, a Terms of Reference with relevant agencies and CLFN will be established. B: Monitoring results will be provided to the Ministry of Environment, Conservation and Parks (MECP) and the environmental advisory committees can request the results from MECP.		
Constance Lake First Nation	45	The conclusion in the Cumulative Effects Assessment (CEA) that cumulative impacts on reptiles and amphibians are “not significant” may underestimate potential risks associated with road mortality. Reptiles and amphibians are particularly vulnerable to vehicle collisions due to their slow movement,	A: As described in Section 7.3.1.6.5.2 of Appendix K Wildlife Technical Support Document, culverts will be modified to accommodate safe passage of amphibians and reptiles, and exclusion fencing will be established at strategic locations to funnel these species through to minimize road mortality risks.	Comment noted; see response for details	790

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		tendency to bask on road surfaces, seasonal migrations, and low visibility to drivers. These risks may be compounded by habitat fragmentation and increased vehicle traffic along the road over time—especially if traffic volumes rise due to future development in the region, including potential activities connected to the Ring of Fire. While the EA/IS acknowledges that mortality could occur, it does not clearly outline how mortality will be monitored or how mitigation measures will be adjusted if roadkill levels are higher than anticipated. There is also limited information on whether areas with high concentrations of reptiles and amphibians will be identified and managed accordingly. Recommendation: A. The Proponent should design and commit to constructing wildlife crossing structures where feasible (e.g., amphibian tunnels, culverts, or overpasses), and install directional fencing to guide reptiles and amphibians toward these safe crossings. B. The Proponent should post wildlife crossing signage and reduce speed limits during key migration and breeding seasons in areas identified as high-risk for road mortality.	Additional mitigations for reptiles and amphibians will be considered and incorporated into preliminary and detail design. B: As described in Section 7.3.1.6.5.2 of Appendix K, signage will be posted in areas where reptiles and amphibians are regularly observed. C: As described in Section 9 of Appendix K, engagement and consultation with Indigenous communities and federal and provincial regulators, as well as requirements outlined in federal and provincial permits or authorizations, will confirm the final monitoring programs for reptiles and amphibians. As noted in Constance Lake 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		

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		C. The Proponent should commit to adaptive management measures (e.g., installation of additional crossing structures, fencing, reduced speed zones, new signage) if road mortality exceeds thresholds set in consultation with Indigenous Knowledge holders and species experts.	mandate to Marten Falls First Nation, work with relevant agencies and Indigenous Peoples to establish a Terms of Reference for one.		
Constance Lake First Nation	46	The EA/IS concludes that no turtle species are present within the project area; however, this determination is not supported by adequate fieldwork or targeted survey effort. No turtle-focused surveys were conducted, and there is limited baseline data to justify this conclusion. The Western Midland Painted Turtle (Chrysemys picta bellii) has a known range that extends just south of the project area, suggesting that suitable habitat conditions may exist within the region. Given the remote nature of the area and the overall lack of herpetofauna survey effort, the apparent absence of turtles may reflect data deficiency rather than true absence. Wetland and riparian habitats along the proposed road corridor. Recommendation: A. CLFN requests that targeted herpetofauna surveys be conducted	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. 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 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	Comment noted; see response for details	791

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		along the proposed road corridor, focusing on identifying turtle presence in suitable wetland and riparian habitats during appropriate seasonal windows. These surveys should prioritize the southern section of the corridor where potential habitat overlaps with the known range of the Western Midland Painted Turtle is most likely. B. CLFN requests that ongoing monitoring should be implemented throughout the construction and operation of the road. If turtles are observed, mitigation measures (exclusion fencing, nest protection, or timing restrictions) must be developed and implemented in consultation with CLFN	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 noted in Constance Lake 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 Constance Lake First Nation will be established.		
Constance Lake First Nation	47	The impact of invasive species on vegetation in the local study area is of great concern to CLFN because the existing LSA has limited human disturbance and no invasive species were documented during field surveys. This pristine habitat will very likely have	A: Revegetation strategies will be developed as part of the Environmental Protection Plan (EPP). The development and implementation of the EPP 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	792

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		invasive species introduced because roads are major conduits for the spread of invasive plants into new areas as they create disturbed environments that favor invasives and provide a corridor for transmission of seeds on vehicles. One of the measures to mitigate the impact of invasive species propagation within the EA/IS is to use seed mixes with appropriate native species for all seeding and restoration works. Recommendation: A. For all re-vegetation efforts, the Proponent must consult with CLFN, to select an appropriate seed mix that closely mimics the pre-construction plant community and includes plants of medicinal and traditional importance. This could be done by either sourcing seed mix from a local seed distributor, or using wild seeds propagated from plants collected from the project area. B. The Proponent should support the establishment of a regional road invasive species subcommittee that includes CLFN and other affected First Nations.	discussions with the Province regarding the ownership and operations for the Community Access Road. B: As noted in Constance Lake 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 with relevant agencies and Constance Lake First Nation will be established.		
Constance Lake First Nation	48	CLFN has already experienced significant impacts from terrestrial invasive species within our Traditional Territory, particularly in areas disturbed	The Final EA/IS and the Technical Support Documents were prepared to meet the requirements outlined in the Terms of Reference, the Tailored Impact	Comment noted; see response for details	793

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		by past infrastructure and industrial development. These species have affected native plant communities, reduced the availability of traditional medicines, and altered habitat for culturally important wildlife. The construction of the MFCAR in a largely intact ecosystem increases the likelihood of invasive species introduction via vehicle traffic, contaminated soil, and construction activity. CLFN is particularly concerned about cumulative impacts across multiple projects and jurisdictions and emphasizes the need for coordinated proactive management. Recommendation: The Proponent should support the establishment of a regional road invasive species subcommittee that includes CLFN and other affected First Nations. This subcommittee should be responsible for developing and coordinating terrestrial invasive species prevention measures, long-term monitoring programs, and response strategies. The EA/IS should explicitly recognize the role of this subcommittee as part of the Project's regional mitigation framework, ensuring a consistent and Indigenous-led approach to invasive species management across northern	Statement Guidelines and the technical discipline-specific study plans. The establishment of a regional road invasive species subcommittee is not a regulatory requirement and as such was not developed as part of the Final EA/IS.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		road networks.			
Constance Lake First Nation	49	Section 5.1.2.2 of the Surface Water Technical Support Document (Appendix F) notes that the Waboose Diversion Dam on the Ogoki River, though located outside the defined RSA, directly influences flows within it, including at the proposed Ogoki River crossings. The dam is managed under the Nipigon River System Water Management Plan and is primarily regulated based on water levels in Lake Nipigon - not conditions within the Ogoki River system itself. This introduces significant uncertainty regarding seasonal and interannual flow variability in the Ogoki River, particularly during high-water events on Lake Nipigon when the dam may be opened to divert additional water north through the Ogoki basin and into the Albany River system. This is compounded by the fact that high flow periods in the Lake Nipigon System are very likely to coincide with high flow periods in the Ogoki River. This water management approach, focused on downstream hydropower optimization in the Lake Nipigon watershed, may lead to unpredictable, extreme changes in flow volume, velocity, and duration within the Ogoki River.	A. Section 5.1.3 of Appendix F Surface Water Quantity Technical Support Document includes reference to the hydrometric stations within the Upper Ogoki watershed, including the Waboose Lake Reservoir at Waboose Dam, Ogoki River at Waboose Falls Dam, and Ogoki River Diversion to Lake Nipigon stations. Information for these hydrometric gauges ceased publication in 1994, with only a short timeframe of hydrometric information provided by the Ontario Power Generation (i.e., water levels and flows within a two-year span). Based on the limited information publicly available for the Waboose Control Dam, an quantitative assessment could not be completed. B. During the detail design phase, information regarding seasonal variability, including potential flow diversions expected from the Waboose Control Dam, will need to be factored in the design and construction of respective crossing structures that could be directly impacted downstream along the Ogoki River. C. Construction sequencing and risks	Comment noted; see response for details.	794

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		These hydrological uncertainties raise serious concerns for the stability and long-term integrity of the proposed Ogoki River crossing, as well as other infrastructure located near the riverbanks (e.g., access routes, culverts, bridges, work pads). Fluctuations in flow may increase the risk of erosion, sedimentation, and scouring, particularly during extreme flow events or unanticipated dam releases. Recommendation: A. The Proponent should prepare a quantitative assessment of flow variability in the Ogoki River, including under multiple Lake Nipigon water level scenarios and potential releases at the Waboose Diversion Dam. B. The Proponent should commit to preparing a detailed hydraulic risk analysis for the Ogoki River crossings, including: • Erosion and sedimentation modeling under high-flow conditions; • Infrastructure design tolerances for variable and sudden flow increases; • Emergency protocols in the event of unanticipated dam releases. C. The Proponent should identify and assess construction sequencing risks related to hydrological variability, including potential delays or unsafe	related to hydrological variability will be determined during detail design. D. It will be the Owner/Operator's responsibility to coordinate with Ontario Power Generation and regulators related to the Nipigon River System Water Management Plan. Marten Falls First Nation continues to have discussions with the Province regarding ownership and operations of the Community Access Road. E. Refer to response B. F. As outlined in response A, limited information is publicly available for Waboose Diversion Dam, and therefore a quantitative assessment in the cumulative effects assessment could not be completed.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		working conditions during high-flow periods influenced by dam operations. D. The Proponent should discuss how they will coordinate with Ontario Power Generation (OPG) and other regulatory authorities managing the Nipigon River System Water Management Plan to ensure advance notification of operational changes at the Waboose Diversion Dam that could affect flow levels in the Ogoki River during both construction and operation phases. E. The Proponent should incorporate design measures into water crossing infrastructure to accommodate long-term uncertainties in hydrology resulting from dam management priorities outside the project's direct control. For example, the crossing could be designed for a 1 in 10,000 year flood event. F. The Waboose Dam should be included in the cumulative effects assessment.			
Constance Lake First Nation	50	Section 5.1.2.2 of the Surface Water Technical Support Document (Appendix F) does not discuss the Cedar Channels Control Dam (CCCD) on the Albany River despite being mentioned by MFFN members during community engagement for the Project. The CCCD directly influences flows within the Albany River, including at the proposed Albany River	A. Section 5.1.3 of Appendix F Surface Water Technical Support Document includes reference to the hydrometric stations within the Albany River watershed. Information collection for the Cedar Channels Control Dam hydrometric gauges has stopped and results are not publicly available, other than some reports indicating 7 to 14 day	Comment noted; see response for details.	795

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		crossing. The dam is managed under the Lake of the Wood Control Board and is primarily regulated based on water levels in The English River System - not conditions within the Albany River system itself. This introduces significant uncertainty regarding seasonal and interannual flow variability in the Albany River, particularly during high-water events on Lake St. Joseph when the dam may be opened to divert additional water north through the Albany basin and into the Albany River system. This is compounded by the fact that high flow periods in Lake St Joseph are very likely to coincide with high flow periods in the Albany River. This water management approach, focused on downstream hydropower optimization in the English River watershed, may lead to unpredictable, extreme changes in flow volume, velocity, and duration within the Albany River. These hydrological uncertainties raise serious concerns for the stability and long-term integrity of the proposed Albany River crossing, as well as other infrastructure located near the riverbanks (e.g., access routes, culverts, bridges, work pads). Recommendation:	averages, published by the Lake of the Woods Control Board. Full datasets of the Albany Outflow diversion would be required to complete a quantitative assessment of flows diverted from Lake St. Joseph. B. During the detail design phase, information regarding seasonal variability, including potential flow diversions expected within the Albany River, will need to be factored in the design and construction of respective crossing structures that could be directly impacted downstream along the Albany River. C. Construction sequencing and risks related to hydrological variability will be determined during detail design. D. It will be the Owner/Operator's responsibility to coordinate with Lake of the Woods Control Board and regulators related to the Cedar Channels Control Dam. Marten Falls First Nation continues to have discussions with the Province regarding ownership and operations of the Community Access Road. E. Refer to response B.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		A. The Proponent should prepare a quantitative assessment of flow variability in the Albany River, including under multiple Lake St. Joseph water level scenarios and potential releases at the CCCD. B. The Proponent should commit to preparing a detailed hydraulic risk analysis for the Albany River crossing, including: • Erosion and sedimentation modeling under high-flow conditions; • Infrastructure design tolerances for variable and sudden flow increases; • Emergency protocols in the event of unanticipated dam releases. C. The Proponent should identify and assess construction sequencing risks related to hydrological variability, including potential delays or unsafe working conditions during high-flow periods influenced by dam operations. D. The Proponent should discuss how they will coordinate with the Lake of the Woods Control Board and other regulatory authorities managing the English River system to ensure advance notification of operational changes at the CCCD that could affect flow levels in the Albany River during both construction and operation phases. E. The Proponent should incorporate design measures into water crossing	F. As outlined in response A, limited information is publicly available for Cedar Channels Control Dam, and therefore a quantitative assessment in the cumulative effects assessment could not be completed.		

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		infrastructure to accommodate long-term uncertainties in hydrology resulting from dam management priorities outside the project's direct control. For example, the crossing could be designed for a 1 in 10,000 year flood event. F. The CCCD should be included in the cumulative effects assessment for the Project.			
Constance Lake First Nation	51	Section 7.1.2.3 of the EA/IS states that only material that has been cleared through a geochemical verification process will be used to avoid acid rock drainage (ARD) or metal leaching, and that runoff will be monitored from an erosion and sediment control perspective. While this precautionary approach is appropriate, the details of the geochemical verification plan — including site selection, sampling protocols, and thresholds for exclusion — have not been made available for review. Given the proximity of many borrow and quarry areas to lakes, rivers, wetlands, and culturally significant areas, and the potential for ARD and metal leaching to result in long-term degradation of water quality and aquatic habitat, it is critical that potentially impacted Indigenous Nations have the opportunity to review, comment on, and influence the	A geochemical verification plan will be developed during detail design and will be shared with Constance Lake First Nation. The development and implementation of the geochemical verification 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.	Comment noted; see response for details	796

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		development and implementation of the geochemical verification plan. Recommendation: The Proponent must provide advanced review of the draft geochemical verification plan to CLFN.			
Constance Lake First Nation	52	Section 7.2.2.1 of the EA/IS describes a construction phasing approach in which road building could begin simultaneously at multiple locations — for example, both from the north near Marten Falls and the south near Painter Lake Road. While this may reduce the overall duration of construction, it introduces significant uncertainty regarding the environmental impacts of the construction phase, particularly with respect to: • The creation of temporary access routes to reach remote segments; • Increased traffic and staging areas in multiple sensitive landscapes at once; • The potential duplication of environmental disturbances, such as clearing, blasting, sedimentation, and noise, in several places at the same time; • The ability to effectively monitor and enforce sensitive timing windows (e.g., for migratory birds, fish spawning, or cultural practices) when work is occurring concurrently at multiple locations.	The 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. The identification of single-point and multi-point construction impacts were not a regulatory requirement and as such were not developed as part of the EA/IS.	Comment noted; see response for details	797

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The lack of detail about how multi-point construction will be implemented leaves important questions unanswered about how residual and cumulative environmental effects will be avoided or minimized during construction. Recommendation: The Proponent should distinguish the differences in impacts from single-point and multi-point construction and factor this into their residual effects assessment and cumulative effects assessment.			
Constance Lake First Nation	53	The EA/IS indicates that embankment material borrow areas and aggregate site areas (e.g., sand, gravel, and rock) will be required for the construction of the MFCAR. However, the document lacks detailed information on the confirmed availability of borrow material sources along the proposed corridor. Without this information, it is difficult to evaluate the true scope of environmental and cultural impacts, particularly those related to land and water disturbance, wildlife habitat fragmentation, and sedimentation risk near water crossings. Recommendation: A. The Proponent should provide a comprehensive inventory of proposed	A: A Band Council Resolution for the Community Access Road Preferred Route was issued in August 2024 and geotechnical work could not commence until the winter of 2025. These are key inputs required to be able to prepare an inventory of aggregate sites. As such a comprehensive inventory of proposed borrow sources will be determined during detail design. B: Geotechnical information will be collected from aggregate sites to better understand the volume and quality of materials present. This in turn will be used in detail design to assess if the materials are sufficient and of adequate quality or if other sources would be	Comment noted; see response for details.	798

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		borrow sources, including location maps, estimated volumes, material types, and confirmation of suitability through preliminary geotechnical investigations; B. The Proponent should prepare a contingency plan if local materials are found to be insufficient or geochemically unsuitable, including how alternate sites would be selected and assessed.	required.		
Constance Lake First Nation	54	Section 8.1.7.2 of the EA/IS presents groundwater sampling results that show numerous exceedances of Canadian and Ontario drinking water guidelines, as well as provincial water quality objectives and soil/groundwater/sediment standards, for a wide range of metals, volatile organic compounds (VOCs), and other contaminants. These include significant exceedances for arsenic, uranium, lead, chromium, cadmium, and toluene, among others. However, the Proponent does not offer any explanation for the source, significance, or implications of these exceedances, nor how these findings might impact construction planning, potential contamination pathways, or risks to human and ecological health. It is also unclear whether the results reflect natural background conditions, legacy contamination, or project-related	A: Discussion of the observed exceedances is provided in Appendix H Groundwater Technical Support Document. Many of the parameters have both anthropogenic and natural sources and the scope of the existing conditions study provided regional groundwater quality information but not detailed investigations into the potential sources of any exceedances. B: Potential environmental and human health risks related to groundwater quality will be dependent on the specific groundwater source involved and the potential receptor exposures. Sources are highly varied and the effects assessment conservatively did not assume that groundwater sources or discharges would meet required guidelines. Therefore, the mitigation requirements include site specific	Comment noted; see response for details.	799

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		disturbance. Given the potential for the project to interact with groundwater — particularly through excavation, dewatering, aggregate extraction, and water crossings — the absence of this analysis represents a significant gap to properly assess impacts of the Project. Recommendation: A. The Proponent should provide a clear explanation for the observed exceedances, including whether these are believed to be naturally occurring or anthropogenic; B. The Proponent should assess the potential environmental and human health risks associated with the exceedances, especially in areas of planned construction or borrow material extraction; C. The Proponent should clarify whether any of the contaminated groundwater zones intersect with groundwater-surface water interaction zones, traditional land use areas, or potential drinking water sources that will be utilized by construction camps for the Project.	studies, permitting, and monitoring of water takings and discharges do not result in impacts to the environment or human health. C: No contaminated groundwater zones were identified by the existing conditions or effects assessment. Metals parameters exceeding background or guideline levels are assumed to be naturally occurring and volatile organic compounds (VOC) and polycyclic aromatic hydrocarbons (PAH) parameters exceeding background or guideline levels were observed to return or remain at levels below background and guidelines through the existing conditions monitoring. Groundwater will not be a source of drinking water for the construction camp.		
Constance Lake First Nation	55	The residual effects assessment of water presented in the EA/IS suffers from several critical limitations that	A: Marten Falls First Nation is committed to developing a shared understanding of neighbouring Indigenous communities'	Comment noted; see response for	800

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		significantly undermine its credibility from the perspective of CLFN: • The assessment is based solely on western scientific approaches, with minimal integration of Indigenous Knowledge or Indigenous-led indicators for measuring change and significance. • It assumes that all mitigation measures and project components will operate as designed, without acknowledging the high likelihood of system failures, extreme weather events, or implementation challenges — particularly in remote and sensitive environments. • The criteria used to determine significance are based entirely on compliance with federal and provincial regulatory thresholds and do not reflect Indigenous laws, protocols, or standards for environmental and cultural protection. • The magnitude of local impacts is frequently minimized by evaluating them at a regional scale, which obscures site-specific or culturally important effects that may be significant to CLFN. As a result of these methodological choices, nearly all residual effects are classified as “negligible” or “low” in significance — a conclusion that does not reflect how our Nation experiences environmental, cultural, and health-related changes on our lands.	Aboriginal and / or Treaty Rights and Interests (ATRI). Indigenous communities, including Constance Lake First Nation were issued a community-specific Preliminary ATRI Existing Conditions and Impact Assessment Report (the ATRI Report) in June and July 2025. These reports include an assessment of impacts to community-specific rights and interests. Marten Falls First Nation aimed to honour the time needed for feedback on the ATRI Report and therefore provided a 90-day review period to communities for the review of their ATRI Report. We acknowledge that Constance Lake First Nation received the ATRI report after issuing their comments on the Draft EA/IS. B: We appreciate your feedback and the time you have taken to share your perspective. However, the comment is directed at government agencies (Impact Assessment Agency of Canada) 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 to address them.	details.	

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		Crucially, these flawed residual effects assessments are then used as the foundation for the cumulative effects assessment, meaning that cumulative impacts are also underestimated. By underestimating the significance and extent of individual effects, the cumulative effects assessment fails to identify the broader systemic risks posed to Indigenous lands, species (such as woodland caribou), water systems, and traditional practices. Recommendation: A. IAAC and the Proponent must acknowledge in the Final EA/IS and Impact Assessment Report that the current residual and cumulative effects assessments do not adequately reflect the impacts to rights as understood and experienced by Indigenous Nations. This recognition should be documented in the record of consultation and in any decision-making materials. B. IAAC must clarify how Indigenous definitions of significance and culturally specific impacts will be meaningfully considered in the environmental assessment process going forward — including in any conditions imposed or decisions made under the Impact Assessment Act.			

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Constance Lake First Nation	56	Table 10-4 of the EA/IS concludes that the MFCAR will not result in any significant cumulative effects on surface water or groundwater. Given the scale and duration of the project, the number of water crossings, the presence of borrow and aggregate sites, and the potential interactions with other developments (such as the Northern Road Link and eventual Ring of Fire mining projects), this conclusion appears to reflect a limitation in methodology rather than a legitimate finding. This finding is especially concerning given that Indigenous Nations, including ours, have consistently raised concerns about changes to water quantity, quality, and flow patterns — not only from the Project but from the combined effects of historical and foreseeable developments. The exclusion of Indigenous Knowledge and culturally informed significance thresholds from the assessment of cumulative effects undermines the legitimacy and completeness of the results. As mentioned previously, CLFN is assessing the MFCAR EA/IS narrowly, scoped to the impacts from the use of the road by Marten Falls and not by future uses. As such our comments on cumulative effects are better addressed	A: 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 assessment of cumulative effects on water for future mining projects that are not reasonably foreseeable (i.e., in the planning, approvals, design stage) is not a regulatory requirement and as such was not included as part of the Environmental Assessment / Impact Statement. It is the responsibility of future projects to include developments that are certain or reasonably foreseeable in their CEAs. B: We appreciate your feedback and the time you have taken to share your perspective. However, the comment is directed at government agencies (Impact Assessment Agency of Canada) 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 to address them.	Comment noted; see response for details	801

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		through future assessments for mining project in the Ring of Fire Recommendation: A. The Proponent should work collaboratively with CLFN on the methodology and analysis of cumulative effects assessment on water for future environmental assessments for mining projects in the Ring of Fire. This should include the integration of Indigenous Knowledge systems, culturally appropriate indicators, and definitions of significance that reflect the lived experience and worldviews of CLFN. B. IAAC should require that any revisions to the EA/IS for the MFCAR that are made to incorporate Indigenous perspectives on significant cumulative effects are carried forward into conditions for approval, monitoring, and adaptive management, to ensure the rights and interests of CLFN are meaningfully addressed.			
Constance Lake First Nation	57	The EA/IS does not adequately account for the significant challenges associated with managing fuel spills at water crossings in the remote environment where the MFCAR is proposed. According to the U.S. National Oceanic and Atmospheric Administration (NOAA),	A: Section 7.3 of Appendix F Surface Water Technical Support Document includes a commitment to develop and implement a Spill Prevention and Emergency Response Plan which will be developed during detail design phase.	Comment noted; see response for details	802

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		fuel and oil spills in river systems are especially difficult to contain and clean up due to fast-moving currents, limited access to shorelines, and the tendency for oil to strand in isolated floodplains or oxbows, oils tendency to coat riparian vegetation along its path and the potentially complex interactions of oil with riverine sediments (NOAA, 2015). These risks are further amplified in the case of the MFCAR due to its extreme remoteness, limited seasonal access, and the lack of existing infrastructure that would facilitate rapid response efforts. The combination of these factors poses a serious risk to water quality, aquatic ecosystems, and the rights of Indigenous Nations that rely on these waters for sustenance and cultural practices. Given the particular challenges with managing spills on this remote road, the Proponent must have project-specific preparations to avoid and mitigate risks from major spills into rivers along the route. It is also important to add that the residual effects assessment does not incorporate the very high likelihood that a major spill will occur into one of the water crossings over the (indefinite) life of the Project. Recommendation:	B: As outlined in Table 7-5 of Appendix F, changes to surface water quality from wash-off of fuel and explosive chemicals or residue from accidental spills, leaks, or blasting activities to nearby waterbodies was considered as potential project effects. Section 7.3.1.10 and 7.3.1.11 of Appendix F provide descriptions of these potential project effects, mitigation and enhancement measures, and associated residual effects during construction, operation and maintenance.		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		A. CLFN requests that the Proponent provide details on the special arrangements they will make to prevent spills and manage major spills into water bodies along the extremely remote and inaccessible route of the Project B. CLFN requests that the residual effects assessment incorporates the fact that a spill into a river along the route is likely (if not certain) to happen at some point over the life of the Project. This inevitably means that aspects of the residual effects assessment will deem certain effects to surface waters as significant.			
Constance Lake First Nation	58	In the "Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance" Section of the Potential Effects Summary Table for surface water, no specific commitment is made to monitor during high-risk hydrological events like spring melt or major rainfall when erosion, sediment transport, and contaminant movement are most likely. Recommendation: CLFN request a commitment from the Proponent to conduct targeted water quality sampling during spring melt and storm events at key waterbody crossings	Surface water quality will be monitored according to the requirements of the anticipated Fisheries and Oceans Canada (DFO) and Ministry of Natural Resources (MNR) permits to determine mitigation measures are effective. Surface water quality monitoring will follow the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for the Protection of Aquatic Life (CCME, 1999). Timing of monitoring and baseline characterization will be determined during monitoring plan development during the detail design phase of the project.	Comment noted; see response for details	803

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		and sediment-sensitive areas, with details to be determined in the monitoring programs for all stages of the Project.			
Constance Lake First Nation	59	In the "Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance" Section of the Potential Effects Summary Table for surface water, erosion and sediment control is mentioned, however there's no clear requirement for real-time turbidity monitoring at active waterbody crossings during construction or dewatering activities, nor are there requirements for monitoring for spills other than visual observation of oil sheen on water. Recommendation: A. CLFN request that the Proponent commit to real-time turbidity monitoring at all waterbody crossings during in-stream work, with pre-defined action thresholds that trigger stop-work orders or adaptive measures. B. CLFN requests that the Proponent commit to best practices for monitoring fuel spills beyond mere visual observation (e.g. real time fuel level monitoring with alert systems that can indicate potential leaks).	Recommendation A Turbidity will be monitored according to the requirements of the anticipated Fisheries and Oceans Canada (DFO) and Ministry of Natural Resources (MNR) permits to determine sediment control measures are effective. Turbidity monitoring will follow the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for the Protection of Aquatic Life (CCME, 1999). Turbidity will be measured using a water quality meter and samples will be collected for laboratory analysis of total suspended solids and are expected to be requirements of the anticipated DFO and MNR permits. Timing of monitoring and baseline characterization will be determined during monitoring plan development during the detail design phase of the project. Recommendation B A Spill Prevention and Emergency Response Plan will be developed during the detail design phase as outlined in Section 7.3 of Appendix F Surface Water Technical Support Document. The Spill	Appendix F Section 7.3	804

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			Prevention and Emergency Response Plan will be developed to include best management practices and meet the anticipated DFO and MNR permit requirements.		
Constance Lake First Nation	60	In the "Mitigation, Protection, Monitoring, and Study Commitments to be Carried Forward to Construction / Operation and Maintenance" Section of the Potential Effects Summary Table for surface water, the Proponent does not indicate whether or not they intend to use road salt for deicing on the road during winter conditions. Road salt can have significant impacts on the ecology adjacent to the road and can attract wildlife (i.e. moose and caribou) to the road increasing the risk of collisions. Most dirt roads do not use salt for deicing and it is unnecessary to do so to maintain the road under winter conditions. Increased salt concentrations will also increase chloride ions concentrations in watercourses, which is known to be toxic to fish health. Recommendation: CLFN request a commitment from the Proponent to not use salt for de-icing along the road.	As noted in Table 3-3 of Appendix F Surface Water Technical Support Document, several communities provided feedback during Public Information Centre sessions related to the potential impact of salt us on nearby rivers. To address feedback received, Section 7.3 and Table 7-7 of Appendix F include a commitment to use sand on bridge decks and roadways for de-icing instead of salt.	Appendix F Table 7-7, Section 7.3	805
Constance	61	The Proponent has noted that the Project	As outlined in Appendix N Physiography,	Comment	806

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Lake First Nation		is located in an area of isolated permafrost. The construction and operation of the road in areas of permafrost would affect the stability of both the permafrost and the road. The Proponent has stated that “the design will primarily use fill along access roads to minimize permafrost degradation and will follow the recommendations outlined in a permafrost management plan.” The construction and operations monitoring plans make no mention of the development of permafrost monitoring at all. The monitoring of permafrost is challenging (especially in areas of discontinuous permafrost) and road design in areas of isolated permafrost is challenging from an engineering perspective due to the spatially variable effects of permafrost on the road. Recommendation: A. CLFN request that the Proponent develop a conceptual permafrost mitigation and monitoring plan for the Project at the EA/IS stage to understand potential impacts to permafrost from the Project. B. CLFN request that the Proponent provide details on how they will design the road to accommodate the somewhat unpredictable impacts of isolated	Terrain, and Soils Technical Support Document, five instances of potential permafrost areas were identified during aerial reconnaissance and terrain mapping along the northern 24 km of the route, northwest of Ogoki, with two locations documented in Construction Disturbance Area (SG-12, SG-19). Additional permafrost studies are recommended to determine the extent and depth of permafrost within the Local Study Area. The owner/operator of the Project will work with the Ministry of Transportation, the Northern Road Link, and Webequie Supply Road Project Team to develop a coordinated approach to permafrost assessment. A: As outlined in Section 2.1.1 and Table 9-1 of Appendix N, a Permafrost Management Plan will be developed during detail design phase. B: Information collected during additional permafrost studies will be used to inform potential changes during detail design phase.	noted; see response for details.	

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		permafrost on the road.			
Constance Lake First Nation	62	The detailed figures in Appendix N show that quite substantial areas around the road are going to be subject to construction disturbance for sourcing aggregate materials. These large, disturbed areas can have significant impacts on nearby waterbodies. The figures in Appendix N do not show a buffer between construction disturbance and waterbodies, which creates a risk for waterbodies in the Project area from erosion, sedimentation, blast residues and fuel spills. Recommendation: CLFN requests a commitment from the Proponent to avoid construction disturbance within 100m of any waterbody.	We acknowledge Constance Lake First Nation's concern regarding potential impacts to nearby waterbodies from construction disturbance, including erosion, sedimentation, and other risks. All construction activities will adhere to applicable guidelines governing setback distances from waterbodies. In accordance with standard planning and environmental protection practices in Ontario, a minimum 30-metre setback from the high-water mark of lakes, rivers, and streams will be maintained wherever feasible. This buffer is consistent with the Provincial Policy Statement (2020) and remains a widely accepted standard in municipal zoning by-laws and conservation authority regulations across Ontario. Although the Provincial Planning Statement (2024) no longer prescribes a fixed setback, the 30-metre buffer continues to be applied as a best practice to protect water quality, aquatic habitat, and shoreline stability.	Comment noted; see response for details.	807
Constance Lake First Nation	63	The EA/IS recognizes that 62.6% of the LSA is comprised of peatland, which are critical to the local hydrological and ecological function. The report further acknowledges that the loss of peatlands	A. The approach for the assessment of significance is described in Section 4.4.2.6 of Appendix I Peatlands Technical Support Document, and the assessment of significance was informed by	Final EA/IS Section 9.3.5 and Section 10.3.5 Appendix I	808

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		would be permanent and have negative effects, particularly where disturbances such as changes in drainage regimes and physical disturbance occur. However, despite the high magnitude of impact in localized areas, all residual effects on peatland ecosystems are classified as "not significant." This assessment appears to rely heavily on the minimal peatland loss observed within the broader RSA, which downplays the concentrated and more ecologically significant impacts occurring within the LSA, where the majority of disturbances will be focused. Moreover, the report lacks clarity regarding the specific criteria or thresholds applied to determine significance in the context of peatland integrity, habitat loss, or ecological functionality. Recommendation: A. The Proponent should reassess the significance determination, placing greater emphasis on the localized, permanent loss of peatland habitat within the LSA and avoid overreliance on RSA-level data, which may obscure the more concentrated impacts within the LSA. B. The Proponent should revise the significance determination process for peatlands to be based primarily on	magnitude, duration, and geographic extent as the most important factors, along with consideration of context. The significance of effects was classified as a binary response for Peatlands, rather than an ordinal scale (e.g., low, moderate, high). The assessment endpoints, self-sustaining and ecological effective ecosystems, were used as the threshold for significance and determined at the scale of the Regional Study Area. Significance was assigned to each Project-environment interaction, and an overall determination of significance was provided based on a "weight of evidence" or reasoned narrative approach. This considered magnitude, geographic extent, duration, likelihood of effect, uncertainty, available literature, results from field studies, as well as the resilience and adaptive capacity of the ecosystems. Resilience and adaptive capacity provide important ecological context and are related to factors such as current environmental conditions (size of peatland ecosystems, peatland distribution and connectivity, peatland composition and function), and threats to the peatland ecosystems. The application of the assessment	Section 7.3	

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		ecological, hydrological, and cultural valuation of peatland systems, and reassess the significance determination based on this updated process.	endpoints (thresholds) and associated binary approach to assigning significance is precautionary so that effects are not underestimated. In particular, if the weight of evidence indicated that an effect or combined effects are approaching the threshold(s) and had high uncertainty and could be assessed as significant or not significant, a precautionary approach was applied, and the effect was determined to be significant. B. While the pathway associated with the residual effect of changes to the availability and distribution of peatlands was considered not significant, impacts to peatland ecosystems resulting from changes to groundwater (quality and quantity) have been reconsidered. It was determined that the effect should be characterized as 'significant', particularly given the high uncertainty of the magnitude of effect of this pathway and the primary mitigation approach (i.e. the floating road). The Final EA/IS and Appendix I have been revised to significant for impacts to peatland ecosystems resulting from changes to groundwater (quality and quantity).		
Constance	64	The EA/IS identifies significant	A. We have reconsidered the	Comment	809

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
Lake First Nation		uncertainty surrounding two critical residual effects on peatland ecosystems: (1) changes to groundwater regimes that could alter drainage patterns, and (2) changes in surface hydrology that could increase or decrease water flows and levels. This uncertainty is attributed to a limited understanding of local peatland hydrology and hydrogeology, compounded by the preliminary nature of the proposed mitigation measures, such as the floating road design. Despite acknowledging these uncertainties, the report concludes that residual effects will be “not significant,” basing this determination on the assumption that future studies will resolve current gaps in understanding and improve the mitigation measures. This approach is problematic, as it does not align with standard impact assessment protocols, which require significance determinations to be based on the best available data at the time of the assessment. It also fails to account for the precautionary principle, which should be applied when high uncertainty exists. Recommendation: A. The Proponent should take a precautionary approach to their	significance of changes to peatland ecosystems resulting from changes to groundwater and agree with the comment that the effect should be characterized as ‘significant’, particularly given the high uncertainty regarding this pathway and the primary mitigation approach (i.e. the floating road). The Final EA/IS and Appendix I Peatlands Technical Support Document have been revised. Significance is not classified on an ordinal scale (e.g., low, moderate, high) but as a binary response (significant or not significant) as described in in Section 4.4.2.6 of Appendix I. As significance determinations are based on the available data at the time of the assessment, the high uncertainty with respect to the design mitigations of the floating road on groundwater flow and quality in peatland ecosystems resulted in a determination of significant Project effects on peatlands. This is because of the precautionary principle, which is applied when high uncertainty exists. B. A memo providing additional information about the floating road has been added to the Final EA/IS as Appendix W Engineering Memos.	noted; see response for details.	

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		assessment of the effectiveness of mitigation measures, such as floating road designs in the absence of empirical data. This means that in circumstances that there is uncertainty around mitigation measures, they should assume that the mitigations will not be as effective as modeled and that the effects will thus be significant. B. The Proponent should provide updated data or performance studies on the effectiveness of floating road designs from comparable peatland settings. C. The Proponent should develop a comprehensive monitoring and adaptive management plan that includes contingency measures to address any unforeseen hydrological impacts.	C. Monitoring programs and adaptive management planned for the Project are outlined in Section 14 of the Final EA/IS and in Section 9 of each discipline Technical Support Document and include consideration for changes to hydrology. Due to the assessment of a significant determination for peatlands, a peatland monitoring plan will be required, with adaptive management (e.g. putting in culverts if changes to peatland form and function noted) procedures included.		
Constance Lake First Nation	65	The EA/IS acknowledges that there is insufficient detailed hydrological and hydrogeological information for both the LSA and RSA, despite identifying potential residual effects on peatland ecosystems due to changes in groundwater and surface water regimes. This lack of baseline data is a critical gap in the assessment, as peatlands are highly sensitive to hydrological changes, and even minor alterations in water flow, drainage, or water table levels could have long-lasting or irreversible effects	A: Additional studies have been recommended to occur during detail design, including a groundwater monitoring program and water budget study. These studies are intended to improve project understanding of the anticipated impacts of the floating road methodology on peatlands and reduce associated uncertainty specific to changes to groundwater quantity and flow. Proposed studies are described in Sections 9 and 10 of Appendix I Peatlands Technical Support Document.	Final EA/IS Appendix I	810

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		on these ecosystems. The absence of robust data prevents the accurate modeling of potential impacts, the evaluation of mitigation effectiveness, and the assessment of cumulative effects across the broader wetland complex. As a result, the significance conclusions presented in the report are not sufficiently supported by evidence. Recommendation A. The Proponent should complete comprehensive site-specific hydrological and hydrogeological baseline studies, accounting for seasonal variations, groundwater-surface water interactions, and water table mapping. The collected data should be used to develop predictive models for water flow, drainage patterns, and water table changes resulting from road construction and long-term operations and assess the potential indirect hydrological effects extending beyond the project footprint, particularly on interconnected wetland systems. B. The Proponent should reassess the effectiveness of proposed mitigation measures, including floating road designs, based on updated data. C. Until the Proponent completes these studies and integrates them into the	B: Reassessment of proposed mitigation measures will take place as part of the detail design process once information from the studies outlined in response to A have been obtained. C: We have reconsidered the significance of changes to peatland ecosystems resulting from changes to groundwater and the effect is characterized as 'significant', particularly given the high uncertainty regarding this pathway and the primary mitigation approach (i.e. the floating road). The Final EA/IS and Appendix I have been revised.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		EA/IS, the EA/IS should clearly state that the findings related to peatland impacts are preliminary and subject to change.			
Constance Lake First Nation	66	The proposed MFCAR poses a significant risk to the region's extensive peatland carbon stores. The road corridor intersects peatlands that collectively hold up to 96 million tonnes of soil organic carbon, with over 1.38 million tonnes located within the immediate construction disturbance area. These ecosystems currently function as carbon sinks, with negative CO_2 fluxes observed across undisturbed areas. However, within the construction zone, carbon fluxes shift toward emissions—indicating that disturbed peatlands may become net sources of greenhouse gases. While the road footprint may appear narrow, the ecological consequences are not minor. Disturbance of peatlands through excavation, compaction, or altered hydrology can release long-stored carbon, disrupt sequestration processes, and contribute disproportionately to climate change—especially when considered over the full length of the road and its operational lifespan.	Section 7.3 and Tables 7-4 and 10-1 of Appendix I Peatland Technical Support Document outline mitigation measures planned to minimize impacts to peatland disturbances. Design alternatives to minimize peatland disturbances include: - minimizing clearing widths to the extent feasible - adjusting the alignment or clear off centre within the right-of-way - consideration for placement of culverts in peatlands - prepare and implement a Vegetation Restoration Plan	Comment noted; see response for details.	811

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Recommendation: The Proponent should prioritize design alternatives that minimize peatland disturbance. Where impacts are unavoidable, robust mitigation measures, including peatland restoration plans, hydrological protection strategies, and carbon offset commitments should be developed and transparently evaluated. Given the global significance of boreal peatlands for climate regulation, it is essential that peatland preservation is prioritized.			
Constance Lake First Nation	67	Edge and fragmentation effects on peatland ecosystems were determined to be negligible in magnitude. The two studies referenced (Harper et. al., 2015; Franklin et al., 2021) within the Draft EA/IS investigate edge effects on boreal forest ecosystems, ich are very different from peatland ecosystems. Furthermore, the Draft Peatlands Technical Support Document states that “boreal forests are generally adapted to large-scale natural disturbances.” However, road development is not considered a natural disturbance. Therefore, we disagree with the assessment that the magnitude of edge effects on peatlands is negligible. Recommendation:	Forested habitats are not only upland habitats as many peatlands (e.g., treed fens, treed bogs, forested swamps) are also ‘forested’ communities and comprise a large proportion of the boreal forest, therefore would have been included in the studies referenced. It is also recognized that a road is not a natural disturbance. However, the statement in the report that boreal forests are adapted to large-scale natural disturbances is still relevant as it one of the factors that influenced the finding that boreal forest systems are less influenced by edge effects than tropical or temperate forest systems. It is also acknowledged in Section	Comment noted; see response for details.	812

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Given that the studies used to support a negligible magnitude effect for edge effects on peatlands were focused on forest habitats (upland habitat), not peatlands (wetland habitat), the Proponent should provide scientifically defensible reasoning to justify why edge effects to peatlands were determined to be negligible in magnitude.	7.3.1.6.1 of Appendix I Peatland Technical Support Document that "edge effects on open bog, fen and organic marsh peatland communities are likely to be more related to hydrological or hydrogeological changes introduced by the road of construction "edge" where the pooling of water or drying of peat and occur". These effects are accounted for through surface water and groundwater pathways. Likewise, the introduction and spread of invasive species is addressed in a separate pathway. Any additional fragmentation and edge effects were considered negligible. This avoids the double counting of effects.		
Constance Lake First Nation	68	Peatlands are of utmost importance to CLFN as 46 of the 56 plants identified as traditional use plants grow in peatland ecosystems as stated in Table 3.1 of Appendix I. In addition, peatlands provide habitat for many animals that are hunted by our community members including moose. CLFN does not accept the conclusion that all predicted residual effects on peatlands are not significant considering 2,150.6 ha of peatland will be directly removed. CLFN is especially concerned because the peatland loss will be mostly irreversible considering how challenging peatlands are to restore to	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. As noted in Constance Lake First Nation Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report proposed mitigation measures include the collaboration with local existing environmental advisory	Appendix AB	813

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		their natural composition and function. Recommendation: A. CLFN requests to be actively involved in the development and implementation of all plans and monitoring related to peatland restoration including the Vegetation Restoration Plan, with the opportunity to provide meaningful input throughout the process. To facilitate this participation, the Proponent should provide appropriate financial resources to support CLFN involvement in this process. B. For all impacted peatland that cannot be restored to its natural function and composition, the Proponent should provide accommodation measures to CLFN for the loss of Traditional Use Plant habitat within their Traditional Territory.	committees to support the development and implementation of all environmental monitoring programs, including vegetation restoration. 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 CLFN will be established. B: The Final EA/IS has been updated to include Appendix AB Preliminary Biodiversity Offset Plan which includes a plan for offsetting the loss of peatlands (where feasible), along with a long-term monitoring plan to validate success of the offsetting measures. The Preliminary Biodiversity Offset Plan will be finalized during detail design phase.		
Constance Lake First Nation	69	MFFN's air dispersion model does not include any special receptor locations related to CLFN traditional land and resources use (TLRU) and Indigenous Knowledge (IK) sites. CLFN members use the lands and waters in the Project area for TLRU and ceremonial/spiritual purposes and will be exposed to project related air emissions.	Constance Lake First Nation is invited to provide traditional land and resource use, and Indigenous Knowledge information for consideration as part of the air quality assessment. At the time of finalizing the EA/IS, no traditional land and resource use or Indigenous Knowledge has been received from Constance Lake First Nation.	Comment noted; see response for details.	814

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Recommendation: CLFN TLRU and IK sites should be considered in the Proponent's air quality assessment. The geographic locations for TLRU and IK should be inputted into the air dispersion model as special receptors. This will provide site specific data for CLFN land users who use the Project area so they can effectively assess the Project's impact on land use and rights.			
Constance Lake First Nation	70	CLFN disagrees with the Proponents assessment of the significance determination for Volatile Organic Compounds (VOCs) and Polycyclic Aromatic Hydrocarbons (PAHs) as being considered insignificant. PAHs and VOCs are toxic at very low concentrations and in some cases (e.g. benzene, benzopyrene) they are known carcinogens. Exposure to VOCs and PAHs, even for a short duration, can have negative health impacts on humans. CLFN is especially concerned about VOC and PAH exposure for CLFN members who may be working on the Project and/or using the land in close proximity to the Project. For construction workers they could be exposed to VOCs and PAHs for as long	A: Biophysical determiants to human health have been assessed as part of the problem formulation report which is included in Appendix T Community Well-Being Technical Support Document. B: As outlined in Section 9.2 of Appendix S Air Quality and Greenhouse Gas Technical Support Document, an emission monitoring program is recommended during construction which could involve air monitoring and construction activity management, including where mitigation options may be required to help reduce air quality impacts. The inclusion of volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) in the program will be considered during detail	Appendix T	815

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		as 10 years. Further, there is no air quality sampling planned for any VOCs or PAHs during any phase of the Project. It will be impossible to know the concentrations without monitoring, which is a health risk for CLFN members who may be working on the Project or using the land nearby. Recommendations: A. CLFN strongly recommends that the assessment of the significance of VOCs and PAHs be revisited and updated to reflect the serious health risks associated with exposure to these substances, even at low concentrations. Given the potential for long-term exposure—especially for construction workers who could be on-site for up to 10 years—it is critical to reconsider their significance in the environmental assessment and conduct additional monitoring. B. The Proponent must implement air quality sampling and continuous monitoring for VOCs and PAHs during all phases of the Project. This is crucial to accurately assess the levels of these contaminants and understand their impact on air quality. C. The Proponent must conduct a detailed human health risk assessment	design. Monitoring for air quality during operation presents challenges due to the length of the Community Access Road, but monitoring at representative locations will be one of the considerations in development of a dust management plan for operations. Information gathered through other technical monitoring programs specific to potential air quality concerns could also be considered as part of dust management planning. C: Refer to response A. D: Mitigation strategies related to VOCs and PAHs are outlined in Table 10-1 of Appendix S and include: - limiting vehicle speed, where feasible - strategic haul planning to reduce overall number of haul trips required for aggregate material demands. Consider sourcing material from the closest available material transfer points o Where possible, reduce the quantity of material that is either burned or chipped (i.e., consider salvageable material such as salable lumber) - when burning is required consider avoiding periods where meteorological conditions (e.g., wind speed) may result		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		specifically focused on VOCs and PAHs, particularly for those working on the construction phase and those living or using the land near the Project area. This should include long-term exposure scenarios. D. The Proponent must develop and implement targeted mitigation strategies to minimize VOC and PAH emissions. This should include both operational and construction phase controls, such as the use of safer construction materials, air filtration systems, and regular decontamination procedures for workers.	in smoke impacting sensitive receptor locations - maintain equipment as per manufacturing specifications - implement anti-idling policies or procedures to reduce total vehicle idling times		
Constance Lake First Nation	71	The Proponent did not include any metals in the list of air contaminants carried forward as indicators in the air quality assessment/air dispersion model. Particulate emissions would include numerous trace metals which would become airborne and deposit in the natural environment (e.g. on traditionally important vegetation or waterways) or be inhaled by humans or wildlife. This could have potential health impacts on CLFN members harvesting or using the land near the Project, or CLFN members employed by the Project. Recommendation: The Proponent must assess trace metals	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. Specifically, potential contaminants of concern included in the air quality assessment and dispersion model align with those identified in Section 7.2.2 of the Terms of Reference and Table 1 of the Ministry of Transportation's Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects (MTO 2020). The	Comment noted; see response for details	816

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		as an indicator or potential contaminant of concern in the air quality assessment and the air dispersion model. This is required to ensure the Project is within regulatory compliance and does not pose any potential health threats to CLFN members.	inclusion of trace metals in the air quality assessment and air dispersion model were not a regulatory requirement and as such were not included as part of the Environmental Assessment / Impact Statement.		
Constance Lake First Nation	72	The Proponent predicts exceedances of provincial air quality criteria and significant residual effects related to particulates including PM 2.5 - Particulate Matter with a diameter of 2.5 micrometers or smaller, PM 10 - Particulate Matter with a diameter of 10 micrometers or smaller, and TSP - Total Suspended Particulates. These particulates also contain trace metals, which is not discussed in the EIS or appendices. Particulates (TSP, PM 10, PM 2.5) and trace metals will deposit on important vegetation communities, waterbodies, and wildlife habitat. Particulates will also be ingested by humans and wildlife. All of these pathways have the potential to cause adverse health impacts, especially on CLFN members who may be working in the Project. The Proponent's mitigation measures (e.g. dust suppression, anti- idling, etc.)	A: Emissions (or dust) management plans will be prepared for both construction and operations in response to predicted exceedances, mostly of particulate concentrations. The predictions are presented with and without mitigation. For the operations phase, the use of environmentally friendly dust suppression methods approved by the Ontario ministry of Transport would be considered, as would the use of roadside vegetation and natural windbreaks (Table 7-7 of Appendix S Air Quality and Greenhouse Gas Technical Support Document). Other mitigation approaches would also be considered such as setting road speed limits. The operations emissions management plan would also include the development of an appropriate air monitoring program. A construction emissions management plan would consider the mitigation	Comment noted; see response for details.	817

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		are unlikely to be effective given the extensive area of activities in the construction and operations phase. Applying dust suppressants to over 200 km of road is impractical, costly, and only effective for a short duration. Recommendation: A. CLFN strongly recommends that a more comprehensive and effective approach be adopted to address the potential exceedances of air quality criteria for particulates (PM 2.5, PM 10, TSP) and trace metals, as well as their associated health and environmental impacts. Given the predicted exceedances and the significant residual effects on air quality, it is crucial to implement enhanced monitoring and mitigation strategies to minimize the adverse impacts on both the environment and human health, particularly for CLFN members who may be exposed during the construction and operation phases of the Project. B. The Proponent must implement a robust air quality monitoring program that tracks particulate levels (TSP, PM 10, PM 2.5) and the concentration of trace metals in real-time, throughout all phases of the Project. Monitoring should include both ambient air quality and potential	options in Table 7-1 of Appendix S to reduce particulate emissions from material handling and combustion products from blasting and vehicle use. A discussion on potential project effects from air quality on human health is provided in Appendix T Community Well-Being Technical Support Document. As outlined in Section 9.2 of Appendix S, a construction monitoring program has been recommended as a mechanism to help mitigate and/or identify potential conditions that may lead to air quality impacts from construction related activities. A monitoring program, where feasible, may involve either or both air monitoring as well as construction activity monitoring. Construction monitoring activity may include verification that construction best management practices are being applied or identify where additional efforts/mitigation techniques may be necessary to help reduce air quality impacts. Mitigation applied to reduce dust will also reduce metal deposition. Metals were not assessed specifically because they were not included in the list of substances required to be assessed according to the project terms of reference approved by		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		deposition rates on vegetation, waterbodies, and wildlife habitat. The monitoring program should be designed to detect exceedances early and enable prompt corrective actions. C. The Proponent must conduct a more detailed health risk assessment that includes the potential long-term exposure of CLFN members, workers, and wildlife to particulates and trace metals. This assessment should account for various exposure pathways, including inhalation, ingestion, and contact with contaminated soil or vegetation. Special attention should be given to the vulnerable populations within the CLFN community. D. Given the extensive nature of the construction and operational activities, the current mitigation measures (such as dust suppression and anti-idling) will likely be insufficient. The Proponent must investigate the feasibility of enhanced measures such as: • Use of advanced dust suppression technologies (e.g., chemical dust suppressants with longer-lasting effects). • Establishment of physical barriers or windbreaks along critical areas to reduce particulate dispersion. • Implementation of a staged approach to dust control based on real-time air quality data, ensuring that mitigation efforts are	the Ministry of Environment, Conservation and Parks (MECP). B: See response to A. C: An assessment of biophysical determinants of human health has been completed and is provided in Appendix T. D: See response to A. The mitigation measures suggested in Recommendation D will be among the mitigation considered for inclusion in an emissions management plan. E: Table 7-15 of Appendix J Vegetation Technical Support Document includes a commitment to prepare and implement a Vegetation Restoration Plan that will include seeding and/or planting of Traditional Use plants and progressive restoration on staging areas no longer needed. F: If the Community Access Road EA / IS be approved to proceed, a consultation and engagement program will be established to guide discussions through detail design. Monitoring results will be provided to the MECP and local existing environmental advisory committees can request the results from MECP.		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		targeted to areas with the highest risk. E. After construction activities, the Proponent must ensure that a comprehensive land restoration and revegetation plan is in place to quickly stabilize soils and vegetation, reducing the potential for dust emissions over the long term. This plan should include the planting of dust-absorbing vegetation species along the construction route and key areas where sensitive ecosystems may be impacted. F. The Proponent must regularly engage with CLFN throughout the Project's lifecycle to ensure concerns related to air quality and health risks are addressed promptly. This includes providing CLFN members with access to air quality data and health information and supporting community-based monitoring efforts where feasible.			
Constance Lake First Nation	73	In Appendix S1, Section 7.1.1 the Proponent only looks at "Community Impacts" on MFFN, not of surrounding First Nations. The Project is likely to have impacts on communities other than MFFN, those impacts should also be discussed. Recommendation: The Proponent must broaden the	We acknowledge Constance Lake First Nations' concern. In addition to the Indigenous communities within the Local Study Area (LSA; Marten Falls First Nation and Aroland First Nation), other Indigenous communities from the Regional Study Area (RSA) maintain Traditional practices (e.g., hunting, fishing, navigation of waterways) that have a potential pathway for effect within	Final EA/IS Appendices	818

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		discussion of Community Impacts to include surrounding CLFN and areas of shared Territory that may be used for harvesting or cultural purposes.	the LSA. The Final EA/IS has been updated to include Indigenous communities in the effects assessment where a clear pathway for potential impact exists to appropriately assess effects on Traditional activities, harvesting and cultural practices. The assessment to determine potential pathways to effects relies on the confidential Aboriginal Treaty Rights and Interests (ATRI) reports prepared for each Indigenous community. As part of the ATRI reports, communities defined Areas of Interest (AOI) which were compared to the Community Access Road LSA to determine overlap. Where overlap exists and a pathway for effect was identified, the communities have been included in the assessment. Potential new effects and mitigations have been added to the Final EA/IS include but are not limited to: - Identifying key traditional hunting, trapping, and gathering areas to minimize construction activities during peat harvest seasons. - Designate specific approved locations for berry picking and recreational fishing while identifying restricted areas to protect community resources.		

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			- Owner/Operator to establish a working group with Marten Falls First Nation and Aroland First Nation to meet regularly to discuss community-proposed topics.		
Constance Lake First Nation	74	CLFN is concerned about the wide variance in the construction timeline for the Project (3 to 10 years), as this will significantly impact air quality and contaminant emissions. A longer construction period, especially up to 10 years, will lead to higher emissions, worsening air quality. From a human health perspective, prolonged exposure to elevated air contaminants, especially particulates, VOCs, and metals over up to 10 years—pose a risk to CLFN members working on the Project. The difference between 3 years and 10 years of exposure is considerable, with long-term health effects, particularly for those with respiratory or cardiovascular vulnerabilities. Recommendation: A. CLFN recommends that the Proponent better refine construction timelines and model air contaminant emissions accordingly. B. The Proponent should include a thorough health impact assessment and	A: Section 6.1 of Atmospheric Environment and Greenhouse Gasses (GHG) Study Plan (attached to Appendix S Air Quality and Greenhouse Gas Technical Support Document) outlines the construction timeline is anticipated to be 3 to 10 years to complete. The air quality and GHG assessments were based on a 10 year construction timeline. B: The health and safety of construction workers will be the responsibility of the owner/operator of the Community Access Road. The health of the community related to air quality has been assessed as part of the problem formulation report which is included in Appendix T Community Well-Being Technical Support Document.	Comment noted; see response for details.	819

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		implement robust mitigation measures to address air quality concerns, particularly if the construction timeline extends beyond 3 years. The health of CLFN community members and other construction workers should be prioritized in any decision regarding the construction duration.			
Constance Lake First Nation	75	Diesel emissions associated with construction equipment, pickup trucks, crushing equipment, and other equipment are a major source of Project-related air contaminant emissions (particulates, VOCs, PAHs, GHGs). The Proponent must look to decrease the Project's reliance on diesel fuel and utilize Best Available Technology Economically Achievable (BATEA) for construction. Diesel combustion has a significant contribution to the Project's overall carbon footprint and local air quality that could be avoided using other technology (e.g., electric or LNG powered equipment). The GHG emissions and air pollutant emissions would be drastically decreased if alternative technology was implemented. Recommendation: The Proponent must conduct a BATEA study to examine methods for reducing	An emissions management plan will be prepared during detail design phases for both construction and operation phases and will include vehicle emissions and considerations for the use of non-diesel vehicles. Other mitigations to reduce fuel consumption are outlined in Table 7-1 of Appendix S Atmospheric Environment Technical Support Document and include but are not limited to equipment maintenance, speed control, idling time reduction, fleet management to reduce trips and haul distance.	Comment noted; see response for details.	861

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		construction-related air contaminants and GHG emissions through the use of other technologies and equipment.			
Constance Lake First Nation	76	The Proponent does not provide any commitments or details related to monitoring ambient air quality or specific emissions during the construction or operations phases of the Project. MFFN only commits to construction monitoring to ensure mitigation measures are in place. As discussed in the EA/IS there would be no mechanism to quantitatively monitor or track air contaminant emissions. The Proponent does not specify how CLFN will be involved in ambient air quality monitoring during construction and operations phases of the Project. Recommendation: A. The Proponent must conduct ambient air quality monitoring for all contaminants of concern (including particulates and metals) for the construction and a reasonable portion of the operations phase. This is necessary to ensure regulatory compliance and verify the accuracy of air dispersion models and EA/IS predictions. Without quantitative data through ambient monitoring, it will be impossible to measure the Project's	A. An emissions management plan will be prepared during detail design phase for both construction and operations phases. Mitigation measures will be considered for all activities. Not all mitigation options by activity have been included in the residual assessment in Appendix S Atmospheric Environmental Technical Support Document, and additional mitigations will be provided in the emissions management plan. After reviewing the impacts of mitigation options on air quality, monitoring will be considered in each phase and appropriate levels of monitoring will be conducted based on the results of the assessment. B. As noted in Constance Lake 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	Comment noted; see response for details.	863

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		impact on air quality. B. CLFN requests the implementation of robust and long-term environmental monitoring to verify protection of the environment, including community-led ambient air quality monitoring during Construction and Operations of the Project. The Proponent must work with CLFN to identify appropriate contaminants for monitoring, sampling sites, methodology, etc.	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 Constance Lake First Nation will be established.		
Constance Lake First Nation	77	A significant portion of the Project-related air contaminant emissions are related to burning of organic materials during the construction phase. Burning emits material concentrations of particulates (TSP, PM 10, PM 2.5), Nitrogen Dioxide, Acrolein, Acetaldehyde, Formaldehyde, Benzene, Toluene, Ethylbenzene, Xylene, Butadiene, Benzo[a]pyrene and other PAHs). Many of these substances are toxic at low concentrations and in some cases they are known carcinogens. Emissions from burning pose potential risks to CLFN members working on the Project or using the land in the area. MFFN could reduce air emissions greatly by reducing the amount of burning used in the construction phase. Recommendation:	The air quality assessment included an assumption that 50% of vegetation cleared will be burned and 50% will be chipped (Section 4.4.3 of Appendix S Air Quality and Greenhouse Gas Technical Support Document). Table 7-1 of Appendix S includes a mitigation to reduce the quantity of materials that are either burned or chipped (i.e., consider salvageable material such as salvageable lumber), and if burning is required, consider avoiding periods where meteorological conditions (e.g., wind speed) may result in smoke impacting sensitive receptor locations.	Comment noted; see response for details	864

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		To significantly reduce air contaminant emissions and protect the health of Project workers and local land users, it is recommended that the Proponent minimize or eliminate the open burning of organic materials during the construction phase. Alternative disposal methods such as mulching, chipping, composting, or off- site removal should be prioritized. In cases where burning is deemed necessary, it should be strictly controlled and subject to best practices for emission reduction, including use of clean-burning equipment, scheduling burns under optimal meteorological conditions, and implementing air quality monitoring. This approach will help mitigate the release of toxic and carcinogenic substances such as particulate matter, NO_2, PAHs, and volatile organic compounds (VOCs), thereby reducing health risks and supporting environmental protection.			
Constance Lake First Nation	78	The Proponent does not discuss the potential impacts on air quality for the industrial users of the road – specifically mining. Since this MFCAR is closely linked to the development of the Ring of Fire, there is a high likelihood that the road will be used to transport ore or mineral concentrates to the south. Mining related hauling has the potential to	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 assessment of cumulative effects on water for future mining projects that are	Comment noted; see response for details	867

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		exacerbate particulate and air contaminant emissions as larger mining vehicles would be used, which would create higher particulates and criteria air contaminant emissions (associated with burning more diesel). The ore or concentrate being hauled also has the potential to become airborne during transport. Mining related use of the MFCAR would greatly increase impacts to local air quality. Recommendation: CLFN recognizes that future industrial activity could lead to increased emissions along the corridor, we believe it is more appropriate to assess those air quality impacts through future project-specific environmental assessments. Any subsequent proposals involving industrial use of the MFCAR must include a thorough evaluation of associated air emissions along the MFCAR section of the road to the RoF, and identify effective mitigation measures to protect community health and environmental quality	not reasonably foreseeable (i.e., in the planning, approvals, design stage) is not a regulatory requirement and as such was not included as part of the Environmental Assessment / Impact Statement. It is the responsibility of future projects to include developments that are certain or reasonably foreseeable in their CEAs.		
Constance Lake First Nation	79	Climate change may shift the timing of sensitive periods for wildlife, such as breeding or migration. Construction planning and mitigation measures should	It is acknowledged that climate change has the potential to shift the timing of sensitive periods for wildlife such as breeding or migration. Project mitigation	Appendix Y	868

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		be responsive to these changes and updated based on ongoing monitoring. Recommendation: The Proponent should incorporate a dynamic construction and mitigation plan that accounts for potential shifts in the timing of sensitive wildlife periods due to climate change.	planning, which includes monitoring and adaptive management, will consider the effects of climate change in determining the appropriate timing of sensitive periods for wildlife (e.g., breeding, migration, denning). Appendix Y Climate Adaptation and Resiliency Technical Support Document has been updated to include the recommendation to review relevant scientific findings and revisit climate projections and associated potential impacts from climate change, and consider the ongoing inclusion of Indigenous observations regarding the experienced effects of climate change.		
Constance Lake First Nation	80	Climate change is expected to create conditions that support the spread of invasive species. Equipment, construction materials, and workers can unintentionally introduce invasive species, requiring strict hygiene protocols and monitoring. Recommendation: The Proponent should outline the pathways through which equipment, construction materials, and workers may inadvertently facilitate the spread of invasive species and clearly describe the	Section 7.3 of Appendix J Vegetation Technical Support Document outlines potential project effects including pathways for the spread of invasive species. Section 7.3.1.5.2 of Appendix J includes a commitment to develop and implement an Environmental Protection Plan (EPP) to prevent, detect, control (i.e., remove), and monitor areas with invasive species during construction, operation and maintenance, and provides a list of preliminary mitigation measures to be included in the EPP.	Comment noted; see response for details	872

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		proposed hygiene protocols and monitoring measures that will be implemented to prevent and manage the introduction and spread of invasive species.			
Constance Lake First Nation	81	The EA/IS would benefit from a clearer discussion of cumulative climate risks—specifically, how multiple climate events may interact or compound one another. For example, the combination of extended heatwaves followed by intense storms, or the occurrence of wildfires during road construction and maintenance activities, could amplify both environmental and operational impacts. Addressing these scenarios is important for risk planning and ensuring that mitigation strategies are robust under increasingly complex climate conditions. Recommendation: The Proponent should enhance the EA/IS by providing a more detailed analysis of cumulative climate risks, specifically addressing how multiple climate events may interact with each other. This analysis should explore scenarios where extended heatwaves, intense storms, or wildfires may overlap, particularly during critical periods such as	Due to the lack of data, incorporating compound or successive events such as intense storms or occurrences of wildfires into the risk assessment is challenging. Nevertheless, a general discussion of such events and their potential consequences has been included in Appendix Y Climate Adaptation and Resiliency, Section 8.	Comment noted; see response for details.	875

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		road construction, operation, and maintenance activities. The assessment should incorporate strategies for managing these compounded risks, ensuring that mitigation measures are adaptable to increasingly complex climate conditions.			
Constance Lake First Nation	82	Chapter 12 discusses high level technical assessments and risk analyses around climate change indicators and impacts but does not describe how impacted First Nations will be involved in ongoing climate monitoring and response. Climate change will have widespread and interconnected impacts across the region. As such, the EA/IS should outline a more inclusive and coordinated approach that actively involves regional First Nations in the monitoring, management, and adaptation process. Given that the MFCAR may become a critical link for more northern communities during climate-related emergencies, regional Indigenous engagement in climate planning is essential. Recommendation: The Proponent should revise the EA/IS to outline a more coordinated approach that actively involves regional First	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 regional climate monitoring, management and adaptation process is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.	Comment noted; see response for details	877

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Nations in climate monitoring, management, and adaptation processes. This should include specific mechanisms for engagement, such as establishing consultation frameworks, identifying key roles for CLFN in data collection and analysis, and ensuring CLFN participation in climate risk response and planning.			
Constance Lake First Nation	83	Hotter, drier summers combined with more frequent lightning storms are expected to increase wildfire frequency and severity. This could result in more frequent road closures and a need for coordinated evacuation planning, particularly where the MFCAR will serve as the primary or sole route in and out. Recommendation: CLFN request that the Proponent develop and include a detailed evacuation and community resilience plan in the EA/IS, addressing the potential for more frequent and severe wildfires. This plan should focus on ensuring safe, coordinated evacuations in the event of road closures, especially considering that the MFCAR may be the primary or only route for access to and from the community. The plan should involve collaboration with local	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 an evacuation and community resilience plan is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.	Comment noted; see response for details.	882

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		authorities, First Nations, and emergency response teams to establish clear protocols, identify evacuation routes, and ensure that adequate resources are available for timely evacuations.			
Constance Lake First Nation	84	There are several significant climate-related risks that are increasingly affecting infrastructure and community health but are missing from the current risk evaluation framework. These should be explicitly included as individual rows in Table 12-2 and subsequently assessed in Tables 12-3 and 12-4 to ensure a more comprehensive understanding of potential impacts during both construction and operation of the MFCAR. Specifically: • Freeze-Thaw Cycles: Increased temperature variability, particularly during shoulder seasons, is expected to result in unpredictable freeze thaw cycles. This may result in accelerated road and infrastructure degradation, heightened safety risks for vehicles, and significantly higher maintenance costs. • Expansion of invasive Species: Warmer temperatures associated with climate change support the northward and expansion of invasive species , resulting in elevated risk of illnesses, reduced safety for land users and workers, and	The Environmental Assessment / Impact Statement and the Technical Support Documents were developed to meet the requirements of the Terms of Reference, the Tailored Impact Statement Guidelines and the discipline-specific study plans. The development of a risk evaluation framework for freeze-thaw cycles and invasive species is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.	Comment noted; see response for details	885

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		potential disruption of traditional land use and outdoor activities. Inclusion of these risks would strengthen the assessment's relevance to real-world conditions and enhance climate resilience planning for the MFCAR. Recommendation: CLFN request that the Proponent revise the risk evaluation framework in Chapter 12 to explicitly include the following climate-related risks: freeze-thaw cycles and the expansion of invasive species. These risks should be added as individual rows in Table 12-2, with a clear analysis of their potential impacts on road infrastructure, safety, and public health. The assessment in Tables 12-3 and 12-4 should also be updated to evaluate the implications of these risks during both construction and operation phases.			
Constance Lake First Nation	85	While Section 12.4 acknowledges that not all climate-related risks can be eliminated, there is limited discussion of adaptive management as a tool for addressing these evolving risks over time. Given the uncertainties surrounding long-term climate projections and their localized impacts, it is essential that adaptive management plans be	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 an adaptive management plan is not a regulatory	Comment noted; see response for details	886

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		developed, clearly articulated, and regularly re-evaluated throughout the construction and operational phases of the MFCAR. As new climate data and regional predictions become available, strategies and mitigation measures should be updated to reflect emerging risks and ensure the long-term resilience of the road, associated infrastructure, and surrounding ecosystems and communities. Recommendation: CLFN requests that the Proponent develop a detailed adaptive management plan that explicitly addresses the evolving climate- related risks associated with the MFCAR. This plan should outline clear procedures for regularly monitoring and re-evaluating climate data and regional predictions throughout both the construction and operational phases, including specific mechanisms for adjusting strategies and mitigation measures as new information emerges.	requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.		
Constance Lake First Nation	86	While the EA/IS identifies various species at risk and references applicable federal obligations under the Species at Risk Act and other legislation, it does not fully demonstrate how the MFCAR project aligns with Canada's broader	The Impact Assessment Agency of Canada (the Agency) issued the Tailored Impact Statement Guidelines for the Marten Falls First Nation Community Access Road on February 24, 2020. On June 20, 2024, the Budget	Comment noted; see response for details.	889

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		climate change commitments, including Net-Zero Emissions by 2050 or the Sustainable Development Goals (SDGs). Although the EA/IS highlights some general sustainability practices, such as using recycled materials and rainwater harvesting, it lacks explicit mention of how the project will contribute to these national sustainability objectives. Additionally, there are no defined indicators or performance metrics to track and ensure accountability toward these goals over the project's lifecycle. Recommendation: CLFN request that the Proponent provide greater clarity in linking the project to Canada's climate action and sustainability targets, alongside measurable indicators for monitoring and adaptive management, would enhance the EA/IS's alignment with national commitments.	Implementation Act, 2024, No. 1, received Royal Assent and brought into force amendments to the Impact Assessment Act. The Agency sent a letter to Marten Falls First Nation on June 11, 2025 outlining the next steps in the Community Access Road Impact Statement Phase due to the amendments made to the Impact Assessment Act. As stated in the letter, the Agency will focus their technical review of the Community Access Road Impact Statement on key issues under federal jurisdiction, which are relevant for decision making, specifically federal effects and the positive benefits of the Community Access Road. The Agency will also concentrate on leveraging federal mechanisms outside of the Impact Assessment Act as well as provincial legislative frameworks and instruments, to address the key issues. Key issues the Agency will focus on are with respect to fish and fish habitat, migratory birds, potential impacts to Indigenous Peoples and public interest factors. The Environmental Assessment / Impact Statement (EA / IS) was prepared to meet provincial and federal regulatory		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			requirements. The Ministry of Environment Conservation and Parks will determine if the EA / IS meets the provincial requirements; while the Agency will make a determination on whether or not it meets the key issues under federal jurisdiction.		
Constance Lake First Nation	87	The EA/IS outlines the project's sustainability contributions primarily for Marten Falls First Nation, emphasizing social, economic, and cultural benefits. However, it overlooks the potential impacts on neighboring First Nations, who may also be affected by the MFCAR. A more comprehensive approach should consider how the project's sustainability efforts will benefit or impact surrounding communities. Recommendation: CLFN request that the Proponent provide a comprehensive evaluation of the potential impacts on neighboring First Nations, ensuring that the benefits and potential risks of the MFCAR are considered in a regional context. This should involve direct consultation with neighboring Indigenous communities to identify their concerns, needs, and expectations regarding social, economic, and environmental impacts. The EA/IS should clearly	The Impact Assessment Agency of Canada (the Agency) issued the Tailored Impact Statement Guidelines for the Marten Falls First Nation Community Access Road on February 24, 2020. On June 20, 2024, the Budget Implementation Act, 2024, No. 1, received Royal Assent and brought into force amendments to the Impact Assessment Act. The Agency sent a letter to Marten Falls First Nation on June 11, 2025 outlining the next steps in the Community Access Road Impact Statement Phase due to the amendments made to the Impact Assessment Act. As stated in the letter, the Agency will focus their technical review of the Community Access Road Impact Statement on key issues under federal jurisdiction, which are relevant for decision making, specifically federal effects and the positive benefits of the Community Access Road. The Agency will also concentrate on leveraging	Comment noted; see response for details.	891

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		articulate how the project's sustainability efforts will support or address the needs of surrounding communities, both during construction and throughout the operational phase.	federal mechanisms outside of the Impact Assessment Act as well as provincial legislative frameworks and instruments, to address the key issues. Key issues the Agency will focus on are with respect to fish and fish habitat, migratory birds, potential impacts to Indigenous Peoples and public interest factors. Section 13.3 of the Final EA/IS was prepared to meet federal regulatory requirements. The Ministry of Environment Conservation and Parks will determine if the EA/IS meets the provincial requirements; while the Agency will make a determination on whether or not it meets the key issues under federal jurisdiction.		
Constance Lake First Nation	88	The EA/IS does not include any long-term monitoring or management commitments related to greenhouse gas emissions, climate resilience, or broader sustainability objectives during the operation phase of the MFCAR. This is a critical gap, particularly given the cumulative and evolving nature of climate change impacts. While the residual effects assessment concludes that there will be no significant GHG-related effects, this does not account for how the project may interact with other regional and long-	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 climate and sustainability monitoring program is not a regulatory requirement and as such was not developed as part of the Environmental Assessment / Impact Statement.	Comment noted; see response for details	892

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

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		term climate stressors. Recommendation: CLFN request that the Proponent develop and include a climate and sustainability monitoring program to be implemented during the construction and operational phases of the MFCAR.			