TECHNICAL MEMORANDUM

TO:

Impact Assessment Agency of Canada
Ontario Ministry of Environment, Conservation and Parks

FROM	EMAIL	REF
AtkinsRéalis	Craig.Wallace@atkinsrealis.com	661910

DATE

06 April 2026

SUBJECT

Webequie Supply Road Project – Addendum to the Final Environmental Assessment Report / Impact Statement General Supplemental Information

The attached report is Addendum #3 to the Final Environmental Assessment Report / Impact Statement (EAR/IS) for the Webequie Supply Road Project (the Project, WSR). The purpose of the Addendum is to provide supplemental responses to comments received from the review of the Draft and Final EAR/IS from:

- Ministry of Environment, Conservation and Parks - Species at Risk Branch (MECP-SAR):
  - Draft EAR/IS – Comments 004, 009, and 013.
- Ministry of Natural Resources (MNR):
  - Draft EAR/IS – Comments 105, 116, 129, 140, 210, and 274.
- Ministry of Environment, Conservation and Parks – Environmental Assessment Branch (MECP-EAB):
  - Final EAR/IS – Comments 5 and 7.

This Addendum also includes Appendix V-2 that include revisions to some commitments described in Appendix V of the Final EAR/IS as well as new commitments in responses to comments received from review of the Final EAR/IS.

Webequie Supply Road
Environmental Assessment
Report / Impact Statement

April 6, 2026
AtkinsRéalis Ref: 661910

ADDENDUM 3: GENERAL SUPPLEMENTAL INFORMATION

AtkinsRéalis

WSR
WEBEQUIE
SUPPLY ROAD

WEBEQUIE FIRST NATION

Preface

The purpose of this report (Addendum #3) is to provide supplemental responses to comments received from the review of the Draft and Final Environmental Assessment Report / Impact Statement (EAR/IS) from:

- Ministry of Environment, Conservation and Parks - Species at Risk Branch (MECP-SAR):
  - Draft EAR/IS – Comments 004, 009, and 013.
- Ministry of Natural Resources (MNR):
  - Draft EAR/IS – Comments 105, 116, 129, 140, 210, and 274.
- Ministry of Environment, Conservation and Parks – Environmental Assessment Branch (MECP-EAB):
  - Final EAR/IS – Comments 5 and 7.

This Addendum #3 includes the following:

1) Additional rationale and consideration in categorizing pathways of potential effects on the terrestrial environment for screening factors used in evaluating alternatives (comment MECP-SAR-004).
2) Response to MECP-SAR's request to include a commitment to incorporate the best management practices for the restoration of disturbed areas consistent with Boreal Caribou habitat in the detailed design stage (comment MECP-SAR-009).
3) Clarification on list of required employment positions/skills in Table 4-10 in Section 4 of the Draft EAR/IS (comment MECP-SAR-013).
4) Clarification on the map label "Moose Factory 68 First Nation" on the Project Location Figure 1.1 in the Executive Summary of the Draft EAR/IS (comment MNR-105).
5) Clarification on the description of "access controls" in the Draft EAR/IS (comment MNR-116).
6) Additional information on management of any future potential changes to the Project as detailed in the EAR/IS should approval be granted under the Environmental Assessment Act (comment MNR-129).
7) Response to the MNR recommendation for the Project Team to consider incorporating similar mitigation measures being implemented by the MNR Far North District to mitigate potential concerns related to potential impacts to wildlife and traditional harvesting activities (comment MNR-140).
8) Clarification on mitigation measures to address potential effects of the Project on diet/consumption of Indigenous traditional foods which is one of the determinants of health included in the assessment of effects on human health (comment MNR-210).
9) Clarification on the proposed locations of aggregate areas and considerations of setback/buffer areas from known fish habitat for further planning and development of aggregate source areas (comment MNR-274).
10) Response to MECP-EAB's comment inconsistent definitions for determining significance of cumulative effects between Sections 5 and 21 of the Final EAR/IS (comment MECP-EAB-05).
11) Response to MECP-EAB's comment regarding missing Figure 21.1 in Section 21 of the Final EAR/IS (MECP-EAB-07).

The general format of the Addendum #3 report is a description of the reviewers' comment followed by the Project Team's response.

This Addendum also includes Appendix V-2 that include revisions to some commitments described in Appendix V of the Final EAR/IS as well as new commitments in responses to comments received from review of the Final EAR/IS.

Contents

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In-Text Tables

Appendix:

1 MECP-SAR-004

Comment on Page 3-6 / 3.1.1 / Table 3-1:

The Draft EAR/IS Report states, “At this level of screening, impacts were considered to fall into one of two categories. The categories were the potential for general impacts to (1) the aquatic environment resulting from construction / maintenance at waterbody crossings and (2) the terrestrial environment, **primarily from vegetation clearing during construction**.” [emphasis added]

It is unclear why impacts to the terrestrial environment were limited to vegetation clearing. As it relates to species at risk, it is reasonable to expect that other impacts may occur during the other components of construction and operation of the Project. Additional rationale and justification is required to support the decision to scope the assessment of terrestrial impacts to vegetation clearing, or clarify what consideration was given in the assessment to other Project activities.

Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to revise the statement as follows:

“At this level of screening, impacts were considered to fall into one of two categories. The categories were the potential for general impacts to (1) the aquatic environment resulting from construction / maintenance at waterbody crossings and (2) the terrestrial environment~~, primarily from vegetation clearing during construction~~.”

Alternatively, please provide additional rationale and justification required to support the decision to scope the assessment of terrestrial impacts to vegetation clearing, or clarify what consideration was given in the assessment to other Project activities.

Response:

The Project Team considers the statement that the reviewer commented on remains valid and the suggested removal of the phrase “, primarily from vegetation clearing during construction” is not necessary. The statement describes the general pathway of impacts with vegetation clearing as a key activity of the Project construction affecting the terrestrial environment, for the purpose of alternatives screening; hence the inclusion of the wording “primarily” in the statement. Other pathways such as air and noise emissions are inherently associated with vegetation clearing activities and are also discussed and evaluated in the alternatives screening (refer to Tables 3-5 and 3-6 in Section 3 and Appendix C-2 of the Final EAR/IS).

2 MECP-SAR-009

Comment on Page 4-46 / 4.4.2.6:

The Draft EAR/IS Report states, “As required, disturbed areas will be stabilized using an appropriate native groundcover seed mix in accordance with Ontario Provincial Standard Specification (OPSS) 803 – Construction Specifications for Vegetative Cover.”

MECP SARB encourages the Project Team to refer to, and implement, recommended best management practices for the restoration of disturbed areas consistent with Boreal Caribou habitat. Specifically, please see Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario.

Please update this section of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include a commitment to incorporate the best management practices for the restoration of disturbed areas consistent with Boreal Caribou habitat in the detailed design stage. Specifically, please see Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario.

Response:

MECP SARB's recommendation is noted. The Project Team has captured the recommendation as commitments to be fulfilled during the detail design stage of the Project. These commitments are described in "**Table V-1: Webequie Supply Road Project (the Project) – Environmental Assessment/Impact Assessment (EA/IA) Mitigation and Monitoring Commitments"** in Appendix V of the Final EAR/IS as follows:

- *Commitment ID 1369 - MECP-SAR-009:*

  The best management practices for the restoration of disturbed areas consistent with Boreal Caribou habitat will be incorporated in the detail design stage. Specifically, best management practices for mineral exploration and development activities and Woodland Caribou in Ontario will be used.

- *Commitment ID 1376 - MECP-SAR-093:*

  The proponent will consider the Best Management Practices for mineral exploration and development activities and Woodland Caribou in Ontario in the development of the proposed Vegetation and Invasive Species Management Plan, Wildlife Management Plan and Site Restoration and Monitoring Plan during the detail design stage of the Project; and engage MECP SARB on the Plan to ensure it is appropriate and sufficient for species at risk.

3 MECP-SAR-013

Comment on Pages 4-74 – 4-82 / 4.5.1 / Table 4-10:

Table 4-10 does not include Environmental Managers as position/skill requirement.

Section 4.4.3.3 of the Draft EAR/IS Report states, "The delegated Environmental Manager for the road operator will have the right to stop operations activities in the case of non-compliance or failure to implement corrective actions and remediation measures."

Please update Table 4-10 of the Final EAR/IS Report, and all other relevant locations within the EAR/IS Report and associated Appendices, as appropriate, to include Environmental Manager as a required position/skill.

Response:

As required by the federal Tailored Impact Statement Guidelines (TISG), Table 4-10 of the EAR/IS includes expected workforce requirements during the construction and operations phases of the Project based on the National Occupational Classification system (Government of Canada 2021)[1]. Table 4-10 does not include a comprehensive list of personnel required for the Project construction and operations. As noted in Section 4.6 and Appendix E of the EAR/IS, details on roles and responsibilities of the proponent's key personnel, including the Primary Contractor, Environmental Manager, and Environmental Monitor for the Project construction and operations will be provided in the Construction Environmental Management Plan (CEMP) to be developed prior to the start of the construction phase.

4 MNR-105

Comment:

The map on page 1-7 of the Executive Summary (ES) notes Moose Cree First Nation as being "Moose Factory 68 First Nation". Please update the label on the maps within the EA to refer to Moose Cree First Nation.

Response:

As noted in the map legend, the map illustrates locations of First Nation Reserves, not First Nations. Moose Factory 68 First Nation is indicated on the map as a reserve belonging to the Moose Cree First Nation not the First Nation itself.

5 MNR-116

Comment on Sections 8-55/ES 8.5.3; 883/, ES 8.11.4; 884/ ES 8.11.3; 8-91/ 8.12.3:

The noted sections contain descriptions that allude to the implementation of public access restrictions as mitigation measures. However, 1.1 of Section 1 (page 1-4) and 4.4.3 of Section 4 (page 4-65), describes that there are currently no access controls proposed and that it is a subject of further discussion and agreement between Webequie First Nation and Ontario.

Please update sections of the EA that describe "access controls" as mitigation measures, to reflect that the topic is one of further consideration and agreement between Webequie First Nation and Ontario and to ensure consistency with the descriptions noted in other sections of the EA regarding no access controls currently being proposed.

If road ownership and operational responsibilities are confirmed prior to the Final EA, please incorporate this information into the Final EA.

[1] Government of Canada. 2021. National Occupational Classification. Version 1.0. Available: https://noc.esdc.gc.ca/?GoCTemplateCulture=en-CA. Accessed October 2022.

Response:

As the MNR reviewer has noted, the topic of access controls has been presented in Section 1.1 and Section 4.4.3 of the Final EAR/IS. In addition, Appendix V of the Final EAR/IS (refer to commitment IDs 1497, 1510, 1534, and 1635 in **Table V-1: Webequie Supply Road Project (the Project) – Environmental Assessment/Impact Assessment (EA/IA) Mitigation and Monitoring Commitments**) includes a commitment that the ultimate owner of the proposed WSR will consider involvement of various stakeholders and Indigenous communities in consultation, oversight, and decision-making regarding access controls/restrictions or permissions during the detail design and permitting phase for the Project. The Project Team do not feel that it is necessary to repeat this commitment further elsewhere in the EAR/IS.

6 MNR-129

Comment:

Several areas of the Draft EA allude to the potential for changes, such as to project activities and the project footprint. It would be beneficial for the Final EA to ensure that sufficient detail is provided and appropriately considered in the assessment, to ensure that EA "coverage" is provided. See comments #119, 120, 125, 127 and 128 for examples and consideration.

If activities are not described adequately under the comprehensive EA, MNR expects that any future potential project changes/activities would fall under the appropriate Comprehensive EA processes (as described in ES 4.0, page 4-13), and not MNR's Class EA RSFD.

Response:

An amendment procedure/change process was provided in Section 27.5 of the Final EAR/IS. The proponent will follow the EA amendment procedure process for managing changes to the Project as outlined in Section 27 that may be included in conditions of the EA Notice of Approval, if received.

7 MNR-140

Comment:

In relation to consultation regarding feasibility and exploration activities carried out by MNR's Far North District (e.g. geotechnical drilling and monitoring wells), communities have brought forward concerns related to potential impacts to wildlife and traditional harvesting activities, related to the proposed activities. In response, the project team has been implementing mitigation measures for these activities that mitigate the potential concerns raised.

It is recommended that the project team consider incorporating similar mitigation measures regarding project implementation phases into the final EA, in an effort to proactively address concerns that have been previously raised within the project area.

Response:

MNR's recommendation is noted. The proponent will consult with and acknowledge MNR's Far North District sharing of those mentioned mitigation measures to be considered during the detail design stage in the development and implementation of the Construction Environmental Management Plan (CEMP) for the Project.

8 MNR-210

Comment on Pages 17-44, 17-84, & 17-98 / Section 17:

For Diet, including consumption of traditional foods under the operational phase, there is a statement that "Hopefully, Provincial regulations will ensure stable populations of wild game for Webequie First Nation community members wanting to practice traditional food gathering techniques. An expected neutral effect to wellness is anticipated if regulations are adhered to."

This is not an appropriate assumption as provincial hunting regulations only apply to the harvest of game species and do not apply to subsistence-based or traditional harvest. Furthermore, federal legislation (not provincial) regulates harvest of migratory birds (waterfowl, geese). In addition, hunting regulations are based on a Wildlife Management Unit level, not a local level; therefore, the scope is not the same and there could be impacts within the LSA/RSA that are not addressed through provincial hunting regulations.

Please remove or revise this reference for accuracy and reconsider how regulatory requirements may or may not contribute to mitigation of impacts to harvest of game species, in the final EA.

Response:

The comment is acknowledged. Although hunting regulations do not apply to subsistence-based or traditional harvest, it is our opinion that these regulations, provincial hunting lottery system, and conservation laws would help, to some extent to limit over-hunting and access to traditional foods that could minimize adverse impacts to community members with respect to harvesting and consumption of traditional foods. The Project Team noted that the EAR/IS also includes other proposed mitigation measures that address potential impacts related to access to traditional foods within the LSA/RSA such as:

- Traditional hunting areas should be clearly identified by the contractor, and the impact to these areas from the Project should be kept minimal to avoid loss of habitat, and loss of animal traffic due to noise. This will maintain access to traditional foods, and related health benefits.
- Construction and any ground disturbing activity should be avoided by the contractor during critical windows of habitat movement, mating or spawning to help avoid lasting damage to specific species. If this is not possible, appropriate permits should be obtained to reduce the impact to wildlife.
- Webequie First Nation will work with contractor(s) to ensure that disturbances to the local environment are made in a way that minimizes disturbance to natural habitats and focuses on the long-term stability of wild game and traditional plant populations during construction including minimizing noise pollution, especially during key mating periods.

- The Community Readiness Plan (Appendix N of the EAR/IS) outlines a Stewardship and Environmental Management Plan to be developed and implemented through the Community Readiness Working Group, and along with a Monitoring and Adaptive Management Plan to address issues related to hunting and fishing by non-local visitors.

9 MNR-274

The MNR comment 274 is composed of three separate comments. First, the lack of setbacks/buffers for suitable mitigation around aggregate areas (in particular, ARA-2). Second, what factors were used to evaluate the aggregate resources area and what was considered for mitigating impacts to fish habitat. The third was providing the definition of CEMP (Construction Environmental Management Plan) and OEMP (Operational Environmental Management Plan) within this Section 10. This has been dealt with in the Final EAR/IS and not considered further.

Page/Section numbers referenced include the following 7-36/ES 7.0, 8-54/ES 8.5.3, 10-63/10.4.1.1.1 and Shapefiles. MNR noted that this comment may apply to other sections. Please review the Draft EA and update similar instances.

9.1 Aggregate Setbacks

9.1.1 MNR – Comment, Rationale, and Proposed Action

"Section 10.4.1.1.1 states “All temporary construction camps and temporary laydown areas and aggregate source areas (i.e., ARA-2 and ARA-4) and permanent supportive infrastructure (e.g., maintenance and storage facility, rest areas and maintenance turn-around areas) will be located a minimum of 100 m back from the ordinary high-water mark (HWM) of a waterbody through detailed planning.” However, the current setback from the aggregate source delineations to watercourses shown within the shapefiles is as minimal as roughly 15m. High-impact development activities (such as the construction and operation of aggregate areas) should maintain a setback of 120 meters from fish habitat (i.e., the high-water mark of fish-bearing watercourses) where possible. A minimum 30m buffer of vegetation should also be retained around all watercourses in support of preserving water quality and all fish habitats. Additionally, the recommended aggregate/rock sources ARA-2 is located directly adjacent to potential spawning habitat within a system that supports brook trout and lake sturgeon (Southern Hudson Bay-James Bay population, listed as special concern on the Species at Risk in Ontario list). Fish and fish habitat with this level of significance (both ecologically and culturally) and sensitivity requires focused consideration. The habitat adjacent to ARA-4 is unclear from imagery but is also within the same waterbody where these species can be found.

The action proposed by MNR clarifying the locations of the aggregate areas and whether a buffer (please define the buffer size) will be maintained. If not, remove reference as a mitigation measure and consider the impacts of aggregate operations and construction to fish and fish habitat in detail as part of the assessment.

9.1.2 Project Team – Response

ARA-2 and ARA-4 Aggregate Areas

The Project Team assumes the mapping being referred to are **Figure 4.9** (ARA-2) and Figure 4.10 (ARA-4) in the Final EAR/IS.

The buffer/setback areas were left undefined for ARA-2 in **Figure 4.9** of the Final EAR/IS but the supporting text (page 4-27) indicates the pit is on a ridge and it would not be dug below the lake level to minimize any hydraulic link or pit flooding. As well, the pit would maintain a vegetative buffer of at least 100 m, as below:

“The unnamed lake in this area had a water level in the range of 191.0 m to 191.6 m elevation at the time of the terrain LiDAR survey in 2019. Given these water surface elevations, a conservative estimate of available aggregate material has been made by assuming that no mining would be done below the lake water level elevation of 193 m in order to mitigate against potential flooding into the aggregate pit/quarry. In addition, the development of this aggregate/rock source area will include retaining an existing vegetation buffer zone of a minimum of 100 m in width from the unnamed lake.”

Given the potential for spawning habitat within a system that supports brook trout and lake sturgeon (Southern Hudson Bay-James Bay population, listed as special concern on the Species at Risk in Ontario list), AtkinsRéalis supports the MNR recommendation that a 120 m vegetative buffer zone be maintained. A revised figure (**Figure 4.9**) of ARA-2 with a 120 m vegetative buffer zone is presented to clarify this issue for MNR. ARA-2 intersects with the preferred route for the WSR, so no additional access road is needed.

The buffer/setback areas were left undefined for ARA-4 in **Figure 4.10** in the Final EAR/IS but the supporting text (pages 4-28 to 4-30) indicates that the large ridge is up to 25 m above the surrounding low-relief areas. From the soil and terrain investigations completed, the site is a significant reserve of sand and gravel and is considered to be a permanent source for use during the operational period of the road. An access road from the preferred route is required for the development of ARA-4 during construction phase and this road would also serve as permanent access to transport aggregate to the road during the operations phase. The access road to ARA-4 site is approximately 5.5 km in length and would require a waterbody crossing with a bridge.

A revised figure (**Figure 4.10**) of ARA-4 with the 120 m vegetative buffer zone is presented to clarify this issue for MNR. ARA-4 will provide a source of aggregate/rock material for construction of the road as well as a source of material for the assumed 75-year operation and maintenance life cycle for the Project.

The Project Team has responded to MNR first point by clarifying the locations and setbacks of the aggregate areas by increasing the vegetative buffer zone to 120 m at both ARA-2 and ARA-4 aggregate areas.

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N

WC-2A

Camp 2A

WC - 3

Section A

Section B

Section C

Section D

Section E

Section F

Section G

Section H

Section I

Webequie First Nation

Legend

- Preliminary Recommended Preferred Route
- Cross Section
- Recommended Aggregate/Rock Source Area
- Local Study Area (LSA 1 km from Centreline of Preferred Route)
- Webequie First Nation Reserve
- Provincial Park
- Vegetation Buffer Setback of 120 metres from Waterbody
- Waterbody Crossing
- Recommended Construction Camps
  *Camp 2-A is proposed to include permanent Maintenance and Storage Facility (MSF) for operations of the WSR.

WSR WEBEQUIE SUPPLY ROAD

0 0.33 0.65 Km

Webequie Supply Road (WSR)

Location of Aggregate Source Area ARA-2

Figure Number:	REV:
4.9 (revised)	PA

Client:	Project Number:	Date:
Webequie First Nation	661910	2/11/2026

DSC	DRN	CHK	APP
	AD	CW	CW

NOTES

1. Coordinate System: NAD 1983 UTM Zone 16N.
2. Cadastral boundaries are for informational purposes only and should not be considered suitable for legal, engineering, or surveying purposes.
3. Topographic/landcover features obtained from CanVec v12.0 dataset, Natural Resources Canada Earth and Sciences Sector Centre for Topographic Information; and, Land Information Ontario (LIO) Warehouse Open Data (https://geohub.lio.gov.on.ca/), Ontario Ministry of Natural Resources and Forestry (OMNRF) Download Date : 2021-02-04

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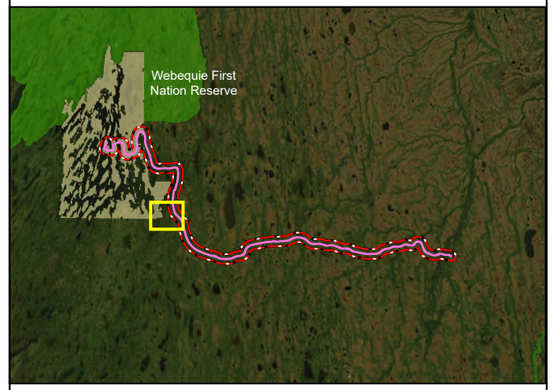
Legend

- Preliminary Recommended Preferred Route
- Permanent Access Road to Preferred Route (approx. 5.5 km)
- Recommended Aggregate Source Area
- Local Study Area (LSA 1 km from Centreline of Preferred Route)
- Webequie First Nation Reserve
- Vegetation Buffer Setback of 120 metres from Waterbody
- Waterbody Crossing



Webequie Supply Road (WSR)

Location of Aggregate Source Area ARA-4

Figure Number:		REV
4.10 (revised)		PA

Client:	Project Number:	Date:
Webequie First Nation	661910	2/11/2026

	DRN	CHK	APP
DSC			
	AD	CW	

0 10 20 40 Km

SCALE: 1:22,000

WSR WEBEQUIE SUPPLY ROAD

NOTES

1. Coordinate System: NAD 1983 UTM Zone 16N.
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9.2 Fish Habitat Mitigation – Aggregate Areas

9.2.1 MNR – Comment, Rationale, and Proposed Action

Executive Summary: Project Effects and Key Mitigation Measures for the Fish and Fish Habitat VC: Effects to Fish Habitat Quantity and Quality describes that the preferred route was selected with consideration to minimize the number of waterbody crossings for the road. There is no mention of the aggregate resource areas (or ancillary access roads) and what was considered with respect to mitigating impacts to fish habitat.

The action proposed by MNR is to describe considerations for fish habitat when planning locations of aggregate areas.

9.2.2 Project Team – Response

The Project Team evaluated alternative sites for temporary and/or permanent aggregate extraction areas (pits/quarries) and production facilities needed for construction and operation of the road, including access roads to these sites in Section 3.4.1 of the Final EAR/IS. Initial investigations into potential aggregate sources started by examining alternatives at a screening level to eliminate alternatives with fatal flaws (i.e., presence of VCs that would preclude development of the aggregate resource) before completing a full evaluation to select the preferred aggregate source(s). Potential aggregate sources (11) were identified based on the potential to provide required construction and maintenance material to the Project's needs. These sites were screened on technical factors including type of material available, quantity of material available, distance from the preferred road corridor and accessibility. If the potential aggregate source was not accessible by truck for hauling, did not have suitable material of sufficient quantity and/or was located too far from the preferred corridor, that alternative was screened out from further consideration. This screening indicated that ARA-2, ARA-3 and ARA-4 had sufficient reserves in various potential combinations (alone or in combination).

Of the potentially viable alternatives that were carried forward, the following four options were able to provide the aggregate types and quantities required by phase:

- **Option 1** – ARA-3 and ARA-4;
- **Option 2** – ARA-2 and ARA-4;
- **Option 3** – ARA-2, ARA-3 and ARA-4; and
- **Option 4** – ARA-4 Only.

Factors are the broad environmental aspects or categories that were considered in the analysis selection of preferred option(s). The broad factors for evaluation of aggregate source alternatives were:

- Indigenous Land Use and Interests;
- Living Environment;
- Physical Environment;
- Socio-Economic Environment; and
- Technical Considerations (cost, constructability, safety, etc.).

Using Multiple Accounts Assessment (MAA) methodology and Pangea software tool (see Section 3.2.5 of the EAR/IS), the factor-level results for the potential aggregate supply options indicate that Option 2 consisting of ARA-2 and ARA-4 was identified as the preferred source of aggregate for the Project.

Table 1-1 is an excerpt from Appendix C-2 related to the fish and fish habitat scoring factors used in the MAA approach. The high scores in this table indicate the degree of significance considered in the analysis for species at risk (SAR) fish and their habitat and Non-SAR fish habitat of high sensitivity.

Table 1-1: Excerpt from Appendix C-2 of scoring matrix for Multiple Accounts Assessment for Fish and Fish Habitat.

Factor	Discipline	Criteria (VC)	Indicator	Score
Living Environment	Fish and Fish Habitat	Fish and Fish Habitat (SAR Fish – Lake Sturgeon)	Area of impacted rare habitat	100
Living Environment	Fish and Fish Habitat	Fish and Fish Habitat (Non-SAR Fish)	Area of waterbodies impacted	10
Living Environment	Fish and Fish Habitat	Fish and Fish Habitat (Non-SAR Fish)	Area of Low Sensitivity Habitat impacted.	10
Living Environment	Fish and Fish Habitat	Fish and Fish Habitat (Non-SAR Fish)	Area of Moderate Sensitivity Habitat impacted.	30
Living Environment	Fish and Fish Habitat	Fish and Fish Habitat (Non-SAR Fish)	Area of High Sensitivity Habitat impacted.	50

After identifying the preferred source(s) for aggregate to supply the Project, the preferred access route to the aggregate deposits was evaluated by MAA. The ARA-2 aggregate source is located directly adjacent to the footprint of the preferred route for the WSR, so the only access roads that were assessed were those for the ARA-4 aggregate source. Based on the physical location of the ARA-4 aggregate source there were only two practical access road alternatives that could be identified by the engineering, environmental and construction teams. The two access road alternatives examined included:

- Access Road Option 1 is a N-S connector, 10 km in length with no watercourse crossings; and
- Access Road Option 2 is an E-W connector, is 3.5 km in length with one major watercourse crossing.

The factor-level results of the Pangea model run for both the road options, Option 2 consisting of 3.5 km of road with one major watercourse crossing was identified as the preferred road option to access aggregate from ARA-4.

Additional fish habitat considerations for fish and fish habitat for ARA-2 and ARA-4 included the following:

- ARA-2
    - No access road required as intersected by the preferred route.
    - Propose mining to only 193 m (~2 m above lake level) to prevent water exchange with the lake.
    - 120 m vegetative buffer zone to address potential SAR fish spawning.

- ARA-4
  - Groundwater monitoring wells drilled at the ARA-4 were observed to be dry during the 2020 and 2021 monitoring period, suggesting the management of groundwater is unlikely to be a concern during the mining/extraction of materials at the site.
  - Limited proximity to waterbodies that support fish/fish habitat.
  - 120 m vegetative buffer zone to be applied comparable to ARA-2.
- Overall - WSR Road Considerations to Minimize Aggregate Requirements and Potential Effects
  - WSR is proposed to be built as close as possible to the natural terrain contours (terrain-following) to limit the movement and volume of earthworks and aggregate material required for the Project.
  - Temporary supportive infrastructure such as construction camps with laydown/storage areas and access roads will also be graded in a manner to minimize the volume of material needed during construction.
  - Naturally occurring earth or till deposits in the project study areas (sandy to sandy silt material) are to be used as engineered fill for the subgrade of the road.

In summary the Project Team's above response and the information contained in Section 3.4.1 describe the numerous considerations regarding for fish habitat when planning the locations of aggregate areas and their access roads for the WSR.

10 MECP-EAB-05

Comment on Section 21 and Section 5:

The definitions of significance for a number of valued components do not match between section 5 (EA Approach) and section 21 (Cumulative Effects Assessment). These should match to ensure a clear, transparent, logical and consistent assessment of the predicted effects. In several cases, the thresholds for when an effect is deemed significant are lower in section 21 than described in the EA methods of section 5.

A few examples are below to illustrate, but the proponent should review all valued components.

Please review all valued components and revise the text so that sections 5 and 21 are consistent, and please indicate in response to this comment whether this results in any changes to the significance determinations for any effects. Please retain table 5-7 as it is very helpful to see all the definitions of significance for all valued components in one place.

- Wetland songbirds (s. 21.4.8.5.6):
  - S. 5 says effect is significant if moderate or high magnitude whereas s. 21 says effect is significant if high magnitude.
  - S. 5 says effect is significant if long-term to permanent duration whereas s. 21 says effect is significant if permanent duration.
  - Seems like it might not change conclusion of "not significant" since the context measure says the birds are resilient, but proponent should confirm.
  - See pages 5-22 and 21-104.

- Reptiles and amphibians (s. 21.4.7.10.1):
  - S. 5 says effect is significant if moderate or high magnitude whereas s. 21 says effect is significant if high magnitude.
  - S. 5 says effect is significant if long-term to permanent duration whereas s. 21 says effect is significant if permanent duration.
  - Seems like it might not change conclusion since effects are already considered “significant” but proponent should confirm.
  - See pages 5-22 and 21-136.
- Caribou and wolverine (s. 21.4.8.1.1 and 21.4.8.2.1):
  - S. 5 says effect is significant if moderate to high magnitude, local or regional extent, long-term to permanent duration whereas s. 21 says effect is significant if permanent, high magnitude.
  - S. 5 includes local/regional geographic extent whereas s. 21 does not.
  - Seems like it might not change conclusion since effects are already considered “significant” but proponent should confirm.
  - See pages 5-23 and 21-158 and 21-169.
- Social environment (s. 21.4.9.6):
  - S. 5 says effect is significant if moderate to high magnitude whereas s. 21 says effect is significant if high magnitude.
  - S. 5 includes local/regional geographic extent whereas s. 21 does not.
  - Seems like it might not change conclusion since effects are already considered “significant” but proponent should confirm.
  - See pages 5-23 and 21-158 and 21-250.

Response:

As noted in the paragraph preceding Table 5-7 in Section 5 of the EAR/IS, Table 5-7 serves as a summary of criteria for determining significance of predicted net effects for each valued component (VC) presented in respective sections (Sections 6 to 20) of the EAR/IS. These criteria are also used in determining significance of cumulative net effects. The Project Team acknowledge that there are inconsistencies among the criteria summarized in Table 5-7, the criteria described in respective VC Sections 10.6, 12.8, and 13.6, and inherently the criteria described in cumulative effects assessment Sections 21.4.5, 21.4.7, and 21.4.8.

To address the noted inconsistencies, the Project Team provide the following editorial changes:

- Revisions to description of criteria for Wildlife and Wildlife Habitat VC and Species at Risk VC in Table 5-7 to be as presented in respective Sections 12.8 and 13.6.

Table 5-7 (Revised): Definitions of Significant Net Effects for Valued Components

Valued Component or Indigenous Value	Subcomponent	Definition of Significance
Geology, Terrain, and Soils	▪ Geomorphology and geochemistry; ▪ Terrain/Topography; ▪ Soil quality; and ▪ Soil quantity.	A predicted net effect would be considered significant if it is assessed as: ▪ High in magnitude; ▪ Regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); and ▪ Identified as a key concern or interest by Indigenous communities and groups.
Surface Water Resources	▪ Surface water quantity; ▪ Surface water quality; and ▪ Sediment quality.	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to high in magnitude; ▪ Regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); and ▪ Identified as a key concern or interest by Indigenous communities and groups.
Groundwater Resources	▪ Groundwater quantity; and ▪ Groundwater quality.	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to high in magnitude; ▪ Regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); and ▪ Identified as a key concern or interest by Indigenous communities and groups.
Atmospheric Environment	▪ Air quality; ▪ Greenhouse gases; ▪ Noise and vibration; and ▪ Lighting.	A predicted net effect would be considered significant if it is assessed as: ▪ High in magnitude; ▪ Local or regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); and ▪ Identified as a key concern or interest by Indigenous communities and groups.

Valued Component or Indigenous Value	Subcomponent	Definition of Significance
Fish and Fish Habitat	▪ Fish habitat quantity and quality; ▪ Fish populations; ▪ Key species: ▫ Brook Trout; ▫ Lake Whitefish; ▫ Chain Pickerel; ▫ Yellow Perch; ▫ Cisco; ▫ Burbot; ▫ Longnose Sucker; ▫ White sucker; ▫ Lake Chub; ▫ Northern Pike; ▫ Walleye; and ▫ Lake Sturgeon (see Species at Risk).	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to high in magnitude; ▪ Regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); ▪ Identified as a key concern or interest by Indigenous communities and groups; and ▪ Effects to fish and fish habitat would cause permanent high magnitude adverse changes to survival or reproduction at a population level such that it can no longer self-sustain itself.
Vegetation and Wetlands	▪ Vegetation communities, species and biodiversity; ▪ Wetland functions; ▪ Plant species and communities at risk, of conservation concern, or locally underrepresented; and ▪ Plant species and communities of traditional importance to Indigenous Peoples.	A predicted net effect would be considered significant if it is assessed as: ▪ High in magnitude; ▪ Local or regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); ▪ Identified as a key concern or interest by Indigenous communities and groups; and ▪ Effects to vegetation and wetlands would cause high magnitude changes to biodiversity and ecosystem function of ecosystem communities to the point where they can no longer self-sustain themselves.
Wildlife and Wildlife Habitat	▪ Wildlife habitat including identified Significant Wildlife Habitat; ▪ Wildlife populations; ▪ Key species and species groups: ▫ Moose; ▫ Furbearers; ▫ Bats; ▫ Migratory Songbirds (Forest and Wetland); ▫ Waterfowl; ▫ Shorebirds; ▫ Raptors; and ▫ Herpetofauna (Reptiles and Amphibians).	A predicted net effect would be considered significant if it is assessed as: ▪ High in magnitude; ▪ Local or regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); ▪ Identified as a key concern or interest by Indigenous communities and groups; and ▪ Effects to wildlife and wildlife habitat would cause permanent high magnitude adverse changes to survival or reproduction at a population level such that it can no longer self-sustain itself.

Valued Component or Indigenous Value	Subcomponent	Definition of Significance
Species at Risk (SAR)	▪ Terrestrial SAR populations; ▪ Terrestrial SAR habitat; ▪ SAR Fish habitat quantity and quality; and ▪ SAR Fish populations. **Terrestrial SAR:** ▪ Caribou (Boreal Population); ▪ Wolverine; ▪ Bats: ▫ Northern Myotis; and ▫ Little Brown Myotis. ▪ Upland Forest Songbirds: ▫ Evening Grossbeak. ▪ Wetland Songbirds: ▫ Olive-sided Flycatcher; and ▫ Rusty Blackbird. ▪ Shorebirds: ▫ Lesser Yellow Legs. ▪ Nightjars: ▫ Common Nighthawk. ▪ Raptors: ▫ Short-eared Owl; and ▫ Bald Eagle. **Aquatic SAR:** ▪ Lake Sturgeon (Hudson Bay – James Bay population).	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to high in magnitude; ▪ Regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); ▪ Identified as a key concern or interest by Indigenous communities and groups; and ▪ Effects to a species at risk and their habitat would cause permanent high magnitude adverse changes to survival or reproduction at a population level such that it can no longer self-sustain itself.
Social Environment	▪ Population and demography; ▪ Housing and temporary accommodations; ▪ Community services; ▪ Education, training and traditional learning; ▪ Emergency and protective services; ▪ Community Infrastructure; and ▪ Community well-being and safety.	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to high in magnitude; ▪ Local or regional in extent; ▪ Medium to long-term in duration; ▪ Effect could require management and represents an impact on community well being or safety. Adverse net effects may be considered significant even with a low likelihood of occurrence; and ▪ Identified as a key concern or interest by Indigenous communities and groups.
Economic Environment	▪ Labour Force, employment and income; ▪ Overall economy; ▪ Business environment; and ▪ Public and Indigenous community finance.	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to High in magnitude; ▪ Local or regional in extent; ▪ Medium to long-term in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level); and ▪ Identified as a key concern or interest by Indigenous communities and groups.

Valued Component or Indigenous Value	Subcomponent	Definition of Significance
Non-Traditional Land and Resource Use	▪ Land Use Compatibility and Stewardship; ▪ Commercial and Industrial; ▪ Recreation and Tourism (i.e., camps, trails, waterways, etc.); ▪ Provincial and Federal Parks, Ontario ANSI (Areas of Natural and Scientific Interest) and Other Protected Areas; and ▪ Transportation.	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to high in magnitude; ▪ Local or regional in extent; ▪ Long-term to permanent in duration; ▪ Representing a management concern (net effects alter the sustainability of the VC beyond a manageable level or result in changes that are not in accordance with provincial and federal guidelines); and ▪ Identified as a key concern or interest by Indigenous communities and groups.
Human Health	**Determinants of health:** ▪ Structural (or Level 3) determinants of health: structural and equity factors, including racism and colonialism; ▪ Intermediate (or Level 2) determinants of health: physical environment, education, service access, and social, cultural and economic factors; and ▪ Proximal (or Level 1) determinants of health: health behaviours including substance use, and diet, including availability of traditional foods (also referred to as “country foods” in this EAR/IS).	A predicted net effect would be considered significant if it is assessed as: ▪ Moderate to high in magnitude; ▪ Local or regional in extent; ▪ Medium to long-term in duration; ▪ Effect could require management and represents a significant impact on existing human health conditions. Adverse net effects may be considered significant even with a low likelihood of occurrence; and ▪ Identified as a key concern or interest by Indigenous communities and groups.
Visual Environment	Visual landscape quality.	A predicted net effect would be considered significant if it is assessed as: ▪ High in magnitude; ▪ Local or regional in extent; ▪ Long-term to permanent in duration; and ▪ Identified as a key concern or interest by Indigenous communities and groups.
Indigenous Peoples and Aboriginal and/or Treaty Rights	Indigenous Peoples’ values and Aboriginal and Treaty Rights: ▪ Indigenous current and historical use of lands and resources for traditional purposes; ▪ Cultural continuity; and ▪ Aboriginal and Treaty Rights: ▫ Changes to rights related to current and historical use of lands and resources for traditional purposes and activities; ▫ Changes to rights related to cultural continuity;	An effect on the rights of Indigenous Peoples would be considered high in severity if it is assessed as: ▪ Likely to be major in scale, permanent/long-term, frequent, possibly irreversible and over a large spatial extent or within an area of exclusive/preferred use; ▪ Cultural well-being is disrupted, impeded or removed; project interacts with only area where a right may be exercised and many historic, existing or proposed developments and/or disturbance; ▪ Decision-making associated with governance and title adversely affected; ▪ Subgroups will be disproportionately impacted by the project and experience no to little benefit;

Valued Component or Indigenous Value	Subcomponent	Definition of Significance
	▫ Socio-economic, health and well-being rights; and ▫ Self-determination and self-governance rights.	▪ Mitigation is unable to fully address impacts such that the practice of the right is substantively diminished or lost.
Cultural Heritage Resources	▪ Built heritage resources; ▪ Cultural Heritage Landscapes; and ▪ Archaeological resources.	A predicted net effect would be considered significant if it is assessed as representing a management concern (net effects result in changes that are not in accordance with provincial and federal guidelines).

- Revisions to the introductory statements in the following subsections in Section 21 to include only references to Sections 10.6, 12.8, 13.6, and 14.6 for criteria for determination of significance and to remove the insistent statements reiterating the criteria after those references:

  - **Section 21.4.5.1 (Fish and Fish Habitat)**

    "21.4.5.1 Determination of Significance
    The determination of significance of net cumulative effects on the VC is based on the process of significance determination outlined in Section 10.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself.~~"

  - **Section 21.4.7.1.6 (Moose)**

    "21.4.7.1.6 Determination of Significance
    The determination of significance of net cumulative effects on the Moose VC is based on the process of significance determination outlined in Section 12.8 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself.~~"

  - **Section 21.4.7.3.3 (Furbearers)**

    "21.4.7.3.3 Determination of Significance
    The determination of significance of net cumulative effects on the Furbearers VC is based on the process of significance determination outlined in Section 12.8 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

  - **Section 21.4.7.5.1 (Forest Songbirds)**

    "21.4.7.5.1 Determination of Significance
    The determination of significance of net cumulative effects on the Forest Songbirds VC is based on the process of significance determination outlined in Section 12.7 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.7.6.1 (Wetland Songbirds)**

  "21.4.7.6.1 Determination of Significance
  The determination of significance of net cumulative effects on the Wetland Songbirds VC is based on the process of significance determination outlined in Section 12.8 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.7.7.1 (Shorebirds)**

  "21.4.7.7.1 Determination of Significance
  The determination of significance of net cumulative effects on the Shorebirds VC is based on the process of significance determination outlined in Section 12.8 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.7.8.1 (Waterfowl)**

  "21.4.7.8.1 Determination of Significance
  The determination of significance of net cumulative effects on the Waterfowl VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.7.9.1 (Raptors)**

  "21.4.7.9.1 Determination of Significance
  The determination of significance of net cumulative effects on the Raptors VC is based on the process of significance determination outlined in Section 12.8 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.7.10.1 (Reptiles and Amphibians)**

  "21.4.7.10.1 Determination of Significance
  The determination of significance of net cumulative effects on the Reptiles and Amphibians VC is based on the process of significance determination outlined in Section 12.8 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.1.1 (Woodland Caribou)**

  "21.4.8.1.1 Determination of Significance
  The determination of significance of net cumulative effects on the Woodland Caribou VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high~~

~~magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.2.1 (Wolverine)**

  "21.4.8.2.1 Determination of Significance
  The determination of significance of net cumulative effects on the Wolverine VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.3.6 (Bats)**

  "21.4.8.3.6 Determination of Significance
  The determination of significance of net cumulative effects on the Bats VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.4.6 (SAR Forest Songbirds)**

  "21.4.8.4.6 Determination of Significance
  The determination of significance of net cumulative effects on the SAR Forest Songbirds VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.5.6 (SAR Wetland Songbirds)**

  "21.4.8.5.6 Determination of Significance
  The determination of significance of net cumulative effects on the Wetland Songbirds VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.6.6 (Lesser Yellowlegs)**

  "21.4.8.6.6 Determination of Significance
  The determination of significance of net cumulative effects on the Lesser Yellowlegs VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.7.6 (Common Nighthawk)**

  "21.4.8.7.6 Determination of Significance
  The determination of significance of net cumulative effects on the Common Nighthawk VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.8.6 (Bald Eagle)**

  "21.4.8.8.6 Determination of Significance
  The determination of significance of net cumulative effects on the Bald Eagle VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.9.6 (Short-eared Owl)**

  "21.4.8.9.6 Determination of Significance
  The determination of significance of net cumulative effects on the Short-eared Owl VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.8.10.6 (Sturgeon)**

  "21.4.8.10.6 Determination of Significance
  The determination of significance of net cumulative effects on the Sturgeon VC is based on the process of significance determination outlined in Section 13.6 for net effects. ~~A predicted net cumulative effect is considered significant if it is evaluated as adverse, permanent, and of high magnitude, and if it negatively impacts species survival or reproduction at the population level to the extent that the population can no longer sustain itself."~~

- **Section 21.4.9.6 (Social Environment)**

  "21.4.9.6 Determination of Significance
  The determination of significance of net cumulative effects on the Social Environment VC is based on the process outlined in Section 14.6 for net effects~~. A predicted net cumulative effect is considered significant if the effect is assessed as moderate to high in magnitude, medium- to long-term in duration, as well as being identified as a key concern by Indigenous communities, and / or where additional management may be needed."~~

The Project Team noted that the editorial changes described above do not change the significance conclusions of the effects assessment and cumulative effects assessment for respective VCs.

11 MECP-EAB-07

Comment on Page 21-38 Section 21:

Figure 21.1 on page 21-38 is missing. The figure is supposed to show the map “Other Past, Present, and Reasonably Foreseeable Future Projects and Physical Activities.”

Response:

Please see Figure 21.1 below.

Number	Project Name	Project Type	Approximate Direct Distance to the WSR
	Other Past and Present Projects and Activities		
1	De Beers Victor Mine (Closed)	Mining	160 km east of WSR
2	Goldcorp's Musselwhite Mine	Mining	210 km west of WSR
3	Greenstone Gold's Hardrock Mine	Mining	344 km south of WSR
4	Construction of upgrades to the Anaconda and Painter Lake Forestry Access Roads	All-Season Road	225 km south of WSR
5	Wataynikaneyap Transmission Project (New Transmission Line to Pickle Lake)	Power Transmission	130 km west of WSR
6	Ogoki Diversion	Hydroelectric	270 km southwest of WSR
7	Long Lac Diversion	Hydroelectric	410 km south of WSR
8	Rapid Lynx Broadband Project (Phase 1)	Telecommunication	1 km north of WSR
9	Wataynikaneyap Transmission Project (Phase 2)	Telecommunication	Various locations –approximately 70 km to 480 km west from WSR
10	Ogoki Forest Management Unit (FMU)	Forest Management	175 km south from WSR
11	Webequie First Nation - Nursing Station Bulk Fuel Storage Upgrades	Community Infrastructure	Within Webequie Community
12	Kasabonika Lake New 7 - 12 school	Community Infrastructure	105 km northwest of WSR
13	Kingfisher Lake First Nation K4-10 School	Community Infrastructure	165 km west of WSR
14	Kingfisher Lake First Nation Subdivision Phase 2	Community Infrastructure	165 km west of WSR
15	Neskantaga First Nation New Construction of an 8-plex teachers residence	Community Infrastructure	94 km southwest of WSR
16	Wapekeka First Nation New School Project	Community Infrastructure	175 km northwest of WSR
17	Wunnumin H1RCI Compound Construction	Community Infrastructure	130 km northwest of WSR
18	Wunnumin Lake First Nation Teacherages Project	Community Infrastructure	130 km west of WSR
	Other Reasonably Foreseeable Future Projects and Activities		
19	Black Horse Project and Big Daddy Project	Mining	Located near eastern terminus of WSR
20	Eagle's Nest Project	Mining	Located near eastern terminus of WSR
21	Marten Falls Community Access Road Project	All-Season Road	100 km south of WSR
22	Northern Road Link	All-Season Road	Connects to eastern terminus of WSR
23	Webequie Supply Road	All-Season Road	N/A
24	East-West Road	All-Season Road	250 m southwest of WSR
25	Kashechewan First Nation Road to Site 5 Project	All-Season Road	320 km east of WSR
26	Hydroelectric generation and transmission connection development opportunities in Albany and Attawapiskat Rivers area	Hydroelectric and Power Transmission	Approximately 80 km south of WSR
27	Rapid Lynx Broadband Project (Phase 2)	Telecommunication	Two locations are present at 330 km south of WSR while other two locations are present at 110 km west of WSR
28	Proposed Neskantaga FMU	Forest Management	100 km southwest of WSR
29	Black Thor, Blackbird, and Black Label Mining Deposits	Mineral Exploration Activity	Located near eastern terminus of WSR
30	Juno Corporation Mining Exploration Activity	Mineral Exploration Activity	Located 65 km east, northeast of WSR
31	Northern Star Eagle Limited and Southern Star Eagle Limited Drilling Program	Mineral Exploration Activity	Located 45 km northeast of western terminus of WSR
32	Development of 10 Lot Residential Subdivision on Eabametoong First Nation	Community Infrastructure	145 km south of WSR
33	Kasabonika Lake First Nation Band Representative Facility	Community Infrastructure	104 km northwest of WSR
34	Neskantaga Community Recreation Centre	Community Infrastructure	90 km southwest of WSR
35	Kinonjeoshtegon - CHRT 41 - CFS Center and Associated Buildings - P048401 - 2422	Community Infrastructure	180 km northwest of WSR
36	Kitchenuhmaykoosib Inninuwug Wastewater System Upgrades & Expansion	Community Infrastructure	195 km northwest of WSR
37	Transportation of ore from future development near the Project for processing, once past the WSR, potentially involving the following: Ferrochrome Production Facility (proposed), Sudbury Smelter (existing), Road from Nakina to Ferrochrome Facility and Sudbury Smelter (existing)	Road Traffic	Three locations are present from 530 km to 820 km southeast of WSR
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39			

Legend

- Other Past and Present Projects and Activities
- Other Reasonably Foreseeable Future Projects and Activities
- Métis Nation of Ontario - Region 2
- First Nation Reserve
- Forest Management Unit
- Provincial Park
- Proposed Wataynikaneyap Transmission Line
- Winter Road
- Railway
- All-Season Road
- Local/Resource Road
- Webequie Supply Road (WSR) Project
- Marten Falls First Nation Community Access Road (MFCAR) Project
- Northern Road Link (NRL) Project
- Anaconda and Painter Lake Road
- East West Road
- Rapid Lynx Broadband Project

Webequie Supply Road (WSR)

Other Past, Present, and Reasonably Foreseeable Future Projects and Physical Activities

Figure Number: 21.1 — 0 100 200 KM — 1:3,500,000 — **REV** PA

Client: Webequie First Nation

Project Number: 661910

Date: 5/23/2025

DSC | DRN | CHK | APP | TE | AD | CB

WSR WEBEQUIE SUPPLY ROAD

NOTES

1. Coordinate System: NAD 1983 UTM Zone 16N.
2. Cadastral boundaries are for informational purposes only and should not be considered suitable for legal, engineering, or surveying purposes.
3. Topographic/landcover features obtained from CanVec v12.0 dataset, Natural Resources Canada Earth and Sciences Sector Centre for Topographic Information; and, Land Information Ontario (LIO) Warehouse Open Data (https://geohub.lio.gov.on.ca/), Ontario Ministry of Natural Resources and Forestry (OMNRF). Download Date : 2021-02-04

DISCLAIMER

Webequie Supply Road Project

Webequie First Nation

April 6, 2026

AtkinsRéalis Ref: 661910

APPENDIX V-2: EA/IA MITIGATION AND MONITORING COMMITMENTS TABLE

Table V-2: Webequie Supply Road Project (the Project) –Environmental Assessment/Impact Assessment (EA/IA) Mitigation and Monitoring Commitments from Review of Final EAR/IS

ID # *	Commitment Type/ Valued Component (VC) *	Mitigation and Monitoring Commitments	Timeline / Project Phase	Status
170 (Revised) *	Fish and Fish Habitat Ministry of Natural Resources (MNR) MNR-64F*	Habitat Offsetting and Enhancement: Waterbodies where HADD and/or death of fish occur will require habitat offsetting in order to comply with the *Fisheries Act* and conditions anticipated in the *Fisheries Act* authorization(s). Once the Project design is finalized, any net effects to fish/fish habitat will be offset through habitat creation or habitat enhancement to achieve no net loss of fish habitat and/or productive capacity. Habitat offsetting and enhancement requirements will be determined in consultation with DFO and First Nations during the detail design permitting phase of the Project. The MNR will be consulted in the determination of habitat offsetting and enhancement requirements/situations.	▪ Detail Design ▪ Construction	EA/IA commitment (comment on Final EAR/IS)
171 (Revised)	Fish and Fish Habitat MNR-64F	Habitat Offsetting and Enhancement: Habitat offsetting and enhancement requirements will be determined in consultation with DFO and First Nations during the detail design permitting phase of the Project. The MNR will be consulted in the determination of habitat offsetting and enhancement requirements/situations.	▪ Detail Design ▪ Construction	EA/IA commitment (comment on Final EAR/IS)
173 (Revised)	Fish and Fish Habitat MNR-64F	Construction Environmental Management and Monitoring: The CEMP and OEMP will include the environmental monitoring requirements during the construction and operation phases of the Project to confirm and document compliance with the provisions of the CEMP and conditions of applicable permits and approvals. During the construction phase, Environmental Monitor(s) and/or Indigenous Monitor(s) will be on-site to observe and document/log the implementation of mitigation measures implemented to minimize the potential effects of construction on fish and fish habitat. The documentation log will identify any deficiencies and record the actions taken to correct any issues of concern. The monitoring framework should include a clear feedback loop with periodic check-ins during construction, including scheduled updates and immediate notification of deficiencies or incidents affecting fish and fish habitat. Monitoring logs and proposed corrective actions should be shared where relevant to fisheries protection or permit/authorization conditions, where applicable.	▪ Detail Design ▪ Construction	EA/IA commitment (comment on Final EAR/IS)
180 (Revised)	Fish and Fish Habitat MNR-64F	Spill Prevention and Response: Any vehicle or equipment that enters a waterbody must be free of fluid leaks and externally cleaned and degreased. Note that vehicle/equipment entry into a waterbody constitutes an in-water activity, occurring only where specifically required and authorized/approved, including DFO review/authorization requirements under the Fisheries Act.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
183 (Revised)	Fish and Fish Habitat MNR-64F	Spill Prevention and Response: Vehicles and equipment will not be permitted to work in-water, unless required. In these cases, works will be conducted under observation by a qualified environmental monitor. Note that vehicle/equipment entry into a waterbody constitutes an in-water activity, occurring only where specifically required and authorized/approved, including DFO review/authorization requirements under the Fisheries Act.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
205 (Revised)	Fish and Fish Habitat MNR-64F	Timing Windows for Construction: • Restricted activity periods will include both Spring and Fall windows to protect fish populations during their spawning, rearing and migratory periods. Based on the species present in the study area, preliminary restricted activity periods are estimated to typically be: ▫ April 1 to June 30 (spring window); ▫ September 1 to June 15 (fall/winter window); and Restricted activity periods will be based on the species discovered in each specific waterbody. Restricted activity periods will be confirmed using all available information, and where uncertainty exists or species may reasonably be present despite non-detection, timing windows will err on the side of caution and apply the more protective MNR-recommended window, with final windows confirmed with MNR during permitting.	▪ Construction ▪ Detail Design	EA/IA commitment (comment on Final EAR/IS)
209 (Revised)	Fish and Fish Habitat MNR-64F	Work Isolation and Fish Rescue: In- water work will allow for construction and repair of waterbody crossing structures will be isolated (i.e., will occur in the dry) from surrounding fish habitat using cofferdams, aquadams, or other methods acceptable the MNR and DFO such as the requirements in the Interim Code of Practice: Temporary Coffer Dams and Diversion Channels.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
210 (Revised)	Fish and Fish Habitat MNR-64F	Work Isolation and Fish Rescue: Submission of appropriate notification and acquisition of necessary permits/approvals from regulatory agencies will occur.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)

ID # *	Commitment Type/ Valued Component (VC) *	Mitigation and Monitoring Commitments	Timeline / Project Phase	Status
211 (Revised)	Fish and Fish Habitat MNR-64F	Work Isolation and Fish Rescue: Temporary dam structures to isolate the work zone will be constructed using clean materials that minimize suspended sediment generation. Work isolation/fish rescue will be avoided where feasible and only implemented when absolutely required and no other option available; when and where it is required, it will be minimized in extent and duration and completed as quickly as practicable to reduce fish mortality/stranding and passage disruption.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
212 (Revised)	Fish and Fish Habitat MNR-64F	Work Isolation and Fish Rescue: Flow will be maintained during in-water works at a level sufficient to sustain aquatic life and prevent upstream impoundment. Work isolation/fish rescue will be avoided where feasible and only implemented when absolutely required and no other option available; when and where it is required, it will be minimized in extent and duration and completed as quickly as practicable to reduce fish mortality/stranding and passage disruption.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
213 (Revised)	Fish and Fish Habitat MNR-64F	Work Isolation and Fish Rescue: Fish rescues will be conducted to relocate fish prior to in-water work, dewatering or conducting works in wetted channels or wetlands. Fish within the isolated workspaces will be rescued (i.e., salvaged and relocated) by qualified professionals under the conditions of a MNR License to Collect Fish for Scientific Purposes to be acquired, and in accordance with requirements in the DFO Interim Standard for In-water Site Isolation. Work isolation/fish rescue will be avoided where feasible and only implemented when absolutely required and no other option available; when and where it is required, it will be minimized in extent and duration and completed as quickly as practicable to reduce fish mortality/stranding and passage disruption.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
214 (Revised)	Fish and Fish Habitat MNR-64F	Work Isolation and Fish Rescue: Fish handling will be minimized, including limiting time spent weighing and measuring fish. Work isolation/fish rescue will be avoided where feasible and only implemented when absolutely required and no other option available; when and where it is required, it will be minimized in extent and duration and completed as quickly as practicable to reduce fish mortality/stranding and passage disruption.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
215 (Revised)	Fish and Fish Habitat MNR-64F	Work Isolation and Fish Rescue: For diversions during isolations, appropriately screened pumps will be used to reduce the risk of entrainment or impingement of fish following the guidance within the interim DFO Code of Practice for end-of-pipe fish protection screens for small water intakes in freshwater. Work isolation/fish rescue will be avoided where feasible and only implemented when absolutely required and no other option available; when and where it is required, it will be minimized in extent and duration and completed as quickly as practicable to reduce fish mortality/stranding and passage disruption.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
224 (Revised)	Fish and Fish Habitat MNR-64F	Public Access Restrictions: Public access restrictions will be explored further in the detail design and construction phases of the Project, such as restrictions on fishing in certain locations or changes to harvesting by First Nation community members to prevent and/or minimize additional fishing pressure. It is acknowledged that any legislative changes or changes to First Nation exercise of their rights to harvesting of fish are beyond the direct control of the proponent.	▪ Detail Design ▪ Construction	EA/IA commitment (comment on Final EAR/IS)
225 (Revised)	Fish and Fish Habitat MNR-64F	Project Design: Installing restrictive fencing and/or barricades near waterbody crossing sites, including on bridge structures to deter fishing. Note that access controls for mitigation is a topic of further consideration and agreement between Webequie First Nation and Ontario.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
228 (Revised)	Fish and Fish Habitat – Monitoring MNR-64F	Monitoring will be conducted by qualified individual(s) during instream construction (e.g., installation of culverts or bridges) or where active water taking and discharge occurs to observe implementation and report on the effectiveness of the procedures and mitigation measures for minimizing potential effects to fish and fish habitat. Specific engagement and feedback will be undertaken with the MNR and may include: ▪ Defined check-ins/reporting to MNR during construction and any applicable post-construction monitoring (frequency and timing to be specified and aligned with key work phases and monitoring windows). ▪ Sharing monitoring outputs (logs/inspection records, exceedances, deficiencies/non-compliance observations, corrective actions taken/proposed, and results/trends). ▪ Prompt notification to MNR of any material issues (e.g., fish passage interruptions, culvert blockages/ponding, erosion/sediment control failures, water quality exceedances, fish mortality/stranding risk, or habitat alteration beyond predictions). ▪ Consultation with MNR on mitigation refinements and corrective actions where actions may affect fish/fish habitat protection measures, timing windows, or permit/approval conditions (including where DFO authorization conditions are implicated).	▪ Construction	EA/IA commitment (comment on Final EAR/IS)

ID # *	Commitment Type/ Valued Component (VC) *	Mitigation and Monitoring Commitments	Timeline / Project Phase	Status
229 (Revised)	Fish and Fish Habitat – Monitoring MNR-64F	Regular inspections and monitoring of installed erosion and sediment control (ESC) measures to verify they are effective and to identify corrective action(s), where applicable. Specific engagement and feedback will be undertaken with the MNR and may include: ▪ Defined check-ins/reporting to MNR during construction and any applicable post-construction monitoring (frequency and timing to be specified and aligned with key work phases and monitoring windows). ▪ Sharing monitoring outputs (logs/inspection records, exceedances, deficiencies/non-compliance observations, corrective actions taken/proposed, and results/trends). ▪ Prompt notification to MNR of any material issues (e.g., fish passage interruptions, culvert blockages/ponding, erosion/sediment control failures, water quality exceedances, fish mortality/stranding risk, or habitat alteration beyond predictions). ▪ Consultation with MNR on mitigation refinements and corrective actions where actions may affect fish/fish habitat protection measures, timing windows, or permit/approval conditions (including where DFO authorization conditions are implicated).	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
230 (Revised)	Fish and Fish Habitat – Monitoring MNR-64F	Culvert monitoring programs to remove debris, prevent fish passage interruptions, and assess blockages and/or ponding. Specific engagement and feedback will be undertaken with the MNR and may include: ▪ Defined check-ins/reporting to MNR during construction and any applicable post-construction monitoring (frequency and timing to be specified and aligned with key work phases and monitoring windows). ▪ Sharing monitoring outputs (logs/inspection records, exceedances, deficiencies/non-compliance observations, corrective actions taken/proposed, and results/trends). ▪ Prompt notification to MNR of any material issues (e.g., fish passage interruptions, culvert blockages/ponding, erosion/sediment control failures, water quality exceedances, fish mortality/stranding risk, or habitat alteration beyond predictions). ▪ Consultation with MNR on mitigation refinements and corrective actions where actions may affect fish/fish habitat protection measures, timing windows, or permit/approval conditions (including where DFO authorization conditions are implicated).	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
231 (Revised)	Fish and Fish Habitat – Monitoring MNR-64F	Monitoring streamflow, turbidity, total suspended solids and other related water quality parameters during construction to confirm effectiveness of ESC measures. Specific engagement and feedback will be undertaken with the MNR and may include: ▪ Defined check-ins/reporting to MNR during construction and any applicable post-construction monitoring (frequency and timing to be specified and aligned with key work phases and monitoring windows). ▪ Sharing monitoring outputs (logs/inspection records, exceedances, deficiencies/non-compliance observations, corrective actions taken/proposed, and results/trends). ▪ Prompt notification to MNR of any material issues (e.g., fish passage interruptions, culvert blockages/ponding, erosion/sediment control failures, water quality exceedances, fish mortality/stranding risk, or habitat alteration beyond predictions). ▪ Consultation with MNR on mitigation refinements and corrective actions where actions may affect fish/fish habitat protection measures, timing windows, or permit/approval conditions (including where DFO authorization conditions are implicated).	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
232 (Revised)	Fish and Fish Habitat – Monitoring MNR-64F	Periodic fish community and habitat surveys to detect changes in fish assemblages. Specific engagement and feedback will be undertaken with the MNR and may include: ▪ Defined check-ins/reporting to MNR during construction and any applicable post-construction monitoring (frequency and timing to be specified and aligned with key work phases and monitoring windows). ▪ Sharing monitoring outputs (logs/inspection records, exceedances, deficiencies/non-compliance observations, corrective actions taken/proposed, and results/trends). ▪ Prompt notification to MNR of any material issues (e.g., fish passage interruptions, culvert blockages/ponding, erosion/sediment control failures, water quality exceedances, fish mortality/stranding risk, or habitat alteration beyond predictions). ▪ Consultation with MNR on mitigation refinements and corrective actions where actions may affect fish/fish habitat protection measures, timing windows, or permit/approval conditions (including where DFO authorization conditions are implicated).	▪ Construction	EA/IA commitment (comment on Final EAR/IS)

ID # *	Commitment Type/ Valued Component (VC) *	Mitigation and Monitoring Commitments	Timeline / Project Phase	Status
233 (Revised)	Fish and Fish Habitat – Monitoring MNR-64F	Pre- and post-construction fish habitat assessments to evaluate habitat alterations, including monitoring changes to stream morphology and substrate caused by increased sediment loads or changes in streamflow. Specific engagement and feedback will be undertaken with the MNR and may include: ▪ Defined check-ins/reporting to MNR during construction and any applicable post-construction monitoring (frequency and timing to be specified and aligned with key work phases and monitoring windows). ▪ Sharing monitoring outputs (logs/inspection records, exceedances, deficiencies/non-compliance observations, corrective actions taken/proposed, and results/trends). ▪ Prompt notification to MNR of any material issues (e.g., fish passage interruptions, culvert blockages/ponding, erosion/sediment control failures, water quality exceedances, fish mortality/stranding risk, or habitat alteration beyond predictions). ▪ Consultation with MNR on mitigation refinements and corrective actions where actions may affect fish/fish habitat protection measures, timing windows, or permit/approval conditions (including where DFO authorization conditions are implicated).	• Construction ▪ Operations	EA/IA commitment (comment on Final EAR/IS)
234 (Revised)	Fish and Fish Habitat – Monitoring MNR-64F	Where a DFO Fisheries Act authorization is required, a qualified fisheries specialist will also conduct the following construction monitoring tasks, in addition to the conditions specified in the authorization: ▪ Review existing plans for the Project, including but not limited to, ESC plans, temporary flow management, dewatering plans and environmental management plans, to ensure these are being followed with the appropriate measures in-place. ▪ Confirm the mitigation measures identified in the EA/IA are being installed/implemented and maintained as designed including providing field advice and necessary corrective actions for non-compliance, and documents whether these measures are protecting fish and fish habitat effectively throughout construction. ▪ Undertake monitoring of off-setting measures outlined in the authorization, including that off-setting measures were constructed as designed. ▪ Undertake post-construction monitoring and prepare annual reporting to confirm that the off-setting measures are functioning as designed and successful in providing fish habitat. Specific engagement and feedback will be undertaken with the MNR and may include: ▪ Defined check-ins/reporting to MNR during construction and any applicable post-construction monitoring (frequency and timing to be specified and aligned with key work phases and monitoring windows). ▪ Sharing monitoring outputs (logs/inspection records, exceedances, deficiencies/non-compliance observations, corrective actions taken/proposed, and results/trends). ▪ Prompt notification to MNR of any material issues (e.g., fish passage interruptions, culvert blockages/ponding, erosion/sediment control failures, water quality exceedances, fish mortality/stranding risk, or habitat alteration beyond predictions). ▪ Consultation with MNR on mitigation refinements and corrective actions where actions may affect fish/fish habitat protection measures, timing windows, or permit/approval conditions (including where DFO authorization conditions are implicated).	• Detail design ▪ Construction	EA/IA commitment (comment on Final EAR/IS)
257 (Revised)	Vegetation and Wetlands MNR-58F	Vegetation Clearing and Grubbing: Prior to any vegetation removal, all areas having the potential to contain rare plant species will be surveyed. Any identified rare specimens will be transplanted by qualified personnel before clearing begins. The proponent will provide a summary report to the MNR of all the rare plants identified for removal and their location prior to being transported.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
299 (Revised)	Vegetation and Wetlands MNR-30F	Increased Risk of Fire: To the extent possible, burning of brush and wood from vegetation clearing activities will be avoided during the dry season. In northern Ontario the dry season typically occurs during between April 1 and October 31 of a given year.	▪ Construction	EA/IA commitment (comment on Final EAR/IS)
1455 (Revised)	Soil Management – Peatland Removal MNR-35F	How peatland will be removed and the type of monitoring program for vegetation restoration will be described during the detail design stage, and documented in the CEMP, including mitigation strategies to minimize excavation. The MNR will be provided with the opportunity to review and provide feedback on aspects of the soil management in the peatland as part of the future MNR permitting requirements applicable to the Project.	▪ Detail design	EA/IA commitment (comment on Final EAR/IS)

ID # *	Commitment Type/ Valued Component (VC) *	Mitigation and Monitoring Commitments	Timeline / Project Phase	Status
1456 (Revised)	Road Patrols and Inspection MNR-36F	Details regarding who will be responsible for the road patrols and inspections, as well as the intended duration of these activities will be provided during the detail design stage. The proponent will allow MNR the opportunity to provide feedback on these details when they become.	▪ Detail design	EA/IA commitment (comment on Final EAR/IS)
1457 (Revised)	Watercourse Riparian Buffers MNR-36F	The classification of a watercourse for the purposes of applying a riparian buffer will be defined and a description of how riparian buffers will be demarked/identified on the ground for watercourses and waterbodies will be provided. “All natural vegetated ecosites” will also be defined during the detail design stage. The proponent will allow MNR the opportunity to provide feedback on these details when they become.	▪ Detail design	EA/IA commitment (comment on Final EAR/IS)
1458 (Revised)	Effects to Rock Barren MNR-182	Site preparation on rock barrens and the effects of Project activities on vegetation communities in rock barrens will be described during the detail design stage and MNR will be afforded the opportunity to review and provide feedback.	▪ Detail design	EA/IA commitment (comment on Final EAR/IS)
1653.	Invasive Species (Invasive Species Centre recommendations)	The following measures related to invasive species prevention (biosecurity) recommended by the Invasive Species Centre will be considered by the ultimate owner/operator for procurement contract mandates to reduce long-term ecological and financial impacts of invasive species: 1. **Clean Equipment Protocols** – All machinery, vehicles, and construction materials must arrive and remain free of soil, seed, and plant debris, consistent with best-practice prevention standards. The protocol should also be applied to all equipment traveling between local work sites, requiring inspection and cleaning before leaving a site. 2. **Disturbed Site Remediation Requirements** – Contracts should specify use of locally sourced native seed mixes, active site stabilization, and prompt habitat restoration to prevent the introduction and establishment of invasive plants. Continued monitoring and invasive species removal for at least 10 years post-construction will reduce long-term spread risk and associated management burdens. 3. **Integrated Biosecurity Plan** – Proponents should be required to implement project-wide prevention, detection, monitoring, and reporting systems aligned with provincial invasive species management frameworks.	• Detail design • Construction ▪ Operations	EA/IA commitment (comment on Final EAR/IS)
1654.	Social – Recreation MNR-12F	The future owner/operator of the WSR Project will undertake further engagement with Webequie First Nation during the detail design phase to determine the location of a potential existing hunting/fishing recreational camp site within the project footprint and methods to avoid impacts where possible.	▪ Detail design	EA/IA commitment (comment on Final EAR/IS)
1655.	Natural Environment - Commitment to Mitigation and Monitoring MNR-13F	The proponent in good faith and sprit of collaboration will work with the MNR in the development of appropriate mitigation and monitoring plans, related to commitment ID#s - 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468 and 1469.	• Detail design • Construction • Operations	EA/IA commitment (comment on Final EAR/IS)
1656.	Wildlife and Wildlife Habitat – Beaver MNR-14F	As part of the CEMP and OEMP, the proponent is committed to developing in consultation with MNR: a beaver conflict mitigation plan that speaks to restricted activity timing windows for sensitive wildlife periods; and a Beaver Management Protocol that includes deterrent measures and other conflict reduction tools.	• Detail Design • Construction • Operations	EA/IA commitment (comment on Final EAR/IS)
1657.	Wildlife and Wildlife Habitat – Bats MNR-15F	As part of the CEMP and OEMP, the proponent is committed to developing in consultation with MNR and MECP further details on bat migration that include: a) defining or replacing “bat crossings” with accepted measures as per the intent of the mitigation; b) list all relevant timing windows (maternity, late-summer swarming, overwintering); and c) Developing a Hibernaculum Response Plan.	• Detail Design • Construction	EA/IA commitment (comment on Final EAR/IS)
1658.	Wildlife and Wildlife Habitat – Reptiles/Amphibians MNR-18F	As part of the detail design stage for the Project the proponent is committed to developing in consultation with MNR further mitigation details for reptiles/amphibians on: a) eco-passages, including locations, intervals and spacing b) defining overwintering/reproductive windows to be avoided; c) a monitoring plan that evaluates eco-passages, and any adaptive management where applicable.	• Detail Design • Construction • Operations	EA/IA commitment (comment on Final EAR/IS)
1659.	Wildlife and Wildlife Habitat – Sensitive Habitats to Species at Risk MNR-22F	The proponent will confirm and identify where applicable additional sensitive/critical habitats that are important to species at risk including special concern species, in pre-construction (detail design) stage to inform SAR mitigation and during construction.	• Detail Design • Construction	EA/IA commitment (comment on Final EAR/IS)

ID # *	Commitment Type/ Valued Component (VC) *	Mitigation and Monitoring Commitments	Timeline / Project Phase	Status
1660.	Wildlife and Wildlife Habitat – Moose Aquatic Feeding Areas	The proponent commits to identify moose aquatic feeding areas, and confirm mitigation measures during the detail design stage. The study area for the assessment of aquatic feeding areas would be 1 km either side of the road project footprint with the results of the analysis provided to MNR for review and feedback.	• Detail Design	EA/IA commitment (comment on Final EAR/IS)
1661.	Engineering Design MNR-31F	The proponent commits to provide MNR with an opportunity to review and provide feedback on aspects of the detail design (refer to MNR comment #s 40, 42, 44-48, 49, 50 and 189 on the draft EAR/IS) as part of the future MNR permitting requirements applicable to the Project.	• Detail Design	EA/IA commitment (comment on Final EAR/IS)
1662.	Fish and Fish Habitat – Thermal Classification MNR-59F	The final determination of thermal regime, fish community and restricted activity timing window periods will be completed through a post EA regulatory process and technical review with the MNR.	• Detail design	EA/IA commitment (comment on Final EAR/IS)
1663.	Fish and Fish Habitat – Culvert Embedment MNR-60F	Water crossing culverts will be embedded a minimum of 10% to consider low flow conditions, with potential additional embedment considered based on the local streambed conditions, MNR review and input, and practical feasibility.	• Detail design	EA/IA commitment (comment on Final EAR/IS)
1664.	Engagement and Consultation Aroland First Nation (ARFN) ARFN-30	The proponent is committed to ongoing dialogue with Aroland First Nation to consider their input in the development of future governance and decision-making frameworks.	• Detail Design • Construction • Operations	EA/IA commitment (comment on Draft EAR/IS)
1665.	Wildlife and Wildlife Habitat Ministry of Natural Resources (MNR) MNR-212	The proponent commits to consult with the MNR in the development of methods for monitoring Moose, Big Brown Bat, Wolverine (furbearer) and Significant Wildlife Habitat for waterfowl.	• Detail design	EA/IA commitment (comment on Draft EAR/IS)
1666.	Species at Risk MECP Species at Risk (SAR) Branch MECP-SAR-097	The proponent commits to enter a data licensing agreement with the Ministry of the Environment, Conservation and Parks Species at Risk Branch to acquire annually Boreal Caribou protected habitat information during the detailed design stage, construction stage, and operation stage of the Project to ensure that proposed mitigation commitments are using the best available information.	• Detail design • Construction • Operations	EA/IA commitment (comment on Draft EAR/IS)
1667.	Engagement and Consultation Constance Lake First Nation (CLFN) CLFN-02	The proponent commits to maintain high environmental standards and continue meaningful consultation with CLFN throughout all permitting and regulatory phases.	• Detail design • Construction • Operations	EA/IA commitment (comment on Draft and Final EAR/IS)
1668.	Road Design in Peatlands Attawapiskat First Nation (ATFN) ATFN-08 (letter, dated March 17, 2026)	The proponent commits to provide interested stakeholders and Indigenous communities with the opportunity to review and provide feedback on the road design, and results of monitoring to demonstrate that impacts to hydrology have been sufficiently considered and implemented to avoid and/or minimize adverse environmental impacts	• Detail design • Construction • Operations	EA/IA commitment (comment on Final EAR/IS)
1669.	Engagement and Consultation Constance Lake First Nation (CLFN) CLFN-05	The proponent commits to considering community concerns related to unauthorized access, cultural and environmental protection, and security as part of discussions with the Province of Ontario, stakeholders and rightsholders regarding potential road access management measures for the WSR during the detail future design stage of the Project, after the EA/IA. Access control measures, where applicable, will be developed in alignment with the roles and responsibilities of the ultimate road owner/operator, applicable jurisdictional authorities, and ongoing engagement with affected Indigenous communities, including CLFN.	• Detail design • Construction • Operations	EA/IA commitment (comment on Draft and Final EAR/IS)

ID # *	Commitment Type/ Valued Component (VC) *	Mitigation and Monitoring Commitments	Timeline / Project Phase	Status
1670.	Surface Water Resources CLFN-36	Additional analysis for ice jam risk at Winisk Lake will be undertaken during detail design by the ultimate owner/operator. The proponent commits to continue communicating the opportunity for Indigenous communities to undertake and/or share Indigenous Knowledge. Input from CLFN and other Indigenous communities are welcome and will be used, if provided, to inform the detail design for the Project.	• Detail design	EA/IA commitment (comment on Draft and Final EAR/IS)
1671.	Project Contributions to Sustainability Weenusk First Nation (WEFN) WEFN-112	The proponent commits to provide a comprehensive list of monitoring and follow-up programs for WSR to interested First Nations at the time of Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP) development.	• Detail design • Construction • Operations	EA/IA commitment (comment on Final EAR/IS)

Note: * Commitments with "###-##**F**" or "(Revised)" in their IDs reflect comments and recommendations received on the Final EAR/IS. Table V-1 in Appendix V of the Final EAR/IS includes commitments described in the Final EAR/IS as well as commitments that considered comments and recommendations received on the Draft EAR/IS.

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