Appendix C6

Feedback and Response Log - Government Review Team - MECP Species at Risk Branch

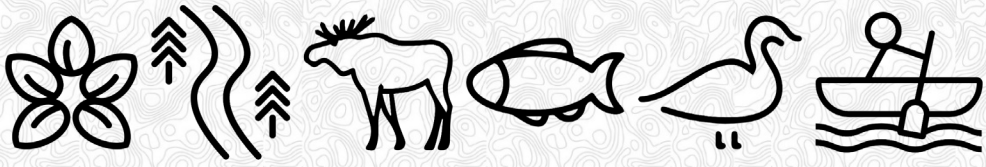

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	1	For awareness, on June 5, 2025 the Province of Ontario passed Bill 5: Protecting Ontario by Unleashing our Economy Act, 2025 which included amendments to the Endangered Species Act, 2007 that are now in force, and the creation of the Species Conservation Act, 2025 which is not yet in effect. These changes are intended to streamline permit applications and approvals and help projects proceed faster while continuing to provide important protections for species at risk and their habitats. Below we have provided some highlights of the recent amendments to the Endangered Species Act, 2007, for you to consider in relation to your project activities, along with guidance to help you determine next steps in the authorization process. Changes to protections under the amended Endangered Species Act, 2007 Species protection Undertaking an activity that results in harassment of a species is no longer prohibited under the amended Endangered Species Act, 2007, and	The owner/operator of the Community Access Road will consider the applicable regulations during the permitting stage.	Comment noted; see response for details.	1621

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		therefore does not require you to seek a permit or make use of an exemption. The Policy Guidance on Harm and Harass under the Endangered Species Act can support you in determining whether an activity may result in only harassment, or whether it may result in harm or killing. Please note that this policy guidance was developed prior to the June 5, 2025, amendments, and some are no longer relevant. Habitat protection Under the amended Endangered Species Act, 2007, the definition of habitat has been changed and is now: o for animals, the dwelling place and immediate surrounding area o for plants, the critical root zone o for all other species (for example, lichens), an area on which any member of the species directly depends to carry out its life processes Habitat for animals does not include areas used exclusively for foraging or travelling between dwelling places. Existing habitat guidance materials available on the ministry's webpage – such as recovery strategies, general			

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		habitat descriptions, and habitat protection summaries will continue to provide valuable information to support you in identifying habitat as it is defined under the amended legislation, though may contain outdated references to concepts from the previous legislation. Determining whether species' habitat is present To determine whether a species' habitat exists in an area expected to be affected by an activity, it will often be necessary to both: a) conduct a desktop analysis to assess the likelihood of species presence in the area based on: o existing species observation records (e.g., available through the Natural Heritage Information Centre or other sources) o species distribution maps or habitat suitability modelling o existing information on ecological site condition (e.g., Ecological Land Classification, satellite imagery, etc.) b) where species are known or likely to be present, conduct appropriate site assessments and field surveys, as necessary, to determine whether areas			

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		that meet the definition of habitat are present. Alternatively, where the species is known or likely to be present in the general area, you may assume that suitable areas are habitat and take appropriate action in advance of your project (e.g., register or seek a permit). This approach may result in cost and time savings in circumstances where precise habitat locations or boundaries are unknown and would require significant survey effort (e.g., multiple years) or research to determine. Determining whether an activity is likely to damage or destroy habitat Not every activity that occurs within or near habitat will damage or destroy it. Activities that take place in a habitat but do not result in damage or destruction can proceed without the need for a permit or exemption. Conversely, you should also keep in mind that in some cases, activities that take place outside of habitat can result in impacts to habitat, such as introducing pollution to a waterway that results in habitat impacts further downstream.			

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		To support you in determining whether an activity is likely to result in the damage or destruction of habitat, it is recommended that you refer to the definitions of these terms in the Categorizing and Protecting Habitat under the Endangered Species Act. Please note that this policy guidance was developed prior to the June 5, 2025 legislative amendments, and therefore some aspects are no longer relevant. Final note – the Species Conservation Act, 2025 In time, once new supporting regulations are created, the Endangered Species Act, 2007, will be replaced by the new Species Conservation Act, 2025 which will enable a new Species Conservation Registry to allow for faster, online registration of eligible activities impacting protected species. Additionally, under the Species Conservation Act, 2025, provincial authorization for migratory birds and aquatic species (fish and mussels) listed on Schedule 1 of the federal Species at Risk Act would not be required. While it is anticipated that these changes may occur in 2026, the ministry is not able to provide precise timing on the			

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		changes. Until the Species Conservation Act, 2025 is enacted, the amended Endangered Species Act, 2007 continues to apply and any applications and information shared with the ministry at this time will be assessed under the current legislation.			
MECP Species at Risk Branch	2	MECP SARB should be engaged in the preparation of the following documents as they related to species at risk: - Environmental Protection Plan - Terrestrial Biodiversity Offset Plan - Cleanup and Reclamation Plan - Vegetation Restoration Plan Please update the Final EA/IS Report, and all other relevant locations within the Report and associated Appendices (e.g., Appendix AA, Appendix K) as appropriate, to include a commitment that the Project Team will engage the Ministry of the Environment, Conservation and Parks Species at Risk Branch in the development of the Environmental Protection Plan, Terrestrial Biodiversity Offset Plan, Cleanup and Reclamation Plan, and Vegetation Management Plan as they relate to species at risk, as necessary.	Section 14 of the Final EA/IS and associated appendices have been updated to clarify that the Ministry of Environment, Conservation and Parks will be engaged on plans related to Species at Risk.	Final EA/IS Section 14	1622
MECP Species	3	For awareness, since development of the	The owner/operator will engage with the	Comment	1623

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
at Risk Branch		ToR and Draft EA/EIS, Eastern Whip-poor-will (EWPW) has been downlisted to Special Concern on the Species at Risk in Ontario (SARO) list under the amended Endangered Species Act, 2007 (ESA) and the following three migratory bat species have been listed as Endangered: • Hoary Bat • Silver-haired Bat • Eastern Red Bat Golden Eagle and Red Knot (rufus subspecies) are currently listed as Endangered and Hudsonian Godwit is currently listed as Threatened on the SARO list. Golden Eagle, Red Knot, Hudsonian Godwit, Hoary Bat, Silver-haired Bat, and Eastern Red Bat are not included as Valued Components in the Draft EA/IS. Once new supporting regulations are created and the Species Conservation Act, 2025 (SCA) replaces the ESA, a new Protected Species in Ontario list will replace the SARO list. Additionally, under the SCA, provincial authorization for migratory birds and aquatic species (fish and mussels) listed on Schedule 1 of the federal Species at Risk Act would not be required.	Ministry of Environment, Conservation and Parks (MECP) to determine appropriate permitting requirements for the newly listed bat species (i.e., Hoary Bat, Silver-haired Bat, Eastern Red Bat).	noted; see response for details.	

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		For awareness, any activities associated with the Marten Falls Community Access Road should consider potential adverse impacts to protected species and their habitat, implement mitigation and avoidance measures appropriate for these species, and seek project authorization under the amended ESA or SCA or register activities under the SCA as required. The Little Brown Myotis and Northern Myotis maternity roost habitat suitability mapping and effects assessment presented in the EA/IS does not capture all of the suitable Eastern Red Bat, Hoary Bat, and Silver-haired Bat maternity roost habitat types, and as such the route evaluation, assessment of residual effects of the Community Access Road, and proposed mitigation for Little Brown Myotis and Northern Myotis is not directly applicable to the migratory bat species. Given the downlisting of EWPW, which no longer receives protections under the amended ESA, MECP SARB will not be reviewing or commenting on the assessment of effects of the Community Access Road to this species.			
MECP Species	4	The metrics used to identify a preferred	The Community Access Road will comply	Comment	1624

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
at Risk Branch		route, as outlined in Table 4-2, do not appear to consider cumulative effects that may occur if the Northern Road Link (NRL) project goes ahead. The metrics used to identify a preferred route, as outlined in Table 4-2, do not appear to consider cumulative effects that may occur if the Northern Road Link (NRL) project goes ahead. It is understood that the approved MFCAR Terms of Reference indicates that the cumulative effects assessment will comprise the "cumulative effects that may result from a combination of the net effects of the preferred alternative with the effects of other past, present and reasonably foreseeable projects." For the permitting phase, additional detail regarding the consideration of cumulative effects (e.g. if it informed route selection) may be required to inform a potential authorization of the Community Access Road under the Endangered Species Act, 2007 (ESA) or Species Conservation Act, 2025 (SCA). Specifically, Segment 3 (i.e., North of Albany Crossing) considered two alternatives (i.e., Alternative 1 and	with all necessary permitting conditions including those required under the Ontario Endangered Species Act and the Ontario Species Conservation Act.	noted; see response for details.	

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Alternative 4) but the selection of preferred Alternative in Segment 3 does not appear to consider the overlap of Alternative 1 with the proposed Project. Based on available information, the proposed NRL project does not include an alternative that connects to the northern end of MFCAR's Alternative 4 in Segment 3. Consequently, there is a very reasonable likelihood that MFCAR's Alternative 1 in Segment 3 will be the preferred route for the Project; which would result in the construction of both Alternative 1 and 4 in MFCAR's Segment 3 between the NRL and MFCAR projects, respectively. Additionally, Section 4.4.3 outlines the main reasons the overall Preferred Route for Segment 3 is Alternative 4, including but not limited to: - Smaller footprint and shorter road length than the other option; - Lower residual effects on wildlife, birds, moose and caribou; - Smaller direct loss of wetland and riparian ecosystems, disturbance of fewer upland ecosite types… Further, Appendix A outlines in more detail the factors, indicators and measures considered for Segment 3,			

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		including consideration of species at risk (e.g., caribou, wolverine, etc). Measures such as “changes to habitat availability and distribution” for species at risk are quantified and the Alternative with the lowest impact (e.g., least amount of habitat impacted) has been used to identify the “least preferred” and “most preferred”. However, by not considering potential cumulative effects from the NRL project on these and other metrics in Segment 3, the evaluation does not account for the total changes to species at risk habitat availability and distribution of species at risk across the MFCAR and other foreseeable development projects; and the potential total cumulative effects across the MFCAR Alternative 4 in Segment 3 and NRL’s likely preferred route (i.e., MFCAR’s Alternative 1 in Segment 3), which could be the summation of both Alternatives which would be much greater than if MFCAR had selected Alternative 1 in Segment 3 (i.e., Alternative 4 in Segment 3 may have a greater impact on species at risk habitat than Alternative 1); and it would therefore not be accurate to suggest Alternative 4 in Segment 3 was selected as the preferred route because it would			

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		have lower residual effects on wildlife, birds, moose and caribou. MECP SARB recognizes the Route Selection Methodology outlined in Appendix B states, "the effects assessment of the preferred alternative was a more detailed assessment than the route evaluation and included assessing net and cumulative effects". However, the absence of consideration for cumulative effects in the route evaluation for Segment 3 significantly limits the value of measures considered, such as changes to ungulate (i.e., caribou) and wildlife (e.g., wolverine) habitat availability and distribution. Additional information may be requested at the permitting stage. For the permitting phase, please consider how the MFCAR considered possible cumulative effects of the NRL in permitting applications, as appropriate.			
MECP Species at Risk Branch	5	Conflicting statements are provided regarding the decommissioning/closing/restoration of temporary infrastructure. Leaving temporary infrastructure to revegetate naturally is, in most cases, likely not appropriate or sufficient. Additional	The wording has been changed to clarify that vegetation will be established, as outlined on the required Rehabilitation Plan to align with the 'Aggregate Resources of Ontario: Site Plan (2020) Standards.	Final EA/IS Section 6.5.1, 7.2.3.4, 7.2.4 Appendix M	1625

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		actions may be required to restore temporary infrastructure. The draft EA/IS Report states, “All temporary infrastructure will either be decommissioned or closed, depending on the infrastructure type. For example, it is not possible to return a temporary aggregate site to its original condition before construction began. As a result, these locations will be closed in accordance with the requirements of the Aggregate Resources Act (Government of Ontario, 1990b). Other types of temporary infrastructure, such as construction camps, will be decommissioned, which includes removing all the components of the camp and allowing the area to revegetate naturally.” [emphasis added] To minimize effects on species at risk, such as Caribou (Boreal population) and Wolverine, the proponent will likely be required to go above and beyond the requirements of the Aggregate Resources Act (for decommissioning and restoration of temporary aggregate pits) and develop specific restoration actions for all temporary infrastructure (e.g., aggregate pits, construction camps, laydown areas, etc.), including planting			

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		or seeding of native trees (as appropriate). This appears to be acknowledged and generally described in Table 10-1 of Appendix M, however limited information is provided on specific restoration actions. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to update the language to better reflect the restoration commitments outlined in Table 10-1 of Appendix M.			
MECP Species at Risk Branch	6	The Project Inclusion List identifies (on Pg. 72) “Mineral exploration activity / mining claims, such as Zenyatta Venture’s Albany Graphite Project”, and while Table 10-1 in Section 10.1 of the Draft EA/IS Report includes Juno Corporation Mining Exploration Activity in the Project Inclusion List in Table 10-1 and Appendix E do not include Wyloo’s early exploration mining activities in the Ring of Fire area aside from Eagle’s Nest Mine, Black Label Mine, Black Thor Mine, Big Daddy Mine and Black Bird Mine. If necessary, update Table 10-1 of the	Table 10-1 of the Final EA/IS and Appendix E have been updated to specify which projects are associated with Wyloo.	Final EA/IS Table 10-1 Appendix E	1626

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Final EA/IS Report and Appendix E to include Wyloo's mining exploration activities in the Project Inclusion List. Alternatively, if all of Wyloo's projects are already included, please update Table 10-1 of the Final EA/IS Report and Appendix E to specify which projects are associated with Wyloo.			
MECP Species at Risk Branch	7	Additional detail regarding the temporary access roads and trails will be required to inform whether authorization of the Community Access Road under the Endangered Species Act, 2007 (ESA) or Species Conservation Act, 2025 (SCA), will be required. The draft EA/IS Report states, "Temporary access roads and trails will be required during construction of the Community Access Road to access various locations along the Construction Development Area. This may include short parallel detours to facilitate construction around sensitive features and watercourses, as well as access roads to potential pits and quarries. In each instance, vegetation will need to be removed, but to a lesser extent than the width of the Construction Development Area, and grubbing / grading may be	It is acknowledged that the Community Access Road will follow potential authorizations under the Endangered Species Act or the Species Conservation Act during the permitting phase.	Comment noted; see response for details.	1627

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		needed to allow for the safe passage of construction vehicles along the temporary access roads." The following additional information will be required for temporary access roads and/or trails that will be situated outside of the right-of-way of the Community Access Road to support whether ESA/SCA authorization be required: - Location of temporary access roads and/or trails; - Construction methods for temporary access roads and/or trails (e.g., addition of aggregate, etc.); - Proposed restoration methodology of temporary access roads and/or trails. No action required. Information provided for awareness as it relates to potential authorization under the ESA or SCA.			
MECP Species at Risk Branch	8	Inconsistent statements regarding when restoration will be carried out on temporary components. Specifically, the Draft EA/IS Report states, "The last step of the construction phase involves the decommissioning of temporary components that are no longer required, which will occur once construction is completed." [emphasis	Section 7.2.4 has been updated to indicate that progressive restoration will be undertaken once temporary components are no longer needed.	Final EA/IS Section 7.2.4	1628

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		added] This is inconsistent with other statements throughout the Draft EA/IS Report and Appendix AA – Technical Support Documents Summary and Recommendations Tables which identify use of progressive restoration onsite once temporary components are no longer needed. MECP SARB encourages progressive restoration of all temporary components consistent with the Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario | ontario.ca to ensure these disturbed areas return to a natural condition and suitable habitat for species at risk, such as Caribou and Wolverine, as quickly as possible. This direction should be considered and incorporated into the Cleanup and Reclamation Plan committed to in Appendix AA. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to ensure consistent			

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		mitigation measures are applied throughout, particularly as it relates to decommissioning and restoration of temporary components.			
MECP Species at Risk Branch	9	Inconsistent statements regarding how restoration will be carried out on temporary components. Specifically, the Draft EA/IS Report states, “Once construction is complete, temporary infrastructure that is no longer needed will be removed and abandoned or decommissioned. Sand and gravel pits, including temporary access roads leading to the pits, will be decommissioned by backfilling, levelling, compacting, and redistributing soils to encourage natural revegetation. Temporary access roads leading to temporary quarry areas will also be decommissioned. Temporary quarries not required for maintenance activities will be abandoned and blocked, while permanent quarries will remain gated and blocked to prevent unauthorized access.” [emphasis added] The statements above are inconsistent with other statements throughout the Draft EA/IS Report and Appendix AA – Technical Support Documents Summary	Section 7.2.4 has been updated to indicate that progressive restoration will be undertaken once temporary components are no longer needed.	Final EA/IS Section 7.2.4	1629

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		and Recommendations Tables which identify use of progressive restoration onsite once temporary components are no longer needed. MECP encourages progressive restoration of all temporary components consistent with the Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario | ontario.ca to ensure these disturbed areas return to a natural condition and suitable habitat for species at risk, such as Caribou and Wolverine, as quickly as possible. This direction should be considered and incorporated into the Cleanup and Reclamation Plan committed to in Appendix AA. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to ensure proposed decommissioning and restoration of temporary components is consistent through the EA/IS and Technical Support Documents. Additionally, MECP SARB encourages			

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		progressive restoration of all temporary components that will return these areas to natural condition and suitable habitat for species at risk, such as Caribou and Wolverine, as quickly as possible.			
MECP Species at Risk Branch	11	The Draft EA/IS Report references a few rivers, specifically Pahtegoshing River, as it relates to the presence of Wolverine and Caribou, however this river is not identified on a map/figure, making it difficult to locate. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to clearly identify all geographic locations referenced in the Report.	The Final EA/IS and associated Appendices have been updated to include a label to Pahtegoshing River on figures.	Final EA/IS watercourse figures and associated appendices	1631
MECP Species at Risk Branch	12	The Draft EA/IS states Weenusk First Nation "noted that caribou migration routes coincide with the Community Access Road". However, no specific locations along the Community Access Road are provided. If the community is willing to share details on this location, the information would be especially helpful to inform the assessment of potential impacts to	Weenusk First Nation has provided an Existing Conditions Report which includes amalgamated trapping, migration and transportation routes which overlap the Ungulates Effects Assessment Regional Study Area. The Final EA/IS and Appendix M Ungulates Technical Support Document has been updated to consider these routes.	Final EA/IS Appendix M	1632

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		Caribou and their habitat in the EA/IS and authorization under the ESA or SCA, should an authorization be necessary. If possible, update the Final EA/IS Report to include clarity on this statement and where Caribou are known to migrate along the Community Access Road.			
MECP Species at Risk Branch	13	The list of Measures of Change appears to be general to wildlife; and not specific to Bats (i.e., Little Brown Myotis, Northern Myotis). For example, it includes “den site selection (for wolverine)”, which is not a life process related to bats. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to scope the measures of change to bats.	Table 8-14 of the Final EA/IS has been updated to scope the measures of change specific to each Valued Component.	Final EA/IS Table 8-14	1633
MECP Species at Risk Branch	14	For clarity, the Measures of Change for Caribou (Boreal population) should include the following, as per the Range Management Policy in Support of Woodland Caribou Conservation and Recovery | ontario.ca (the ‘RMP’): - Habitat Availability and Distribution: o Changes to the amount of cumulative	Table 8.2-2 (formerly Table 8-14) in the Final EA/IS is a summary of indicators, rationale for selection, and measures of change for all Valued Components of Land disciplines. It was intended to be high-level, and as such identifies that the indicators for caribou are habitat availability (quantity and quality), habitat	Comment noted; see response for details.	1634

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		disturbance within the LSA, RSA and individual Caribou ranges (i.e., Principle 1 of the RMP and the 3rd line of evidence in the determination of range condition); o Changes to the amount and arrangement of habitat within the LSA, RSA and individual Caribou ranges (i.e., Principle 2 of the RMP and the 2nd line of evidence in the determination of range condition); o Changes in the spatial configuration and connectivity of categorized habitats (i.e., Category 1, 2 and 3 habitat as per the General habitat description for the Forest-dwelling Woodland Caribou | ontario.ca (i.e., Principle 3 of the RMP); and o Changes in the spatial distribution and movement of animals. - Survival and Reproduction: o Changes to population size (e.g., minimum animal count or population estimate, where available) (i.e., 1st line of evidence in the determination of range condition) o Changes to survival rates; o Changes to recruitment rates; and o Changes to population trend (λ) as estimated through consideration of survival and recruitment estimates (i.e., 2nd line of evidence in the determination	distribution (arrangement and connectivity), and survival and reproduction. The measures of change identified in this summary table include changes in the amount of different quality habitats and animal use of available habitat, changes in the spatial configuration and connectivity of habitats and spatial distribution and movement of animals, and changes in animal abundance from altering survival and/or recruitment. The more nuanced subcategories of measures of change, as identified in the comment, are provided in detail in Appendix M Ungulates Technical Support Document, including a description of the existing conditions (Sections 5.1 and 7.1.1), predicted changes to habitat availability, distribution, survival and reproduction, and range conditions with the addition of the Project (Section 7.3.1), and predicted changes with past, present, and reasonably foreseeable developments (Section 8.2.1). Within the sections of Appendix M identified above, measures of change are calculated within the Ungulate Local Study Area, Caribou Regional Study Area, and individual caribou ranges		

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		of range condition). - Range Condition o Additionally, the above changes should be described and considered in an assessment of the potential change to Range Condition for each range in the RSA (i.e., Missisa, Ozhiski, Nipigon and Pagwachuan). For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nursery area, wintering area) and the area immediately around the dwelling place (i.e. 10 km), which may influence how some or all components of the above will need to be considered under the ESA/SCA. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include the following in Table 8-14:	(Misissa, Nipigon, Ozhiski, Pagwachuan). Caribou collar data collected by Webequie First Nation was not available before submission of the Draft EA/IS. A data sharing agreement has since been signed between the three road projects (i.e., Marten Falls Community Access Road, Webequie Supply Road (WSR), Northern Road Link (NRL)) and Caribou collar data has been shared. The Final EA/IS has been updated to incorporate additional collar data.		

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		- Habitat Availability and Distribution: o Changes to the amount of cumulative disturbance within the LSA, RSA and individual Caribou ranges (i.e., Principle 1 of the RMP and the 3rd line of evidence in the determination of range condition); o Changes to the amount and arrangement of habitat within the LSA, RSA and individual Caribou ranges (i.e., Principle 2 of the RMP and the 2nd line of evidence in the determination of range condition); o Changes in the spatial configuration and connectivity of categorized habitats (i.e., Category 1, 2 and 3 habitat as per the General habitat description for the Forest-dwelling Woodland Caribou | ontario.ca (i.e., Principle 3 of the RMP); and o Changes in the spatial distribution and movement of animals. - Survival and Reproduction: o Changes to population size (e.g., minimum animal count or population estimate, where available) (i.e., 1st line of evidence in the determination of range condition) o Changes to survival rates; o Changes to recruitment rates; and o Changes to population trend (λ) as estimated through consideration of			

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Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		survival and recruitment estimates (i.e., 2nd line of evidence in the determination of range condition). - Range Condition: o Change to Range Condition for each range in the RSA (i.e., Missisa, Ozhiski, Nipigon and Pagwachuan).			
MECP Species at Risk Branch	16	The Wolverine Existing Conditions Local and Regional Study Areas are scoped to only the preferred route in Figure 8-9, while all other LSA and RSA's for Land Disciplines are scoped to the Alternative Routes. Please update Figure 8-9 of the Final EA/IS Report to expand the LSA and RSA for Wolverine to include the Alternative Routes.	Figure 8-9 of the Final EA/IS has been updated to include the alternative routes.	Final EA/IS Figure 8-9	1636
MECP Species at Risk Branch	17	Table 8-19 indicates that functional performance of Bogs for supporting habitat for wildlife or significant species, such as species at risk, is "Low". However, the Draft EA/IS Report indicates Caribou were seen in all seasons, mostly in bogs. Additional rationale and justification is required, including supporting references to literature, to support the conclusion that the functional performance of Bogs	Table 8-19 of the Final EA/IS and Appendix J Vegetation Technical Support Document have been updated to adjust the functional performance of bogs for supporting wildlife habitat from low to high.	Final EA/IS Table 8-19 Appendix J	1637

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		for supporting habitat for wildlife or significant species, such as species at risk, is “Low”. Alternatively, update the conclusion in Table 8-19, as appropriate. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include rationale and justification, including supporting references to literature, to support the conclusion that the functional performance of Bogs for supporting habitat for wildlife or significant species, such as species at risk, is “Low”. Alternatively, update the conclusion in Table 8-19, as appropriate.			
MECP Species at Risk Branch	18	“They can roost in buildings, bat houses, and bridges, showing they can handle changes in their summer habitat.”; “…it is anticipated that artificial bat roost structure will be installed within temporary disturbance areas and in appropriate areas within the effects assessment Local Study Area to mitigate the removal of tree roosts for little brown myotis and northern myotis.” Bats may not occupy bat boxes in areas	The owner/operator will engage with the Ministry of Environment, Conservation and Parks (MECP) to determine appropriate permitting requirements for impacts to roosting habitat of the Species at Risk bats. Consideration regarding effectiveness of bat boxes has been included in Appendix AB Preliminary Biodiversity Offset Plan of the Final EA/IS.	Final EA/IS Appendix AB	1638

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		where natural roosts exist (Holroyd et. al. 2023), and some species of bats do not typically use bat boxes (Mering and Chambers 2014) or anthropogenic structures and will only resort to them if habitat is fragmented and few potential roost trees exist (Humphrey and Fotherby 2019). Therefore, this proposed mitigation may not be effective in minimizing the residual effect of habitat loss and alteration in the LSA. For awareness, consider that bat boxes may be ineffective as mitigation when finalizing the Terrestrial Biodiversity Offsetting Plan, in the assessment of residual effects in the Final EA/IS, and in Project authorization under the ESA or SCA, as required.			
MECP Species at Risk Branch	19	"No abandoned mines suitable for bat hibernation were found during the desktop review." MECP understands aerial reconnaissance surveys were carried out in 2019 to visually search the LSA for features that could support hibernating bats (Appendix K). Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as	Areas where natural caves could potentially occur were searched for evidence of bedrock openings during aerial surveys concurrent with other wildlife, bird, ungulate, and vegetation surveys conducted between 2019 and 2023. Additionally, in response to information received from Neskantaga First Nation, a targeted aerial reconnaissance was conducted in June of 2023 to search for potential bat hibernacula in the area around the	Section 8.2.5.1 Final EA/IS Appendix K	1639

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to include all survey effort carried out to assess habitat in the LSA and RSA as potential bat hibernacula.	Albany River crossing. The Final EA/IS report and Appendix K Wildlife Technical Support Document have been updated to include all survey efforts carried out to assess habitat in the Local Study Area and the Regional Study Area as potential bat hibernacula.		
MECP Species at Risk Branch	20	The EA/IS should identify the status of Wolverine in Ontario. The Draft EA/IS Report notes, “The Committee on the Status of Endangered Wildlife in Canada has classified the wolverine as a species of Special Concern (COSWEIC, 2024)”. However, section 8.2.5.2.1 of the Draft EA/IS Report does not state the status of Wolverine as listed on the Species at Risk in Ontario (SARO) List, as assessed by the Committee on the Status of Species at Risk in Ontario (COSSARO) (i.e., threatened). Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include the provincial status of Wolverine in the Final EA/IS Report, as assessed by the Committee	Section 8.2.5.2.1 of the Final EA/IS has been updated to identify the status of wolverine in Ontario.	Final EA/IS Section 8.2.5.2.1	1640

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		on the Status of Species at Risk in Ontario (COSSARO) and listed on the Species at Risk in Ontario (SARO) List.			
MECP Species at Risk Branch	21	MECP SARB acknowledges the Draft EA/IS has indicated an expectation that the existing winter road will no longer be maintained once the Community Access Road is operational and will be left to naturally regenerate. Should an authorization be required under the ESA or SCA, MECP SARB notes various authorization pathways (e.g., Section 17 permit under the ESA; registration under the SCA) may require actions to offset long-term effects to impacted species at risk. For some species, such as Caribou and Wolverine, the effective removal and restoration of linear features, such as a winter road, can be a means of providing a benefit to the species. No action required. Information provided for awareness as it relates to potential authorization under the ESA or SCA.	The sentence in Section 7.2.6 of the Final EA/IS has been removed as recommended by the MECP Environment Assessment Branch (Comment 21).	Comment noted; see response for details.	1630
MECP Species at Risk Branch	21	MECP SARB acknowledges that two suspected Wolverine denning areas were identified south of the Ogoki River at Plots 7 and 26, as shown on Figure 5-8	The two suspected wolverine denning areas that were identified south of the Ogoki River at Plots 7 and 26 will continue to be considered denning areas	Final EA/IS Section 8 Appendix K	1641

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		of Appendix K – Wildlife and further described in Section 5.4.3 of Appendix K – Wildlife and Photos 1-3 in Annex E of Appendix K – Wildlife. MECP SARB notes these two potential denning areas were identified during the Wolverine Aerial Denning Surveys associated with the geotechnical drilling program which were scoped to a limited portion of the Wolverine LSA. As such, it is likely there are more wolverine denning areas within or near the Community Access Road. Based on this information and understanding the difficulty in confirming the presence of a Wolverine den, MECP SARB strongly recommends these locations be assumed to be denning areas and apply a 4 km buffer to these locations to identify the denning area. These denning areas should be considered appropriately within the EA/IS; and during the project authorization process, should an authorization be necessary. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as	for wolverine during the development of the Community Access Road unless additional surveys are conducted to determine the areas are not used by wolverine for denning. A 4 km buffer will be applied to the two suspected wolverine denning areas within which no construction activities will be conducted during the wolverine denning period of February 1 to May 1. Section 8 of the Final EA/IS and Appendix K Wildlife Technical Support Document have been updated to clarify this mitigation.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to demonstrate how the Project will consider these areas and avoid or minimize impacts to these denning areas.			
MECP Species at Risk Branch	22	Reference to Figures 8-17 and 8-18 states, “Figures 8-17 and 8-18 shows the wolverine habitat range density within the Local Study Area.” [emphasis added] However, the titles for each Figure are “Wolverine Home Range Probability Density in the Local Study Area - Heat Map (2022)” and “Wolverine Home Range Probability Density in the Local Study Area - Heat Map (2023)”, respectively. [emphasis added] Based on the description of the modelling methods as outlined in Appendix K – Wildlife / Attachment C / Section 5.0, MECP SARB understands that the results of the mark-recapture modelling using the data collected using the 2022 and 2023 Wolverine hair snag surveys generated a relative probability density for Wolverine activity centres within the LSA; and is not a habitat model. Please update the Final EA/IS Report to correct the reference to these figures, as appropriate.	The Final EA/IS has been updated to correctly reference Figures 8-17 and 8-18.	Final EA/IS Section 8.2.5.2.1	1642

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	23	The Draft EA/IS Report and supporting information (i.e., Appendix K – Wildlife) lacks a detailed description of Wolverine habitat, both qualitative and quantitative, within the LSA and RSA as it relates to the existing environment, effects assessment, residual effects, and cumulative effects. Section 8.2.5.2.1 simply states, "Wolverine habitat is abundant and widespread throughout the Wolverine Local Study Area". However, neither the Draft EA/IS Report or Appendix K – Wildlife provides a quantification of the existing amount of Wolverine habitat within the LSA or RSA to substantiate this statement, as was done for other wildlife species (e.g., Bats [Table 8-24], American Marten [Table 8-25], Beaver [Table 8-26], etc.). Section 5.2.1.1 of Appendix K – Wildlife notes Wolverine are habitat generalists and do not appear to be associated with any specific vegetation type; and points to evidence that suggests "habitat use is best described as a function of large undisturbed wilderness areas and seasonal variation in food abundance and denning requirements".	Section 5.2.1 of Appendix K Wildlife Technical Support Document provides a discussion of the wolverine habitat and prey requirements in the context of the Regional Study Area (RSA). Section 8.2.5.2.1 of the Final EA/IS and Appendix K have been updated to include: - a quantification of the existing disturbed and undisturbed areas within the Local Study Area (LSA) and RSA, and additional discussion of the tolerance of wolverine to disturbance. - an expanded discussion of wolverine food abundance informed by the results of the relevant wildlife studies - an expanded qualitative description of potential denning habitat in the LSA and RSA.	Final EA/IS Section 8.2.5.2.1 Appendix K	1643

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		However, neither the Draft EA/IS Report or Appendix K – Wildlife provides a clear description or quantification of the existing environment in the context of large undisturbed wilderness areas, food abundance, or potential denning habitat. MECP SARB acknowledges that the entire LSA and RSA is used by Wolverine, and therefore considered habitat. With this in mind, MECP SARB is supportive of characterizing habitat use as a function of large undisturbed wilderness areas, seasonal variation in food abundance and denning requirements, as per supporting literature. However, this will require a clear qualitative description and quantification of large undisturbed areas, food abundance, and potential denning habitat as it relates to the existing environment, effects assessment, residual effects, and cumulative effects. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to provide a robust qualitative description and quantification that supports the stated characterization			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		of Wolverine habitat – including current state of large undisturbed areas, food abundance (i.e., moose, caribou, beaver, etc.), and denning habitat – as it relates to the existing environment, effects assessment, residual effects, and cumulative effects. This should include: - a quantification of large undisturbed areas that considers an appropriate amount and arrangement necessary to support Wolverine (e.g., use a range of average home range sizes estimated for males and females reported from supporting literature); - a quantification of food abundance drawing on the results of the relevant wildlife disciplines in the Final EA/IS Report (e.g., moose, caribou, beaver) and/or literature; and - a quantitative and/or qualitative description of potential denning habitat (e.g., amount of forested habitat which may provide the necessary structure[s] to support den establishment).			
MECP Species at Risk Branch	24	Additional information should be provided on the estimated number of male and female Wolverine within the Local Study Area, if possible. The Draft EA/IS Report states, “The estimated density of wolverines was 1.21	As described in Section 5.2.1 of Appendix K Wildlife Technical Support Document, a total of 17 unique wolverine individuals were identified through the wolverine snag surveys. A large portion of the individuals (11 of 17) were of unknown sex, while 4 females and 2	Comment noted; see response for details.	1644

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		individuals per 1,000 square kilometres in 2022 and 0.60 individuals per 1,000 square kilometres in 2023. It is estimated that approximately 43 wolverines live in the Local Study Area." The estimated number of Wolverines within the Local Study Area (i.e., 43) should be further subdivided into the estimated number of male and female Wolverines. This can be used to specifically estimate the total number of reproductive female denning areas likely to be directly impacted (e.g., habitat removal, etc.) and indirectly impacted (e.g., sensory disturbance, etc.) by the Community Access Road. For awareness, this information will be required to inform whether ESA/SCA authorization is required. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to expand the analysis to estimate the number of male and female wolverine home ranges that overlap the existing conditions Local Study Area, if possible.	males were confirmed. An actual sex ratio in the samples or local population remains uncertain. The mark-recapture modelling predicted that 43 individuals may have home ranges that overlap the Local Study Area, however, due to the limited demographic data obtained during baseline, predictions of sex ratios are difficult to accurately estimate. Due to the uncertainty, the Final EA/IS and Appendix K have not been updated with wolverine sex ratios in the LSA or RSA. The owner/operator will engage with the Ministry of Environment, Conservation and Parks (MECP) to determine the appropriate assumptions that will be required for the permitting or authorization requirements for impacts of the Community Access Road on wolverine.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	25	The statement "[Short-eared Owl]…range might be expanding due to climate change," is misleading as the species' range will be entirely removed in Ontario under temperature increases of 1.5°C and 2.0°C, and most of the range (>50%) in Ontario will be removed under temperature increases of 3.0°C, although there will be minor localized areas of range maintenance and expansion near Fort Severn (<50% [National Audobon Society, 2024]; Appendix L, Section 8.2.20.1.1.2). Revise the statement "[Short-eared Owl]…range might be expanding due to climate change," in the Final EA/IS to reflect that >50% of the species' range in Ontario will be recessed under climate change driven temperature increases of 1.5-3.0°C.	Distribution of Short-eared Owl is discussed in Section 5.6.9.2 of Appendix L Birds Technical Support Document and clarifies that "climate change may be increasing the nesting range for this species; in 2000, a nesting individual was reported on Banks Island, Northwest Territories for the first time (Smith et al., 2013), while a territorial individual was reported for the first time on Bylot Island, Northwest Territories in 2008 (Therrien, 2010)."	Comment noted; see response for details.	1645
MECP Species at Risk Branch	26	The draft EA/IS Report refers to "woodland caribou", "forest-dwelling boreal caribou", "boreal caribou" and "eastern migratory caribou". To ensure clarity and alignment with provincial and federal terminology, MECP SARB recommends the following terms be used throughout the EA/IS consistent with designable units (COSEWIC 2011),	The Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to clarify and align caribou naming with federal and provincial terminology as outlined in the comment.	Final EA/IS Sections 8.2.7, 9.4.7.4 and 10.3.5 Appendix M	1646

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the Species at Risk in Ontario List under the Endangered Species Act, 2007 (ESA), and Schedule 1 under the Species at Risk Act (SARA): Common Name Alternate Common Name Scientific Name Caribou (Boreal population) Boreal Caribou (Rangifer tarandus) Caribou (Eastern Migratory population) Eastern Migratory Caribou (Rangifer tarandus)			
MECP Species at Risk Branch	27	Clarification is required on how Caribou, both Boreal Caribou and Eastern Migratory Caribou. will be assessed in the EA/IS Report. The Draft EA/IS Report states, “For this assessment, the forest-dwelling boreal caribou will be treated as a stand-in for all caribou. We assume that eastern migratory caribou will face the same effects as boreal caribou when they are in the ungulates study areas.” Boreal Caribou and Eastern Migratory Caribou represent two separate and distinct populations, or “designatable units”, which acknowledges that these are spatially, ecologically or genetically discrete and evolutionarily significant	In spring 2021, following completion of initial caribou collaring for the Community Access Road, six animals were identified displaying eastern migratory behaviours (i.e., moving to spend calving season on the coast of Hudson Bay) within 35 km of the proposed routes. This finding was provided to provincial and federal regulators including Ministry of Environment, Conservation and Parks (MECP) in a meeting on September 28, 2021 and in a follow up memo submitted October 19, 2021. In that presentation and memo, the regulators were informed of the intention to keep boreal caribou as a valued component and to conduct a qualitative assessment of eastern migratory caribou in the description of existing conditions for the EA/IS. The	Comment noted; see response for details.	1647

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		units - and behavioural variability reflective of both plasticity and adaptation to local environments - as described in COSEWIC's Designatable Units for Caribou (Rangifer tarandus) in Canada (2011). As such, it may not be appropriate to assume Eastern Migratory Caribou will face the same effects as Boreal Caribou (e.g., potential effects on movement may differ and result in different effects on access to important habitats and/or movement patterns). The Community Access Road may also result in effects to Eastern Migratory Caribou that may also have broader effects to other disciplines (e.g., Indigenous harvest). Please consider the potential for the proposed Project to affect these Boreal Caribou and Eastern Migratory Caribou differently, particularly movement/migration.	rationale was that given both ecotypes group together in the winter, eastern migratory caribou would be expected to experience the same predicted effects as boreal caribou in the season that they occur in the study areas, and mitigation measures applied to boreal caribou would protect "all caribou". Neither the provincial or federal regulators responded at that time with concerns about the proposed approach. Appendix M Ungulates Technical Support Document, Attachment C Ungulates Statistical Analyses and Modelling Methods describes how collared individuals were determined to be boreal caribou or eastern migratory caribou. A qualitative discussion is provided about eastern migratory caribou range and movement periods in Appendix M Sections 5.1.2.1, 5.1.2.2, 7.1.1.2.1 and 7.1.1.2.2, and Section 5.1.3 provides a discussion on the population status of both ecotypes.		
MECP Species at Risk Branch	28	Additional information is required to characterize existing conditions for Boreal Caribou in the RSA. The Draft EA/IS Report describes the following:	Appendix M Ungulates Technical Support Document includes quantitative and qualitative descriptions of undisturbed and disturbed habitat, cumulative disturbance (natural, anthropogenic), range condition, habitat availability	Appendix M	1648

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		- The caribou ranges intersected by the Ungulate LSA and Caribou RSA, and the amount of area within each Caribou Range; - Habitat Availability and Distribution: o Area (ha) and percent of known and potential Category 1, 2 and 3 habitat within the Ungulate LSA and Caribou RSA; o General qualitative description of habitat (i.e., use of different habitat types, such as fens and bogs); o Predicted Winter Habitat Use; o Distribution of Seasonal Ranges within the Ungulate LSA and Caribou RSA. o General qualitative description of movement/travel within the Caribou RSA - Survival and Reproduction: o Annual survival rate estimates; o Pregnancy rates estimated in 2021 at the time of collaring; o Recruitment estimate (pooled across 2022 and 2023); o General description of the main threats to Caribou (e.g., wolves, black bears, climate change, etc). The description of existing conditions should also include the following, as per the Range Management Policy in Support of Woodland Caribou Conservation and Recovery | ontario.ca (the 'RMP'):	(amount, quality), habitat use, habitat distribution (arrangement, connectivity, linear feature density) for the ungulate Local Study Area (LSA) and caribou Regional Study Area (RSA) and each individual range (Missisa, Nipigon, Ozhiski, Pagwachuan). Population size (minimal animal counts) and trends for each individual range (Missisa, Nipigon, Ozhiski, Pagwachuan) are provided in Sections 5.1.3 and 7.1.1.3 of Appendix M using federal and provincial data, and available Integrated Range Assessments. The Final EA/IS has been updated to include a minimum animal count for the ungulate LSA. A population size estimate cannot be calculated for the ungulate RSA as the area was not surveyed for the Community Access Road. The Final EA/IS has not been updated with Environment and Climate Change Canada's caribou fecal DNA survey data as it was not yet available. Appendix M has also been updated to include additional collar data collected by Webequie and Marten Falls First Nations for the Webequie Supply Road and Northern Road Link projects.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		- Habitat Availability and Distribution: o Amount of cumulative disturbance within the LSA, RSA and individual Caribou ranges (i.e., Principle 1 of the RMP and the 3rd line of evidence in the determination of range condition); o Amount and arrangement of habitat within the LSA, RSA and individual Caribou ranges (i.e., Principle 2 of the RMP and the 2nd line of evidence in the determination of range condition); - Survival and Reproduction: o Population size estimates (e.g., minimum animal count or population estimate, where available) (i.e., 1st line of evidence in the determination of range condition) o Population trend (λ) as estimated through consideration of survival and recruitment estimates (i.e., 2nd line of evidence in the determination of range condition). Additionally, the EA/IS Report should also describe the Range Condition, drawing from previous assessments (i.e., Integrated Range Assessment Reports for each range). Furthermore, while updated Integrated Range Assessments are not available for the Missisa, Ozhiski, Nipigon and Pagwachuan Ranges, there may be sufficient updated information			

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		available for the Missisa and Ozhiski Ranges to generally describe anticipated existing conditions in the context of Range Condition, using updated estimates of the four lines of evidence that inform Range Condition (i.e., population size, population trend, cumulative disturbance, habitat amount and arrangement). For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nursery area, wintering area) and the area immediately around the dwelling place (i.e. 10 km), which may influence how some or all components of the above will need to be considered under the ESA or SCA. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to include quantitative and qualitative descriptions of the following factors within the Ungulate LSA, Caribou RSA, and each individual Caribou range: - Cumulative disturbance; - Habitat amount and arrangement; - Population Size; - Population Trend (λ); - Range Condition.			
MECP Species at Risk Branch	29	The Draft EA/IS notes 30 collars were placed on adult female caribou but does not differentiate between the number placed on Boreal Caribou versus Eastern Migratory Caribou. Recognizing the behavioural differences between these two populations (e.g., sedentary versus migratory, predator avoidance behavioural strategies during calving and post-calving seasons), this is an important distinction to ensure the effects assessments recognize the differences between these two populations and appropriately reflects the potential impacts on each population separately. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as	Section 5.1.2.1 of Appendix M Ungulates Technical Support Document outlines that 15% of collars were placed on eastern migratory caribou and details on how boreal or migratory ecotypes were identified for collared individuals is outlined in Attachment C of Appendix M. Section 8.2.7.1 of the Final EA/IS has been updated to include number off collared individuals of each ecotype.	Final EA/IS Section 8.2.7.1 Appendix M	1649

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to clarify the number of collars placed on Boreal Caribou and Eastern Migratory Caribou.			
MECP Species at Risk Branch	30	Figure 8-33 is titled “Provincial and Federal Caribou Range Boundaries in Ontario and Project Study Area”. The map identifies an area as “Caribou Eastern Migratory Boundary”. However, no information is provided on this boundary (e.g., rationale, methods for delineating, etc.). MECP SARB notes that the province has not delineated Eastern Migratory Caribou distribution. Furthermore, the area identified in Figure 8-33 does not align information collected on Eastern Migratory Caribou by the Project Teams, or that of the Webequie Supply Road (WSR) and Northern Road Link (NRL) Projects, the Ministry of Natural Resources Science and Research Branch’s collaring data, or the information presented in the Woodland caribou (Rangifer tarandus caribou) in the Far North of Ontario: Background information in support of land use planning (MNR 2014). Furthermore, COSEWIC’s Designable Units for Caribou (Rangifer tarandus) in	Figure 8.2-27 (formerly Figure 8-33) and sections of the Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to use the Southern Hudson Bay subpopulation boundary identified in the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) Status Assessment (2017). A statement has been included in the narrative about the uncertainties in the definition of the boundaries.	Figure 8.2-27 Final EA/IS Appendix M	1650

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Canada (2011) identifies a slightly different area for Eastern Migratory Caribou, but notes uncertainties in the definition of boundaries. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to clarify the area identified in Figure 8-33 for Eastern Migratory Caribou, including methods for delineation, rationale, etc.			
MECP Species at Risk Branch	31	The MFCAR Terms of Reference (ToR) requires an assessment of the spatial extent of General Habitat Description Category 1, 2 and 3 habitat for Boreal Caribou. As it relates to this ToR requirement to consider Category 1, 2 and 3 habitat, the draft EA Report characterizes and quantifies existing conditions (i.e., Section 8.2.7.1 and Table 8-40), describes and quantifies the refined existing conditions (i.e., Section 9.4.5.1.1), and identifies residual effects and proposed mitigation and enhancement measures (i.e., Section 9.4.5.4 and Table 9-27). Further detailed information is also provided in Appendix	Section 7.1.1.1.3 and Table 7-5 of Appendix M Ungulate Technical Support Document include a summary of Category 1, 2, and 3 habitats at the individual range level (Missisa, Nipigon, Ozhiski, Pagwachuan).	Comment noted; see response for details.	1651

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		M (e.g., Section 4.3.1.3; 5.1.1.3; etc.). However, the information provided in Section 8.2.7.1, Table 8-40, and Section 9.4.5.1.1 only consider the amount of Category 1, 2 and 3 habitat at the local study area and regional study area scales. Information should also be provided summarizing Category 1, 2 and 3 habitat at the individual range level. For Boreal Caribou, the range is considered the appropriate biological scale for conservation planning and management. This scale acknowledges that caribou rely on the entire range, including high-use areas, seasonal ranges, and the overall landscape, to carry out their life processes. As such, the same information provided in Section 8.2.7.1, Table 8-40, and Section 9.4.5.1.1 should also include the amount of Category 1, 2 and 3 habitat within each individual range (i.e., Missisa, Ozhiski, Nipigon, Pagwachuan). For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nursery area, wintering area) and the			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		area immediately around the dwelling place (i.e. 10 km), which differs from the previous General Habitat Description that identified the entire range as habitat and how Category 1, 2, and 3 habitat is currently described in the draft EA. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a summary of Category 1, 2 and 3 habitat at the individual range level.			
MECP Species at Risk Branch	32	Additional information is required to provide clarity on the information used to identify, quantify, and characterize seasonal caribou range, as per Section 3.4.1 of the Terms of Reference. Specifically, the EA/IS should include all available caribou collaring data, including that collected by the Project as well as that collected by the Ministry of Natural Resources, Northern Road Link, and	Caribou collar data collected by Webequie First Nation was not available before submission of the Draft EA/IS. A data sharing agreement has since been signed between the three road projects (i.e., Marten Falls Community Access Road, Webequie Supply Road (WSR), Northern Road Link (NRL)) and Caribou collar data has been shared. The Final EA/IS and Appendix M	Section 8 Final EA/IS Appendix M	1652

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Webequie Supply Road, where it is relevant to the Project study areas (i.e., Construction Disturbance Area, Project Area, LSA, and RSA). Additionally, clarity is required on whether these seasonal distribution maps reflect both Boreal Caribou and Eastern Migratory Caribou, or just Boreal Caribou. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include additional information, where available. Alternatively, please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to describe why additional information was not considered and incorporated into the assessment.	Ungulates Technical Support Document have been updated to include the additional collar data in the analysis and discussion of existing conditions. Clarity has also been provided to confirm that caribou distribution on Figures 8-35 and 8-36 include both Boreal Caribou and Eastern Migratory Caribou.		
MECP Species at Risk Branch	33	References are required to substantiate the following statement: “Caribou react differently to disturbances like roads and trails, often showing little to no reaction, especially in areas with	Information regarding the current understanding of caribou responses to disturbances and predicted effects of the Project are provided in Appendix M Ungulates Technical Support Document and include associated references.	Final EA/IS Section 8.7.1	1653

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		fewer disturbances. This behaviour is consistent with other studies in the region." [emphasis added] Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include references that support the statement that "this behaviour is consistent with other studies in the region".	Section 8.2.7.1 of the Final EA/IS has been updated to align with the information provided in Appendix M.		
MECP Species at Risk Branch	34	The Draft EA/IS Report states, "Caribou appear to travel through the northern, northeastern, and central portions of the caribou existing conditions Regional Study Area to reaching their calving and winter ranges, indicating good connectivity in these regions. However, we don't have enough data on caribou in the southern part to understand connectivity there." [emphasis added] How does the Project Team plan to address this information gap? Will additional studies be conducted to inform existing conditions as it relates to habitat connectivity in the southern part of the Project? Would information from other recent/ongoing studies (e.g., MNR Caribou Collaring, NRL Caribou	Caribou collar data collected by Webequie First Nation was not available before submission of the Draft EA/IS. A data sharing agreement has since been signed between the three road projects (i.e., Marten Falls Community Access Road, Webequie Supply Road (WSR), Northern Roade Link (NRL)) and Caribou collar data has been shared. The Final EA/IS and Appnedix M Ungulates Technical Support Document have been updated to include the Caribou collar data. Additional detailed information regarding habitat connectiveity in the Regional Study Area is provided in Sections 5.1.2 and 7.1.1.2 of Appendix M.	Final EA/IS Section 8.2.7.1 Appendix M	1655

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Collaring, etc.) include relevant information that could address this, if it was not already incorporated and considered? Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to identify how the Project Team will address the apparent information gap associated with habitat connectivity in the southern part of the Project.	Monitoring programs during construction and operation may also be implemented to fill any remaining information gaps. Monitoring programs will be determined during the permitting phase in collaboration with local existing environmental advisory committees and regulators.		
MECP Species at Risk Branch	35	Additional information is required to provide clarity on the information used to estimate survival and recruitment. Specifically, the EA/IS should include a table summarizing the following for each year of annual survival rates: - # of collared adult female caribou available to estimate survival (n) - # of mortalities (d) - survival (S) - upper and lower 95% confidence intervals (CI) Additionally, the EA/IS Report should include a table summarizing the following for each year of annual recruitment estimates:	Section 8.2.7.1 of the Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to include a table summarizing annual survival rates and a table summarizing annual recruitment.	Final EA/IS Section 8.2.7.1 Appendix M	1656

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		- the type of survey (e.g., winter distribution survey, targeted recruitment survey, etc.) - # of unknown adults - # of adult males - # of adult females - # of calves - # of unknown age/sex - Total # of adults - Total # of caribou - Sex ratio (i.e., ratio of adult females to adult males) - # of adjusted adult females* - Recruitment estimate (i.e., ratio of calves to 100 adjusted adult females)* * note: the sex ratio should be used to estimate the number of adult females present in the groups containing unknown adults (i.e., adjusted number of adult females). This information is necessary to support an understanding of the sample sizes and group compositions. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include two tables that summarize the information used to estimate caribou survival and			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		recruitment.			
MECP Species at Risk Branch	36	Further clarity is required on the spatial extent used to estimate survival (e.g., LSA, RSA, individual caribou ranges [i.e., Missisa, Ozhiski, Nipigon, Pagwachuan) and which collared caribou were included in the estimate of survival (i.e., what spatial extent are the survival estimates relevant). For example, the Integrated Range Assessments (MNRF 2014) used data from all adult female collared caribou that had the majority of their telemetry locations (>50%) within the relevant Caribou Range to estimate survival. Where there is a sufficient sample size, survival estimates should be calculated for each Caribou Range separately to enable comparison to previous survival estimates from the Integrated Range Assessments; and enable the effects assessment at the appropriate scale in which Caribou are managed in Ontario (i.e., range scale). Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as	Section 8.2.7.1 of the Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to include the estimate of survival and recruitment rates for Missisa and Ozhiski ranges provided by Ministry of Environment, Conservation and Parks in Comment 37 (below) and to provide clarity on the spatial extent used to estimate caribou survival and which collared caribou were included in the survival estimate..	Final EA/IS Section 8.2.7.1 Appendix M	1658

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to provide clarity on the spatial extent used to estimate caribou survival and which collared caribou were included in the survival estimate. Where there is sufficient sample size, estimates of caribou survival in the Existing Conditions Assessment should be reported at the individual range scale and the Effects Assessment should evaluate the potential effects of the Community Access Road at the Range scale, in addition to the LSA and RSA.			
MECP Species at Risk Branch	37	As per previous comment and for awareness, the Ministry of Natural Resources Science and Research Branch recently updated estimates of adult female survival rates and annual recruitment rates for Boreal Caribou in the Missisa and Ozhiski Ranges (unpublished): Missisa Ozhiski Adult Female Survival Rate 86% 1 88% 4 Annual Recruitment Rate (calves/100 adult females) 50 2 33.7 5 35.2 6 Population Growth Rate (λ) 1.14 3 1.00 7 1.10 8 1 Boreal Caribou, pooled across years (2020-23); n = 147 collar-years	The information related to estimates of adult female survival rates and annual recruitment rates for Boreal Caribou in the Missisa and Ozhiski Ranges has been included to Section 8.2.7.1 of the Final EA/IS and Appendix M Ungulates Technical Support Document.	Final EA/IS Section 8.2.7.1 Appendix M	1659

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		2 Boreal Caribou, calf-at-heel, pooled across years (2020, 2021 & 2023); n = 54 adjusted cows + calves 3 Boreal Caribou, Geometric mean (2020-23) 4 Boreal Caribou, pooled across years (2019-23); n = 241 collar-years 5 Geometric mean of the two recruitment estimates recorded during 2018 and 2019 (i.e., 2018 group composition-based estimate of 35.4 calves/100 cows [n = 329 adjusted cows + calves]; and 2019 calf-at-heel estimate of 32.1 calves/100 cows [n = 37 adjusted cows + calves]) 6 Geometric mean of the two recruitment estimates recorded during 2021, 2022 & 2024 (i.e., pooled 2021, 22 & 24 group composition-based estimate of 31 calves/100 cows [n = 199 adjusted cows + calves]; and pooled 2021, 22 & 24 calf-at-heel estimate of 40.1 calves/100 cows [n = 70 collared cows + calves]) 7 Boreal Caribou, mean recruitment (2018-19); adult survival (2019) 8 Boreal Caribou, mean recruitment (pooled group. comp. and CAH for 2021, 2022 & 2024); mean adult survival The above estimates of adult female			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		survival in the Missisa Range (86%) and Ozhiski Range (88%) are above the estimated 85% adult survival rate that is necessary for a stable to increasing population (EC 2008, 2011). The above estimates of annual recruitment rates in the Missisa Range (50 calves/100 adult females) and Ozhiski Range (33.7-35.2 calves/100 adult females) are above the "persistence threshold" of 28.9 calves per 100 adult females generally considered necessary for a stable or increasing population assuming an adult survival rate of 85% (EC, 2008). The above estimates of lambda (λ) in the Missisa Range (1.14) and Ozhiski Range (1.00-1.10) suggest the short-term population trend is increasing in the Missisa Range and is stable or increasing in the Ozhiski Range. MECP SARB recommends the above information be considered in the Final EA/IS Report. For awareness, the assessment of potential impacts of the proposed Community Access Road will need to consider the best available information,			

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		including the above estimates of survival, recruitment and population growth rates, during the authorization process, should an authorization under the ESA or SCA be required. _____ Environment Canada. 2008. Scientific Review for the Identification of Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada. August 2008. Ottawa: Environment Canada. 72 pp. plus 180 pp Appendices. Environment Canada, 2011. Scientific Assessment to Inform the Identification of Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada: 2011 update. Ottawa, Ontario, Canada. 102 pp. plus appendices. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include MNR's recent updated estimates of adult female survival rates and annual recruitment			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		rates for the Missisa and Ozhiski Ranges for comparative purposes at the range level; and describe what these results suggest.			
MECP Species at Risk Branch	38	Supporting evidence should be provided as it relates to the statement in the Draft EA/IS Report which states, “Wolves are the main threat to caribou, but black bears and occasionally polar bears also hunt them. Wolves and bears are present in the study area but not in large numbers”. MECP SARB encourages the Project Team to provide the following information to clarify and support the above statement: - Clarify the relevant study area(s) being referred to (e.g., Construction Disturbance Area, LSA, RSA) - Supporting evidence from existing literature and/or baseline field studies undertaken to inform the Community Access Road that describe existing numbers and/or densities of wolves and bears within the Ungulate LSA and Caribou RSA; and - Describe how these align with, or deviate from, wolf and/or bear densities shown in existing literature to affect caribou populations, for context.	Detailed information regarding predator densities and predation risk are provided in Sections 5.1.3.3 and 7.1.1.3 of Appendix M Ungulates Technical Support Document. Section 8.2.7.1 has been updated to align with Appendix M.	Final EA/IS Section 8.2.7.1	1661

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to clarify the relevant study area(s) referred to in relation to existing numbers of wolves, provide supporting evidence that describes existing numbers and/or densities of wolves and bears within the Ungulate LSA and Caribou RSA, and contextual information from existing literature on wolf and/or bear densities shown to affect caribou populations.			
MECP Species at Risk Branch	39	Supporting evidence should be provided as it relates to the statement in the Draft EA/IS Report which states, “Human hunting of caribou is not a significant threat because it has been banned in Ontario since 1929”. While non-Indigenous harvest of Caribou has been banned in Ontario since 1929, this has not limited Caribou harvest by Indigenous communities and individuals exercising Aboriginal and treaty rights. As such, MECP SARB encourages the Project to provide the following information to clarify and support the above statement:	Additional Indigenous Knowledge reports have been provided since the submission of the Draft EA/IS and have been incorporated into all relevant sections of the Final EA/IS and Appendices. Detailed information regarding hunting pressure, including clarity that the ban on caribou hunting relates only to non-Indigenous individuals is included in Sections 5.1.3.3 and 7.1.1.3 of Appendix M Ungulates Technical Support Document. Section 8.2.7.1 and Table 9.4-14 (formerly Table 9-27) of the Final EA/IS	Final EA/IS Section 8.2.7.1 and Table 9.4-14	1662

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		- A summary of Caribou harvested by Indigenous communities within or near the study area(s) (i.e., Construction Disturbance Area, LSA, RSA), where this information is available and able to be shared. MECP SARB notes that information provided in Section 5.1.3.3.3 of Appendix M – Ungulates regarding Caribou harvest was limited to Marten Falls First Nation; and does not include information from other Indigenous communities or individuals within or near the Community Access Road study areas. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, with a general summary of the number of Caribou harvested annually by Indigenous communities or individuals exercising their Aboriginal and treaty rights of Caribou harvest. Alternatively, if data is not available on Indigenous harvest in the RSA, individual ranges, or LSA, specify that the ban on hunting only applies to non-Indigenous individuals, acknowledge the lack of available information on Indigenous	has been updated to align with Appendix M.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		harvest numbers, and consider if the conclusion that hunting of caribou is not significant is still valid.			
MECP Species at Risk Branch	40	Table 8-15 should include the Project Study Area, as described in Section 6.5.2. Recognizing the final detailed design has not been completed, and there may be changes to the final location of the Construction Development Area, the existing conditions and effects assessment should also evaluate existing conditions and effects on species at risk and their habitat across the broader area in which the final Construction Disturbance Area may be located. For awareness, the final location of the 100 m right-of-way that will be established during the detailed design phase will be required to inform whether ESA/SCA authorization is required, ensuring the assessment of impacts is accurate and reflects the full extent of potential effects on species at risk and their habitat. Consider including the Project Study Area in the Existing Conditions and	Maps delineating the Study Area for each valued component are already included in Section 8 of the Draft EA/IS. These maps provide spatial context for the assessment and help illustrate the extent of analysis conducted for each component.	Comment noted; see response for details.	1635

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Effects Assessment in the Final EA/IS Report.			
MECP Species at Risk Branch	40	MECP SARB recognizes Aroland First Nation provided confidential information regarding commercial harvesting and trapping areas within the Preferred Route. Should any of that information be related to species at risk (e.g., Wolverine), the EA/IS should consider and discuss how the Project will positively or negatively impact the species and Aboriginal and Treaty Rights and Interests. If necessary, update the Final EA/IS Report and associated Appendices as appropriate, to include a discussion of how the Project will positively or negatively impact the species and Aboriginal and Treaty Rights.	Information provided by Aroland First Nation was incorporated into the Final EA/IS including information related to species at risk. Indigenous Knowledge was provided by Indigenous Knowledge holders and additional information was provided by Indigenous community members. Information provided is outlined in Tables 3-1 and 3-2 of each Technical Support Document, as well as how the information informed the assessments. For example, Indigenous Knowledge and information related to wolverine was provided as outlined in Table 3-1 and 3-2 of Appendix K Technical Support Document. Information provided related to wolverine presence near specific watercourses and waterbodies and the information informed the selection and description of wolverine as a value component, as well as informing the locations of wolverine hair snag stations and sampling locations. Impacts to species at risk are provided in the Technical Support Documents. Residual effects on wolverine are predicted to be not significant (Appendix	Comment noted; see response for details.	1663

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			K). Impacts to Aboriginal and Treaty Rights were assessed and provided to each First Nation in a Nation-specific, confidential Aboriginal and / or Treaty Rights and Interest Assessment Report.		
MECP Species at Risk Branch	41	MECP SARB notes the Project has indicated there is no anticipated pathway for indirect effect between Wildlife (Ungulates) (i.e., Caribou) and Aboriginal and Treaty Rights and Interests as a result of the Community Access Road. However, given potential impacts to Boreal Caribou (e.g., habitat loss, nursery areas, etc.) and Eastern Migratory Caribou (e.g., movement/travel, habitat loss, etc.) it appears there may be potential for the Community Access Road to affect traditional harvest. Please clarify how the Project considered the potential effects of the Community Access Road on Caribou (both Boreal Caribou and Eastern Migratory Caribou) and the interactions this may have on Aboriginal and Treaty Rights and Interests (i.e., traditional harvest).	Table 9.1-1 (formerly Table 9-2) of the Final EA/IS provides a preliminary analysis of the Project-environment interactions between disciplines. The preliminary review did not identify indirect effects between ungulates and Aboriginal and / or Treaty Rights and Interests (ATRI). The ungulate assessment provided in Appendix M Ungulates Technical Support Document, however, concluded that the residual effects on Caribou are significant, and that these effects have direct implications for ATRI, including availability of Caribou for harvest, ability to access and use lands for cultural and subsistence activities, and continuity of cultural practices and intergenerational knowledge transmission as outlined in Section 7 of Appendix M.	Comment noted; see response for details.	1664
MECP Species at Risk Branch	42	Seven traplines intersect the Community Access Road centreline, out of 10 traplines intersecting the Local Study	Appendix T Community Well-Being Technical Support Document has been updated to include consideration for	Appendix T	1665

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Area. All of these are held by Indigenous Trappers. Aroland said 5 of their traplines intersect the Regional Study Area. Their commercial trapping areas intersect with 47.4km of the Preferred Route, the commercial trapping areas overlap 1,651ha of the Construction Disturbance Area. Ginoogaming identified 4 traplines within the Project Study Area to be significant to members (GE 210, GE 138, GE 150 and GE 153). Both GE 138 and GE 153 overlap the Construction Disturbance Area. Additional information has been requested from this Community by the Proponent. Should any of that information be related to species at risk (e.g., Wolverine), the Final EA/IS should consider and discuss how the Project will positively or negatively impact the species and Aboriginal and Treaty Rights and Interests. If necessary, update the Final EA/IS Report and associated Appendices as appropriate, to include a discussion of how the Project will positively or	information provided by Indigenous Trappers as part of the effects on Traditional Foods. Specific effects to Aboriginal and/or Treaty Rights (ATRI) are outlined in the confidential, Nation specific ATRI reports provided to each Nation.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		negatively impact the species and Aboriginal and Treaty Rights.			
MECP Species at Risk Branch	43	The Spatial Boundaries of Land Disciplines lacks a figure showing the revised LSA and RSA boundaries for Wolverine based on the development of the Preferred Route. Please include an appropriate figure with the revised LSA and RSA for Wolverine in the Final EA/IS.	Figure 9-5 of the Final EA/IS has been updated to include the revised wolverine Local Study Area and Regional Study Area.	Final EA/IS Figure 9-5	1666
MECP Species at Risk Branch	44	"sand and gravel pits…will be decommissioned…encourage natural revegetation…temporary quarries not required for maintenance activities will be abandoned."; "Prepare and implement a Vegetation Restoration Plan"; "Use seed mixes with appropriate native species for all seeding.."; "An Environmental Protection Plan and a Cleanup and Reclamation Plan will be developed and implemented. Where necessary, seedling planting will occur…" MECP understands that remediation including revegetation effectiveness monitoring and adaptive management will be detailed in a Vegetation Restoration Plan, Environmental Protection Plan, and Cleanup and	Sections 7.3.1 and 9.4, and Tables 7-15, 9-1 and 10-1 of Appendix J Vegetation Technical Support Document have been updated to clarify that the Vegetation Restoration Plan will be developed through engagement and consultation with Indigenous communities and integration of local Indigenous Knowledge and stewardship protocols. Strategies for site-specific revegetation of disturbed areas/disturbed habitat will include natural revegetation, seeding, and seedling planting and will include consideration for Traditional Use Plants and will be determined during detail design.	Comment noted; see response for details.	1667

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Reclamation Plan. MECP cannot comment on the content and sufficiency of revegetation measures in these Plans, it is unclear what type of silvicultural treatment (natural revegetation, seeding, planting) will be implemented in the various disturbed areas following construction, and it is unclear how much area of disturbed habitat for each species at risk will be restored through rehabilitation and restoration. However, remediation and revegetation measures included in the Vegetation Restoration Plan, Environmental Protection Plan, and Cleanup and Reclamation Plan may, or may not, provide sufficient benefit to mitigate long-term effects of the Project on bat habitat loss and alteration. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to summarize the area of disturbed habitat for each species at risk that is anticipated to be restored through rehabilitation, and include the following commitments: - MECP recommends a qualified professional advise on site-specific			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		revegetation of disturbed areas including appropriateness of implementing natural revegetation, seeding, and seedling planting - ensure vegetation communities are restored similar to pre-construction conditions.			
MECP Species at Risk Branch	45	"Ecosites identified as candidate maternity roost habitat for little brown myotis and northern myotis in the study area…based on guidance from the Ministry of the Environment, Conservation and Parks." The total area of suitable Little Brown Myotis and Northern Myotis maternity roost habitat in the Wildlife Effects Assessment LSA is estimated at 5,877 ha. MECP understands that suitable maternity roost habitat for Little Brown Myotis and Northern Myotis was defined by ecosites that was provided in guidance from the MECP. However, there is a total of 5,721 ha of suitable maternity roost habitat available in the LSA if the ecosites in the LSA defined as suitable maternity roost habitat are summed (i.e., ecosites B040Tt, B042Tl, B055, B055Tl, B055Tt, B057Tt, B070, B070Tl, B070Tt, B088Tt, B119, B059Tl, B059Tt, B076Tt based on ecosite classification	The discrepancy in suitable Little Brown Myotis and Northern Myotis maternity roost habitat between the vegetation and wildlife Local Study Areas (LSAs) is due to different LSA sizes. A description of the vegetation LSA is provided in Section 4.2.3 of Appendix J Vegetation Technical Support Document and Section 4.2.3 of Appendix K Wildlife Technical Support Document. Detailed methods on how bat maternity roost habitat was calculated is provided in Section 4.3.3.2.3 of Appendix K.	Comment noted; see response for details.	1668

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		summarized in Table 3-5 and Table 3-6 of Appendix J, Attachment B: Vegetation Technical Support Document). Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to provide supporting information on how 5,877 ha of suitable Little Brown Myotis and Northern Myotis maternity roost habitat was calculated (e.g. rolling up ecosites into vegetation community groupings, additional ecosites considered such as unclassified ecosite types, etc.).			
MECP Species at Risk Branch	46	The Draft EA/IS Report lacks clarity on how Wolverine habitat availability was compared between the existing conditions and the conditions of the effects assessment. The Draft EA/IS Report states, “When wolverine habitat availability in the existing conditions Local Study Area was compared to the conditions of the effects assessment Local Study Area, it was determined that the conclusions are valid for both study areas.” However, the Draft EA/IS Report lacks a	Section 9.4.3.1.2 of the Final EA/IS and Appendix K Wildlife Technical Support Document have been updated to provide the following: - a quantification of the existing disturbed and undisturbed areas within the wolverine Local Study Area (LSA) and Regional Study Area (RSA) - discussion on the tolerance of wolverine to disturbances - an expanded discussion on wolverine food abundance informed by the results of relevant wildlife studies - an expanded qualitative description of potential denning habitat in the wolverine	Final EA/IS Section 9.4.3.1.2 Appendix K	1669

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		detailed description of Wolverine habitat, both qualitative and quantitative, within the LSA and RSA as it relates to the existing environment. As such, it is unclear what habitat was compared and/or what conclusions were made regarding the validity of those conclusions for both study areas. Please update the Final EA/IS Report, and associated Appendices as appropriate, to include a detailed description of Wolverine habitat, both qualitative and quantitative, within the LSA and RSA as it relates to the existing environment.	LSA and RSA.		
MECP Species at Risk Branch	47	Additional information should be provided on the estimated number of male and female Wolverine within the Local Study Area, if possible. The Draft EA/IS Report states, “The model predicted that 43 individuals (18 to 74) had home ranges that may overlap the effects assessment Local Study Area in 2022 and 21 individuals (11 to 34) had home ranges that may overlap the effects assessment Local Study Area in 2023.” Please update this section of the Final	As described in Section 5.2.1 of Appendix K Wildlife Technical Support Document, a total of 17 unique wolverine individuals were identified through the wolverine snag surveys. A large portion of the individuals (11 of 17) were of unknown sex, while 4 females and 2 males were confirmed. An actual sex ratio in the samples or local population remains uncertain. The mark-recapture modelling predicted that 43 individuals may have home ranges that overlap the Local Study Area, however, due to the limited demographic data obtained during baseline, predictions of sex ratios are	Comment noted; see response for details.	1670

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to expand the analysis to estimate the number of male and female wolverine home ranges that overlap the existing conditions Local Study Area, if possible.	difficult to accurately estimate. Due to the uncertainty, the Final EA/IS and Appendix K have not been updated with sex ratios in the Local Study Area (LSA) or Regional Study Area (RSA).		
MECP Species at Risk Branch	48	Context: “Availability of summer maternity roosting habitat may be a limiting factor for these species.”; Magnitude: “Low magnitude direct loss of an estimated 694 hectares of maternity roost habitat in the local area.”; Significant: “Not Significant”. The MFCAR ToR required an assessment of the availability, quality, and distribution of Little Brown Myotis and Northern Myotis habitat. As it relates to this ToR requirement, the Draft EA/IS Report characterizes existing conditions (i.e., Section 8.2.5.1), describes the refined existing conditions (i.e., Section 9.4.3.1.1), and identifies residual effects and proposed mitigation and enhancement measures (i.e., Section 9.4.3.4 and Table 9-22), with supporting information in Appendix K.	The determination of magnitude and significance for the residual effect of habitat loss and alteration on Species at Risk bats followed the significance framework outlined in Section 4.4.2 of Appendix K Wildlife Technical Support Document. As described in Section 7.3.3.2 and Section 7.3.4.1 of Appendix K, the evaluation of manitude and significance was conducted at the scale of the wildlife Regional Study Area (RSA) which is the appropriate special boundary for assessing population-level effects. Although suitable maternity roost habitat is prediced to be removed in the Local Study Area for the construction of the Community Access Road, the area removed represents a small portion of the total suitable habitat in the RSA and which the change is measurable it is not expected to compromise population-level	Comment noted; see response for details.	1671

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Construction will result in the predicted residual effect of direct removal of 694 ha of suitable bat maternity habitat, or 11.8% of the total suitable habitat in the Wildlife Effects Assessment Local Study Area (i.e., 5,877 ha), which does not include the loss of function of suitable bat maternity habitat in proximity to the Construction Disturbance Area during construction (see comment #52) or the cumulative loss of suitable maternity habitat from future reasonably foreseeable development. It is unclear how it was determined that the projected removal of suitable maternity roost habitat is low in magnitude and not significant, considering that maternity roost habitat is uncommon in the LSA and RSA (Appendix K) and maternity roost habitat may be a limiting factor for these species (based on "Context" for the assessment of residual effects in the Draft EA/IS). For awareness, the lack of alternative suitable roosts in the LSA and RSA may significantly impact bats' ability to find suitable maternity roosts in future maternity roost periods (CWHC 2024). Roost removal may indirectly decrease female survival and reproductive success especially if alternative suitable roosts are not available on the landscape, and the loss of 18% of roost trees over three	resilience or ecological effectiveness. Given the above, the current assessment provides a sufficiently detailed, defensible, and well-supported rationale for the determination that the magnitude of maternity roost habitat loss is low, and that the residual effect is not significant at the population scale. No revisions to the magnitude or significance conclusion s are warranted. It is also acknowledged that the new definition of habitat differs from the ecosite-based habitat definition considered in the assessment.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		years could be considered a significant reduction in habitat quality (CWHC 2024). It has been acknowledged in the Draft EA/IS that suitable maternity roost habitat is limiting in the LSA and RSA. Additional information to rationalize the effects assessment for the potential effect of habitat loss and alteration to Little Brown Myotis and Northern Myotis should also consider other MECP comments regarding bats such as the loss of function of suitable bat maternity habitat in proximity to the Construction Disturbance Area during construction through sensory disturbance (see comment #52), the “unknown” or “uncertain” population state of Little Brown Myotis and Northern Myotis (see comment #92) and the road acting as a barrier to bats suggesting a lower tolerance for this type of anthropogenic disturbance (see comment #137). For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for species at risk bats protected under the amended ESA/SCA is scoped to the dwelling place (e.g. maternity roost) and the area immediately around the dwelling place, that may differ from suitable species at risk bat habitat currently described in the			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Draft EA/IS. Please update all relevant sections of the Final EA/IS Report and associated Appendix K with additional rationale on how the determination of magnitude and significance was determined for the residual effect of bat habitat loss and alteration. Consideration should be given to the applicable legislation following EA/IS completion to ensure compliance for project related impacts to protected species and habitat.			
MECP Species at Risk Branch	49	"Avoid clearing maternity roost habitat during the bat maternity roosting period (May 1 to August 31). If potential maternity roost habitat is to be removed during the roosting period, it will be subject to Endangered Species Act permitting requirements and site-specific mitigation measures that would be developed in consultation with the Ministry of the Environment, Conservation and Parks, Species at Risk Branch." "Mitigation will include pre-clearing surveys to determine if potential maternity roost trees are present in the	Section 9.4.3.4 and Table 9-22 of the Final EA/IS and Section 7.3.1.2.3.2 of Appendix K Wildlife Technical Support Document have been updated to provide additional details on the methods of pre-clearing surveys for candidate roost trees including, a description of candidate roost trees, and description of the updated habitat definition under the amended Endangered Species Act.	Final EA/IS Section 9.4.3.4, Table 9-22 Appendix K Section 7.3.1.2.3.2	1672

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		area to be cleared." "Ground-based pre-clearing surveys…will include surveys to identify potential Species at Risk bat maternity roost habitat within the Construction Disturbance Area to determine the presence of potential bat habitat prior to any tree clearing to be conducting during the bat maternity roost season (May 1 to August 31)."; "If potential maternity roosting habitat is identified and planned to be removed during the roosting period, bat exit surveys may be conducted depending on the outcome of consultation and Endangered Species Act permitting with the Ministry of the Environment, Conservation and Parks Species at Risk Branch." These mitigation measures suggest that tree/vegetation clearing could still be carried out during the bat maternity roost period. From the information provided, a qualitative assessment of potential roost trees will be conducted followed by exit surveys at potential roost trees. However, it is unclear how often trees/vegetation will be cleared during the bat maternity roost period and how often pre-clearing (bat) surveys will be carried out, how potential roost trees will be identified to			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		be surveyed, the forest types where the pre-clearing surveys will be completed, the timing of pre-clearing surveys during the maternity roost period (e.g. carried out when pups are volant), the timing of pre-clearing surveys at potential maternity roosts prior to clearing of potential roosts, the survey effort and survey timing at potential maternity roost trees to rule out as used as maternity roosts, the use of acoustic monitoring paired with exit surveys, and if stop-work measures or clearing setbacks/buffers will be implemented if maternity roost trees are encountered during the surveys. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and as appropriate, to provide additional information regarding the proposed "ground-based pre-clearing surveys ("wildlife sweeps")" to improve MECP's understanding of the proposed surveys at potential bat maternity roost habitat during construction. For awareness, pre-clearing (bat) surveys in forested habitats may not be effective, are generally not supported, and would likely not avoid all impacts to			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		species at risk bats if tree/vegetation clearing is proposed during the bat maternity roost period. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer prohibited. Undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. As such, any activities associated with the Marten Falls Community Access Road should consider adverse impacts to species at risk bats and their habitat (e.g. maternity roosts) if tree/vegetation clearing during the bat maternity roost period is proposed and seek Project authorization under the ESA or SCA, or register activities under the SCA, as required.			
MECP Species at Risk Branch	50	Predicted Residual Effect: Uncertainty: "Low"; "The prediction confidence for the assessment of significance is considered high." It is unclear if the high level of confidence in the assessment of residual effects (i.e., habitat loss and alteration, sensory disturbance) to Little Brown Myotis and Northern Myotis considers the uncertainty associated with the population state of Little Brown Myotis and Northern Myotis (see comment #92)	Although mitigations to limit the effects of the Community Access Road on Species at Risk bats are well understood and the methods have been demonstrated to be effective, the uncertainty associated with the population state of the species are acknowledged. Section 9.4.3.4 and Table 9.4-9 (formerly Table 9-22) of the Final EA/IS and Section 7.3.5.1 of Appendix K Wildlife Technical Support Document have been updated to revise the prediction confidence and uncertainty to moderate for Species at Risk bats.	Final EA/IS Section 9.4.3.4, Table 9.4-9 Appendix K Section 7.3.5.1	1673

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		in the effects assessment (i.e., ecological context in determination of magnitude and significance of residual effects; the self-sustaining and ecologically effective status of the population). Consider revision of the prediction confidence for the residual effects assessment of significance (i.e., habitat loss and alteration, sensory disturbance) accordingly in the Final EA/IS.			
MECP Species at Risk Branch	51	"Night work will be avoided where feasible."; "It is expected that most if not all construction activities will be undertaken during daylight hours when bats are roosting and therefore are less affected by anthropogenic noise." These mitigation measures suggest that construction may be carried out at night. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer prohibited. Undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. As such, consider implementing a mitigation measure to avoid construction activities within and adjacent to suitable bat maternity roost habitat from 30 minutes	Section 9.4.3.4 and Table 9.4-9 (formerly Table 9-22) of the Final EA/IS, and Sections 7.3.1.2.2.1, 9.2 and 10 of Appendix K Wildlife Technical Support Document have been updated to include the following mitigation: - Construction activities causing loud noises including the use of heavy machinery will not be undertaken within 50 m of candidate or confirmed maternity roosts from 30 minutes before sunset to 30 minutes after sunrise during the maternity roost season (May 1 to August 31).	Final EA/IS Section 9.4.3.4, Table 9.4-9 Appendix K Sections 7.3.1.2.2.1, 9.2 and 10	1674

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		prior to dusk to 30 minutes after dawn during the bat maternity roost period (May 1 to August 31) and including it in the Final EA/IS. For awareness, any activities associated with the Marten Falls Community Access Road should consider adverse impacts to species at risk bats (e.g. sensory disturbance, harm) if night work is proposed during the bat maternity roost period and seek Project authorization under the current ESA or SCA, or register activities under the SCA, as required.			
MECP Species at Risk Branch	52	Context: “Generally tolerant to human disturbance such as noise associated with construction activities.”; “Furthermore, the construction noise frequencies are below the frequencies at which little brown myotis and northern myotis are most sensitive.”; “Noise levels (baseline + Project) will reach 50 dBA at 600 m from the edge of the effects assessment Construction Disturbance Area during road and bridge construction. Noise levels at quarries during Construction will reach 50 dBA at 1,000 m from the edge of the effects assessment Construction Disturbance Area. Bats will avoid areas with sensory disturbances exceeding 88 dBA.”; “Therefore, all areas of bat habitat that	The assessment of sensory disturbance impacts on Little Brown Myotis and Northern Myotis are provided in Section 7.3.1.2.2 of Appendix K Wildlife Technical Support Document. Table 9-22 of the Final EA/IS and Appendix K have been updated to include the anticipated area of indirect bat habitat loss due to sensory disturbance during construction.	Final EA/IS Section 9.4.3.4, Table 9-22 Appendix K Section 7.3.1.2.2	1675

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		may be indirectly affected by sensory disturbance [from operations and maintenance] include all areas within 100 m of the effects assessment Construction Disturbance Area. A total of 236 ha of potential bat foraging habitat may be indirectly affected within 100 m of the effects assessment Construction Disturbance Area." The MFCAR ToR required an assessment of the change or disruption in Little Brown Myotis and Northern Myotis breeding behaviour, habitat distribution, and survival and reproduction (population state). The Draft EA/IS summarizes the potential displacement and relocation of Little Brown Myotis and Northern Myotis from using available maternal roosts in the Construction Disturbance Area to outside of the Construction Disturbance Area during/following Construction and during operations/maintenance (Appendix K). This informed the magnitude and determination of significance of residual effects summarized in Section 9.4.3.4 and Table 9-22 of the Draft EA/IS. For your information, broadband noise			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		>65 dBA is likely to mask or negatively impact a bat's echo perception from objects beyond ~1.5 m range (Arnett et al. 2013) and most studies report disturbance in normal bat activity with noise >60 dBA (e.g. bats need to call more frequently or be more active so more energetically costly; Bednarz 2020). Anthropogenic noise >10 kHz has been shown to disrupt normal echolocation frequency (Moretto and Francis 2017, Bunkley et al. 2015) and some bat species will shift echolocation frequencies in anthropogenic noise even when there is no frequency overlap (i.e., it is possible even low frequency noise will impact both low and high frequency bats) (Hage et al., 2013; Hage and Metzer 2013). Low frequency bats have been shown to continually decrease activity with increasing noise levels (dBA; Moretto and Francis 2017). Therefore, it is likely noise from construction, operation, and maintenance ≥60 dBA is likely to impact both high frequency bats (including VC Little Brown Myotis and Northern Myotis) and low frequency bats during the maternity roost period (May 1 to August 31), and is likely to impair the function of potential maternity roosting habitat and foraging habitat within a range of ≥60 dBA from construction			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		activities (including pit, quarries, and temporary infrastructure), operation of the preferred route, and maintenance of the preferred route (including quarry activity and aggregate extraction to support maintenance of the road). For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for species at risk bats protected under the amended ESA/SCA is scoped to the dwelling place (e.g. maternity roost) and the area immediately around the dwelling place, and habitat used for foraging is not protected under the amended ESA/SCA. This may differ from suitable species at risk bat habitat currently described in the Draft EA/IS. Although the Draft EA/IS summarizes the direct loss of potential bat maternity roost habitat from construction, the anticipated area of habitat lost indirectly through sensory disturbance during construction, and subsequent displacement/relocation of roosting bats, is not provided. Consider providing the anticipated area of indirect bat habitat lost through sensory disturbance during construction, and subsequent displacement/relocation of roosting bats, to Table 9-22 of the			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Final EA/IS and Appendix K as required. The Draft EA/IS summarizes the indirect loss of bat habitat resulting from operations and maintenance as 236 ha, and that the effects of sensory disturbance on bats are predicted to be greatest during foraging. Consider bringing this anticipated area of indirect bat habitat loss to Table 9-22 of the Final EA/IS.			
MECP Species at Risk Branch	53	"The use of nighttime lighting around bat roosting areas will be minimized to the extent possible during construction."; "Control lighting required for Operation of the Project, including direction and timing to avoid effects on bats, while meeting operation health and safety requirements." These mitigation measures suggest that nighttime lighting will be utilized in/around suitable bat maternity roost habitat during construction. The directionality and timing of the control lighting (e.g. continuous timing throughout the night, motion sense lighting, downwards directionality) is unclear, introducing uncertainty in the effectiveness of the mitigation in reducing impacts to bats. Under the amended ESA and	As stated in the Final EA/IS and Appendix K Wildlife Technical Support Document, minimizing the use of nighttime lighting to the extent possible in proximity to suitable bat maternity roost habitat during the maternity season (May 1 to August 31) is the primary mitigation for this potential impact. Consideration will not be given to the use of red lights for construction workplace lighting, however, they will not be used as red lights provide insufficient brightness, can increase fatigue, and diminishes the ability of workers to distinguish colours.	Comment noted; see response for details.	1676

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer prohibited. Undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. As such, consider improving the effectiveness of the proposed mitigation measures in avoiding project impacts to species at risk bats, including providing details on the timing / directionality of operation/maintenance control lighting and considering the use of red lights (Hermans et. al. 2024) where nighttime lighting is absolutely required during the bat maternity roost period, in Project implementation and in the Final EA/IS. For awareness, any activities associated with the Marten Falls Community Access Road should consider adverse impacts to species at risk bats (e.g. sensory disturbance, harm) in installation and use of control lighting in/around suitable bat maternity roost habitat during the bat maternity roost period and seek Project authorization under the current ESA or SCA, or register activities under the SCA, as required.			
MECP Species at Risk Branch	54	The MFCAR ToR required an assessment of the change in Little Brown Myotis and Northern Myotis mortality, such as due to increase in vehicle travel.	As discussed in Section 4.4.3.2.1 of Appendix K Wildlife Technical Support Document, the cumulative effects assessment (CEA) builds on the residual	Comment noted; see response for details.	1677

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The Draft EA/IS summarizes the potential residual effect of bat "collisions with vehicles and equipment" during construction, operations, and maintenance, summarized in Section 9.4.3.4 and Table 9-22 of the Draft EA/IS with proposed mitigation. "Although bat mortalities from collisions with vehicles and equipment are poorly documented, bats, including little brown myotis, are killed by vehicles with some regularity."; "With mitigation, bat mortalities from collisions with vehicles and equipment during the Construction Phase may be possible to avoid. A limited number of bat mortalities during the Operation and Maintenance Phase of the Project may occur."; "Proposed designated speed limit of 80 km per hour." Based on the information provided, there remains uncertainty if the mitigation proposed would be effective in avoiding vehicle collisions with bats during construction and limiting bat mortalities during operation and maintenance. The Project preferred route transects suitable bat maternity roost habitat. It is unclear to MECP how the proposed mitigation during construction to provide wildlife awareness training will reduce vehicle	effects assessment. The Valued Components that do not have a residual effect predicted, or the residual adverse effect is of negligible magnitude and the likelihood is unlikely or possible to occur, or positive in direction, will not be carried forward into the cumulative effects assessment (CEA). The residual effect of collisions with vehicles and equipment on Little Brown Myotis and Northern Myotis was not carried forward to the CEA as the residual effects predicted were negligible in magnitude and possible to occur.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		collisions with bats as bats are small and difficult to detect and avoid in a vehicle when driving at high speeds. It is unclear to MECP how posting and enforcing a speed limit of 80 km/hr during operations and maintenance will reduce vehicle collisions with bats as it takes longer to slow down/stop and more difficult to navigate around wildlife at higher speeds and wildlife collisions increase as vehicle speed and traffic volume increase (Altringham and Kerth 2016). The residual effect of "Collisions with vehicles and equipment" was not carried forward to the cumulative effects assessment; the Project and other reasonably foreseeable developments (e.g. operation and maintenance of the Northern Road Link and Anaconda and Painter Lake Forestry Access Road Upgrades projects) are expected to increase traffic volumes in the RSA and along the Marten Falls Community Access Road and the residual effect of "Collisions with vehicles and equipment" to Little Brown Myotis and Northern Myotis relative to existing conditions. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harm to SAR or killing a			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		SAR continues to be prohibited. As such, consider additional mitigation during construction, operations, and maintenance to further minimize and avoid the Project impact of vehicle collisions to bats by considering speed limit reductions where the preferred route crosses flyways, such as watercourse crossings (e.g. Albany River, Ogoki River), as bat mortality from road crossings is higher at flyways where there is favourable habitat on both sides of the road (Altringham and Kerth 2016). Consider bringing forward the residual effect of "Collisions with vehicles and equipment" on Little Brown Myotis and Northern Myotis to the cumulative effects assessment in the Final EA/IS.			
MECP Species at Risk Branch	55	"Herbicides will not be used during Construction." is in contrast to the Vegetation Management Plan (Appendix J) that indicates herbicides may be used to control vegetation growth. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to correct the discrepancy whether or not herbicides will be used	The Final EA/IS has been updated for clarity around use of herbicides. Herbicide use is not planned. Appendix K Wildlife Technical Support Document has been updated for consistency.	Appendix K	1678

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		between the Final EA/IS and Appendix J documents, and remove as a proposed mitigation measure for species at risk if herbicides are proposed, as required.			
MECP Species at Risk Branch	56	"Vegetation clearing activities will occur between August 15 and April 27 (outside of the migratory bird nesting season for nesting zones C5 and C6), as much as possible."; "Non-intrusive pre-clearing nest surveys to look for migratory bird nests will be completed if any vegetation clearing is required during the migratory bird nesting season (April 28 to August 14)."; "Implement buffer zones for nests and indicated nests."; "If any areas are found to have birds exhibiting breeding behaviour during non-intrusive pre-clearing nest surveys, these areas, including an activity disturbance buffer, will be flagged, and protected from disturbance until the fledglings have left the nest or the nest is otherwise deemed unoccupied." These mitigation measures suggest that tree/vegetation clearing could still be carried out during the migratory bird nesting period. Based on the information provided, it is unclear how often trees/vegetation will be cleared during the migratory bird nesting period and	Non-intrusive pre-clearing nest surveys are described in Sections 9.4.4.4, 13.2, 14.2.2.3 and Table 9-25 of the Final EA/IS and in Sections 7.3.1.1, Section 9.2, Table 10-1 and Attachment D of Appendix L Birds Technical Support Document.	Comment noted; see response for details.	1679

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		how often pre-clearing nest surveys will be carried out, the spacing of transects/meanders during the survey, what habitat types the pre-clearing nest surveys will be completed in, if stop-work measures will be implemented if species at risk nests/birds are encountered, and the setback distance of activity disturbance buffers implemented around Lesser Yellowlegs and Short-eared Owl nests if these nests are encountered during the surveys. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and Appendix L as appropriate, to provide additional information regarding the proposed “non-intrusive pre-clearing nest surveys” to improve MECP’s understanding. For awareness, pre-clearing nest surveys for Lesser Yellowlegs and Short-eared Owl may not be effective and are generally not supported, and would likely not completely avoid impacts to species at risk birds and nests if tree/vegetation clearing is proposed during the migratory bird nesting period. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		SAR is no longer prohibited. Undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. As such, any activities associated with the Marten Falls Community Access Road should consider adverse impacts to Lesser Yellowlegs and Short-eared Owl and their habitat (e.g. nests) if tree/vegetation clearing during the migratory bird nesting period is proposed and seek Project authorization under the ESA or SCA, or register activities under the SCA, as required. Under the SCA provincial authorization for migratory birds listed on Schedule 1 of the federal Species at Risk Act, 2002 would not be required. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.			
MECP Species at Risk Branch	57	"Providing wildlife awareness training for road construction works to reduce vehicle speeds." The MFCAR ToR required an assessment of the change in wildlife mortality, such as due to increase in vehicle travel.	Although wildlife can be difficult to detect and avoided at high speeds, awareness training is intended to foster a culture of caution and responsibility among workers, which can contribute to reducing collision risks. It is acknowledged that training alone may not be sufficient to fully mitigate this risk. Reduced speed limits will be	Comment noted; see response for details.	1681

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The Draft EA/IS summarizes the potential residual effects of wildlife and bird "collisions with vehicles and equipment" during construction, operations, and maintenance, summarized in Table 9-22 and Table 9-25 of the Draft EA/IS with proposed mitigation. It is unclear to MECP how the proposed mitigation during construction to provide wildlife awareness training will reduce vehicle collisions with wildlife as wildlife can be difficult to detect and avoid in a vehicle when driving at high speeds. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. As such, consider implementation of a speed limit during construction to further reduce potential collisions with construction vehicles and equipment with species at risk, including Short-eared Owl, during construction.	implemented during construction as a standard safety measure.		
MECP Species at Risk Branch	58	"Posting and enforcement of appropriate speed limit during Project Operation and Maintenance."; "Proposed designated speed limit of 80 km per hour."	Section 7.3.1.1.11 of Appendix L Birds Technical Support Document has been updated to clarify a posted speed limit of 80 km/hr for the Community Access Road.	Section 7.3.1.1.11 of Appendix L	1682

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The MFCAR ToR required an assessment of the change in wildlife mortality, such as due to increase in vehicle travel. The Draft EA/IS summarizes the potential residual effects of wildlife and bird "collisions with vehicles and equipment" during construction, operations, and maintenance, summarized in Table 9-25 of the Draft EA/IS with proposed mitigation. It is unclear how a speed limit of 80 km/hr would be effective in preventing vehicle collisions with Short-eared Owl and Lesser Yellowlegs during operation / maintenance, as it takes longer to slow down/stop and more difficult to navigate around wildlife at higher speeds, and wildlife collisions increase as vehicle speed and traffic volume increase (Altringham and Kerth 2016). For clarity for readers, replace the phrase "appropriate speed limit" with "80 km per hour" in Table 9-25 of the Final EA/IS Report. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as	The potential effects analysis considered birds, with specific assessments for birds that forage and/or fly at low heights where vehicle collisions are more likely to occur. Section 7.3.2.1 and Table 7-73 of Appendix L outline that impacts to all birds, including species at risk (i.e., Short-eared Owl, Lesser Yellowlegs) were negative in direction, and negligible in magnitude, and that impacts were not significant. The assessment did not specify a speed limit, however, a posted speed limit of 80 km/hr was assumed.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to provide more information how the posted speed limit of 80 km/hr would be effective in preventing vehicle collisions with species at risk, including Short-eared Owl. Under the SCA, provincial authorization for migratory birds listed on Schedule 1 of the federal Species at Risk Act, 2002 would not be required. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.			
MECP Species at Risk Branch	59	"The slopes of material stockpiles will be maintained at 70 degrees or less to deter bank swallow nesting." The proposed mitigation measure does not include sloping (at 70 degrees or less) of extraction faces. For awareness, slope rendering (at 70 degrees or less) of material stockpiles would likely not completely avoid impacts to Bank Swallow colonies if aggregate extraction is proposed during the migratory bird nesting period. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer	Section 9.4.4.4 of the Final EA/IS has been updated to include the mitigation "Placing geotextile, plastic covers, or tarping over slope faces or stockpiles to prevent access by birds. It is important to avoid using nets or other cover types that could entangle birds and cause potential injury or mortality."	Section 9.4.4.4 of the Final EA/IS	1683

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		prohibited. Undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. Consider revising the mitigation measure to include sloping of extraction faces, as well as material stockpiles, to deter creation of suitable Bank Swallow nesting habitat, attracting the species to nest. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include the additional mitigation that was included in Appendix L (p. 284, Section 7.3.1.1.11.2): “Placing geotextile, plastic covers, or tarping over slope faces or stockpiles to prevent access by birds. It is important to avoid using nets or other cover types that could entangle birds and cause potential injury or mortality.” Under the SCA, provincial authorization for migratory birds listed on Schedule 1 of the federal Species at Risk Act, 2002 would not be required. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	60	"Maintenance activities would be undertaken in the fall and winter where feasible to avoid nesting periods."; "mowing is expected to start in June or July and continue through September."; "Mowing of roadside ditches and rest areas is predicted to primarily impact the survival and reproduction of ground-nesting birds that require open, grassy habitats." These mitigation measures suggest that vegetation clearing could still be carried out during the migratory bird nesting period. Based on the information provided, it is unclear how often mowing of roadside ditches and rest areas will occur during the nesting period, if pre-clearing wildlife sweep surveys will be conducted prior to clearing during the nesting period, if stop-work measures will be implemented if species at risk nests/birds are encountered, and the setback distance of activity disturbance buffers implemented around Lesser Yellowlegs and Short-eared Owl nests if these nests are encountered during clearing and pre-clearing surveys (if carried out). Please update this section of the Final EA/IS Report, and all other relevant	Vegetation clearing and mowing may be carried out during the migratory bird nesting period. Construction mitigations in Table 7-72, Section 9.2, and Table 10-2 of Appendix L Birds Technical Support Document include completion of wildlife sweeps prior to vegetation clearing during nesting season to look for Pileated Woodpecker nesting cavities and raptor stick nests. Road-side ditches are not considered to be suitable habitat for Short-eared Owl or Lesser Yellowlegs based on the species' habitat requirements, and impacts to species from sensory disturbances. Mitigations for nest sweeps prior to mowing of road-side ditches during operation and maintenance are not included.	Comment noted; see response for more details	1684

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		locations within the Final EA/IS Report and Appendix L as appropriate, to provide additional information regarding any supplemental measures (e.g. pre-clearing surveys, stop work measures) that will be implemented to mitigate potential impacts to species at risk birds from maintenance activities (mowing) during the migratory bird nesting period. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer prohibited. Undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. For awareness, any activities associated with the Marten Falls Community Access Road should consider adverse impacts to Lesser Yellowlegs and Short-eared Owl and their habitat (e.g. nests) if tree/vegetation clearing is proposed during the migratory bird nesting period, and seek Project authorization under the ESA or SCA, or register activities under the SCA, as required. Under the SCA, provincial authorization for migratory birds listed on Schedule 1 of the federal Species at Risk Act, 2002 would not be required. Consideration should be given to the applicable			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.			
MECP Species at Risk Branch	61	"Industry best practices will be used for blasting activities, including scheduling when in the vicinity of sensitive wildlife sites." This mitigation measure may suggest that blasting could be carried out during the migratory bird nesting period. Based on the information provided, it is unclear what industry best practices will be used, and if blasting will be scheduled outside of the migratory bird nesting period. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and Appendix L as appropriate, to provide additional information regarding best practices that will be implemented to mitigate potential impacts to species at risk birds from blasting during the migratory bird nesting period. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer prohibited. Undertaking an activity that results in harm to SAR or killing a	Blasting may occur during the migratory bird nesting period. An environmental monitoring program will be developed and implemented during construction and will include policies and actions for avoiding and minimizing impacts to wildlife from blasting and blasting materials. Best management practices will be included in the environmental monitoring program and will include, at minimum, recommendations for pre-blast surveys for migratory birds, bird nest sweeps, habitat assessment for migratory birds, and noise and vibration control (e.g., using smaller, more controlled charges, or staggering blasting). Section 7.3.1.1.12.2 of Appendix L and Table 9.4-12 (formerly Table 9-25) of the Final EA/IS have been updated to include additional information related to the construction mitigations for blasting as outlined above.	Final EA/IS Table 9-25 Appendix L Section 7.3.1.1.12.2	1685

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		SAR continues to be prohibited. For awareness, any activities associated with the Marten Falls Community Access Road should consider adverse impacts to Lesser Yellowlegs and Short-eared Owl and their habitat (e.g. nests) if blasting is proposed during the migratory bird nesting period, and seek Project authorization under the ESA or SCA, or register activities under the SCA, as required. Under the SCA, provincial authorization for migratory birds listed on Schedule 1 of the federal Species at Risk Act, 2002 would not be required. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.			
MECP Species at Risk Branch	62	The MFCAR ToR required an assessment of Short-eared Owl survival and reproduction (population state). The Draft EA/IS summarizes the population state of Short-eared Owl to be "self-sustaining and ecologically effective in the effects assessment Regional Study Area at existing conditions." Short-eared Owl is nomadic and Short-	Short-eared Owl was determined to be ecologically effective due to the amount of habitat availability within the Local Study Area and Regional Study Area both pre- and post-construction of the Community Access Road. Sections 7.3.1.21 and 7.3.2.20, and Table 7-21 of Appendix L Birds Technical Support Document outline context for the species habitat.	Comment noted; see response for details.	1686

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		eared Owl populations are prone to annual fluctuations. Based on the information provided it is unclear how the "self-sustaining and ecologically effective" population status was determined, as fixed census projects (such as the Ontario Breeding Bird Atlas) do not adequately sample the species. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and Appendix L as appropriate, to provide additional information detailing how it was determined that the Short-eared Owl population appears to be self-sustaining and ecologically effective.	Short-eared Owl was determined to be self-sustaining and ecologically effective as the residual effects meet the criteria as outlined in Section 4.4 of Appendix L Birds Technical Support Document.		
MECP Species at Risk Branch	63	"Species may be sensitive to sensory disturbance within 500 metres of the disturbance source."; "A total of 9,481.5 ha of high to moderate quality short-eared owl habitat may be indirectly affected within 500 m of the effects assessment Construction Disturbance Area because of sensory disturbance inducing habitat avoidance during Construction."; "Sensory disturbance during Project Operation and Maintenance may have a negative effect on short-eared owl habitat availability if individuals avoid areas with sensory	The availability, quality and distribution of Short-eared Owl habitat is provided in Table 7-21, Section 7.3.1.21 and 7.3.2.20 of Appendix L Birds Technical Support Document. The amount of Short-eared Owl habitat predicted to be impacted by the Community Access Road is provided in Table 7-63 of Appendix L, and is the upper limit of anticipated impacts for all stages of the project.	Comment noted; see response for details.	1687

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		disturbance.”. The MFCAR ToR required an assessment of the availability, quality, and distribution of Short-eared Owl habitat. As it relates to this ToR requirement, the Draft EA/IS characterizes existing conditions (i.e., Section 8.2.6.6), describes the refined existing conditions (i.e., Section 9.4.4.1.6), and identifies residual effects and proposed mitigation and enhancement measures (i.e., Section 9.4.4.4 and Table 9-25), with supporting information in Appendix L. The Draft EA/IS and Appendix L summarizes the anticipated indirect loss of 9,481.5 ha of Short-eared Owl habitat resulting from Construction, but does not include the anticipated area of indirect loss of Short-eared Owl habitat resulting from Operation and Maintenance. For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Short-eared Owl protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nest) and the area immediately around the dwelling place, that may differ			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		from suitable Short-eared Owl habitat currently described in the Draft EA/IS. Although the Draft EA/IS summarizes the direct and indirect loss of potential Short-eared Owl habitat from Construction, the anticipated area of habitat lost indirectly through sensory disturbance during Operation and Maintenance, and subsequent displacement/relocation of Short-eared Owl, is not provided. Provide the anticipated area of indirect Short-eared Owl habitat lost through sensory disturbance during Operation and Maintenance, and subsequent displacement/relocation of the species, to Table 9-25 of the Final EA/IS and Appendix L as required.			
MECP Species at Risk Branch	64	"Uncertainty: Moderate" for residual impacts to "Increase in edge habitat". It is unclear how the uncertainty was determined to be "Moderate". The Draft EA/IS Report provides a definition of uncertainty classified as moderate as "Uncertainty was considered to be moderate if there were baseline data for much of the study area of the ecological knowledge of the Valued Component is adequate to generate habitat models with confident assumptions and predictions supported by the literature,	Section 4.4.2.5 of Appendix L Birds Technical Support Document provides details on how significance was determined for Short-eared Owl. Uncertainty was characterized as moderate as it meets the definition outlined in Section 4.4.2.6 of Appendix L. "Project-related effects are mostly understood" and the incomplete understanding is due to a lack of known predation rates along linear disturbances and how often Short-eared Owl use	Comment noted; see response for details.	1688

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the Project-related effects are mostly understood, and the level of certainty associated with the effectiveness of proposed mitigation measures is moderate to high." (pg. 73, Section 4.4.2.6). Based on the information provided, it is unclear how it was determined there was "Moderate" uncertainty for residual impacts to "Increase in edge habitat-can increase nest predation" to Short-eared Owl, and how this uncertainty resulted in a determination of the residual effect being "Not significant". Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and Appendix L as appropriate, to provide additional information regarding the determination of "Not significant" for residual impacts to "Increase in edge habitat-can increase nest predation" to Short-eared Owl, considering "Moderate" uncertainty, to improve MECP's understanding of the residual impacts of the Marten Falls Community Access Road on Short-eared Owl.	these areas for nesting. Impacts to Short-eared Owl was determined to be not significant as the species is self-sustaining and ecologically effective (Sections 7.3.1.21 and 7.3.2.20 of Appendix L). The Community Access Road is not anticipated to change habitat availability, distribution, or survival/reproduction for Short-eared Owl in the study areas.		
MECP Species at Risk Branch	65	"Species may be sensitive to sensory disturbance within 300 metres of the disturbance source."; "A total of 7,249.9	A description of sensory disturbance to Lesser Yellowlegs as part of Construction and Operations, including a percentage	Comment noted; see response for	1689

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		ha of high to moderate quality lesser yellowlegs habitat may be indirectly affected within 300 m of the effects assessment Construction Disturbance Area because of sensory disturbance inducing habitat avoidance during Construction."; "Sensory disturbance during Project Operation and Maintenance may have a negative effect on lesser yellowlegs habitat availability if individuals avoid areas with sensory disturbance." The MFCAR ToR required an assessment of the availability, quality, and distribution of Lesser Yellowlegs habitat. As it relates to this ToR requirement, the Draft EA/IS characterizes existing conditions (i.e., Section 8.2.6.6), describes the refined existing conditions (i.e., Section 9.4.4.1.6), and identifies residual effects and proposed mitigation and enhancement measures (i.e., Section 9.4.4.4 and Table 9-25), with supporting information in Appendix L. The Draft EA/IS and Appendix L summarizes the anticipated indirect loss of 7,249.9 ha of Lesser Yellowlegs habitat resulting from Construction, but	of area within the Project study areas is outlined in Section 7.3.2.21 of Appendix L Birds Technical Support Document.	details.	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		does not include the anticipated area of indirect loss of Lesser Yellowlegs habitat resulting from Operation and Maintenance. For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Lesser Yellowlegs protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nest) and the area immediately around the dwelling place, that may differ from suitable Lesser Yellowlegs habitat currently described in the Draft EA/IS. Although the Draft EA/IS summarizes the direct and indirect loss of potential Lesser Yellowlegs habitat from Construction, the anticipated area of habitat lost indirectly through sensory disturbance during Operation and Maintenance, and subsequent displacement/relocation of Lesser Yellowlegs, is not provided. Provide the anticipated area of indirect Lesser Yellowlegs habitat lost through sensory disturbance during Operation and Maintenance, and subsequent displacement/relocation of the species, to Table 9-25 of the Final EA/IS and Appendix L as required.			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	66	The MFCAR ToR requires an assessment of cumulative range disturbance. As it relates to this ToR requirement to consider cumulative range disturbance, the Draft EA Report characterizes and quantifies existing conditions (i.e., Section 9.4.5.1.1 of Draft EA Report, Section 4.3.4.2 of Appendix M). However, the cumulative disturbance values for Boreal Caribou referenced in Section 9.4.5.1.1 do not appear to consider all relevant data or spatial scales. The Draft EA/IS Report states, “Habitat for caribou was modelled under existing conditions using ecosite mapping and landcover classes in the caribou effects assessment Regional Study Area, which is the same area for both the existing conditions and effects assessment.” [emphasis added] The above data sets (i.e., ecosite mapping and landcover) are insufficient on their own to adequately identify natural and anthropogenic disturbances; and the use of only these two data sets to inform the assessment of cumulative	Provincial cumulative disturbance mapping methods outlined in the Integrated Assessment Protocol for Woodland Caribou Ranges in Ontario were followed, and the most recent spatial data sets available were used. A detailed description of spatial data sets and buffers associated with disturbance types used in the caribou disturbance calculations is provided in Attachment C of Appendix M Ungulates Technical Support Document. Data sets used included: - Ontario Far North Land cover - Ontario provincial Land Cover 2000 Edition. - A digital elevation model and an esker dataset were obtained from Land Information Ontario (LIO) and Geology Ontario, respectively. - Depletions were obtained from the Ontario Fire Disturbance Area and Forest Resources Inventory datasets. - Linear and point anthropogenic disturbances were obtained from LIO or Geology Ontario and then buffered to account for the direct disturbance footprint of these features so effects would not be underestimated (i.e., a precautionary approach was applied). - The dataset provided by MECP in Comment 67 (below).	Final EA/IS Section 8.2.7.1 Appendix M	1690

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		disturbance is inconsistent with Ontario's approach to mapping and estimating cumulative disturbances for Boreal Caribou. For example, based on the information included in Figure 10-9, it does not appear as though early mineral exploration activities or recent activities associated with the Project or adjacent projects (e.g., groundwater drilling, geotechnical drilling, etc.) within the RSA were included or considered. The provincial cumulative disturbance mapping methods are outlined in Appendix A of the Integrated Assessment Protocol for Woodland Caribou Ranges in Ontario; and include numerous spatial data sets that represent both natural and anthropogenic disturbances and provide a comprehensive and robust approach to mapping cumulative disturbance for Boreal Caribou. As such, MECP SARB encourages the proponent to consider a more robust method to estimating cumulative disturbance within the LSA and RSA. Additionally, the Draft EA/IS Report does not appear to provide estimates of cumulative disturbance (natural disturbances; anthropogenic disturbances + 500 meter buffer) at the	Buffer distances were based on those used in Berglund et al. 2014 and are presented in Table 3 of Attachment C of Appendix M. Mining claims that did not have a footprint associated with them were not included in the existing disturbance calculations which aligns with MECP's Comment 67 (below). Estimates of current and future predicted disturbance (natural and anthropogenic + 500 m buffer) were calculated for the ungulate Local Study Area (LSA) and Regional Study Area (RSA) and for each range (Missisa, Ozhiski, Nipigon and Pagwachuan) and are detailed in Sections 5.1.1, 7.1.1.1, 7.3.1.2.1, and 8.2.1.1 of Appendix M.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		range level (i.e., Missisa, Ozhiski, Nipigon, Pagwachuan). Ontario has adopted a Range Management Approach which recognizes the range-level as the appropriate scale in which to assess Boreal Caribou. As such, MECP SARB recommends the EA/IS Report consider the existing conditions in the context of amount of natural, anthropogenic and total cumulative disturbance within each Range and describe the potential effects of the Community Access Road at the Range scale, in addition to the LSA and RSA scales. For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nursery area, wintering area) and the area immediately around the dwelling place (i.e. 10 km), which differs from the previous General Habitat Description that identified the entire range as habitat and how habitat is currently described in the Draft EA/IS. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		species and habitat. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include: - an updated assessment of natural and anthropogenic disturbances, where anthropogenic disturbances are buffered 500 metres using the best available information consistent with the provincial methodology outlined in Appendix A of the Integrated Assessment Protocol for Woodland Caribou Ranges in Ontario; - a summary of the existing conditions associated with natural, anthropogenic and total cumulative disturbance at the Range scale, in addition to the LSA and RSA scale; - an updated figure (i.e., Figure 10-9) showing cumulative disturbances (i.e., natural and anthropogenic) within the LSA, RSA, and individual caribou ranges; - updates to all relevant cumulative disturbance information in Appendix M - Ungulates (e.g., section 4.3.4.2; section 5.1.1.2; section 7.1.1.1.2; section 7.3.1.2; and section 8.2.1.1.1).			
MECP Species at Risk Branch	67	For awareness Ontario has recently updated estimates of cumulative	Section 8.2.7.1 of the Final EA/IS and Appendix M Ungulates Technical Support	Final EA/IS Section	1691

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		disturbance between 2017 - 2022 for Boreal Caribou in the Missisa and Ozhiski Ranges (unpublished). Below is the total cumulative disturbance (i.e., natural and anthropogenic disturbance including a 500 meter buffer on all anthropogenic disturbances [except operational mining cell claims]) in each range between 2017 - 2022: Year Total Cumulative Disturbance (%) Missisa Ozhiski Nipigon Pagwa-chuan 2011 n/a1 n/a1 37.9 31.0 2012 n/a1 n/a1 38.8 32.9 2013 14.42 27.62 39.0 33.3 2015 11.32 27.02 39.3 33.1 2017 8.5 20.6 40.3 35.3 2018 8.5 21.5 40.5 32.8 2019 8.4 20.9 40.5 33.0 2020 8.4 20.7 40.8 33.2 2021 8.4 20.6 40.9 33.6 2022 8.4 20.5 40.9 33.7 1 Estimates of cumulative disturbance in 2013 and 2015 are considerably higher than those between 2017 to 2022 as a result of generalized mineral claims data available for the earlier estimates which are understood to have over-inflated cumulative disturbance estimates in 2023 and 2015. Estimates generated between 2017 to 2022 incorporated more detailed “operational cell claim” data which	Document have been updated with the updated estimates of cumulative disturbance provided.	8.2.7.1 Appendix M	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		represents an improvement to the earlier estimates. 2Estimates of cumulative disturbance for the Missisa and Ozhiski Ranges in 2011 and 2012 are not available. The above estimates suggest cumulative disturbance: - in the Missisa Range has remained relatively stable between 2017-2022 and has consistently been and is currently below the level that is expected to support a self-sustaining caribou population; - in the Ozhiski Range has remained relatively stable between 2017-2022 and has consistently been and is currently below the level that is expected to support a self-sustaining caribou population; - in the Nipigon Range has remained relatively stable between 2011-2022 and has consistently been and is currently above the level that is expected to support a self-sustaining caribou population; - in the Pagwachuan Range has decreased slightly between 2011-2022 and has consistently been and is currently below the level that is expected to support a self-sustaining caribou population.			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		For awareness, the assessment of potential impacts of the proposed Community Access Road will need to consider the best available information, including the above estimates of cumulative disturbance, during the project authorization process, should an authorization under the ESA or SCA be required. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to consider the recent updated estimates of cumulative disturbance for the Missisa, Ozhiski, Nipigon, and Pagwachuan Ranges for comparative purposes at the range level; and describe what these results suggest in the context of the threshold identified in the Scientific Assessment to Inform the Identification of Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada: 2011 update (Environment Canada, 2011) and provincial policy (i.e., principle 1 of the Range Management Policy in Support of Woodland Caribou Conservation and Recovery).			
MECP Species	68	Additional information is required	MECP Comment 14 stated that “For	Final EA/IS	1692

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
at Risk Branch		regarding the areas identified as "potential new Category 1 travel corridors". The Draft EA/IS Report states, "In the caribou effects assessment Regions Study Area, … Telemetry data identified 5,069,969 hectares of potential new Category 1 travel corridors." This statement should be qualified by specifically identifying if the metric is related to Boreal Caribou, Eastern Migratory Caribou, or was estimated using caribou collar data from both ecotypes. Additionally, recognizing Boreal Caribou and Eastern Migratory Caribou exhibit different seasonal movement patterns (e.g., distance, timing, location etc.), it is not appropriate to identify these areas collectively (i.e., Category 1 travel corridors should be considered separately for Boreal Caribou and Eastern Migratory Caribou). As such, MECP SARB further recommends the Project consider reporting estimated amounts of potential new Category 1 travel corridors for Boreal Caribou and Eastern Migratory Caribou separately.	awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA is scoped to the dwelling place (e.g. nursery area, wintering area) and the area immediately around the dwelling place (i.e. 10 km), which may influence how some or all components of the above will need to be considered under the ESA/SCA." This implies that travel corridors will no longer be identified or protected as Category 1 habitat. The Final EA/IS has been updated to separately identify travel corridors for Boreal and Eastern Migratory Caribou. As a result, the Final EA/IS presents a conservative estimate of the effects on caribou habitat as it assesses effects on travel corridor habitat that is no longer protected under the ESA.	Section 9.4.5.1.1 Appendix M	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to clarify the estimated amount of potential new Category 1 travel corridors; and consider reporting the amount of potential new Category 1 travel corridor habitat separately for Boreal Caribou and Eastern Migratory Caribou.			
MECP Species at Risk Branch	69	Additional mitigative actions should be followed as it relates to Wildlife Attractants and Roadkill. Specifically, in the event of SAR mortalities (e.g., caribou, Wolverine, SAR bats, SAR birds, etc.) due to collisions with equipment or vehicles during construction and/or operation, the contractor and/or operator should report the incident to SAROntario@ontario.ca and the Natural Heritage Information Centre (NHIC) at NHICRequests@ontario.ca. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to expand the proposed	Tables 9.4-9, 9.4-12 9.4-14 (formerly Tables 9-22, 9-25 and 9-27) of the Final EA/IS have been updated to include a commitment that in the even of Species at Risk (SAR) mortalities (e.g., caribou, wolverine, SAR bats, SAR birds) due to collisions with equipment or vehicles during construction and/or operation, the contractor and/or operator should report the incident to SAROnatrio@ontario.ca and the Natural Heritage Information Centre (NHIC) at NHICRequests@ontario.ca.	Final EA/IS Tables 9-22, 9-25 and 9-27	1693

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		mitigation and enhancement measures to include suggested reporting.			
MECP Species at Risk Branch	70	MECP SARB acknowledges the proposed mitigation measure which states, “Blasting will be suspended within 10 kilometers of known or potential caribou Category 1 areas during sensitive periods to minimize sensory disturbances (nursery areas: May 1 to July 14 very low tolerance, July 15 to September 15 low tolerance; winter use areas: December 1 to March 31; MNR 2013b,c). If timing windows cannot be adhered to, follow environmental approval conditions, permits, or authorizations issued for the Project, including those issued from Environment and Climate Change Canada, Ontario Ministry of Environment, Conservation and Parks and Ontario Ministry of Natural Resources.” MECP SARB strongly encourages the Project Team to avoid blasting and other activities that are likely to result in a sensory disturbance to Caribou during the respective sensitive time periods (i.e., nursery areas: May 1 to September 15; winter use areas: December 1 to March 31). If blasting within 10 kilometers of a Caribou nursery area or winter use area	It is acknowledged that the Community Access Road activities that may result in a sensory disturbance to caribou during sensitive time periods, including blasting, may require authorization under the Endangered Species Act or Species Conservation Act.	Comment noted; see response for details.	1694

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		during the sensitive time periods as stated above cannot be avoided during the respective sensitive time periods, impacts to Caribou are likely to occur and a project authorization under the ESA or SCA will be required. No action required.			
MECP Species at Risk Branch	71	MECP SARB acknowledges the proposed mitigation measure which states, "A buffer zone will be placed around the perimeter of blasting activities and surrounding forested habitat. Blasting will be prohibited if large mammals (such as, moose and / or caribou) are observed within 500 metres from the blasting location. Pre-blasting surveys will be developed in the Environmental Protection Plan and followed." Noise disturbance can result in short-term behavioural and physiological responses of individual boreal caribou, including a startle response, elevated heart rate, and production of glucocorticoids (i.e., steroid hormone in response to stress). Sustained or repeated disturbance can result in avoidance of areas and the reduction in use of suitable habitat (ECCC 2020;	Monitoring programs during construction and operation including pre-blasting surveys will be determined during the permitting phase in collaboration with local existing environmental advisory committees and regulators. It is acknowledged that the Community Access Road activities that may result in a sensory disturbance to caribou, including blasting, may require authorization under the Endangered Species Act or Species Conservation Act.	Comment noted; see response for details.	1695

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Sapolsky, 1992; Creel et al., 2002). Existing literature suggests Caribou reactions to noise/vibration producing activities is highly variable and ranges from no response to panicked reactions depending on a variety of factors (e.g., distance, level of noise, existing exposure, type of activity, etc). Depending on the specific details associated with the proposed blasting activities (e.g., timing, duration, terrain, size of explosives, etc.), Caribou greater than 500 metres from the blasting activities may be negatively affected. Additionally, further detail is required on the proposed pre-blasting surveys that will be developed in the Environmental Protection Plan. The development of pre-blasting surveys should consider alternative approaches to monitoring during the: - Winter (e.g., aerial transect flights spaced 500 m apart up to 10 km of the blasting location; review of all active collared caribou, etc.); and - Spring/summer/fall (e.g., combination of ground surveys and/or aerial surveys, review of all active collared caribou, etc.) Regardless of the methodology			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		developed, the proposed pre-blasting surveys are unlikely to definitively confirm presence/absence of Caribou, or other species at risk (e.g., Wolverine, SAR Bats and Birds, etc.), within or greater than 500 m from the blasting activities. Consequently, there remains potential for the proposed blasting activities to result in sensory effects and displacement of Caribou and other species at risk during the time in which activities are being carried out; and depending on the cumulative nature of the blasting and other activities in the region there is potential for cumulative effects which may displace Caribou and other species at risk from their habitat within and/or near the proposed Community Access Road in the short to long term. For awareness, where the effects of blasting on Caribou (and other species at risk, such as Wolverine and species at risk bats and birds) cannot be avoided, an authorization under the ESA or SCA will likely be required. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to consider a broader distance than 500 meters; and incorporate, as appropriate, in the development of the pre-blasting surveys and Environmental Protection Plan. Additionally, please consider in project activities that result in a sensory disturbance to Caribou may require Project authorization under the ESA or SCA.			
MECP Species at Risk Branch	72	The Draft EA/IS Report states the Project route will be located "… in such a way that minimizes overlap with sensitive habitats to the extent feasible, including provincially identified Category 1 areas for caribou (nursery areas, winter use areas, travel corridors; Government of Ontario, 2013a), areas which contain biophysical habitat attributes for caribou (Environment and Climate Change Canada 2020), and significant wildlife habitat for moose." Note, Project routing should also consider areas identified as "potential" Caribou habitat based on all available information (e.g., caribou collaring data), including nursery areas and winter use areas, where possible.	The Final EA/IS has been updated to note that the Preferred Community Access Road route will be located in such a way that minimizes overlap with sensitive habitats to the extent feasible, including provincially identified (known) Category 1 areas and potential new Category 1 areas as identified as part of the Final EA/IS.	Final EA/IS Section 4	1696

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices, as follows (proposed changes in bold): "Locate the Project route in such a way that minimizes overlap with sensitive habitats to the extent feasible, including provincially identified known and potential Category 1 areas for caribou (nursery areas, winter use areas, travel corridors; Government of Ontario, 2013a), areas which contain biophysical habitat attributes for caribou (Environment and Climate Change Canada 2020), and significant wildlife habitat for moose."			
MECP Species at Risk Branch	73	The Draft EA/IS Report states, "The Project construction schedule will avoid activities during the sensitive timing windows for caribou (May 1 to September 15 for nursery areas, December 1 to March 31 for winter use areas) in known and potential new Category 1 areas, to the extent practical. When activity restrictions cannot be followed, the Ministry of Environment, Conservation and Parks will be engaged to determine alternative approaches." [emphasis added]	Table 9.4-14 (formerly Table 9-27) of the Final EA/IS has been updated to revised this mitigation as follows: - The Project construction schedule will avoid activities during the sensitive timing windows for caribou (May 1 to September 15 for nursery areas, December 1 to March 31 for winter use areas) within 10 km of known and potential new Category 1 areas, to the extent practical. When activity restrictions cannot be followed, the Ministry of Environment, Conservation and Parks	Final EA/IS Table 9-27	1697

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Note, MECP SAR also recommends avoiding Project construction activities likely to result in a sensory disturbance within 10 km of known and potential new Category 1 areas, including nursery areas and winter use areas. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to specify the Project construction schedule will also avoid activities during the sensitive timing windows for Caribou within 10 km of known and potential new nursery areas and wintering areas.	will be engaged to determine alternative approaches.		
MECP Species at Risk Branch	74	The Draft EA/IS Report concludes effects of construction, operation and maintenance related to Habitat Loss and Habitat Alteration are low magnitude and not significant in the RSA and Missisa range, Ozhiski range, and Pagwachuan range. However, it's unclear how the Project Team arrived at this conclusion given the conclusions made for other factors considered in the predicted residual effects (i.e., continuous, long term, irreversible, certain, etc.).	Section 7.3.1.2.1 of Appendix M Ungulates Technical Support Document provides a detailed assessment, including references, of the effects of construction, operation and maintenance of the Community Access Road related to habitat loss and habitat alteration.	Comment noted; see response for details.	1698

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Additional rationale and justification, including literature references, need to be provided for the conclusion that the construction, operation, and maintenance of the Project will not have a moderate to high magnitude effect and is not significant, particularly with consideration that the Project will impact Category 1 habitat for a threatened species at risk. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include rationale and justification, including literature references, for conclusions made on the predicted residual effects of construction, operation, and maintenance as it relates to Habitat Loss and Habitat Alteration for Caribou (Boreal population). Alternatively, reconsider the assessment of predicted residual effects of construction, operation, and maintenance as it relates to Habitat Loss and Habitat Alteration for Caribou (Boreal population).			
MECP Species at Risk Branch	75	The MFCAR ToR includes a commitment to identify the direct and indirect effects of the Project (Section 10.2.5).	The values presented in Section 10.2.5 were calculated based on the footprint plus a 500 m buffer to account for both	Final EA/IS Section 10.2.5	1699

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The Draft EA/IS Report states, “The Construction of the Project will directly remove 17,476 hectares of known and potential new Category 1 habitat, a change of -6.6 percent relative to the available Category 1 habitat in the ungulate effects assessment Local Study Area in the existing environment and -0.2 percent relative to the available Category 1 habitat in the caribou effects assessment Regional Study Area in the existing environment. The loss of Category 1 habitat occurs in the Missisa range (16,901 hectares) and in the Nipigon range (575 hectares). As a result, a low magnitude of change to habitat availability, distribution, and survival and reproduction is predicted in the Caribou Regional Study Area and in the Missisa range, and a moderate magnitude of change is predicted in the Nipigon range, relative to existing conditions.” [emphasis added] However, it appears these areas were calculated using only the direct physical construction footprint within known and potential nursery areas and winter use areas; and did not consider the total amount of area within nursery areas and winter use areas in which the function of	direct and indirect effects as described in Section 7.3.1.2 of Appendix M Ungulates Technical Support Document. Section 10.2.5 has been updated to clarify how the values were calculated.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		those habitat components are likely to be impaired by indirect effects of the Project (i.e., sensory disturbances) and therefore avoided by Caribou during both construction, operation, and maintenance. As per Section 10.2.5 of the Terms of Reference, the EA/IS Report should consider the total amount of habitat directly and indirectly impacted by the Project. Furthermore, the Draft EA/IS Report states the significance of these impacts are “Long term and Irreversible” and “Not Significant” for the Caribou Regional Study Area, Missisa range, Ozhiski range and Pagwachuan range. However, if the above effects assessment of the amount of nursery areas and winter use areas that will be impacted were to also consider indirect effects of the Project, it is likely that habitat loss with the RSA, LSA and individual ranges as a result of the construction of the Project will be significant. Please note, this applies to both Habitat Loss and Habitat Alteration. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		and associated Appendices as appropriate, to include consideration for additional areas of nursery areas and winter use areas that will be indirectly impacted by sensory disturbances associated with the construction, operation and maintenance activities; and re-assess if/how this affects the magnitude and significance of the effects of the Project, while considering these effects are long term and irreversible.			
MECP Species at Risk Branch	76	The Draft EA/IS Report concludes effects of construction, operation and maintenance related to Sensory Disturbance are low magnitude of change to habitat availability, distribution, and survival and reproduction; and is not considered significant. However, it's unclear how the Project Team arrived at this conclusion given the conclusions made for other factors considered in the predicted residual effects (i.e., continuous, long term, irreversible, certain, etc.); and existing evidence which indicates long term sensory disturbances impair the function of habitat and result in avoidance. Additional rationale and justification, including literature references, need to be provided for the conclusion that the	Section 7.3.1.2.2 of Appendix M Ungulates Technical Support Document includes a detailed assessment and associated literature references of the effects of construction, operation and maintenance of the Community Access Road related to sensory disturbance for caribou.	Comment noted; see response for details.	1700

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Sensory Disturbance associated with construction, operation, and maintenance of the Project will not have a moderate to high magnitude effect and is not significant, particularly with consideration that the Project will impact Category 1 habitat for a threatened species at risk. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include rationale and justification, including literature references, for conclusions made on the predicted residual effects of construction, operation, and maintenance as it relates to Sensory Disturbance for Caribou (Boreal population). Alternatively, reconsider the assessment of predicted residual effects of construction, operation, and maintenance as it relates to Sensory Disturbance for Caribou (Boreal population).			
MECP Species at Risk Branch	77	The Draft EA/IS Report concludes effects of construction, operation and maintenance related to Increased Predator Access will have a negligible magnitude of change to survival and reproduction within the RSA and are not	Section 7.3.1.2.4 of Appendix M Ungulates Technical Support Document includes a detailed assessment and associated literature references of the effects of construction, operation and maintenance of the Community Access	Comment noted; see response for details.	1701

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		significant. It appears the Project Team has relied on the limited change in linear feature density at the RSA scale and associated ratio of linear feature densities per square kilometer at which predation is expected to have a limiting effect on Caribou populations. However, the known effects of linear features on Caribou as a result of increased predator efficiency, the current status of Caribou as threatened, and the conclusions made for other factors considered in the predicted residual effects (i.e., continuous, long term, irreversible, certain, etc.) may suggest the effects of new linear features, particularly a permanent road, are greater than negligible magnitude and are significant. Additionally, the estimates of linear feature density should be made at the range scale; and recognize there are other linear features within the Ring of Fire area in Missisa Range related to early exploration mining activities (e.g., trails, line cutting) which are not available spatially. As such, it is likely the estimate of linear feature density within the Missisa range will be higher than available information suggests. Additional rationale and justification,	Road related to increased predator access for caribou.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		including literature references, need to be provided for the conclusion that the Increased Predator Access associated with construction, operation, and maintenance of the Project will not have a moderate to high magnitude effect and is not significant, particularly with consideration existing evidence on the association of linear features and increased predator efficiency. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include rationale and justification, including literature references, for conclusions made on the predicted residual effects of construction, operation, and maintenance as it relates to Increased Predator Access for Caribou (Boreal population). Alternatively, reconsider the assessment of predicted residual effects of construction, operation, and maintenance as it relates to Increased Predator Access for Caribou (Boreal population).			
MECP Species at Risk Branch	79	The Draft EA/IS Report concludes effects of operation and maintenance related to Increase in Public Access are low	Section 7.3.1.2.5 of Appendix M Ungulates Technical Support Document includes a detailed assessment and	Comment noted; see response for	1702

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		magnitude and not significant. However, it's unclear how the Project Team arrived at this conclusion given the conclusions made for other factors considered in the predicted residual effects (i.e., continuous, long term, irreversible, high degree of uncertainty, etc.). Additional rationale and justification, including literature references, need to be provided for the conclusion that the Increase in Public Access associated with operation and maintenance of the Project will not have a moderate magnitude effect and is not significant, particularly recognizing there is no mandatory or voluntary reporting for Indigenous harvest, so harvest estimates and impacts from Indigenous hunting are difficult to determine. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include rationale and justification, including literature references, for conclusions made on the predicted residual effects of operation and maintenance as it relates to Increase in Public Access for Caribou (Boreal population).	associated literature references of the effects of operation and maintenance of the Community Access Road related to increased public access for caribou.	details.	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Alternatively, reconsider the assessment of predicted residual effects of operation and maintenance as it relates to Increase in Public Access for Caribou (Boreal population).			
MECP Species at Risk Branch	80	The Draft EA/IS Report states, “Minimize or avoid the use of eskers or similar geological features for aggregate resources by using bedrock quarries or other sand and gravel resources whenever possible.” [emphasis added] Eskers have been shown to be positively selected by Boreal Caribou in the Far North of Ontario (Berglund et al. 2014). Based on the information provided, it appears suitable aggregate source are limited within the LSA and esker are anticipated to provide suitable aggregate material. MECP SARB notes that the Draft EA/IS Report already identifies the Project is anticipated to disturb 5 out of 16 eskers present in the RSA, or 31%. Additional information is necessary to describe how the Project Team will balance the need for aggregate material to construct the road and Caribou habitat considerations.	Mapping of eskers is provided in Appendix N Physiography, Terrain and Soils Technical Support Document. Detailed mapping identified five eskers (sinuous low ridges composed of glaciofluvial sand and grave) in the Construction Disturbance Area, and published surficial geology mapping at a scale of 1:1,000,000 identified five additional unconfirmed eskers in the Physiography, Terrain and Soils Regional Study Area (RSA). Only esker landforms within the Construction Disturbance Area may be disturbed as a potential aggregate (pit) resource; eskers outside the Construction Disturbance Area will not be disturbed. Field studies are currently being conducted to verify the soil type of ridged landforms to determine suitability for aggregate sources. Based on previous borehole studies, it is anticipated that some ridged landform areas identified as eskers on published surficial geology	Comment noted; see response for details.	1703

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a description of how the Project will consider Boreal Caribou and their habitat as it relates to eskers and in identification of aggregate resources.	mapping may actually be clay and silt, rather than sand and gravel as outlined in Section 5.5.2 of Appendix N. A comprehensive inventory of proposed borrow sources, including location maps, estimated volumes, material types and confirmation for suitability through preliminary geotechnical investigations will be completed for the purposes of aggregate licensing through Ministry of Natural Resources. An application for proposed pits will be submitted and will follow the Aggregate Resources of Ontario: Provincial Standards, Version 1.0, including notifications and consultation. Alternative aggregate sources from bedrock quarries or sand and gravel glacial fluvial deposits that are not esker landforms will be prioritized for use. The Ungulate Local Study Area (LSA) includes the Construction Disturbance Area plus a 10 km buffer. Existing baseline disturbances in the Ungulate LSA were estimated to be 21.3% as outlined in Table 7-2 of Appendix M Ungulates Technical Support Document. Predicted cumulative disturbance estimates within the the Missisa, Ozhiski, Nipigon and Pagwachuan ranges are 8.4%, 20.5%, 40.9% and 33.7%,		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			respectively and include information provided by Ministry of Environment, Conservation and Parks in Comment 67 (above). Given that 76% of the Ungulate LSA is within the Missia range (8.4% cumulative disturbance estimate), it is assumed that disturbance of up to five eskers within the Construction Disturbance Aera will retain sufficient remaining biophysical attributes (e.g., other eskers, islands, lakeshores, treed muskeg, lichen rich mature forests) for caribou to carry out life processes such as calving and winter habitat.		
MECP Species at Risk Branch	81	The approach to determining significance of residual effects of the Community Access Road on species at risk addressed in sections 9.4.7.2.1 (i.e., Bats), 9.4.7.2.2 (i.e., Wolverine), and 9.4.7.4.1 (i.e., Caribou) in the Draft EA/IS Report is unclear. Section 9.3.6.1 describes the assessment of significance for each discipline in Water Groupings as: - “Significant: residual effects were considered to be significant if the majority of the residual effects characteristics were assessed as high in magnitude and long-term or permanent in duration, at any geographic extent, or they	Section 4.4.2.6 of Appendix M Ungulates Technical Support Document includes a description of the approach and methods for determination of significance for caribou and moose.	Comment noted; see response for details.	1704

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		represented a management concern; and - Not Significant: residual effects were considered not significant if they demonstrated any other combination." However, Section 9.4.7 does not include a similar/comparable description of the assessment of significance for each discipline in Land Groupings, nor a clear description of how the "Residual Effects Characteristics" outlined in Table 6-1 of the Draft EA/IS Report are considered individually and combined. MECP SARB encourages the Project Team to consider residual effects for species at risk associated with specific environmental interactions as significant in a comparable manner to Water Groupings (i.e., if the majority of the residual effects characteristics were assessed as high in magnitude and long-term or permanent in duration, at any geographic extent, or they represented a management concern). For example, any activities that are likely to kill or harm a species at risk, or damage or destroy their habitat, may represent a relevant management concern and should be considered significant. Please update this section of the Final			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a clear description of how the significance of residual effects of the Community Access Road on each discipline in the Land Groupings, specifically species at risk, is being determined. Specifically, this should clearly describe how the "Residual Effects Characteristics" outlined in Table 6-1 of the EA/IS Report are considered individually and combined.			
MECP Species at Risk Branch	82	Additional rationale is required describing why magnitude and geographic extent were considered the most important factors when determining the significance of residual effects of the Community Access Road. The Draft EA/IS Report states, "The assessment of significance of residual effects of the Community Access Road is informed by the interaction between the significance factors, with magnitude and geographic extent being the most important factors." [emphasis added] The other residual effects characteristics	Additional rationale and justification for why magnitude and geographic extent are the most important factors in the assessment of significance has not been added as this comment is considered recommended	Comment noted; see response for details	1705

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		listed in Table 6-1 of the Draft EA/IS Report include context, direction, duration, frequency, and reversibility. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include rationale and justification for emphasizing magnitude and geographic extent as being the most important factors.			
MECP Species at Risk Branch	83	Potential copy/paste error. Section 9.4.7 of the Draft EA/IS Report states, “Implementation of proven mitigation measures is expected to aid in the avoidance or reduction of the magnitude, geographic extent, and / or duration of residual effects on surface water, fish and fish habitat, groundwater and geochemistry, and peatlands.” [emphasis added] However, Section 9.4.7 is associated with the “Land” Grouping, not the “Water” Grouping; and should likely read as follows in bold: “Implementation of proven mitigation measures is expected to aid in the	Section 9.4.7 of the Final EA/IS has been updated as follows: “Implementation of proven mitigation measures is expected to aid in the avoidance or reduction of the magnitude, geographic extent, and / or duration of residual effects on vegetation, wildlife, birds, ungulates, and physiography, terrain and soils.”	Final EA/IS Section 9.4.7	1706

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		avoidance or reduction of the magnitude, geographic extent, and / or duration of residual effects on vegetation, wildlife, birds, ungulates, and physiography, terrain and soils." Please update the Final EA/IS Report, as appropriate.			
MECP Species at Risk Branch	84	The Draft EA/IS Report states, "Residual effects on caribou due to sensory disturbance, increased predator access, increase in public access, collisions with vehicles and equipment, changes in groundwater, and fugitive dust emissions were determined to be not significant (Table 9-27)." As per previous comments, MECP SARB is seeking additional rationale and justification, including literature references, to substantiate these conclusions, specifically as it relates to sensory disturbance, increased predator access, increase in public access, collisions with vehicles and equipment. Considering all relevant effects characteristics (i.e., context, magnitude, extent, duration/reversibility, frequency, likelihood), the predicted residual effects associated with these specific environmental interactions appear	Section 7.3 of Appendix M Ungulates Technical Support Document provides a detailed assessment including rationale, justification, and literature references of the effects of construction, operation and maintenance of the Community Access Road related to sensory disturbance, increased predator access, and collisions with vehicles and equipment for caribou.	Comment noted; see response for details.	1707

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		significant for Caribou (Boreal population). Please update the Final EA/IS Report as appropriate.			
MECP Species at Risk Branch	85	The Draft EA/IS Report states, "The small incremental increase in habitat disturbance from the Community Access Road (3,951 hectares, which represents a 0.3 percent increase in anthropogenic disturbance in the range relative to existing conditions) will contribute to the existing significant effect of habitat loss and alteration in the Nipigon range. however, the loss of habitat is predicted to have little to no influence on survival and reproduction at the population level." [emphasis added] This statement is not consistent with the residual effects of the Project, or the conclusions made by the Project Team regarding the significance of the residual effects. As noted in the Draft EA/IS Report, the Nipigon range is currently below the established threshold of 65 percent undisturbed habitat that is considered necessary to support a self-sustaining population. Consequently, any increases, even relatively small ones, further decrease the likelihood of a stable	The Nipigon range is below the threshold 65% undisturbed habitat and as such the effect of habitat loss within the Nipigon range was assessed as significant as outlined in Section 7.3.3 of Appendix M Ungulates Technical Support Document. An increase of 0.3 % disturbance within the Nipigon range is unlikely to result in a measurable change in survival and reproduction at the population level relative to the existing conditions within the range and additional rationale is provided in Section 7.3.1.2 of Appendix M.	Comment noted; see response for details.	1708

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		or increasing population. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include broader consideration of the predicted effects of the Project on survival and reproduction at the population level.			
MECP Species at Risk Branch	86	The Draft EA/IS Report states, "Caribou collared for this Community Access Road and in previous research in northern Ontario have demonstrated behavioural plasticity in ecotypes and their movements between habitats." [emphasis added] This statement is a broad generalization and should be quantitatively and/or qualitatively described (e.g., how many collared individuals demonstrated behavioural plasticity in ecotypes); and should include reference to specific studies, reports, and/or literature to substantiate the statement. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as	Sections 5.1.2.2 and 5.1.3.1 of Appendix M Ungulates Technical Support Document provide a qualitative discussion on behavioural plasticity including literature references. The Final EA/IS and Appendix M have been updated to clarify which caribou switched ecotypes during the time period of the study.	Final EA/IS Section 9.4.7.4.1 Appendix M	1709

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to include a quantitative and/or qualitative description of the observed behavioural plasticity, including reference to specific studies, reports, and/or literature.			
MECP Species at Risk Branch	87	The Draft EA/IS Report states, "Other studies have detected variation in the responses of caribou to linear developments from strong avoidance to degrees of habituation and adaptive capacity to travel across roads." [emphasis added] Additional information, including literature references, should be provided to support this statement. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include additional information, including literature references, to support this statement.	Section 5.1.2.3 of Appendix M Ungulates Technical Support Document provides detailed information, including literature references, about current understanding of caribou responses to linear features.	Comment noted; see response for details.	1710
MECP Species at Risk Branch	88	The Draft EA/IS Report states, "… it is anticipated that naive caribou may exhibit strong avoidance behaviours during construction and operations of the Community Access Road."	Section 7.3.1.2.3 of Appendix M Ungulates Technical Support Document provides detailed information, including literature references, regarding potential effects of linear barriers on caribou.	Comment noted; see response for details.	1711

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Additional information, including literature references, should be provided to support this statement. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include additional information, including literature references, to support this statement.			
MECP Species at Risk Branch	89	Interpreting which Project in Table 10-1 was included in each disciplines cumulative effects assessment is difficult and requires cross-referencing with Appendix E, which is not identified in Section 10.1 of the Draft EA/IS Report. Additionally, Table 10-1 only includes consideration of Temporal Overlap with the Marten Falls Community Access Road, but does not appear to consider the Spatial Overlap or consistently indicate if the Project(s) are reasonably foreseeable. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to identify the complete list	The information requested is included in Table 10.2-2, Table 10.3-3 and Table 10.4-2 (formerly Table 10-3, Table 10-7, and Table 10-9) of the Final EA/IS. The following sentence has been added to Section 10.1 of the Final EA/IS to provide clarify on wording: "A summary of projects included in each discipline assessment, spatial and temporal overlap, and identification if a project or activity is reasonably foreseeable is included in Tables 10.2-2, Table 10.3-3 and Table 10.4-2 ."	Final EA/IS Section 10.1	1712

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		of Projects that were included in each disciplines cumulative effects assessment found in Appendix E. Additionally, update Table 10-1 in the Final EA/IS Report to include: - a column that identifies if the Project was included in one or more disciplines cumulative effects assessments (yes or no); and if possible, list which disciplines the Projects are included in. - a column that identifies if the Project is assumed to spatially overlap with the Community Access Road Activities (yes or not). - a column that identifies if the Project is reasonably foreseeable.			
MECP Species at Risk Branch	90	Table 10-1 indicates several Projects that were “not included in the cumulative effects assessment as it is a deposit and not an active project”. However, the following Projects have been ongoing for several years and/or are reasonably foreseeable; and should be included in the cumulative effects assessment for the “Wildlife” valued component, specifically as it relates to Caribou (Boreal population) and Wolverine: - Juno Corporation Mining Exploration Activity - Seymour Lake Lithium Project (overlaps	The project inclusion list has been updated to include Juno Corporation Mining Exploration Activity, and Seymour Lake Lithium Project as outlined in Table 10-1 of the Final EA/IS. All effects assessments for Valued Components (VC) have been updated to consider the updated project inclusion list as they relate to the VC study areas, including Appendix K Wildlife Technical Support Document and Appendix M Ungulates Technical Support Document.	Final EA/IS Section 10 Appendix K Appendix M	1713

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the Caribou Regional Study Area) - Black Bird Project - Big Daddy Project - Black Label Project - Black Thor Project Caribou (Boreal population) and Wolverine are both wide-ranging, landscape species with large home ranges and activities associate with the above Projects are reasonably foreseeable, overlap with the MFFN CAR Regional Study Areas for each species (for most Projects listed above), and have been occurring and/or will continue to occur during construction, operation and maintenance phases. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include Juno Corporations mining exploration activities in the cumulative effects assessment for Caribou (Boreal population) and Wolverine; and any of the other projects, as appropriate.			
MECP Species at Risk Branch	91	“In addition, the effects related to climate change are uncertain but are mostly assumed to have an adverse influence on bat habitat.”; Valued Component:	Section 10.3.3 of the Final EA/IS and Section 8.2.2.1.2.3 of Appendix K Wildlife Technical Support Document have been updated with additional details on climate	Final EA/IS Section 10.3.3 Appendix K	1714

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Bats: Predicted Residual Effect (Habitat Loss and Alteration): “Magnitude: Low”, “Significance: Not Significant” The MFCAR ToR required an assessment of the change or disruption in Little Brown Myotis and Northern Myotis habitat distribution and survival and reproduction (population state). The Draft EA/IS summarizes the cumulative effects of reasonably foreseeable developments on alteration/removal of suitable bat maternity roost habitat, including the uncertain, but assumed adverse, impacts of climate change (Section 10.3.3, Table 10-7). This informed the magnitude and determination of significance of residual effects summarized in Section 10.3.7 Table 10-7 of the Draft EA/IS. It is unclear if the cumulative effects assessment of bat habitat loss and alteration associated with climate change included reproductive declines and reduced survival in dryer years; effects that are expected to be irreversible in the long-term. For awareness, under the recent amendments to the ESA and creation of	change related effects on Little Brown Myotis and Northern Myotis survival and reproduction. Appendix K has also been updated to include a discussion of the potential effects of climate change influences to patterns of precipitation and the occurrence of drought on the survival and reproduction of these bat species.	Section 8.2.2.1.2.3	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the new SCA, habitat for species at risk bats protected under the amended ESA/SCA is scoped to the dwelling place (e.g. maternity roost) and the area immediately around the dwelling place, and habitat used for foraging is not protected under the amended ESA/SCA. This may differ from suitable species at risk bat habitat currently described in the Draft EA/IS. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and Appendix K as appropriate, to include additional detail with respect to climate change-related effects on species survival and reproduction (population state).			
MECP Species at Risk Branch	92	"Considering the above-mentioned effects from the Project and past, present and reasonably foreseeable developments, the predicted magnitude of effects on little brown myotis and northern myotis are predicted to range from negligible to low… After development of the Project and past, present and reasonably foreseeable developments, the weight of evidence from the analysis predicts that the changes to little brown myotis and	Mitigations to limit the effects of the Community Access Road on Little Brown Myotis and Northern Myotis are well understood and the methods have been demonstrated to be effective, however, the uncertainty associated with the population state of these two bat species is acknowledged. Therefore, the prediction confidence and uncertainty has been revised to moderate. The original assessment of magnitude	Final EA/IS Section 10.3.3	1715

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		northern myotis habitat availability, distribution, and population survival and reproduction are expected to remain within the resilience and adaptability limits of the regional populations in the wildlife effects assessment Regional Study Area. Therefore, the cumulative effects on little brown myotis and northern myotis after implementation of the Project and the other reasonably foreseeable developments are predicted to be not significant." The MFCAR ToR required an assessment of Little Brown Myotis and Northern Myotis survival and reproduction (population state). The Draft EA/IS summarizes that the effects assessment for bats includes the consideration of ecological context in determination of magnitude and significance of residual effects: "Integrating ecological context to understand the point at which a given magnitude is large enough to be critical for a valued component is directly linked to the self-sustaining and ecologically effective status of the…population and therefore directly linked to significance." (Section 9.4.2.3). Self-sustaining and ecologically effective populations are	and the conclusions of the significance determination have been reviewed, and have been determined appropriate for the following reasons as outlined in Appendix K Wildlife Technical Support Document: - Population State and Regional Context: While it is acknowledged that the populations of these bat species have experienced declines due to white-nose syndrome, the assessment considered the best available information, including evidence that some populations are stable or slightly increasing in certain regions. The assessment explicitly recognized the vulnerability of these bat species which was incorporated into the evaluation of magnitude and significance. - Magnitude Determination: The determination of magnitude was based on the proportion of habitat affected, the availability of alternative roosting sites, and the expected impact at the population level within the Wildlife Regional Study Area (RSA). Although the loss of maternity roost habitat is anticipated to result in a measurable decrease in bats in the Wildlife Local Study Area (LSA), the change within the RSA is predicted to be low		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		defined as “populations that would be maintained into the future without the need for immigration of individuals from other populations.” (Appendix K, Section 4.4.2.6), indicating that a stable or positive population trend is required for populations to persist. Population trend is determined through population metrics such as reproductive output and survival rates. The Draft EA/IS summarizes the population state of Little Brown Myotis and Northern Myotis in Appendix K, Section 5.1.3 as follows: • “Little brown myotis and northern myotis are listed as endangered…on the provincial Endangered Species Act.”. This indicates the species are at risk of extinction or extirpation throughout all or a significant portion of its Ontario range if the limiting factors are not reversed (MNR 2019). • Appendix K, Section 5.1.3 summarizes that the species have generally low population numbers due to white nose syndrome, mean annual survival <1, and a low reproductive output (1 pup/annually) that declines with increasing latitude. These metrics would point to a decreasing population trend. • “However, some little brown myotis	in magnitude and will not significantly influence the ability of bats to be self-sustaining and ecologically effective. The Community Access Road is not expected to increase the risk or spread of white-nose syndrome. - Assessment Framework and Precautionary Approach: The effects assessment for bats was conducted using the approach described in Section 4.4.2.6 of Appendix K. Effects were classified as significant if they are likely to compromise the ability of the population to remain self-sustaining and ecologically effective within the RSA.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		populations in some white nose syndrome-affected areas have shown to be stable or slightly increasing, albeit at much lower numbers than pre-white nose syndrome populations." Although individual survival has increased in these populations, it remains unclear if this is sufficient for the species to rebound from white-nose syndrome (Auteri and Knowles 2020), and increased survival is not sufficient to support a positive growth trend (Humphrey and Fotherby 2020). • "It is unknown whether populations of northern myotis and little brown myotis that overlap with the existing conditions Regional Study Area are decreasing, and it should therefore be assumed that these populations are stable but vulnerable." Population trend uncertainty may be more appropriate than concluding Little Brown Myotis and Northern Myotis populations are stable but vulnerable. Based on the uncertainty associated with Little Brown Myotis and Northern Myotis population state, consider revising the "stable but vulnerable" classification of Little Brown Myotis and Northern Myotis population trends in this assessment to "uncertain" or "unknown", and incorporate to the bats effects			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		assessment through consideration of ecological context in determination of magnitude and significance of residual effects in the Final EA/IS.			
MECP Species at Risk Branch	93	The Draft EA/IS Report states, "The Project and the other reasonably foreseeable developments are predicted to remove 73,145 hectares of previously undisturbed habitat for wolverine." It appears this area was quantified based on the direct physical construction footprint of the Community Access Road and other foreseeable developments. However, MECP SARB encourages the Project Team to also consider the total area of Wolverine habitat likely to be impaired (i.e., functional habitat loss) as a result of indirect effects (e.g., sensory disturbance) resulting in avoidance. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include consideration for the total area of Wolverine habitat likely to be impaired (i.e., functional habitat loss) as a result of indirect effects (e.g., sensory disturbance).	A qualitative assessment of sensory disturbance to wolverine during construction and operations is outlined in Section 7.3.3.3.2 of Appendix K Wildlife Technical Support Document.	Comment noted; see response for details.	1716

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	94	MECP SARB encourages the Project Team to reconsider the cumulative effects assessment of magnitude associated with “sensory disturbances” and “increase in public access” as negligible to low. Specifically, based on the information provided in the Draft EA/IS Report and Appendix K – Wildlife including direct and indirect effects as a result of sensory disturbances to the function of Wolverine habitat, including denning areas, the weight of evidence demonstrating the effects of incidental trapping on Wolverine survival and reproduction, and Wolverines naturally low densities and reproductive rates, it is likely more appropriate to identify the magnitude of “sensory disturbances” and “increase in public access” from the Community Access Road, other reasonably foreseeable developments, and climate change as moderate to high. This would further support and validate the Project Team’s conclusion that the cumulative effects associated with the Community Access Road, other reasonably foreseeable developments, and climate change is significant. MECP SARB encourages the Project Team to reconsider the cumulative effects assessment of magnitude	Based on the weight of evidence and the feedback received from Ministry of Environment, Conservation and Parks (MECP), the magnitude of the cumulative effects of an increase in public access and sensory disturbance on wolverine have been reconsidered and revised to be characterized as moderate rather than low. Section 10 of the Final EA/IS and Appendix K Wildlife Technical Support Document have been updated to include the revised magnitude and rationale for the revised magnitude characterization.	Final EA/IS Section 10 Appendix K	1717

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		associated with “sensory disturbances” and “increase in public access”, and update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate.			
MECP Species at Risk Branch	95	The Draft EA/IS Report is inconsistent in statements regarding the Cumulative Effects Assessment of magnitude and Significance for Wolverine. Section 10.3.3 states: - “Considering the above-mentioned effects from the Project and past, present and reasonably foreseeable developments, the predicted magnitude of effects on wolverine are predicted to range from negligible to low.” [emphasis added] - “Therefore, the cumulative effects on wolverine after the implementation of the Project and the other reasonably foreseeable developments are predicted to be not significant.” [emphasis added] However, Table 10-7 summarizes magnitude of the cumulative effects on “habitat loss and alteration” and “collisions with vehicles and equipment” is Moderate; which is consistent with the information provided and determinations outlined in Sections 8.2.3.1.4 (pgs. 367-	The Final EA/IS and Appendix K Wildlife Technical Support Document have been updated to correct the inconsistencies and clarify that the magnitude of effects from habitat loss and alteration, and collisions with vehicles and equipment were characterized as moderate and determined to be significant.	Final EA/IS Section 10.3.3, Table 10-7 Appendix K Section 8.2.3, Table 8-10	1718

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		368) and 8.2.3.4.4 (pgs. 376-377), and summarized in Table 8-10 (pgs. 429-430), of Appendix K – Wildlife. Additionally, Table 10-7 predicts significance of the cumulative effects associated with habitat loss and alteration" and "collisions with vehicles and equipment" is Significant; which is consistent with the information provided and determinations outlined in Section 8.2.3.6 (pgs. 380-381) of Appendix K - Wildlife. Based on the information provided and weight of evidence within the literature, MECP SARB agrees with the Project's determination as summarized in Table 10-7 of the Draft EA/IS Report and Appendix K - Wildlife (i.e., magnitude = moderate; significance = significant) for the cumulative effects on "habitat loss and alteration" and "collisions with vehicles and equipment". Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to clarify the assessment of magnitude of "habitat loss and alteration" and "collisions with vehicles and			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		equipment" as it relates to Wolverine to ensure consistency.			
MECP Species at Risk Branch	96	Section 10.3.4.1, Pg. 802: "The cumulative residual effects from previous, existing, and reasonably foreseeable developments (including the Community Access Road), are therefore considered not significant. However, climate change may have significant effects on the bird populations beyond the cumulative effects assessment Regional Study Area if temperatures increase by 1.5 degrees Celsius to 3.0 degrees Celsius relative to current conditions." Section 10.3.7, Table 10-7, pg. 829: "Significance: Not significant" (residual effects resulting from habitat loss and alteration due to reasonable foreseeable developments alone); "Significance: significant" (if considering climate change) Cumulative effects to Lesser Yellowlegs and Short-eared Owl habitat loss and alteration are anticipated to be significant when considering climate change. The MFCAR ToR requires an assessment of species and habitat	Consideration will be given to applicable legislation following completion of the EA/IS including the Ontario Endangered Species Act (ESA) and Species Conservation Act (SCA).	Comment noted; see response for details	1719

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		distribution and any changes to wildlife behaviour during and after construction. As it relates to these ToR requirements, the Draft EA/IS summarizes the bird monitoring program in Section 14.3.2.3 and 14.4.2.3, characterizes existing conditions (i.e., Section 8.2.6.6), describes the refined existing conditions (i.e., Section 9.4.4.1.6), and identifies residual effects and proposed mitigation and enhancement measures (i.e., Section 9.4.4.4 and Table 9-25), with supporting information in Appendix L. Once new supporting regulations are created, the ESA will be replaced by the new SCA which will enable a new Species Conservation Registry to allow for faster, online registration of eligible activities impacting protected species. Should measures to mitigate lasting impacts of the project and construction and post-construction monitoring requirements be required, these will likely be outlined in the regulations, or project-specific permits, as required. For awareness, if a project-specific authorization under the amended ESA or new SCA is required, actions to mitigate long-term effects to the species from			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		climate change may be required and may include long-term post-construction monitoring (i.e., beyond 6 years) to capture long-term changes to species population trends, implementing measures to reduce invasive of shrub cover in the LSA, maintaining vegetated buffers around wetlands and watercourses where temporary construction camps, laydown areas, and other activities will be avoided, and reducing tree/vegetation clearing at road water crossings. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat.			
MECP Species at Risk Branch	97	Valued Components: Upland Ecosystems, Wetland Ecosystems, Riparian Ecosystems; “Cumulative Effect: Changes to ecosystem availability, distribution, composition and function as a result of direct vegetation loss”, “Magnitude: Low”, “Reversibility: Irreversible (for permanent impacts)”, “Uncertainty: Moderate”, “Significance: Not Significant” Valued Component: Groundwater:	The residual effects and cumulative effects assessments for species at risk, including bats and birds, incorporated the results of the biophysical environmental assessments. Specifically, changes to groundwater and surface water were first evaluated for their potential to affect vegetation communities (i.e., upland, wetland, riparian ecosystems). The subsequent assessment of wildlife Valued Components, including species at risk, considered the vegetation effects as	Comment noted; see response for details.	1720

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		"Description of Potential Effect: Changes to groundwater quantity due to road construction in peatland areas", "Magnitude: Medium", "Reversibility: Irreversible", "Uncertainty: Moderate", "Significance: Not Significant" Valued Components: Surface Water Quantity, Surface Water Quality, Sediment Quality: "Description of Potential Effect: Changes to surface water quantity, surface water quality, and sediment quality due to changes in land cover", "Magnitude: Negligible", "Reversibility: Irreversible", "Uncertainty: Moderate", "Significance: Not Significant" It is unclear if the residual effects and cumulative effects assessment to species at risk bats and birds incorporated the results of the effects assessment to valued components of the biophysical environment, including irreversible changes to vegetation communities, irreversible changes to groundwater quantity, and irreversible changes to surface water quantity and quality and sediment quality that may impact species at risk habitat availability and distribution. It is unclear how the moderate level of uncertainty of these effects to biophysical valued components	part of the effects assessment for habitat availability and quality as outlined in Section 7.3.1.1 of Appendix K Wildlife Technical Support Document. This approach also considered any irreversible changes to the biophysical environment that could influence species at risk habitat. Finally, the moderate uncertainty of the effects on the biophysical environment influenced the confidence rating assigned to the significance determinations for species at risk.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		has been incorporated to the species at risk assessment as well, as this would infer that there is a low level of confidence in the determination of each of these residual effects as “Not Significant”. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to provide additional information on how the effects assessment to species at risk wildlife incorporated the effects assessment to irreversible changes to vegetation communities, groundwater quantity, surface water quality, surface water quantity, and sediment quality, including the moderate level of uncertainty associated with the effects assessment for these biophysical valued components.			
MECP Species at Risk Branch	98	MECP SARB recognizes placeholders have been included for direction, magnitude, extent, duration, frequency, reversibility, probability of occurrence, significance, and uncertainty in Table 10-7 for the predicted cumulative effects on Caribou. However, the following sections of the	The Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to address placeholders and include a summary of the predicted cumulative effects for Caribou.	Section 10 of the Final EA/IS; Section 8 of Appendix M	1721

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Draft EA/IS Report include some incomplete information: - Section 10.3.5 outlines information considered in the determination of some of the factors (e.g., significance) for some, but not all, effects (e.g., habitat loss, linear barriers). - Section 10.3.5.1.1 identifies the combined residual cumulative effects (i.e., determination of significance) from the Community Access Road and past, present and reasonably foreseeable developments on caribou and caribou habitat in the caribou effects assessment Regional Study Area. Furthermore, Table 8-24 in Section 8.2.1.9 of Appendix M – Ungulates summarizes the combined residual cumulative effects for Caribou and Section 8.2.1.10 outlines the determination of significance. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a summary of the predicted cumulative effects for Caribou.			
MECP Species at Risk Branch	99	Concerns related to environmental existing conditions; additional details requested:	Community-specific Aboriginal and / or Treaty Rights and Interests (ATRI) reports have been provided to each	Comment noted; see response for	1722

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		• Concern was expressed regarding caribou migration and impacts to gathering rights Under How the Development of Milestones 1, 2, and 3 Has Been or May Be Informed Specific information was not provided.....limited information in the Environmental Assessment/Impact Statement: • General identification of caribou locations has been used for field investigations (Ungulates Technical Support Document Appendix M) also noted in Section 8.2.7.1 Information to date on caribou migration and impacts to gathering rights has been considered in Section 9.4.5.4. “confidential individual Aboriginal and/or Treaty Rights and Interest reports will be prepared for each Indigenous community.” These consider caribou and impacts to gathering rights for those communities which identified caribou as part of their Aboriginal and/or Treaty Rights and Interests. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as	community. A summary of the approach is provided in Appendix O Aboriginal and / or Treaty Rights and Interested Technical Support Document. Results of the community-specific ATRI reports are considered confidential and will not be incorporated into the Final EA/IS. Concerns related to Caribou migration and impacts to ATRI will be addressed as follows: - Indigenous Knowledge informed the study plans and the EA/IS as outlined in Section 3 of Appendix M Ungulates Technical Support Document. - the EA/IS recognizes increased access and hunting pressure has potential to impact ATRI (Section 7 of Appendix M). - mitigation measures have been proposed to reduce impacts on harvesting, wildlife movement and population stability (Section 7 and Table 10-1 of Appendix M). - As noted in the community-specific Aboriginal and / or Treaty Rights and Interests: Draft Impact Assessment Report, proposed mitigation measures include the collaboration with local	details.	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to describe how these concerns will be addressed.	existing environmental advisory committees to support the development and implementation of all environmental monitoring programs, including Caribou monitoring. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and communities will be established. Monitoring results results will be provided to the Ministry of Environment, Conservation and Parks (MECP) and the environmental advisory committees can request the results from MECP. - Indigenous Environmental Monitors will be onsite during construction to confirm mitigations are being implemented properly (Section 14 of the Final EA/IS). - a Preliminary Biodiversity Offset Plan has been included in Appendix AB in response to provincial and federal requirements for the Project and summarizes results of the residual effects assessment and presents biodiversity offset options for provincially and federally mandated terrestrial Key		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			Biodiversity Components for the Project, including Caribou.		
MECP Species at Risk Branch	100	Under Indigenous Communities Input and Information Revision to Aboriginal and/or Treaty Rights and Interests Study Areas for the Environmental Assessment/Impact Statement: • Concerns expressed over the preferred route How the Development of Milestones 1, 2, and 3 Has Been or May Be Informed • Based off feedback a Caribou Regional Study Area has been identified Will there be a summary of how this area was developed (were most of the comments focusing on impacts to the species population potentially impacting harvesting, or were concerns expressed over impacts to the species in general)? Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to describe how these concerns will be addressed.	The Final EA/IS has been updated to include "concerns expressed over the preferred route" to Aboriginal and/or Treaty Rights and Interests Study Area for the Environmental Assessment / Impact Statement under the Indigenous Communities Input and Information column. Table 11-9 (formerly 11-6) was also updated to clarify how the Caribou Regional Study Area was developed to address concerns.	Table 11-6 of the Final EA/IS	1723
MECP Species	101	The conclusion that existing baseline	Section 14.1.2.4 of the Final EA/IS and	Final EA/IS	1724

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
at Risk Branch		data collected for species at risk, including SAR Bats, SAR Birds, Wolverine and Caribou (Boreal population), is expected to be adequate for pre-construction monitoring, and additional monitoring is not required, may be valid for some wildlife species and in the short-term. However, should the initiation of construction be delayed for an extended period of time (e.g., 5+ years) following the completion of the provincial environmental assessment and subsequent necessary provincial and federal authorizations, additional pre-construction monitoring may be required to inform an updated assessment of adverse effects and application of mitigation measures during the project authorization process, should an authorization be required under the ESA or SCA. Additionally, Wolverine lives at especially low densities and their dens are difficult to identify. Baseline data collected for existing conditions confirmed the presence of Wolverine within the LSA and RSA, but did not include a high density aerial transect survey across the entire Project during the denning period	Sections 9.1 of Appendix K Wildlife Technical Support Document, Appendix L Birds Technical Support Document and Appendix M Ungulates Technical Support Document have been updated to clarify that should the initiation of construction be delayed for an extended period of time (e.g., 5+ years) following the completion of the provincial environmental assessment and subsequent necessary provincial and federal authorizations, additional baseline monitoring may be required to update an assessment of adverse effects during the Endangered Species Act authorization process. Aerial transect surveys targeting wolverine dens has been proposed for the construction monitoring program as outline in Section 9.2 of Appendix K.	Section 14.1.2.4 Appendix K Section 9.1 Appendix L Section 9.1 Appendix M Section 9.1	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		to identify Wolverine dens. As such, MECP SARB recommends the Project Team consider carrying out winter aerial transect surveys consistent with the methods previous developed and applied for the 2023 Marten Falls First Nation Community Access Road Project Aerial Wolverine Denning Surveys to inform the MFCAR hydrogeological drilling program. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to recognize that additional baseline monitoring may be required to update an assessment of adverse effects during the ESA authorization process (i.e., permitting), should authorization under the ESA or SCA be required.			
MECP Species at Risk Branch	102	The Draft EA/IS Report states, "Additional pre-construction monitoring is not required. Baseline data collected from caribou collaring in 2021 to 2024, caribou and moose winter aerial surveys in 2022 to 2023, and remote camera monitoring surveys from 2021 to 2023 are expected to be adequate for pre-construction monitoring of ungulates." While the existing baseline data collected	Caribou collar data collected by Webequie First Nation was not available before submission of the Draft EA/IS. A data sharing agreement has since been signed between the three road projects (i.e., Marten Falls Community Access Road, Webequie Supply Road (WSR), Northern Road Link (NRL) and caribou collar data has been shared. The Final EA/IS and Appendix M	Final EA/IS Section 14 Appendix M Section 9.1	1725

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		from the caribou studies identified were sufficient to inform baselines characterization for the purposes of the MFCAR EA/IS, additional pre-construction monitoring may be advisable to confirm areas that have not been identified as known or potential nursery areas or winter use areas are not being used by Caribou for the purposed of breeding and rearing, or wintering, respectively. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a commitment for additional pre-construction monitoring for Caribou (Boreal population) necessary to identify areas being used by Caribou for the purposes of breeding and rearing (i.e., nursery areas) or wintering (i.e., winter use areas).	Ungulates Technical Support Document have been updated to incorporate the additional collar data for the identification of potential nursery areas or winter use areas. This analysis, completed at the request of Ministry of Environment, Conservation and Parks (MECP), augments the information about known areas from MECP's General Habitat Description spatial layer and supports the characterization of baseline conditions for caribou in the Ungulate Local Study Area and Regional Study Area. Data acquired from collared animals is intended to be a representation of the population in the Ungulate LSA and RSA, with recognition that knowledge gaps are inevitable unless all individuals are collared. The Section 14 of the Final EA/IS and Section 9.1 of Appendix M have been updated to clarify that should the initiation of construction be delayed for an extended period of time (e.g., 5+ years) following the completion of the provincial environmental assessment and subsequent necessary provincial and federal authorizations, additional baseline monitoring may be required to update an assessment of adverse effects during the Endangered Species		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			Act authorization process.		
MECP Species at Risk Branch	103	Additional information is required regarding proposed wildlife sweeps to clarify the proposed survey methodology, frequency, response (e.g. stop work processes), and Environmental Monitor and Indigenous Environmental Monitor training, or when the detailed survey methodology will be developed (e.g., Environmental Protection Plan). The Draft EA/IS Report states, “Ground-based pre-clearing surveys (“wildlife sweeps”) will be completed along the Construction Disturbance Area under the direction of the Environmental Monitor, prior to any clearing or grubbing. The wildlife sweeps will entail surveying for sensitive wildlife features, including mammal dens, beaver lodges, amphibian and reptile habitats, and bat maternity roost habitat;” Please note, MECP SARB strongly encourages proponents avoid impacts to species at risk, including avoiding conducting development activities during sensitive time periods (e.g., nesting, roosting, rearing, denning, wintering, etc.). In some instances, wildlife sweeps are not sufficient to determine absence	Section 14.2.2.2 of the Final EA/IS and Sections 9.2 of Appendix K Wildlife Technical Support Document and Appendix M Ungulate Technical Support Document have been updated to note that the details of the ground-based pre-clearing surveys (wildlife sweeps) will be described in the Environmental Protection Plan, which will be prepared prior to the project authorization process so as to inform provincial and federal authorizations, as necessary.	Final EA/IS Section 14.2.2.2 Appendix K Section 9.2 Appendix M Section 9.2	1726

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		and may result in unintended impacts to species at risk depending on the species, proposed methodology, frequency, timing, etc., thereby causing more harm. As such, MECP SARB generally does not support the use of wildlife sweeps as a means to avoid impacts to species at risk when undertaking development activities during sensitive time periods. However, in situations where wildlife sweeps are appropriate (e.g., wolverine transect surveys during the denning period), the EA/IS Report should either: a. Include additional details on specific methodology, frequency, Environmental Monitor training, and response (e.g. stop work processes) associated with the proposed wildlife sweeps; including training Environmental Monitor and Indigenous Environmental Monitor by a qualified biologist with expertise in audible and visual identification of species at risk and wolverine dens and denning areas, avian ground nests and nest defensive behaviours, and bat maternity roost habitat, and include separate methods for each species at risk and/or unique habitat (e.g., general SAR presence, wolverine dens and denning areas, caribou nursery areas, caribou winter use areas, bat maternity			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		roost habitat, lesser yellowlegs nests, short-eared owl nests, etc.); or b. If this level of detail will not or cannot be provided during the EA, include the following language: o "The details of the ground-based pre-clearing surveys (wildlife sweeps) will be described in the Environmental Protection Plan which will be prepared prior to the project authorization process so as to inform provincial and federal authorizations, as necessary." Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to either: a. Include the species-specific methodology, frequency, response (e.g. stop work processes), and Environmental Monitor and Indigenous Environmental Monitor training associated with the proposed wildlife sweeps; or b. If this level of detail will not or cannot be provided during the EA, include the following language: o "The details of the ground-based pre-clearing surveys (wildlife sweeps) will be described in the Environmental Protection Plan which will be prepared prior to the project authorization process			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		so as to inform provincial and federal authorizations, as necessary."			
MECP Species at Risk Branch	104	The proposed method for “wildlife sweeps” may not be appropriate for all species at risk and/or sensitive species at risk habitat. The Draft EA/IS Report states, “Ground-based pre-clearing surveys (“wildlife sweeps”) will be completed along the Construction Disturbance Area under the direction of the Environmental Monitor, prior to any clearing or grubbing. The wildlife sweeps will entail surveying for sensitive wildlife features, including mammal dens, beaver lodges, amphibian and reptile habitats, and bat maternity roost habitat;” [emphasis added] Ground-based methods and/or limiting the scope of “wildlife sweeps” to just the Construction Disturbance Area may not be biologically appropriate or effective for all species at risk. For example: - Conducting aerial transect surveys between 1 to 10 km from the Construction Disturbance Area, depending on the time of year, prior to clearing or grubbing to identify the presence of Caribou would be more appropriate and effective for identifying	Section 14.2.2.2 of the Final EA/IS and Sections 9.2 of Appendix K Wildlife Technical Support Document and Appendix M Ungulate Technical Support Document have been updated to note that the details of the ground-based and aerial pre-clearing surveys (wildlife sweeps) will be completed along within a biologically relevant distance of the Construction Disturbance Area under the direction of the Environmental Monitor, prior to any clearing or grubbing, and that wildlife sweeps will entail surveying for sensitive wildlife features, including mammal dens, beaver lodges, amphibian and reptile habitats, and bat maternity roost habitat.	Final EA/IS Section 14.2.2.2 Appendix K Sections 9.2 Appendix M Sections 9.2	1727

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the presence of this species and/or their sensitive habitat features within a biologically relevant distance from construction activities that are likely to have the greatest impact on the species (e.g., displacing caribou from winter use areas thereby increasing predation risk). - Conducting aerial transect surveys up to 4 km from the Construction Disturbance Area during the Wolverine denning period (i.e., January 15 to May 31) prior to clearing or grubbing to identify the presence of Wolverine denning activity would be more appropriate and effective for identifying the presence of this species and/or their sensitive habitat features within a biologically relevant distance from construction activities that are likely to have the greatest impact on the species (e.g., displacing Wolverine from denning areas possibly resulting in den and kit abandonment and kit mortality). Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include the following language in strikethrough or bold: “Ground-based or aerial pre-clearing			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		surveys (“wildlife sweeps”) will be completed along within a biologically relevant distance of the Construction Disturbance Area under the direction of the Environmental Monitor, prior to any clearing or grubbing. The wildlife sweeps will entail surveying for sensitive wildlife features, including mammal dens, beaver lodges, amphibian and reptile habitats, and bat maternity roost habitat;”			
MECP Species at Risk Branch	105	“A reporting protocol and system to report incidental wildlife observations and wildlife-vehicle collisions (bats, furbearers and other large mammals, and reptiles and amphibians) …will be developed.” The proposed mitigation measure does not specify where incidental wildlife observations will be reported to and if species at risk observations will be included. The proposed mitigation measure does not include reporting of observations and wildlife-vehicle collisions of Short-eared Owl. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a requirement of	Section 14.2.2.2 of the Final EA/IS and Sections 9.2 of Appendix K Wildlife Technical Support Document and Appendix M Ungulate Technical Support Document have been updated with the commitment that the reporting protocol and system to report incidental wildlife observations and wildlife-vehicle collisions (i.e., bats, furbearers and other large mammals, reptiles, amphibians) will include the requirement to report species at risk observations (including short-eared owl) to the Ministry of Natural Resources Natural Heritage Information Centre.	Final EA/IS Section 14.2.2.2 Appendix K Sections 9.2 Appendix M Sections 9.2	1728

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the reporting protocol and system to report species at risk observations, including resulting from collisions, during construction, operation and maintenance, to the Ministry of Natural Resources Natural Heritage Information Centre. Consider including Short-eared Owl to this mitigation measure.			
MECP Species at Risk Branch	106	The proposed desktop review of plant community mapping to identify areas with potential to support wolverine denning may not be sufficient to identify all potential microhabitat features; and additional data and/or broader monitoring may be more appropriate. The Draft EA/IS Report states, “Areas with potential to support wolverine denning will be identified through a review of plant community mapping (looking for communities that may contain the microhabitat features), and targeted aerial site reconnaissance during the denning period to survey for signs of potential denning areas well prior to the initiation of construction activities (for example, clearing and grubbing).” Wolverine den sites have included	Section 14.2.2.2 of the Final EA/IS and Section 9.2 of Appendix K Wildlife Technical Support Document has been updated with additional details on the methods for determining which areas have potential to support wolverine denning. It is understood that suitable microhabitat features can be found in a wide variety of plant communities. A precautionary approach will be taken to determine which plant communities have potential to provide denning microsites.	Final EA/IS Section 14.2.2.2 Appendix K Section 9.2	1740

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		downed trees with snow caves, snow tunnels and root balls, rocky caves or cracks with snow tunnels and caves, snow drifts with tunnels or caves, slash piles, and beaver lodges. For awareness, recognizing the potential for impacts to denning Wolverine and their kits as a result of clearing and grubbing during the sensitive denning period, and the likely effects this will have on the species reproduction and population given the species low reproductive capacity, these activities are likely to require an ESA authorization if conducted during the denning period (i.e., January 15 to May 31). Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a comprehensive methodology that will be used to identify potential microhabitat features for Wolverine denning, including all relevant data sets that have sufficient resolution. Recommended for EA			
MECP Species at Risk Branch	107	The Draft EA/IS Report states, “If clearing or grubbing are required during	Section 14.2.2.2 of the Final EA/IS and Section 9.2 of Appendix K Wildlife	Final EA/IS Section	1741

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the wolverine denning period (February 1 to May 1) in habitat suitable for wolverine denning, surveys for the presence of wolverine dens will be conducted prior to clearing. Surveys will be conducted from helicopters or drones. The survey extent will include all potentially suitable denning habitat within 4 kilometres of the disturbance. The methods of the surveys will be determined in consultation with the Ministry of Environment, Conservation and Parks Species at Risk Branch." Additional information is required regarding the proposed survey methodology or when the detailed survey methodology will be developed (e.g., Environmental Protection Plan). Additionally, the EA/IS Report should either: a. Include the specific methodology associated with the proposed Wolverine surveys (e.g., timing, weather/snow conditions, altitude, speed, etc.); or b. If this level of detail will not or cannot be provided during the EA, include the following language: o "The details of the Wolverine aerial surveys will be described in the Environmental Protection Plan."	Technical Support Document has been updated with a commitment that details of the wolverine aerial survey methods will be described in the Environmental Protection Plan.	14.2.2.2 Appendix K Section 9.2	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to either: - Include the specific methodology associated with the proposed Wolverine surveys (e.g., timing, weather/snow conditions, altitude, speed, etc.); or - If this level of detail will not or cannot be provided during the EA, include the following language: o "The details of the Wolverine aerial surveys will be described in the Environmental Protection Plan." B - Recommended for EA D – Permitting Related			
MECP Species at Risk Branch	108	“The effectiveness of mitigation measures will be evaluated during construction and operations, and mitigation measures will be modified or enhanced as necessary through adaptive management.” As most mitigation for birds proposed is with regards to pre-clearing nest surveys carried out during the migratory bird nesting period, it is unclear how the effectiveness of these surveys will be evaluated, as nests that are missed (i.e., not identified) during	Vegetation clearing is being completed primarily outside of the breeding bird active season. Mitigation measures will be detailed in the Environmental Protection Plan (EPP) to be developed by the Owner/Operator during detail design. The EPP mitigation measures be re-evaluated during Construction and Operations phases. A draft nest sweep protocol has been prepared that outlines protocols for completing these surveys and is outlined in Appendix L Birds	Comment noted; see response for details.	1742

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		nest sweeps cannot be quantified and end up becoming disturbed or damaged, and birds that end up being harassed/harmed through tree/vegetation clearing during the migratory bird nest period cannot be quantified. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to provide additional detail on how the effectiveness of proposed bird-related mitigation will be assessed. A - Required for EA	Technical Support Document.		
MECP Species at Risk Branch	109	Limited information has been provided regarding the full scope of planned effects and effectiveness monitoring during the construction of the Project and, as such, MECP SARB is unable to comment on the sufficiency of the Construction Monitoring Program and Operation and Maintenance Monitoring Program at this time. MECP SARB highlights the importance of developing a detailed Construction Monitoring Program for species at risk birds and bats, Wolverine, and Caribou; and consulting with the ministry and	Details about monitoring programs during construction, operation and maintenance will be described in the Environmental Protection Plan which will be prepared prior to the authorization process so as to inform provincial and federal authorizations, as necessary. The owner/operator will collaborate with regulators and local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning	Comment noted; see response for details.	1743

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		other relevant ministries and Indigenous communities and organizations. Please note, detailed information will be required to inform future authorizations under the ESA or SCA. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to consider the appropriate level of information in the development of the Construction Monitoring Program and Operation and Maintenance Monitoring Program; and plan to provide sufficient time to consult relevant ministries, including MECP, and Indigenous communities and organizations, on the development of appropriate monitoring activities. A – Required for EA D – Permitting Related	resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and communities will be established.		
MECP Species at Risk Branch	110	The Draft EA/IS Report does not identify monitoring of sensory disturbances as part of the Construction Monitoring Program and Operation and Maintenance Monitoring Program. Recognizing the limited information on the effects of sensory disturbances	Details about monitoring programs during construction, operation and maintenance will be described in the Environmental Protection Plan which will be prepared prior to the authorization process so as to inform provincial and federal authorizations, as necessary. The owner/operator will collaborate with	Comment noted; see response for details.	1744

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		associated with the construction, operation and maintenance of an all-season road on Caribou, conducted within Ontario, MECP SARB strongly encourages the Project Team develop and implement a long-term monitoring approach to assess the effect of sensory disturbances on Caribou as part of the Construction Monitoring Program and Operation and Maintenance Monitoring Program. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include a long-term monitoring approach of sensory disturbances to Caribou as part of the Construction Monitoring Program and Operation and Maintenance Monitoring Program. A – Required for EA	regulators and local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and communities will be established.		
MECP Species at Risk Branch	111	The Draft EA/IS Report states, “Clearing, construction activities and decommissioning of temporary construction areas in and within 10 kilometers of Category 1 nursery use areas will occur outside the sensitive timing window of May 1 to September 15,	The Section 14.2.2.2 of the Final EA/IS and Section 9.2 of Appendix M Ungulates Technical Support Document have been updated to note that the details of the ungulate monitoring program, including caribou, will be described in the Environmental	Final EA/IS Section 14.2.2.2 Appendix M Section 9.2	1745

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		to the extent practical. Clearing and construction activities in and within 10 kilometers of Category 1 winter use areas will occur outside the sensitive timing window of December 1 to March 31, to the extent practical. If activity restrictions cannot be followed for construction activities, the Ministry of Environment, Conservation and Parks will be engaged to determine alternative approaches. This may include daily monitoring of caribou locations with collars and only commencing construction activities if collar data indicates that there are no caribou within pre-defined "cautionary zones" (pre-defined spatial buffer areas): - Cautionary zones will be pre-defined spatial buffer areas based on the level of sensory disturbance expected for the activity; - A hierarchy of mitigation actions based on disturbance type, distance from caribou, and season will be established." Additional information will be required regarding the proposed monitoring methodology or when the detailed monitoring methodology will be developed (e.g., Environmental Protection Plan).	Protection Plan. It is acknowledged that the Community Access Road activities that cannot be avoided during the caribou sensitive timing windows will likely require authorization under the Endangered Species Act or the Species Conservation Act.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The EA/IS Report should either: a. Include the specific methodology associated with the proposed development of cautionary zones (e.g., how will the expected levels of sensory disturbance be defined) and hierarchy of mitigation actions (e.g., the specific list of disturbance type, distances, etc.); or b. If this level of detail will not or cannot be provided during the EA phase, include the following language: o "The details of the Caribou monitoring program will be described in the Environmental Protection Plan." Additionally, for awareness a review of caribou collar locations, while helpful to minimize potential species impacts, is unlikely to be sufficient to avoid impacts to the species (i.e., collared caribou only represent a subsample of the population and cannot be relied on to avoid impacts to all individuals of the species). As such, if clearing activities, construction activities, and decommissioning of temporary construction areas within 10 km of a Caribou nursery area or winter use area cannot be avoided during the sensitive timing windows (i.e., May 1 to September 15 and December 1 to March 31, respectively), an authorization under the ESA or SCA will likely be required.			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to either: a. Include the specific methodology associated with the proposed development of cautionary zones (e.g., how will the expected levels of sensory disturbance be defined) and hierarchy of mitigation actions (e.g., the specific list of disturbance type, distances, etc.); or b. If this level of detail cannot be provided during the EA, include the following language: o "The details of the Caribou monitoring program will be described in the Environmental Protection Plan." Additionally, consider that an authorization under the ESA or SCA will likely be required for construction activities undertaken during sensitive time periods. B – Recommended for EA D – Permitting Related			
MECP Species at Risk Branch	112	The Draft EA/IS Report states, “In addition to the intensive monitoring during sensitive seasons described above, ground-based pre-clearing surveys (“wildlife sweeps”) will be	The Section 14.2.2.2 of the Final EA/IS and Section 9.2 of Appendix M Ungulates Technical Support Document have been updated to confirm that ground-based or aerial pre-clearing	Final EA/IS Section 14.2.2.2 Appendix M Section 9.2	1746

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		completed outside of the sensitive timing windows to detect and document presence of large mammals, migratory bird nests and raptor stick nests ahead of clearing and blasting activities. Trained staff will survey the areas to be cleared or blasted, plus a 500-metre buffer, by foot, all-terrain vehicles, snow machine, or trucks. Wildlife observations and signs will be documented and reported to the contractor's Environmental Manager." [emphasis added] The proposed "wildlife sweeps" will have a limited value to caribou based on the proposed method (i.e., ground-based) and extent (i.e., 500 m buffer); and in some regards are likely to result in additional impacts to Caribou. Ground-based methods and/or limiting the scope of "wildlife sweeps" to just the areas to be cleared or blasted, plus a 500-metre buffer, may not be biologically appropriate or effective for all species at risk. For example: - Conducting aerial transect surveys between 1 to 10 km from the Construction Disturbance Area, depending on the time of year, prior to clearing or grubbing to identify the presence of Caribou would be more	surveys ("wildlife sweeps") will be completed outside of the sensitive timing windows to detect and document presence of large mammals, migratory bird nests and raptor stick nests and Caribou ahead of clearing and blasting activities. Trained staff will survey the areas to be cleared or blasted, plus a biologically relevant distance, by foot or via aerial transect surveys, all-terrain vehicles, snow machine, or trucks. Wildlife observations and signs will be documented and reported to the contractor's Environmental Manager and the Environmental Manager will ensure all species at risk observations will be reported to the Natural Heritage Information Centre (NHIC) as per Report rare species (animals and plants) | ontario.ca and to MECP SARB at SAROntario@ontario.ca.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate and effective for identifying the presence of this species and/or their sensitive habitat features within a biologically relevant distance from construction activities that are likely to have the greatest impact on the species (e.g., displacing caribou from winter use areas thereby increasing predation risk). Additionally, conducting ground-based surveys with all-terrain vehicles, snow machines, or trucks for the purpose of identifying the presence of Caribou is likely to impact Caribou; and is not supported by MECP SARB. Furthermore, any observation of Caribou, or any other species at risk, should also be reported to the Natural Heritage Information Centre (NHIC) as per Report rare species (animals and plants) | ontario.ca and to MECP SARB at SAROntario@ontario.ca. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include the following language in strikethrough or bold: “In addition to the intensive monitoring			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		during sensitive seasons described above, ground-based or aerial pre-clearing surveys (“wildlife sweeps”) will be completed outside of the sensitive timing windows to detect and document presence of large mammals, migratory bird nests and raptor stick nests Caribou ahead of clearing and blasting activities. Trained staff will survey the areas to be cleared or blasted, plus a 500-metre buffer a biologically relevant distance, by foot or via aerial transect surveys, all-terrain vehicles, snow machine, or trucks. Wildlife observations and signs will be documented and reported to the contractor’s Environmental Manager; and the Environmental Manager will ensure all species at risk observations will be reported to the Natural Heritage Information Centre (NHIC) as per Report rare species (animals and plants) | ontario.ca and to MECP SARB at SAROntario@ontario.ca.”			
MECP Species at Risk Branch	113	In addition to the proposed Before-After Control-Impact monitoring programs identified in Section 14.2.2.4, MECP SARB encourages the Project Team to consider implementing aerial survey monitoring of the Construction Disturbance Area, plus a 10 km buffer, during construction and operation and	Section 14.2.2.2 of the Final EA/IS and Section 9.2 of Appendix M Ungulates Technical Support Document have been update to include aerial surveys in addition to ground-based surveys as part of the pre-clearing surveys ("wildlife sweeps").	Final EA/IS Section 14.2.2.2 Appendix M Section 9.2	1747

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		maintenance to monitor the effects of the Community Access Road on Caribou population trends and habitat use; and recommends the methodology and schedule be outlined in the Environmental Protection Plan. Please update this section of the Final EA/IS Report, and all other relevant locations within the Final EA/IS Report and associated Appendices as appropriate, to include appropriate aerial survey monitoring during the construction, operation and maintenance to monitor the effects of the Community Access Road on Caribou habitat use; and describe the methodology and schedule in the Environmental Protection Plan. B – Recommended for EA	Details about monitoring programs during construction, operation and maintenance will be described in the Environmental Protection Plan which will be prepared prior to the authorization process so as to inform provincial and federal authorizations, as necessary. The owner/operator will collaborate with regulators and local existing environmental advisory committees to support the development and implementation of all environmental monitoring programs. The objective is to include Indigenous interests and perspectives, particularly concerning resources utilized for rights-based purposes. In the absence of an existing advisory committee with an aligned mandate to Marten Falls First Nation, a Terms of Reference between relevant agencies and communities will be established.		
MECP Species at Risk Branch	114	The Draft EA/IS Report states, "The following monitoring is anticipated to be required as part of permitting…Bat maternity season acoustics: monitoring to confirm continued presence of Species at Risk bats at stations within the Project Local Study Area as well as relative bat activity levels in the Operation and Maintenance Phase."	It is understood that compliance with the applicable legislation will be required to protect species and their habitat from impacts related to the Community Access Road. As stated in Section 14 of the Final EA/IS and Sections 9.2 and 9.3 Appendix K Wildlife Technical Support Document, the final monitoring will be determined in consultation with the Indigenous	Comment noted; see response for details.	1748

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The MFCAR ToR requires an assessment in the change to wildlife behaviour during and after construction. As it relates to this ToR requirement, the Draft EA/IS Report summarizes the wildlife monitoring program in Section 14.3.2.2 and 14.4.2.2. Once new supporting regulations are created, the ESA will be replaced by the new SCA which will enable a new Species Conservation Registry to allow for faster, online registration of eligible activities impacting protected species. Should construction and post-construction monitoring requirements be required, these will likely be outlined in the regulations, or project-specific permits, as required. For awareness, if a project-specific authorization under the amended ESA or new SCA is required, bat maternity acoustic monitoring during construction and post-construction (i.e., for a duration during operation and maintenance) may be required and may include acoustic monitoring at bat acoustic stations established to support the EA baseline surveys, mobile driving surveys to target	communities and federal and provincial regulators.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		monitoring of migratory bat species, acoustic grid surveys, and/or bat tagging and tracking to understand habitat use, distribution, and behaviour (migratory patterns) in the RSA. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. D - Permitting Related			
MECP Species at Risk Branch	115	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, “Avoid clearing maternity roost habitat during the bat maternity roosting period (May 1 to August 31). If potential maternity roost habitat is to be removed during the roosting period, it will be subject to the Endangered Species Act permitting requirements and site-specific mitigation measures that would be developed in consultation with the Ministry of Environment, Conservation and Parks Species at Risk Branch. All appropriate permits for this work will be acquired in consultation with the Ministry of the Environment, Conservation and Parks Species at Risk Branch.” [emphasis	Section 9.4.3 and Table 9.4-8 (formerly Table 9-21) of the Final EA/IS, Appendix AA and relevant sections of Appendix K Wildlife Technical Support Document have been updated to expand the bat active period for mitigation to May 1 to September 30 in recognition of the recent listing of migratory bat species (Hoary Bat, Silver-Haired Bat, Eastern Red Bat). Mitigation measures, including avoidance of activities during the bat active period will be applied to all listed bat species.	Final EA/IS Section 9.4.3 and Table 9-21 Appendix AA Appendix K	1749

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		added] Recognizing the recent listing of migratory bat species in January 2025 (i.e., Hoary Bat, Silver-haired Bat, Eastern Red Bat), the bat active period, including maternity roosting, is broadly considered May 1 to September 30, and MECP SARB encourages the Project Team to consider these dates as it relates to proposed mitigation (i.e., avoidance of activities during the bat maternity roosting period). Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to consider the newly listed migratory bat species in the identification and application of the bat active period (i.e., May 1 to September 30). B - Recommended for EA			
MECP Species at Risk Branch	116	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, “A Terrestrial Biodiversity Offset Plan is being developed to offset little brown myotis and northern myotis residual effects. As the offsetting plan is developed, it is	It is anticipated that some of the offsetting measures will offset impacts to these species (i.e., Hoary Bat, Silver-Haired Bat, Eastern Red Bat), the decision has been made to not specifically include them in Appendix AB Preliminary Biodiversity Offset Plan. The	Comment noted; see response for details.	1750

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		anticipated that artificial bat roost structures will be installed within temporary disturbance areas and in appropriate areas within the effects assessment Local Study Area to mitigate the removal of tree roosts for little brown myotis and northern myotis." MECP SARB strongly encourages the Project Team consider including appropriate actions in the Terrestrial Biodiversity Offset Plan for the migratory bat species recent listed in January 2025 (i.e., Hoary Bat, Silver-haired Bat, Eastern Red Bat). Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to also identify that the Terrestrial Biodiversity Offset Plan will also include actions to offset residual effects and mitigate the lasting impacts of the removal of roosting habitat for the newly listed migratory bat species (i.e., Hoary Bat, Silver-haired Bat, Eastern Red Bat).	owner/operator will engage with the Ministry of the Environment, Conservation and Parks (MECP) to determine permitting or registration requirements under the Endangered Species Act or the Species Conservation Act.		
MECP Species at Risk Branch	117	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, "Detailed Design will incorporate industry best practices	The Final EA/IS and associated Appendices have been updated to provide references to industry best practices used for blasting including:	Appendix AA	1751

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		used for blasting activities, including scheduling when in the vicinity of sensitive wildlife habitat." [emphasis added] Additional detail is required on the "industry best practices used for blasting activities", including reference to best practice documents and specific actions. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide more detail on the specific best practices and actions that will be applied for blasting activities. A - Required for EA	- Ontario Provincial Standard Specification (OPSS.PROV 120) – General Specification for the Use of Explosives - Ministry of Transportation Ontario Environmental Reference for Highway Design - Ontario Regulation 244/97 (Aggregate Resources Act) - Ministry of Transportation Ontario Noise Protocol and Environmental Guide for Noise - Department of Fisheries and Oceans Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters Appendix AA has also been updated to include these references.		
MECP Species at Risk Branch	118	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, "… exit surveys may be conducted prior to clearing in very limited areas. Clearing will not be undertaken in areas with occupied roosting habitat." Please note, clearing should not be undertaken in any areas of potential bat roosting habitat (i.e., suitable ecosites within 1000m of roost tree) unless it has	As described in Sections 7.3.1, 7.3.2, and 10 of Appendix K Wildlife Technical Support Document, clearing will not be undertaken in areas with occupied roosting habitat. If clearing is required during the roosting period (May 1 to September 30), the Ministry of Environment, Conservation and Parks (MECP) will be engaged to determine if additional surveys (i.e., exit surveys) are appropriate for confirming or ruling out if potential roost trees are occupied. The	Comment noted; see response for details.	1752

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		been confirmed through appropriate field surveys that the roost tree is not being used by roosting bats. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clearly identify vegetation clearing will not be undertaken in areas of potential roosting habitat during the bat active period (May 1 to September 30), unless appropriate field surveys have confirmed the area is not being used by roosting bats, or an authorization under the ESA or SCA will be acquired prior to conducting activities. A - Required for EA	limitations of exit surveys are well understood, and due to the effort required (i.e., a minimum of one surveyor per tree per night) this would only be practical for the clearing of a limited/manageable number of candidate roost trees. It is understood that the clearing of confirmed or potential bat maternity roost habitat during the active period will be subject to an authorization under the Endangered Species Act or the Species Conservation Act (Appendix K), and that the conditions and site-specific mitigation measures would be developed in consultation with the MECP. Regarding the 1,000 m buffer of the contiguous ecosite around a maternity roost tree, it is understood there are two versions of an undated, unsigned, guidance document bearing no MECP letterhead that discusses interim/preliminary habitat summary guidance for bats that conflict in their description of protected habitat (ecosite or all habitat). It is also unclear how the protection of habitat or the contiguous ecosite up to 1,000 m from a confirmed roost is compatible with the new definition of habitat under the amended Endangered Species Act. As such, a 1,000 m buffer has not been included in		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			the Final EA/IS or Appendix K.		
MECP Species at Risk Branch	119	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, "… the Ministry of Natural Resources will be engaged." Please note, for species at risk bats the Project Team will need to engage the Ministry of the Environment, Conservation and Parks. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clearly identify that the Project Team will engage the Ministry of the Environment, Conservation and Parks on all matters related to species at risk bats. A - Required for EA	Appendix AA Metrics to Help Identify a Preferred Route, and all other relevant sections of the Final EA/IS and Appendix K Wildlife Technical Support Document have been updated to clarify that engagement regarding all matters related to species at risk bats will be with the Ministry of Environment, Conservation and Parks (MECP).	Final EA/IS Appendix AA Appendix K	1753
MECP Species at Risk Branch	120	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, "An Environmental Protection Plan and a Cleanup and Reclamation Plan will be developed and implemented. Reclamation plans will be confirmed through engagement with Indigenous communities, the Ministry of Natural Resources and local foresters."	The Final EA/IS, Appendix AA Metrics to Help Identify a Preferred Route, Appendix K Wildlife Technical Support Document and all other relevant locations within other appendices will be updated to identify that the owner/operator will engage the Ministry of the Environment, Conservation, and Parks Species at Risk Branch,	Final EA/IS Appendix AA Appendix K Section 7.3.1.3.2.2	1754

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		MECP SARB should also be engaged on the development Reclamation Plans related to species at risk, including Wolverine. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clearly identify that the Project Team will engage the Ministry of the Environment, Conservation and Parks Species at Risk Branch on the development of Reclamation Plans related to species at risk, including Wolverine, as necessary.	Indigenous communities, and local foresters on the development of the reclamation plans including species at risk bats and wolverine.		
MECP Species at Risk Branch	121	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, “Temporary access roads and trails, construction camps, turnaround areas, waterbody crossings and temporary laydown areas will be reclaimed at the end of Construction.” Habitat reclamation/restoration should be conducted progressively throughout the construction phase of the Project. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS	Progressive revegetation/restoration has been proposed during construction phase as outlined in Section 7.3.1.5.2 and Tables 7-7 and 10-1 of Appendix F Surface Water Technical Support Document, and Appendix AA Summary and Recommendations.	Comment noted; see response for details.	1755

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Report as appropriate, to clearly identify that Project reclamation/restoration will be completed progressively through the construction phase of the Project.			
MECP Species at Risk Branch	122	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, “Detailed Design drawings will incorporate vegetation buffers to be retained around quarries to reduce noise, where feasible.” MECP SARB encourages the Project Team to also consider alternative noise barriers where surrounding vegetation is not present, or where it’s not feasible to retain surrounding vegetation. For example, using shipping containers has been used around quarry sites to minimize noise. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include alternative noise barriers where surrounding vegetation is not present, or where it’s not feasible to retain surrounding vegetation.	The use of noise barriers will be considered during detail design to address noise around quarry sites.	Comment noted; see response for details.	1756
MECP Species at Risk Branch	123	MECP SARB notes the mitigation, protection, monitoring, and study	The methods described in this comment are consistent with those employed prior	Final EA/IS Section	1758

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		commitments states, “Impacts to denning areas will be minimized to the extent possible. Areas with potential to support wolverine denning will be identified through a review of plant community mapping (looking for communities that may contain the microhabitat features [e.g., fallen trees and blowdown, boulders and variable terrain] that wolverine require for denning), and targeted aerial site reconnaissance during the denning period to survey for signs of potential denning areas well prior to the initiation of Construction (e.g., clearing and grubbing).” [emphasis added] Additional information and documentation, including references to literature where available, is required to support whether the approach to identifying potential denning habitat will be sufficient to avoid impacts to Wolverine. Additionally, clarity is required on what is meant by “well prior to the initiation of Construction” and additional information is required on the specific methodology of the proposed targeted aerial site reconnaissance, including timing. Specifically, MECP SARB encourages	to vegetation clearing during wolverine denning periods during previous phases of the assessment, such as the groundwater drilling program in 2022 and 2023. Section 14.2.2.2 of the Final EA/IS and Section 9.2 of Appendix K Wildlife Technical Support Document have been updated with a commitment that details of the wolverine aerial survey methods will be described in the Environmental Protection Plan (refer to response 107).	14.2.2.2 Appendix K Section 9.2	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the Project Team to consider carrying out aerial track surveys to identify potential denning areas between February 1 and March 30 in accordance with the following: - Search Area: § Flight transects are recommended to be spaced 500 metres apart covering a 4 km buffered area centered on the project area (i.e., roads, aggregate sources, temporary access roads and work camps, etc.); and § If wolverine tracks are seen along a transect, they should be followed to identify areas of potential denning activity. After this deviation, the helicopter should resume flying the transects back at the deviation point; § If necessary, the helicopter should land to confirm identification of tracks (note: if conditions are ideal, landing to confirm will likely not be required); § Based on section 2.2a of Selected Wildlife and Habitat Features Inventory Manual (Ranta 1997), suggested altitudes for surveys of wildlife habitat, flights should range between 100 and 200 m altitude depending on terrain and visibility; at a 90 kph flight speed. - Conditions: § Surveys should take place 12 to 72 hours after fresh snowfall;			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		§ Minimum of 25 cm snow depth § Surveys should be done under clear, bright conditions (i.e., avoid cloudy and overcast skies). High, very light overcast or scattered, thin clouds are also acceptable, but increased observer fatigue may result; - Timing: § Surveys should be conducted roughly between the hours of 10:00 and 15:00 to prevent having shadows obstruct a clear view of tracks; § Ideally, aerial transect surveys should be completed as close as possible in advance of project activities. - Confirmation of denning: Areas should be considered as potential denning areas where: § Several (2+) sets of wolverine tracks are observed in the search area; § Wolverine tracks are concentrated in certain areas; and/or § Wolverine tracks disappear into features that could support denning, such as snow-covered blowdown or drifts, rock piles, etc. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include: - clarity on what is meant by “well prior to			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		the initiation of Construction"; and - additional information on the specific methodology, including timing, conditions, etc. for the proposed targeted aerial site reconnaissance. A – Required for EA			
MECP Species at Risk Branch	124	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, "If a wolverine den is identified during Construction, and should this timing not be able to be maintained within the buffer widths identified (i.e., 4 kilometer), local Ministry of the Environment, Conservation and Parks' Species at Risk Branch offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested. " Please note, should a wolverine den be identified MECP SARB strongly encourages the Project Team to avoid activities that would impact the reproductive female and kits as impacts are likely to result in den and/or kit abandonment which will affect the reproductive success of the individual and overall population. Where the Project is unable to avoid damaging or	Section 14.2.2.2 of the Final EA/IS, Appendix AA Metrics to Help Identify a Preferred Route, and Sections 7.3.2 and 10 of Appendix K Wildlife Technical Support Document have been updated to include the following commitment: - If a wolverine den is identified during Construction, and should this timing not be able to be maintained with the buffer widths identified (i.e., 4 kilometres), a den management plan will be developed and local Ministry of Environment, Conservation and Parks' (MECP) Species at Risk Branch (SARB) offices will be contacted and appropriate Indigenous communities will be notified, where requested. Project activities with the potential to adversely affect denning wolverines will be avoided when possible. If Project activities with the potential to adversely affect denning wolverines cannot be avoided, an authorization under the Endangered Species Act or Species Conservation Act	Final EA/IS Section 14.2.2.2 Appendix AA Appendix K Section 7.3.2, Section 10	1762

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		destroying the den site and/or denning area (i.e., up to 4 km from the den site), an authorization under the ESA or SCA will be required. Should the Project Team seek an authorization under the ESA or SCA in advance of construction for impacts to a specific number of potential Wolverine and Wolverine den sites/areas likely to be impacted by the entire Project, it is likely the authorization will include requirements to minimize adverse effects which would be informed by the Project Team's Wolverine Den Management Plan. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to reflect the following proposed changes in strikethrough and bold: "If a wolverine den is identified during Construction, and should this timing not be able to be maintained within the buffer widths identified (i.e., 4 kilometer), a den management plan will be developed and local Ministry of the Environment, Conservation and Parks' Species at Risk Branch offices will be contacted to develop a den management plan and appropriate Indigenous communities will be notified, where requested; and the	will be obtained prior to the undertaking of the activities.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Project will avoid activities during the denning period that would adversely affect Wolverine or seek an authorization under the ESA or SCA, as appropriate, prior to conducting activities." B – Recommended for EA			
MECP Species at Risk Branch	125	MECP SARB notes the mitigation, protection, monitoring, and study commitments states, "Quarry blasting will not be permitted within 4 kilometers of wolverine dens or suspected wolverine denning areas during the wolverine denning season." [emphasis added] MECP SARB encourages the Project Team to also consider avoiding other activities that generate loud noises during the denning period, such as rock crushing and screening, sustained use of heavy equipment (e.g., bulldozers and graders), and other activities that generate loud noises. Alternatively, if the Project is unable to avoid undertaking activities that result in a sensory disturbance to Wolverine during the denning period (i.e., January 15 to May 30), and authorization under the ESA or SCA will be required. Note, this mitigation action, including	Section 14.2.2.2 of the Final EA/IS, Appendix AA Metrics to Help Identify a Preferred Route, and Sections 7.3.1, 7.3.2 and 10 of Appendix K Wildlife Technical Support Document have been updated to include the following commitment: - Quarry blasting, rock crushing and screening, the use of heavy equipment, and other activities that generate loud noises will not be permitted within 4 kilometres of wolverine dens or suspected wolverine denning areas during the wolverine denning season.	Final EA/IS Section 14.2.2.2 Appendix AA Appendix K Sections 7.3.1, 7.3.2 and 10	1765

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		suggested changes, should be applied to the list of mitigation, protection, monitoring and study commitments for Incidental Take associated with Operation and Maintenance, and Sensory Disturbance and Habitat Loss and Alteration associated with both Construction, Operation and Maintenance. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to reflect the following proposed changes in strikethrough and bold: - “Quarry blasting and screening, sustained use of heavy equipment, and other activities that generate loud noises, will not be permitted within 4 kilometers of wolverine dens or suspected wolverine denning areas during the wolverine denning season.” Additionally, add this mitigation action, including suggested changes, to the list of mitigation, protection, monitoring and study commitments for Incidental Take associated with Operation and Maintenance, and Sensory Disturbance and Habitat Loss and Alteration associated with both Construction, Operation and Maintenance. B – Recommended for EA			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	126	MECP SARB acknowledges the commitment during the Detailed Design phase to "prepare a Cleanup and Reclamation Plan that describes the restoration plan including seedling planting, if necessary, to improve restoration success on areas of temporary disturbance (e.g., temporary access roads, laydown areas, camps, and workspaces). Reclamation plans will be confirmed through engagement with Indigenous communities, the Ministry of Natural Resources, and local foresters." MECP SARB recommends the following as it relates to the proposed Cleanup and Reclamation Plan: - The development of the proposed Cleanup and Reclamation Plan should be completed by a qualified professional with expertise in site reclamation within the Hudson Bay and James Bay Lowlands, or comparably similar ecological conditions. - The development of the proposed Cleanup and Reclamation Plan should include clear objectives for site restoration with a particular focus on habitat restoration for species at risk. - The proposed Cleanup and Reclamation Plan should include detailed site-specific preparation and silvicultural	Best Management Practices for Mineral Exploration and Development Activities and Woodland Caribou in Ontario (https://www.ontario.ca/page/best-management-practices-mineral-exploration-and-development-activities-and-woodland-caribou) will be considered during the development of the Cleanup and Reclamation Plan which will be developed during detail design. Engagement with the Ministry of Environment, Conservation and Parks (MECP) will occur during plan development to discuss appropriate and sufficient mitigations for species at risk.	Comment noted; see response for details.	1768

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		actions necessary to achieve the stated objective(s) and consider the unique type of temporary disturbances (e.g., road, trail, aggregate site, laydown areas, camps, etc.) and pre-existing site conditions (e.g., ecosite, upland or lowland, conifer, mixedwood, deciduous, etc.). For example, temporary roads constructed on upland conifer sites may require active restoration actions such as de-compacting soil and seedling planting to regenerate the site(s) to natural conditions and create of movement barriers to limit predator (e.g., wolf) line-of-sight, movement and hunting efficiency. Alternatively, in some limited instances where temporary disturbance feature(s) in lowland sites receive limited sunlight (e.g., foot trails) passive restoration actions may be appropriate (e.g., natural regeneration). - The development of the proposed Cleanup and Reclamation Plan should be completed with consideration for the Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario | ontario.ca. At a broad scale, this direction is also relevant to Wolverine. - The proposed Cleanup and Reclamation Plan should include detailed monitoring plans, including timing (e.g.,			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		at year 1, 2, 5 and 10 post-planting) and adaptive management actions that will be employed (and when) should monitoring determine the initial restoration efforts are not tracking towards the stated objects for a given site. - In addition to engaging with Indigenous communities, the Ministry of Natural Resources, and local foresters to confirm the proposed Cleanup and Reclamation Plan, the Ministry of the Environment, Conservation and Parks (MECP) Species at Risk Branch (SARB) should also be engaged to ensure the proposed Plan is appropriate and sufficient for species at risk. Additionally, MECP SARB encourages Marten Falls First Nation to include a commitment in the Final EA/IS Report that the proposed Cleanup and Reclamation Plan will be developed in advance of an ESA authorization of the Community Access Road project, should an ESA authorization be necessary, to: o Ensure all appropriate actions are taken to restore temporary project components to suitable habitat for species at risk (e.g., Caribou, Wolverine, Bats, Birds, etc.); o Facilitate the development of appropriate conditions of the ESA			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		authorization; o Meet the legal tests associated with the potential ESA authorizations are met (e.g., reasonable steps to minimize adverse effects on the species are required by conditions of the permit); and o Minimize the likelihood of potential permit amendments. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include consideration of the Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario | ontario.ca (https://www.ontario.ca/page/best-management-practices-mineral-exploration-and-development-activities-and-woodland-caribou) in the development of the proposed Cleanup and Reclamation Plan; and engage MECP SARB on the Plan to ensure it is appropriate and sufficient for species at risk. B – Recommended for EA D – Permitting Related			
MECP Species at Risk Branch	127	For awareness, Ontario has delineated Nursery Areas and Wintering Areas based on observations of animals,	Section 14.2.2.2 of the Final EA/IS and Sections 9.2 and 9.3 of Appendix M Ungulates Technical Support Document	Final EA/IS Section 14.2.2.2	1769

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		evidence of use (e.g., tracks, beds, pellets, slushing, cratering, etc.), and collaring information collected between May 1 to September 15 and December 1 to March 31, respectively. The Final EA/IS Report should include an additional commitment to establish a sensitive data license agreement with the Ministry of the Environment, Conservation and Parks' Species at Risk Branch for the Project (i.e., Contractor) to acquire Boreal Caribou protected habitat information which will support other proposed mitigation commitments (e.g., avoid activities within nursery areas and wintering areas during the sensitive periods). Additionally, MECP SARB recommends the Final EA/IS Report include a commitment to seek updated protected habitat information annually to ensure the Project is using the best available information. Please update this section of Appendix AA, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include an additional commitment to acquire Boreal Caribou protected habitat information; and request updated mapping annually during the	have been updated to include a commitment that the owner/operator will establish a sensitive data license agreement with the Ministry of the Environment, Conservation and Parks' (MECP) Species at Risk Branch for the Community Access Road to acquire Boreal Caribou protected habitat information, which will support other proposed mitigation commitments during construction and operations. Section 14.2.2.2 of the Final EA/IS and Section 9.3 of Appendix M have also been updated to include a commitment to seek updated protected habitat information annually during construction so that the Community Access Road is using the best available information.	Appendix M Section 9.2, Section 9.3	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Construction phase to ensure the Project is using the best available information. B – Recommended for EA			
MECP Species at Risk Branch	128	Additional rationale and justification are required describing why the following projects were excluded from cumulative effects assessment: - Ogoki Forest Management Plans - Little Jackfish River Hydroelectric Project - Mushkegowuk James Bay All-Season Road Coastal and Inland (maybe for EMC)? - North Star and South Star Eagle Limited - Ring of Fire Projects: o Black Bird Mine o Big Daddy Mine o Black Label Mine o Black Thor Mine - Juno Corporation Mining Exploration Activity - Seymour Lake Lithium Project It is MECP SARB's understanding that activities associated with these projects have been initiated and are ongoing. For example, Juno Corporation Mining Exploration Activity and Seymour Lake Lithium Project include early exploration activities that have occurred and are ongoing that should be considered in the	All of these projects were included and considered in the overall Project Inclusions List but were not carried forward to discipline-specific cumulative effects assessments for various reasons, except for the Ogoki Forest Management Plans which were assessed under the Vegetation and Wildlife disciplines. - The Ogoki Forest Management Plans was carried forward in the Ungulates Technical Supporting Document cumulative effects assessment. - The Little Jackfish River Hydroelectric project was not carried forward because the project is currently on hold. At the time of preparing the Final EA/IS, no publicly available information regarding its timing or status was available. - The Muskkegowuk James Bay All-Season Road Coastal and Inland project was not carried forward because at the time of preparing the Final EA/IS, no publicly available information regarding its timing or status was available.	Final EA/IS Table 10-1 Appendix E Appendix M	1770

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		cumulative effects assessment. If this is not the case and these projects have not been initiated, please confirm. Please update this section of Appendix E, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include additional rationale and justification describing why these projects were excluded from cumulative effects assessment. Alternatively, please confirm if these projects have not been initiated. B – Recommended for EA	- The North Star and South Star Eagle Limited Project could not be included in the cumulative affects assessment as reasonably foreseeable activities, since plans for future development had not been disclosed at the time of preparing the Final EA/IS. - Ring of Fire projects are mineral deposits, and no activities are currently occurring. Therefore, they cannot be assessed as reasonably foreseeable activities in the cumulative effects assessment, as plans for future development have not been disclosed at the time of preparing the Final EA/IS. Furthermore, a representative from the Ring of Fire projects indicated in May 2025 that the Black Thor and Black Label deposits should not be considered feasible at this time or in the near future. - Updated information has been included for Juno Corporation Mining Exploration Activity and Seymour Lake Lithium Project on the Project Inclusions List, and this was updated in the Final EA/IS.		
MECP Species at Risk Branch	129	Figures 3-2 and 3-3 appear to be displaying incorrectly. Please update this section of Appendix J, and all other relevant locations within	Attachment B of Appendix J Vegetation Technical Support Document have not been updated.	Comment noted; see response for details.	1771

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		relevant Appendices and Final EA/IS Report as appropriate, to correct figures. C - Editorial			
MECP Species at Risk Branch	130	"Sensory disturbance…can alter ungulate habitat availability…" This appears to be a typo as MECP understands the Draft Technical Support Document: Existing Conditions & Effects Assessment is specific to all wildlife with the exception of ungulates. Revise the typo in the Final EA/IA. C - Editorial	The comment indicates there is a typo in the executive summary relating to "sensory disturbance ... can alter ungulate habitat availability". The executive summary includes no such sentence. Tables 9.3-13 and 9.3.14 (formerly Tables 9-26 and 9-27) of the Final EA/IS do include that language. These tables are specific to ungulates and as such the mention of sensory disturbance which can alter ungulate habitat availability is correct.	Comment noted; see response for details.	1772
MECP Species at Risk Branch	131	The information sources listed do not include the Abandoned Mine Infrastructure System database, orthophotography, and topographical mapping referenced elsewhere (e.g. Appendix K, Attachment B) as information sources reviewed to support refinement of screening of potential features to support bat hibernacula in the LSA and RSA. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include all of the databases and	Section 4.3.1.1 of Appendix K Wildlife Technical Support Document has been updated to include all of the databases and information sources that were reviewed in screening potential features to function as bat hibernacula in the Wildlife Local Study Area and Regional Study Area including the Abandoned Mines Information System database, orthophotography, and topographic mapping.	Appendix K Section 4.3.1.1	1773

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		information sources that were reviewed in screening potential features to function as bat hibernacula in the LSA and RSA in the Final EA/IS. A - Required for EA			
MECP Species at Risk Branch	132	Table 4-7 summarizes bat maternity roost habitat surveys and bat acoustic monitoring carried out during the maternity period but does not include field surveys carried out at potential bat hibernacula. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include all field surveys that were carried out to screen out potential features as candidate hibernacula in the LSA and RSA. A - Required for EA	Table 4-7 and Attachment B of Appendix K Wildlife Technical Support Document has been updated to include a description of all field surveys that were carried out to screen out potential features as candidate hibernacula in the Wildlife Local Study Area and Regional Study Area including aerial surveys between 2019 and 2023, and a targeted aerial reconnaissance survey of the Albany River crossing in 2023.	Appendix K Table 4-7, Attachment B	1774
MECP Species at Risk Branch	133	“Bats that roost in tree cavities have less fidelity to roost sites than species that roost in buildings or caves.” However, high fidelity to suitable natural maternity roosts has been observed, with roosting areas and some roost sites used within and in subsequent years and across generations (i.e., offspring return to natal roost to raise young; MECP 2020; CWHC 2024). Fidelity to natural roosts may be lower if suitable roosts are not	The literature cited (MECP 2020, CWHC 2024, Holroyd et al., 2023) have been reviewed and Sections 5.1 and 7.3.1.2 of Appendix K Wildlife Technical Support Document have been updated as appropriate to discuss the fidelity of bats to natural roosts in the context of the habitat available in the Wildlife Local Study Area and Regional Study Area.	Appendix K Section 5.1, Section 7.3.1.2	1775

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		limiting on the landscape (Holroyd et. al. 2023). The Draft EA/IS acknowledges that suitable maternity roost habitat is limiting in the LSA and RSA. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to consider the potential for Little Brown Myotis and Northern Myotis to exhibit higher fidelity to natural roosts in the LSA and RSA where suitable maternity roost habitat is limiting in the residual effects assessment. B – Recommended for EA			
MECP Species at Risk Branch	134	Appendix K – Wildlife does not provide a robust description of Wolverine habitat or estimates of the total amount of Wolverine habitat within the LSA and RSA within the existing environment, following the effects assessment, residual effects, and cumulative effects, as was done for other wildlife species (e.g., Bats, American Marten, Beaver, etc.). Rather, the Draft EA/IS Report appears to suggest that Wolverine are habitat generalists and do not appear to be associated with any specific vegetation habitat. Rather, evidence suggests "habitat use is best described as a	Section 5.2.1 of Appendix K Wildlife Technical Support Document provides a discussion of the wolverine habitat, including denning requirements, and prey requirements in the context of the Wolverine Regional Study Area (RSA). Section 7.3.1.3.1.3 of Appendix K describes the predicted residual effects of habitat loss resulting from the Community Access Road with the assumption that all habitat is considered wolverine habitat. The relevant sections of Appendix K will be updated to include a quantitative description of Wolverine habitat within the Wolverine Local Study Area (LSA)	Appendix K Section 5.2.1, Section 7.1.2.1, Section 8.2.3	1776

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		function of large undisturbed wilderness areas and seasonal variation in food abundance and denning requirements". However, neither the Draft EA/IS Report or Appendix K – Wildlife provides a clear description of the existing environment in the context of large undisturbed wilderness areas, food abundance, or potential denning habitat. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include a description of Wolverine habitat and estimate the total amount of Wolverine habitat within the LSA and RSA within the existing environment, following the effects assessment, residual effects, and cumulative effects, as was done for other wildlife species (e.g., Bats, American Marten, Beaver, etc.). A – Required for EA	and RSA within the existing environment, and a qualitative discussion of Wolverine habitat within the residual and cumulative effects.		
MECP Species at Risk Branch	135	Additional information should be provided on the estimated number of male and female Wolverine within the Local Study Area, if possible. Section 5.2.1.3 of Appendix K – Wildlife states, "Based on the spatial capture-	As described in Section 5.2.1 of Appendix K Wildlife Technical Support Document, a total of 17 unique wolverine individuals were identified through the wolverine snag surveys. A large portion of the individuals (11 of 17) were of unknown sex, while 4 females and 2	Comment noted; see response for details.	1777

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		recapture modelling completed using the data collected during the 2022 wolverine hair snag surveys, the estimated density of wolverine for the Local Study Area is 1.21 individuals per 1,000 km2, and 0.60 individuals per 1,000 km2 in 2023. The model predicted that 43 individuals had home ranges that overlap the existing conditions Local Study Area in 2022, and 21 individuals had home ranges that overlap the existing conditions Local Study Area in 2023." The estimated number of Wolverines within the Local Study Area (i.e., 43 in 2022; 21 in 2023) should be further subdivided into the estimated number of male and female Wolverines. This can be used to specifically estimate the total number of reproductive female denning areas likely to be directly impacted (e.g., habitat removal, etc.) and indirectly impacted (e.g., sensory disturbance, etc.) by the Community Access Road. For awareness, this information will likely be required during the authorization process under the ESA or SCA, should an authorization be required. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as	males were confirmed. An actual sex ratio in the samples or local population remains uncertain. The mark-recapture modelling predicted that 43 individuals may have home ranges that overlap the Local Study Area, however, due to the limited demographic data obtained during baseline, predictions of sex ratios are difficult to accurately estimate. Due to the uncertainty, the Final EA/IS and Appendix K have not been updated with wolverine sex ratios in the Wolverine Local Study Area (LSA) or Regional Study Area (RSA). The owner/operator will engage with the Ministry of Environment, Conservation and Parks (MECP) to determine the appropriate assumptions that will be required for the permitting or authorization requirements for impacts of the Community Access Road on wolverine.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		appropriate, to expand the analysis to estimate the number of male and female wolverine home ranges that overlap the existing conditions Local Study Area, if possible. B – Recommended for EA D – Permitting Related			
MECP Species at Risk Branch	136	"As such, individuals returning during maternity roosting that previously used habitats in the effects assessment Construction Disturbance Area are expected to establish roosts in suitable habitat outside of the effects assessment Construction Disturbance Area." "Although sensory disturbance from traffic may result in periodic changes to bat foraging behaviour, it is unlikely to have a measurable effect on bat survival and reproduction" "Changes in animals' energy budgets may decrease their survival or reproductive success." "Bats are highly mobile and capable of relocating to portions of the cumulative effects assessment Regional Study Area not affected by the sensory disturbance from the Project and other reasonably foreseeable developments."	Consideration will be given to the applicable species at risk legislation for Project-related effects on protected species and habitat during construction, operation and maintenance phases of the Community Access Road. Regarding the determination of magnitude and significance for residual effects on Little Brown Myotis and Northern Myotis resulting from displacement from maternity roosts due to Project activities, the assessment recognizes that suitable maternity roost habitat for these species is limited in the Wildlife Local and Regional Study Areas. The determination of magnitude and significance was made based on several factors: - Species Mobility and Roosting Ecology: Both bats are highly mobile and capable of relocating to alternative roosts within the landscape. While fidelity to maternity roosts can occur where suitable habitat is limited, these species	Comment noted; see response for details.	1778

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		The MFCAR ToR required an assessment of the change or disruption in Little Brown Myotis and Northern Myotis breeding behaviour, habitat distribution, and survival and reproduction (population state). The Draft EA/IS summarizes the potential displacement and relocation of Little Brown Myotis and Northern Myotis from using available maternal roosts in the Construction Disturbance Area to outside of the Construction Disturbance Area during/following Construction (Appendix K). This informed the magnitude and determination of significance of residual effects summarized in Section 9.4.3.4 and Table 9-22 of the Draft EA/IS. Under the amended ESA and forthcoming SCA, undertaking an activity that results in harassment of a SAR is no longer prohibited. Undertaking an activity that results in harm to SAR or killing a SAR continues to be prohibited. The Policy Guidance on Harm and Harass under the Endangered Species Act can support you in determining whether an activity may result in only harassment, or whether it may result in harm or killing. Please note that this policy guidance was	are known to use a network of roosts and can adapt to changes in habitat availability, especially in landscapes where suitable habitat remains. - Assessment of Habitat Availability: The assessment considered both the direct loss of maternity roost habitat and the availability of alternative roosting sites in the broader study areas. Although the loss of roosting habitat is anticipated, the proportion of habitat affected relative to the total available was determined to be low, and the remaining habitat is expected to support self-sustaining and ecologically effective populations at the regional scale. - Precautionary Approach: Where uncertainty exists, a precautionary approach was applied in the assessment, as described in the methods in Appendix K Wildlife Technical Support Document. The significance threshold was set at the population level, and effects were considered significant if they were likely to compromise the ability of the population to remain self-sustaining and ecologically effective. Based on these considerations, the original determination of magnitude and significance is appropriate and supported by the available evidence and		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		developed prior to the June 5, 2025, amendments, and some are no longer relevant. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. For awareness, species avoidance of suitable maternity roost habitats due to Project activities may eliminate the function of suitable habitat surrounding the Construction Disturbance Area to support maternity roosting bats, and may indirectly decrease female survival and reproductive success especially if alternative suitable roosts are not available on the landscape (CWHC 2024). Traffic noise exceeding 10 kHz disrupts normal echolocation frequencies for species at risk bats (Moretto and Francis 2017, Bunkley et al. 2015). MECP SARB encourages the MFCAR Project Team to consider how species displacement and avoidance of suitable habitat from project activities may result in negative impacts to species' breeding behaviour, survival and reproductive success, and provide additional information detailing how the displacement of maternity roosting bats	assessment framework.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		from maternal roosts within the Construction Disturbance Area may affect female breeding behaviour, survival, and reproductive success in the final EA/IS. Please consider revising determinations of magnitude and significance of residual effects in the final EA/IS. B – Recommended for EA D - Permitting Related			
MECP Species at Risk Branch	137	"The Project is predicted not to have any effect on connectivity among populations that overlap with the effects assessment Regional Study Area because bats are highly mobile."; "Although sensory disturbance from traffic may result in periodic changes to bat foraging behaviour, it is unlikely to have a measurable effect on bat survival and reproduction". However, the writers note that "Roads are thought to have greater barrier effects on bats than other linear disturbances such as rail lines and transmission lines because roads are usually wider and have more vehicle traffic (sensory disturbance)." and "Changes in animals' energy budgets may decrease their survival or reproductive success." This information appears to suggest bats may have a lower tolerance for roads,	Section 5.1.2 and 7.3.1.2.2 of Appendix K Wildlife Technical Support Document provide a description, including literature references, of the potential barrier effect of roads on bats. Potential impacts of sensory disturbance, including noise levels and their potential to disrupt echolocation and foraging, were considered in the determination of magnitude. The assessment found that, although periodic changes in foraging behaviour may occur, these are unlikely to have a measurable effect on bat survival and reproduction at the population level, given the availability of alternative habitat and the species' mobility. Based on these considerations, the original determination of magnitude and significance is appropriate and	Comment noted; see response for details.	1779

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		that may result in changes to connectivity (movement and behaviour), affecting habitat availability and distribution, adversely affecting survival and reproduction. For awareness, traffic noise exceeding 10 kHz disrupts normal echolocation frequencies for species at risk bats (Moretto and Francis 2017, Bunkley et al. 2015). It is unclear if the barrier effect of roads, changes in bat energy budgets, and impacts to bat foraging behaviour and normal echolocation activity were considered in evaluating effects to bat habitat availability, distribution, survival and reproductive success. To improve clarity, please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide more information that the barrier effect of roads, changes in bat energy budgets, and impacts to bat foraging behaviour and normal echolocation activity were considered in the determination that sensory disturbance through Operation and Maintenance is not measurable (negligible magnitude). B – Recommended for EA	sufficiently supported by the available evidence and assessment framework. If new evidence or monitoring results indicate that barrier effects or sensory disturbance are having a greater impact than anticipated, adaptive management measures will be implemented to address these effects.		
MECP Species	138	“Changes in the availability of foraging or	Retention of suitable maternity roost	Comment	1780

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
at Risk Branch		roosting habitat are not predicted to cause a change in the abundance of bats within the effects assessment Regional Study Area because bats are highly mobile and cavity tree roosting habitat is ephemeral in nature." Because cavity trees are ephemeral in nature these species rely on a network of roosts in a larger roosting area, highlighting the importance of retention of suitable maternity roost habitat in a landscape where it is limiting. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to consider the importance of retention of suitable maternity roost habitat in a landscape where it is limiting in the assessment of residual project effects on bat habitat loss and alteration. B – Recommended for EA	habitat in a landscape where it is limited, where feasible, is included in the Final EA/IS and Appendix K Wildlife Technical Support Document. Mitigation measures for Project-related effects from habitat loss and alteration on bat habitat availability, distribution, and survival and reproduction are described in Section 7.3.1.2.1.2 and Table 7-10 of Appendix K.	noted; see response for details.	
MECP Species at Risk Branch	139	Additional information should be included in the Final EA/IS Report associated with the commitment to develop and implement a Cleanup and Reclamation Plan for Bats. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide additional information on the	Section 7.3.1.2.1.2 of Appendix K Wildlife Technical Support Document includes a commitment to develop a Cleanup and Reclamation Plan which will be developed during detail design and will include considerations for bats. Engagement with the Ministry of Environment, Conservation and Parks (MECP) will occur during plan	Comment noted; see response for details.	1781

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		commitment to develop and implement a Cleanup and Reclamation Plan for Bats. B – Recommended for EA D – Permitting Related	development to discuss appropriate and sufficient mitigations for species at risk.		
MECP Species at Risk Branch	140	Insufficient information provided regarding the number of potential reproductive Wolverine denning areas likely to be impacted by the Construction, Operation and Maintenance of the Community Access Road. Section 7.3.1.3.1.1 of Appendix B – Wildlife states, “Two suspected wolverine denning areas were observed during the aerial wolverine den survey program… The aerial wolverine den survey did not provide complete coverage of the wolverine existing conditions Local Study Area. Therefore, these suspected wolverine denning areas are likely not the only wolverine denning area located in the wolverine effects assessment Local Study Area.” The Final EA/IS Report should include an assessment on the number of potential Wolverine denning areas likely to be impacted by the Project to inform the assessment of the existing condition, effects assessment, residual effects	Based on the information available, including previous studies on home range size and the mark-recapture study conducted for the Community Access Road, it is not possible to provide an estimate of the total number of wolverine denning areas likely to be impacted by the Community Access Road. Section 5.2.1 of Appendix K Wildlife Technical Support Document provides a description of female home ranges, denning habitat and literature references. As outlined in Section 5.2.1, there is variation in the findings between studies regarding the size of female home ranges. Scrafford et al. (2022) found the average home range area for females in the Red Lake area to be 713 km2. Dawson et at. (2010) found the female average home range in the Red Lake area to be 340 km2. Reproductive females have smaller home ranges than non-reproductive females. In addition to the wide range of female home range areas documented in the Red Lake area,	Comment noted; see response for details.	1782

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		assessment and cumulative effects assessment associated with Habitat Loss, Habitat Availability and Reproduction and Survival. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide an assessment on the number of potential Wolverine denning areas likely to be impacted by the Project. A - Required for EA	there are important differences in the habitat availability and population densities between the Red Lake area and the Project Local Study Area (LSA) and Regional Study Area (RSA). The LSA and RSA have a more limited abundance and distribution of rocky habitat, a greater abundance and distribution of wetlands, and a lower wolverine population density than the Red Lake area, which limit the ability to apply home range sizes in the Red Lake area to the Project study areas. The wolverine hair snag mark-recapture study informed the modelling of the relative probability of density of wolverine activity centres in the LSA but does not inform an estimate of home range size. Additionally, suitable denning habitat is not uniformly distributed across the LSA, and the species occupies the LSA in low numbers. Due to the uncertainty described above, it would not be accurate to estimate the number of potential denning areas within the LSA based on the information available. Section 9.2 of Appendix K includes a commitment that if clearing or grubbing are required during the wolverine denning period (February January 15 to		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
			May 31) in habitat suitable for wolverine denning, surveys for the presence of wolverine dens will be conducted prior to clearing. Details on the surveys are provided in Section 9.2 of Appendix K.		
MECP Species at Risk Branch	141	Additional information should be included in the Final EA/IS Report associated with the commitment to develop and implement a Cleanup and Reclamation Plan for Wolverine. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide additional information on the commitment to develop and implement a Cleanup and Reclamation Plan for Wolverine. B – Recommended for EA D – Permitting Related	Sections 7.3.1, 7.3.2 and 10 of Appendix K Wildlife Technical Support Document have been updated to clarify that a Cleanup and Reclamation Plan will be developed during detail design and will include consideration for Wolverine. Engagement with the Ministry of Environment, Conservation and Parks (MECP) will occur during plan development to discuss appropriate and sufficient mitigations for species at risk.	Appendix K Section 7.3.1, Section 7.3.2 and Section 10	1783
MECP Species at Risk Branch	142	The Appendix states, “hanges to surface water quantity” [emphasis added] Revise the typo in the Final EA/IS Report. C - Editorial	Table 7-10 of Appendix K Wildlife Technical Support Document has been updated to revised "hanges" to "changes".	Appendix K Table 7-10	1784
MECP Species at Risk Branch	143	To further minimize the potential effects of the Community Access Road on increased incidental trapping, MECP SARB recommends the list of proposed mitigation and enhancement measures related to the potential effect of increase	Section 7.3.1.3.6.2 and Tables 7-10, 9-1 and 10-1 of Appendix K Wildlife Technical Support Document have been updated to include mitigation and enhancement measures to develop and implement a proactive outreach and education	Appendix K Section 7.3.1.3.6.2 and Tables 7-10, 9-1 and 10-1	1823

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		in public access include a proactive outreach and education program with all licensed trappers whose traplines overlap with the Wolverine LSA to increase awareness of the presence of Wolverine within the area, the potential effects of incidental trapping on Wolverine populations, and effective mitigation measures that reduce the likelihood of incidentally trapping a Wolverine as outlined in Best Management Practices to Avoid Wolverine (OFMF 2018). Additionally, MECP SARB recommends developing the outreach and education program with input from the Ontario Fur Managers Federation (OFMF), the Ministry of Natural Resources, and the Ministry of the Environment, Conservation and Parks. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include an additional mitigation and enhancement measure to develop and implement a proactive outreach and education program aimed at increasing awareness of the presence of Wolverine within the area, the potential effects of incidental	program aimed at increasing awareness of the presence of Wolverine within the area, the potential effects of incidental trapping on Wolverine populations, and effective mitigation measures that reduce the likelihood of incidentally trapping a Wolverine as outlined in Best Management Practices to Avoid Wolverine (OFMF 2018).		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		trapping on Wolverine populations, and effective mitigation measures that reduce the likelihood of incidentally trapping a Wolverine as outlined in Best Management Practices to Avoid Wolverine (OFMF 2018). B – Recommended for EA			
MECP Species at Risk Branch	144	Additional information is required to clarify and support the conclusions of Residual Effects for Wolverine, specifically determinations of magnitude as a result of habitat loss and alteration. The Draft EA/IS Report (Section 9.4.3.3 – pg. 470) states, “Magnitude is categorized as negligible, low, moderate, or high using numeric quantification or qualitative expression and supported by the literature through a reasoned narrative”. However, several statements in Section 7.3.3.3.1 of Appendix K – Wildlife do not include numeric quantification or provide references to supporting literature. For example: - “Changes to available habitat, particularly in areas where maternal dens may be constructed, may reduce the survival and reproductive output of wolverines in the wolverine effects	Sections 7.3.1.3.1 and 7.3.3.3.1 of Appendix K Wildlife Technical Support Document provide a scientifically supported rationale for the characterization of the residual effects of habitat loss and alteration on wolverine. The assessment draws on a combination of quantitative data, literature review, and established ecological principles to characterize both direct and indirect effects of habitat loss and alteration. Literature references are cited in Section 7.3.1.3.1 of Appendix K. Section 7.3.1.3.1 of Appendix K has been updated to include estimates of female wolverine home range sizes from the scientific literature to further strengthen the rationale and transparency of the assessment.	Appendix K Section 7.3.1.3.1	1824

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		assessment Local Study Area." o While MECP SARB agrees with this statement, reference to supporting literature should be included. - "The total area of habitat to be removed by the Project amount to less than one female home range." o This statement should include the range of estimated average female home range sizes from available literature and reference to supporting literature. - "Indirect road effects on potential denning habitat within 4 km of the Construction Disturbance Area will further affect habitat availability, distribution, and survival and reproduction." o While MECP SARB agrees with this statement, limited information has been provided/referenced that informs the extent of this impact. For example, additional information should be provided on the estimated number of male and female Wolverine home ranges that overlap the Local Study Area, if possible, to further inform and substantiate this statement. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		additional information and literature references to support the characterization of potential residual effects. B - Recommended for EA			
MECP Species at Risk Branch	145	Additional information is required to clarify and support the conclusions of Residual Effects for Wolverine, specifically determinations of magnitude as a result of sensory disturbances. Section 7.3.3.3.2 (Sensory Disturbance) of Appendix K – Wildlife provides the following numeric quantification and reasoned narrative regarding the potential effects of sensory disturbance associated with the Community Access Road: - The amount of habitat that will be indirectly affected within 4 km of the active roadway (189,145 ha, or 40.95% and 1.17% of the LSA and RSA, respectively); - Supporting literature which suggests sensory disturbances are likely to affect: o foraging and dispersal, contributing to habitat fragmentation and decreasing survival; o modified behaviour such as increase movement rates through the Project	The assessment acknowledges that increased sensory disturbance may lead to avoidance of suitable denning habitat. Indirect road effects on potential denning habitat within 4 km of the Construction Disturbance Area will further affect habitat availability, distribution, and survival and reproduction. The potential for population-level impacts on the regional wolverine population resulting from the residual effects of Project-related sensory disturbance is recognized. Based on the weight of evidence and the feedback received from the Ministry of Environment, Conservation and Parks (MECP), the magnitude of this effect has been reconsidered and will be characterized as moderate rather than low. Section 9.4.3 of the Final EA/IS and Section 7.3.3.3 of Appendix K Wildlife Technical Support Document have been updated to include the revised magnitude and rationale for the magnitude	Final EA/IS Section 9.4.3 Appendix K Section 7.3.3.3	1825

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		area, alter the areas chosen to build dens, modify their dispersal patterns, and avoid the area altogether. Section 7.3.3.3.1 (Habitat Loss and Alteration) of Appendix K – Wildlife also provides relevant information regarding the potential indirect habitat loss (due to sensory disturbance), including: - “Changes to available habitat, particularly in areas where maternal dens may be constructed, may reduce the survival and reproductive output of Wolverines in the Wolverine effects assessment LSA;” - “Indirect road effects on potential denning habitat within 4 km of the Construction Disturbance Area will further affect habitat availability, distribution, and survival and reproduction.” It's also identified that the effects of sensory disturbance on Wolverine are anticipated to be continuous, permanent, and irreversible. However, the Project has concluded that these effects from sensory disturbance are anticipated to be low in magnitude. This is inconsistent with the evidence provided and summarized above. Sensory disturbances are likely to result	characterization.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		in continuous, permanent, and irreversible impacts to up to an estimated 43 Wolverines within the LSA (Section 7.1.2.1.3 of Appendix K – Wildlife [pg. 131]). Recognizing the population estimate for Wolverine in Ontario is 458-645 (Section 5.2.1.3 of Appendix K – Wildlife [pg. 94]), the Community Access Road is therefore anticipated to affect between 6.7% to 9.4% of the total Wolverine population in Ontario. Furthermore, the Community Access Road is anticipated to impact a minimum of two reproductive female Wolverine denning areas; but given the estimated 43 Wolverine home ranges likely to be impacted, the lack of estimated male:female ratio, and the limited spatial coverage of the Wolverine Denning Surveys, there is a high likelihood that more than two denning areas will be impacted by sensory disturbance. Collectively, direct and indirect effects as a result of sensory disturbances to the function of Wolverine habitat, including denning areas, associated with the Community Access Road are anticipated to reduce the survival and reproductive output of Wolverines within both the LSA and RSA. With the above understanding and recognizing Wolverines have low			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		reproductive rates and naturally occur at low population density across their range (COSEWIC, 2014), it is likely more appropriate to identify the magnitude of sensory disturbance from the Community Access Road is anticipated to be moderate. MECP SARB encourages the Project to reconsider the conclusions associated with the magnitude of sensory disturbances; and update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate. B - Recommended for EA			
MECP Species at Risk Branch	146	Additional information is required to clarify and support the conclusions of Residual Effects for Wolverine, specifically determinations of magnitude as a result of increase in predator access. Section 7.3.3.3.3 of Appendix K – Wildlife states, “Increased predator access along the Community Access Road corridor may allow for increased competitive interactions between wolverines and coyotes, wolves, black bears, or Canada lynx, and may cause increased mortality	The assessment of residual effects for Wolverine, specifically determinations of magnitude as a result of increase in predator access is provided in Appendix K Wildlife Technical Support Document and is considered valid and robust for several reasons: - Evidence-Based Approach: The analysis of increased predator access is grounded in quantitative data, including the calculation of linear feature density within the Wolverine Regional Study Area (RSA). The assessment found that the Community Access Road will result in a	Comment noted; see response for details.	1826

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		from direct predation of wolverines by species such as wolves and black bears." Despite this and the conclusion that the predicted effects of increased predator access will be continuous and permanent, the Project has concluded the magnitude is anticipated to be negligible due to a "very small increase in linear feature density in the wolverine effects assessment Regional Study Area (0.04 km/km2), and linear corridors will remain absent or limited in most of the wolverine effects assessment Regional Study Area" MECP SARB notes that "uncertainty" was assessed as "low", suggesting there is sufficient information available to infer this level of magnitude. However, Section 7.3.3.3.3 does not include any discussion or provide any information or supporting literature to inform or support this assessment of uncertainty. Additionally, MECP SARB notes that the Project has considered proposed mitigation measures in the above assessment, but these measures appear to focus predominantly on temporary project components and "inactive areas",	small increase in linear feature density (0.04 km/km²), and that linear corridors will remain absent or limited in most of the Wolverine RSA. - Consideration of Regional Context: The assessment recognizes that Wolverines are sensitive to landscape fragmentation and increased predator access, but also places the Community Access Road's incremental effects in the context of the existing landscape. Given the low baseline density of linear features and the limited extent of new corridors, the predicted effect on predator access is considered negligible at the population level. - Precautionary Approach and Overall Effects: While the direct residual effect of increased predator access is characterized as negligible and not significant, the assessment also considers the combined interactions of all Project-related effects. Importantly, the overall determination of significance of the Community Access Road on Wolverine incorporates these interacting effects, and where warranted, the assessment applies a precautionary approach, and a significant effect is predicted. - Supporting Literature and Rationale: The methods for determining t		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		and/or actions that may have limited effect during operation and maintenance (e.g., physical control measures such as roll back, removal of creek crossings, recontouring to surrounding topography, etc.). As such, it is unclear how effective the proposed mitigation measures will be in reducing predator access/use and associated predator interactions. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include additional information and literature references to support the characterization of potential residual effects. B - Recommended for EA	he magnitude and significance of effects is described in detail in Sections 4.4.2.5.2 and 4.4.2.6 of Appendix K. These sections outline the criteria, rationale and literature references used to evaluate population-level impacts, resilience, and adaptability. Based on these considerations, the current assessment of increased predator access is appropriate and sufficiently supported. Therefore, no additional updates have been made to the Final EA/IS or Appendix K.		
MECP Species at Risk Branch	147	Additional information is required to clarify and support the conclusions of Residual Effects for Wolverine, specifically determinations of magnitude as a result of increase in public access. Section 7.3.1.3.6.1 (Potential Effects) of Appendix K – Wildlife (pg. 211) states, “Wolverine mortalities and injuries have been demonstrated to occur due to incidental catch during fur trapping	The assessment acknowledges that increased public access may lead to greater trapping pressure and incidental mortality for Wolverine, a species with low reproductive rates and low resilience to additional mortality. The potential for population-level impacts is recognized. Based on the weight of evidence and the feedback received from the Ministry of Environment, Conservation and Parks	Final EA/IS Section 9.4.3 Appendix K Section 7.3.3.3	1827

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		(Scrafford et al., 2024; Ontario Wolverine Recovery Strategy, 2013)." Section 7.3.1.3.6.3 (Predicted Residual Effects) of Appendix K – Wildlife (pg. 212) states, "The Project is expected to result in a measurable increase in public access and trapping opportunities for Indigenous and non-Indigenous trappers in the wolverine effects assessment Local Study Area during Operation and Maintenance relative to existing conditions… Any increase in wolverine trapping effort may have a measurable effect on wolverine survival and reproduction." [emphasis added] Section 7.3.3.3.6 (pgs. 300-301) of Appendix K – Wildlife states: - "The geographic extent of the effect is likely limited to the area within 10 km of the Community Access Road, with the effect decreasing with distance from the road. The potential increase in trapping and the corresponding increase in wolverine mortality within the wolverine effects assessments Local and Regional Study Areas resulting from the increase in public access is not possible to predict because fur market prices influence efforts expended on trapping (Ontario Wolverine Recovery Team, 2013)"	(MECP), the magnitude of this effect has been reconsidered and will be characterized as moderate rather than low. Section 9.4.3 of the Final EA/IS and Section 7.3.3.3 of Appendix K Wildlife Technical Support Document have been updated with the revised magnitude and rationale for the magnitude characterization.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		- "The effects of increase in public access are predicted to be possible, continuous, and irreversible within the wildlife effects assessment Local Study Area. After mitigation, the effects from Increase in Public Access on the ability of the wolverine population in the wolverine effects assessment Regional Study Areas to remain self-sustaining and ecologically functional are anticipated to be negative but low in magnitude." Despite this and the conclusion that the predicted effects of increase in public access will be permanent, continuous, and irreversible, and the high degree of uncertainty regarding potential increase in trapping (intentional or incidental), the Project has concluded the magnitude is anticipated to be low. This conclusion is inconsistent with the information provided. Incidental trapping is identified as one of the principal threats to Wolverine survival and recovery in Ontario (Ontario Wolverine Recovery Strategy, 2013), which notes, "By virtue of their low reproductive rates, limited range and distribution, and large home ranges, Wolverine has a low resilience to trapping pressure. As such, overexploitation can lead to local extirpation with replacement of removed			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		animals a slow process, if it occurs at all (Banci and Proulx 1999).” Between the 2001-02 to 2012-13 trapping seasons, there were 34 confirmed incidental Wolverine captures in the province; and between the 2001-02 to 2007-08 trapping seasons, First Nations harvest reported 50 Wolverine (Ontario Wolverine Recovery Strategy, 2013). Scrafford et al. (2024) recently noted the largest source of death [within their study] was from incidentally trapped Wolverine (n = 6 in Red Lake), which aligns with the findings from trapped populations throughout North America (Krebs et al. 2004, Webb et al. 2013); and suggested, “Wolverine population stability or growth might be achieved by reducing incidental trapping deaths or injury and hindering human access to wolverine habitats through decommissioning or limiting development of industrial roads or other anthropogenic linear features.” Additionally, the Community Access Road may impact up to an estimated 43 Wolverine home ranges that overlap the LSA (Section 7.1.2.1.3 of Appendix K – Wildlife [pg. 131]). Recognizing the population estimate for Wolverine in			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Ontario is 458-645 individuals (Section 5.2.1.3 of Appendix K – Wildlife [pg. 94]), the Community Access Road is therefore anticipated to affect between 6.7% to 9.4% of the total Wolverine population in Ontario. MECP SARB also notes the Project has considered proposed mitigation measures in the above assessment, but these measures appear to focus predominantly on temporary project components and access roads. While these measures may be somewhat effective in reducing public access to these limited areas, they will do little to mitigate the greater increase in public access provided by the Community Access Road itself. Based on the information provided and the weight of evidence demonstrating the effects of incidental trapping on Wolverine survival and reproduction, the potential effects on Wolverine as a result of increase in public access associated with the Community Access Road are anticipated to reduce the survival and reproductive output of Wolverines within both the LSA and RSA. With the above understanding and recognizing Wolverines have low reproductive rates			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		and naturally occur at low population density across their range (COSEWIC, 2014), it is likely more appropriate to identify the magnitude of increase in public access from the Community Access Road is anticipated to be moderate. MECP SARB encourages the Project to reconsider the conclusions associated with the magnitude of sensory disturbances; and update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate. B - Recommended for EA			
MECP Species at Risk Branch	148	The proposed mitigation, protection, monitoring, and study commitments notes, “The wolverine denning period (February 1 to May 31) will be considered when planning construction timing if clearing or grubbing must occur during the wolverine denning period, aerial surveys to detect the presence of potential denning areas will be completed prior to construction within 4 km of active wolverine dens during the denning period.” [emphasis added], and “If clearing or grubbing must occur during the wolverine denning period (February 1	Sections 7.3.1 and 9.2, and Tables 7-10 and 10-1 of Appendix K Wildlife Technical Support Document have been updated to clarify the Wolverine denning period as January 15 to May 31.	Appendix K Sections 7.3.1 and 9.2, Tables 7-10 and 10-1	1828

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		to May 1), areas with potential dens will be surveyed prior to construction activities." The Wolverine denning period is broadly considered January 15 to May 31, and MECP SARB encourages the Project Team to consider these dates as relates to the proposed mitigation (i.e., conducting aerial surveys to detect the presence to potential denning areas). Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to correct the wolverine denning period referenced in Section 10 – Table 10-1, and all other relevant locations within the Report and associated Appendices (e.g., Appendix AA, Appendix K), as appropriate. A – Required for EA			
MECP Species at Risk Branch	149	"Residual effects…do not represent a substantial risk to reptile and amphibian populations in the wildlife effect assessment Regional Study Area." This paragraph relates to Little Brown and Northern Myotis, not reptile and amphibians.	Section 8.2.2.3 of Appendix K Wildlife Technical Support Document has been updated to correct the taxon.	Appendix K Section 8.2.2.3	1829

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Correct the taxon in the sentence in the Final EA/IA. C - Editorial			
MECP Species at Risk Branch	150	"Rapid bat maternity roost habitat characterization…consisting of a habitat description and three cavity tree density plots."; "…bat maternity roost habitat characterization…consisting of a habitat description and an estimate of cavity tree density." It is unclear if results of cavity tree density plots were incorporated in mapping of suitable Little Brown Myotis and Northern Myotis maternity roost habitat. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide additional detail if and how estimates of cavity tree densities calculated from habitat characterization surveys were incorporated into mapping of suitable Little Brown Myotis and Northern Myotis maternity roost habitat. B – Recommended for EA	Bat maternity roost habitat was mapped as suitable/unsuitable based on ecosite classification. Attachment C of Appendix K Wildlife Technical Support Document provides a description of the modelling methods including a list of the ecosites considered suitable maternity roost habitat. The list of suitable ecosites was provided by the Ministry of the Environment, Conservation and Parks (MECP; Buck 2016, Sills 2016, McColm 2021). Based on guidance provided by the MECP, any ecosites identified as suitable by MECP was considered habitat, regardless of cavity tree density, if the ecosite contains trees with a minimum diameter at breast height of 10 cm (McColm 2021). Therefore, the cavity tree density plots were not specifically incorporated into the mapping of suitable maternity roost habitat. No updates have been made to the Final EA/IS and Appendices.	Comment noted; see response for details.	1830

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
MECP Species at Risk Branch	151	The characterization of habitat at the 17 bat acoustic survey stations monitored to support the EA/IS includes a description of habitat from field observations and landcover classes overlapping each acoustic survey station ("Ontario Landcover Compilation V2 Classification"). However, the ecosite(s) classification that overlaps and/or is in the vicinity of the acoustic survey stations has not been provided (per methods outlined in the Appendix J: Vegetation Report). Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include the ecosite(s) and rolled up vegetation classes that overlap and/or in the vicinity of the acoustic survey station, where available. Consider including figures depicting: - the acoustic survey stations and Little Brown Myotis and Northern Myotis maternity roost habitat characterization that overlap the ecosite classification that was carried out for the LSA, and - the acoustic survey stations and Little Brown Myotis and Northern Myotis maternity roost habitat characterization that overlap the rolled-up vegetation	Table 5-14 of Attachment B of Appendix K Wildlife Technical Support Document provides a detailed habitat description for each bat acoustic survey station based on field observations.	Comment noted; see response for details.	1831

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		classes, where available. MECP understands ecosite classification would not be available for all acoustic survey stations (i.e., for those outside of the LSA of the preferred route). B – Recommended for EA			
MECP Species at Risk Branch	152	The figure is labelled “Figure 6-4” but should be “Figure 5-4”. Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to correct the figure number on Figure 5-4 in the Final EA/IS. C - Editorial	Attachment B of Appendix K Wildlife Technical Support Document has been updated with the correct figure number references.	Appendix K Attachment B	1832
MECP Species at Risk Branch	153	Clarity is required on which Land Cover class Wolverine were most commonly observed in during the Remote Wildlife Camera Tracking study. The Draft EA/IS (Appendix K – Wildlife / Attachment B) states, “Wolverine were most frequently observed in coniferous treed habitat”. However, based on Table 5-28, it appears Wolverine were most frequently	Section 5.5.3.4 of Attachment B of Appendix K Wildlife Technical Support Document will be updated to reflect that Wolverine were most frequently observed in swamp habitat.	Appendix K Attachment B, Section 5.5.3.4	1833

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		observed in Swamp habitat (n = 3) as compared to coniferous treed habitat (n = 2). Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clarify which type of general habitat (i.e., Land Cover class) Wolverine were most frequently observed in during the Remote Wildlife Camera Tracking study. C - Editorial			
MECP Species at Risk Branch	154	"Ecosites identified as candidate maternity roost habitat for little brown myotis and northern myotis in the study area…based on guidance from the Ministry of the Environment, Conservation and Parks"; "…mapping accuracy was high for swamps and deciduous forest (i.e., greater than 70%), so habitat assessments for species with swamp or deciduous forest habitat preferences have higher confidence than species with bog, marsh or mixed forest habitat preferences, which had lower mapping accuracy (i.e., less than 35%). Coniferous forest and fen had a moderate mapping accuracy (i.e., 45-60%)…"	It is acknowledged that mapping accuracy varies among habitat types, with higher confidence for swamps and deciduous forests and lower accuracy for bogs, marshes, and mixed forests. Attachment C (Wildlife Modelling Report) of Appendix K will be updated to provide additional detail on the accuracy of the ecosite classification completed for the LSA.	Appendix K Attachment C	1834

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Please update this section of Appendix K, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide additional detail on the accuracy of the ecosite classification completed for the LSA and impact on confidence of the habitat modelling that was presented for Little Brown Myotis and Northern Myotis. A – Required for EA			
MECP Species at Risk Branch	155	It is difficult to determine from Figure 5-14 where there is moderate-high habitat suitability for Bank Swallow within provincial park boundaries (i.e., Albany River Provincial Park, Ogoki River Provincial Park). Under the Species Conservation Act, 2025, provincial authorization for migratory birds listed on Schedule 1 of the federal Species at Risk Act, 2002 would not be required. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. Consider revising Figure 5-14 symbology	Moderate-high quality Bank Swallow habitat was not identified within the Local Study Area (LSA) or the Regional Study Area (RSA), including provincial parks. Symbology used in Figure 5-14 of Appendix L Birds Technical Support Document has been updated to provide clarity.	Appendix L Figure 5-14	1835

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		to refine moderate-high quality Bank Swallow habitat within provincial park boundaries. B – Recommended for EA			
MECP Species at Risk Branch	156	There is a Bank Swallow record approximately 22 km northeast of the RSA (2021; possible breeding; Ontario Breeding Bird Atlas) near Streatfield Lake. Under the Species Conservation Act, 2025, provincial authorization for migratory birds listed on Schedule 1 of the federal Species at Risk Act, 2002 would not be required. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. Please update this section of Appendix L to include the Bank Swallow observation near Streatfield Lake. B – Recommended for EA	Section 5.6.3.5 of Appendix L Birds Technical Support Document has been updated to include the observation of Bank Swallow near Streatfield Lake.	Appendix L Section 5.6.3.5	1836
MECP Species at Risk Branch	157	“Habitat suitability for lesser yellowlegs were modelled under existing conditions using ecosite mapping in the effects assessment Local Study Area…”	All fen habitat within the Local Study Area (LSA) are considered high to moderate habitat suitability for Lesser Yellowlegs. In addition, all coniferous,	Section 6.6 of the Final EA/IS	1837

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		It appears from the "MFFN_Lesser_Yellowlegs_HSI_20240213.shp" shapefile that high to moderate habitat suitability for Lesser Yellowlegs is represented by fen land cover class and coniferous and deciduous forests adjacent to fens in the Ontario Land Cover Compilation Version 2 dataset. It is unclear why fen habitats mapped through ecosite mapping for the Project (Figures 7.2; Appendix J) were not incorporated in the habitat suitability mapping for Lesser Yellowlegs. However, MECP understands there were limitations in applying the ecosite mapping completed for the Project based on data verification/accuracy issues. It is unclear why coniferous and deciduous forests adjacent to fens were included as high to moderate habitat suitability for the species as other text in the Final EA/IS specifies that only fen habitats were classified as high to moderate suitability habitat (see comment #162). Please update this section of Appendix L, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clarify whether	deciduous, mixed, and early sucessional/sparse forest that are located within 200 m of a fen are considered high to moderate habitat suitability for Lesser Yellowlegs. Appendix L Birds Technical Support Document used Land Inventory Ontario for mapping ecosites for bird habitat including Lesser Yellowlegs (Section 4.13 of Attachment C) while Appendix J Vegetation Technical Support Document relied on an iterative process using terrain mapping to base their ecosite classification. The difference in mapping methods has resulted in a discrepancy between fen habitat areas in Appendix L and Appendix J. While both appendices include ecosite mapping, only the ecosite mapping completed in Appendix L for the purpose of habitat mapping was used to determine habitat for Lesser Yellowlegs. A statement has been added to the Final EA/IS that there may be mapping discrepancies between disciplines due to mapping methods.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		or not ecosite mapping completed for the Project was incorporated into habitat suitability mapping for Lesser Yellowlegs and Short-eared Owl. Additionally, please update this section of Appendix L, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to reflect that high to moderate habitat suitability for Lesser Yellowlegs includes fens with adjacent coniferous and deciduous forests, with supporting rationale. A – Required for EA			
MECP Species at Risk Branch	158	"Fen…communities are the dominant wetland communities within the effects assessment Local Study Area, comprising 39.7 percent…"; "High and moderate habitats cover approximately 30 percent of the effects assessment Local Study Area…"; "Lesser yellowlegs was only detected in fen habitats during autonomous recording unit surveys."; High to moderate habitat suitability for Lesser Yellowlegs in the effects assessment Local Study Area is	All fen habitat within the Local Study Area (LSA) are considered high to moderate habitat suitability for Lesser Yellowlegs. The discrepancy noted between fen habitats comprising 39.7 % of the LSA, and high to moderate habitats for Lesser Yellowlegs covering approximately 31.2 % of the LSA is the difference in mapping style. Appendix L Birds Technical Support Document used Land Inventory Ontario for mapping ecosites for bird habitat including Lesser Yellowlegs. Appendix I Peatlands Technical Support Document	Section 6.6 of the Final EA/IS.	1838

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		summarized as 31.2%. It is unclear why all of the fen habitats in the effects assessment Local Study Area (i.e., 39.7% of the effects assessment Local Study Area) were not classified as suitable habitat for the species (quantified as 31.2% of the effects assessment Local Study Area). In contrast to this discrepancy, all fen habitats represented by the fen land cover class in the Ontario Land Cover Compilation Version 2 dataset appear to be classified as high to moderate habitat for Lesser Yellowlegs in the "MFFN_Lesser_Yellowlegs_HSI_20240213.shp" shapefile. Please update this section of Appendix L, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide additional detail on why all of the fen habitats in the LSA were not classified as suitable habitat for Lesser Yellowlegs (i.e., why all fens comprising 39.7% of the effects assessment Local Study Area were not classified as suitable habitat [31.2% of the effects assessment Local Study Area]). If this is an error, please fix the discrepancy so the total percentage of fens in the LSA is equal to the total	and Appendix J Vegetation Technical Support Document relied on an iterative process using terrain mapping to base their ecosite classification. The approach for mapping Lesser Yellowlegs habitat is provided in Appendix L (see Section 4.13 of Attachment C). A statement has been added to the Final EA/IS that there may be mapping discrepancies between disciplines due to mapping methods.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		moderate-high suitable Lesser Yellowlegs habitat. A – Required for EA			
MECP Species at Risk Branch	159	"degradation of suitable ovenbird habitat…" This appears to be a typo as this sentence is included in the Lesser Yellowlegs section. Revise the typo in the Final EA/IA. C - Editorial	Section 8.2.21.2.1.1 of Appendix L Birds Technical Support Document has been updated to clarify the habitat availability discussion is related to Lesser Yellowlegs and not ovenbirds.	Appendix L Section 8.2.21.2.1.1	1839
MECP Species at Risk Branch	160	Total of 5 detections of Lesser Yellowlegs; "Lesser yellowlegs was recorded during autonomous recording unit surveys in the Local Study Area at 4 of 54 autonomous recording unit survey plots in the Local Study Area in 2022…" Please update Attachment B of Appendix L to clarify if Lesser Yellowlegs were observed twice at one of the autonomous recording unit survey plots (i.e., 5 total detections at 4 stations). A – Required for EA	Attachment B, Section 6.6.14 of Appendix L Birds Technical Support Document has been updated to clarify the number of Lesser Yellowleg observations.	Attachment B, Section 6.6.14 of Appendix L	1840
MECP Species at Risk Branch	161	Lesser Yellowlegs was detected during spring migration and during the migratory bird nesting period; Lesser Yellowlegs:	Annex A (withing Attachment B) of Appendix L Birds Technical Support Document has been updated to reflect	Annex A (withing Attachment	1843

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		"Migration" is listed under "Season When Possible to Occur in the RSA". Please update this section in Annex A of Appendix L to reflect that Lesser Yellowlegs was detected in the breeding nesting period. A – Required for EA	the detection of Lesser Yellowlegs during the breeding nesting period.	B) of Appendix L	
MECP Species at Risk Branch	162	Figure 5-14 depicts pooled shorebird abundance values recorded at autonomous recording unit stations throughout, however it is unclear where Lesser Yellowlegs was detected throughout the Local Study Area. MECP understands there are data sensitivity requirements in depicting location information of species at risk. For awareness, Lesser Yellowlegs observations and the Golden Eagle observation collected through baseline surveys would need to be shared with MECP if Project authorization under the ESA or SCA is required. D – Permitting Related	If Project authorization is required under the Endangered Species Act or Species Conservation Act, Lesser Yellowlegs observation locations will be provided to Ministry of Environment, Conservation and Parks (MECP).	Comment noted; see response for more details	1844
MECP Species at Risk Branch	163	"Bank swallow usually construct their nests on anthropogenic structures such as bridges, tunnels, culverts, and	Section 4.6 of Appendix L Birds Technical Support Document has been updated to correct the error: Bank Swallow	Appendix L Section 4.6	1863

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		buildings." This appears to be a typo as the sentence describes Barn Swallow nesting habitat requirements. Please revise in the Final EA/IA, as appropriate. C – Editorial	reference has been replaced with Barn Swallow.		
MECP Species at Risk Branch	164	"Suitable chimney swift, bank swallow, and barn swallow nesting habitats in the study areas are: Anthropogenic disturbance." Based on the "MFFN_Bank_Swallow_HSI_20240212.shp" shapefile, moderate to high suitable Bank Swallow habitat also appears to be riparian areas and riverbanks of a handful of major rivers in the Regional Study Area. Please update Attachment C of Appendix L to revise the description of suitable Bank Swallow habitat to include riparian areas and riverbanks. A – Required for EA	Attachment C of Appendix L Birds Technical Support Document has been updated to clarify habitat mapping for Bank Swallow includes riparian areas and riverbanks.	Attachment C of Appendix L	1864
MECP Species at Risk Branch	165	The list of information sources does not appear to include the caribou collaring data collected by Webequie First Nation	Caribou collar data collected by Webequie First Nation was not available before submission of the Draft EA/IS. A	Final EA/IS and associated	1865

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		to inform the Webequie Supply Road Project or by Webequie First Nation and Marten Falls First Nation to inform the Northern Road Link Project. This information should be used to inform the assessment of existing conditions, selection of the preferred route alternative, residual effects assessment, and cumulative effects assessment. It should also be used to inform implementation of mitigation actions, effects monitoring, and effectiveness monitoring. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include the caribou collaring data from other studies within the LSA and RSA, if not already done so. Alternatively, update this section of Appendix L, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to acknowledge the existence of this information and provide rationale and justification for why it has not been acquired and incorporated.	data sharing agreement has since been signed between the three road projects (i.e., Marten Falls Community Access Road, Webequie Supply Road (WSR), Northern Road Link (NRL)) and Caribou collar data has been shared. The Final EA/IS and associated Appendices have been updated to include Caribou collar data collected by Webequie First Nation to inform the WSR, and collected by Webequie First Nation and Marten Falls First Nation to inform the NRL.	Appendices	

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		A – Required for EA			
MECP Species at Risk Branch	166	Appendix M – Ungulates states, "Habitat types where mortalities occurred was most commonly conifer swamp and black spruce forest, and he most common cause of death was predation by wolves." Additional information is required to support this statement given mortality investigations were typically conducted weeks or months after the mortality. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include a description of information used to determine cause of mortality and confidence in the determination of moralities. A – Required for EA	Sections 4.3.5 and 5.2 of Attachment B of Appendix M Ungulates Technical Support Document provide information about mortality investigations of collared Caribou.	Appendix M Attachment B Sections 4.3.5 and 5.2	1866
MECP Species at Risk Branch	167	There appear to be some differences in the methods used in the Caribou Habitat Disturbance Assessment described in Section 4.3.4.2 of Appendix M – Ungulates as compared to the provincial mapping as outlined in Appendix A of the Integrated Assessment Protocol for Woodland Caribou Ranges in Ontario.	A detailed description of spatial data sets and buffers associated with disturbance types used in the caribou disturbance calculations is provided in Attachment C of Appendix M Ungulates Technical Support Document.	Comment noted; see response for details.	1867

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Specifically, MECP SARB noted the following differences: - It does not appear all relevant data sets listed in Appendix A of the Integrated Assessment Protocol for Woodland Caribou Ranges in Ontario were included in the Caribou Habitat Disturbance Assessment; - It appears the Caribou Habitat Disturbance Assessment included all disturbances less than 40 years in age, whereas Ontario's methods identified any disturbances less than 36 years in age. - It appears the Caribou Habitat Disturbance Assessment buffered point locations and linear features by a set amount (e.g., all season roads buffered 50 m) prior to applying the 500 m buffer, whereas Ontario's methods did not buffer point locations and linear features prior to applying the 500 m buffer. Additionally, MECP SARB noted the following similarities which are incorrectly described in Section 4.3.4.2 of Appendix M – Ungulates: - Ontario's Integrated Range Assessments and recent cumulative disturbance mapping include the Fire Disturbance Area (LIO) data set where a forest fire was not appropriately mapped			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		with a more detailed data set (e.g., forest resource inventory, Far North Disturbance Mapping, landcover, etc.) Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include an updated assessment of natural and anthropogenic disturbances consistent with the provincial methodology outlined in Appendix A of the Integrated Assessment Protocol for Woodland Caribou Ranges in Ontario. B – Recommended for EA			
MECP Species at Risk Branch	168	The MFCAR ToR requires an assessment of the spatial extent of General Habitat Description Category 1, 2 and 3 habitat for Boreal Caribou, which includes travel corridors as part of Category 1 habitat. As it relates to this ToR requirement to consider Category 1, 2 and 3 habitat, Appendix M – Ungulates (Section 4.3.4.3.2) of the Draft EA Report characterizes and quantifies existing conditions, describes and quantifies the refined existing conditions, and identifies residual effects and proposed mitigation	Caribou collar data collected by Webequie First Nation was not available before submission of the Draft EA/IS. A data sharing agreement has since been signed between the three road projects (i.e., Marten Falls Community Access Road, Webequie Supply Road (WSR), Northern Road Link (NRL)) and Caribou collar data has been shared. The Final EA/IS has been updated to incorporate additional collar data. A conservative approach was chosen to identify all potential new travel corridors of collared individuals, regardless of	Comment noted; see response for details.	1868

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		and enhancement measures. Further detailed information is also provided in Appendix M - Ungulates. Specifically, Appendix M – Ungulates describes the methods for identifying potential new Category 1 travel corridors. As noted, the conservative approach taken to identify these features (i.e., identifying based on per individual caribou) overestimates amount and total area of these features; and is inconsistent with Ministry approaches to identifying travel corridors, which are intended to be features demonstrating repeated use over multiple years by multiple individuals. For awareness, under the recent amendments to the ESA and creation of the new SCA, habitat for Boreal Caribou protected under the amended ESA/SCA is scoped to the dwelling place used for the purpose of breeding, rearing, staging, wintering, or hibernating (e.g. for Boreal Caribou, this means nursery areas and wintering area) and the area immediately around the dwelling place (i.e. 10 km), which differs from the previous General Habitat Description that identified the entire range as habitat and how Category 1, 2, and 3 habitat is currently described	whether they were repeatedly used in all years of the study by multiple individuals. This results in a precautionary assessment of potential effects to caribou Category 1 habitat in the residual effects assessment and cumulative effects assessment and likely overestimates the number and area of travel corridors in the Study Area.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		in the Draft EA/IS Report. Specifically, movement is no longer a biological process protected under the ESA, or new SCA, and, as such, travel corridors are no longer protected habitat. Consideration should be given to the applicable legislation following EA completion to ensure compliance for project related impacts to protected species and habitat. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to amend the approach to identifying travel corridors based on repeated use over multiple years by multiple individuals. Alternatively, update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to provide rationale and justification for the current approach taken. A – Required for EA			
MECP Species at Risk Branch	169	MECP SARB notes the Project has indicated there is no anticipated pathway for indirect effect between Wildlife	Table 9.1-1 (formerly Table 9-2) of the Final EA/IS provides a preliminary analysis of the Project-environment	Comment noted; see response for	1869

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		(Ungulates) (i.e., Caribou) and Aboriginal and Treaty Rights and Interests as a result of the Community Access Road. However, given potential impacts to Boreal Caribou (e.g., habitat loss, nursery areas, etc.) and Eastern Migratory Caribou (e.g., movement/travel, habitat loss, etc.) it appears there may be potential for the Community Access Road to affect traditional harvest. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clarify how the Project considered the potential effects of the Community Access Road on Caribou (both Boreal Caribou and Eastern Migratory Caribou) and the interactions this may have on Aboriginal and Treaty Rights and Interests (i.e., traditional harvest). A - Required for EA	interactions between disciplines. The preliminary review did not identify indirect effects between ungulates and Aboriginal and / or Treaty Rights and Interests (ATRI). The ungulate assessment provided in Appendix M Ungulates Technical Support Document, however, concluded that the residual effects on Caribou are significant, and that these effects have direct implications for ATRI, including availability of Caribou for harvest, ability to access and use lands for cultural and subsistence activities, and continuity of cultural practices and intergenerational knowledge transmission as outlined in Section 7 of Appendix M.	details.	
MECP Species at Risk Branch	170	The natural, anthropogenic, and total cumulative disturbance estimates provided do not reflect the current levels of disturbance provincially. For awareness, MECP and MNR have	The Final EA/IS Report and associated appendices were updated with the shared information. See also response to MECP Comment 67.	Final EA/IS and appendices	1870

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		recently updated estimates of cumulative disturbance for all ranges in the province between 2017-2023; and should be used to inform a description of the existing conditions and assessment of impacts, residual effects, and cumulative effects. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to ensure current levels of disturbance are reflected accurately. B – Recommended for EA D – Permitting Related			
MECP Species at Risk Branch	171	The natural, anthropogenic, and total cumulative disturbance estimates of the caribou existing conditions should be reported at the Range scale. Appendix M – Ungulates states, “Existing anthropogenic disturbances in the ungulate existing conditions Local Study Area and Caribou existing conditions Regional Study Area are depicted in Figure 5-4. An estimated 8% of the ungulate existing conditions Local Study Area and an estimated 16% of the caribou existing conditions Regional Study Area are anthropogenically	Estimates of the natural, anthropogenic and total cumulative disturbance in the existing environment are reported at the individual range level (i.e., Missisa, Ozhiski, Nipigon and Pagwachuan) in Sections 5.1.1.2.3 and 7.1.1.1.2 of Appendix M Ungulates Technical Support Document. The Final EA/IS and Appendix M have been updated with new estimates of cumulative disturbance provided by Ministry of Environment, Conservation and Parks in Comment 67 above.	Final EA/IS Appendix M	1872

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		disturbed under existing conditions (Table 5-4)." In addition to the LSA and RSA, MECP SARB recommends reporting estimates of natural, anthropogenic, and total cumulative disturbance at the individual Range scale (i.e., Missisa, Ozhiski, Nipigon, Pagwachuan). Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include natural, anthropogenic, and total cumulative disturbance estimates of the caribou existing conditions at the Range scale. B – Recommended for EA D – Permitting Related			
MECP Species at Risk Branch	172	Additional information is required regarding the areas identified as "potential new Category 1 travel corridors". The Draft EA/IS Report – Ungulates states, "The caribou existing conditions Regional Study Area includes Missisa, Ozhiski, Nipigon and Pagwachuan ranges. … Telemetry data identified 5,069,969 hectares of potential new	Section 8.2.7.1 of the Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to separately report travel corridors for Boreal and Eastern Migratory Caribou.	Section 8.2.7.1 of the Final EA/IS; Appendix M	1873

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Category 1 travel corridors." The Draft EA/IS Report – Ungulates states, "Seasonal movement patterns, including the movement along travel corridors, varied between boreal and eastern migratory caribou. A greater proportion of eastern migratory caribou used travel corridors compared to boreal caribou and generally travelled further distances over longer durations." Recognizing Boreal Caribou and Eastern Migratory Caribou exhibit different seasonal movement patterns (e.g., distance, timing, location etc.), it is not appropriate to identify travel corridors collectively (i.e., Category 1 travel corridors should be considered separately for Boreal Caribou and Eastern Migratory Caribou). As such, MECP SARB recommends the Project consider reporting estimated amounts of potential new Category 1 travel corridors for Boreal Caribou and Eastern Migratory Caribou separately. Please update the sections of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clarify the estimated amount of potential new			

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Category 1 travel corridors; and consider reporting the amount of potential new Category 1 travel corridor habitat separately for Boreal Caribou and Eastern Migratory Caribou. A – Required for EA			
MECP Species at Risk Branch	173	Figure 5-24 is referenced on pg. 78 as incidental observations of caribou, however the actual Figure 8-24 on pg. 79 shows incidental observations of moose; which is replicated on pg. 81 (Figure 8-25). Please update this section of Appendix M to include the correct figure of incidental observations of caribou in Figure 8-24 in the Final EA/IS Report. A – Required for EA	Section 5.5.1 of Appendix M Ungulates Technical Support Document has been updated to include the correct reference and figure for incidental observations of Caribou.	Section 5.5.1 of Appendix M	1874
MECP Species at Risk Branch	174	The statistical analyses and modelling only included the Caribou collaring data from the Marten Falls First Nation (MFFN) data set (n = 30) and Ministry of Natural Resources (MNR) data set (n = 159) , but did not include other Caribou collaring data collected between 2021 to 2024 within the Caribou LSA and RSA, specifically the Webequie Supply Road (n = 29) and Northern Road Link Caribou	Caribou collar data collected by Webequie First Nation was not available before submission of the Draft EA/IS. A data sharing agreement has since been signed between the three road projects (i.e., Marten Falls Community Access Road, Webequie Supply Road (WSR), Northern Road Link (NRL)) and Caribou collar data has been shared.	Appendix M; Section 8.2.7 of the Final EA/IS	1876

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		(n = 14) collaring data was not considered in the identification of parturition rates (e.g., reproduction and neonatal survival), seasonal ranges (i.e., habitat availability and distribution), and ecotype classification (i.e., boreal or eastern migratory), resource selection modelling, dynamic Brownian bridge movement models, and occupancy models. Recognizing the collared Caribou from the MFFN data set and MNR data set represents a subsample of the overall population across the Missisa and Ozhiski Ranges, and to some extent the broader RSA, MECP SARB strongly encourages the client to acquire and incorporate all additional recent caribou collaring data collected within the RSA (i.e., Webequie Supply Road; Northern Road Link) to further increase the sample sizes and improve the analyses and modelling; and at the same time the analyses will be updated with the final year of caribou collar data (April 1, 2023 to March 1, 2024) findings as part of the final version of the report, as per the Draft EA/IS Report (Section 2.1.1). For awareness, MECP SARB will expect all available data relevant to the	The Final EA/IS and associated Appendices have been updated to include Caribou collar data collected by Webequie First Nation to inform the WSR, and collected by Webequie First Nation and Marten Falls First Nation to inform the NRL.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		proposed Community Access Road to inform the assessment of potential impacts during the authorization process under the ESA or SCA, should an authorization be required. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to incorporate additional Caribou collaring data from the Webequie Supply Road and Northern Road Link projects into the Ungulates statistical analyses and modelling as part of the final version of the report, if not already done so. A – Required for EA D – Permitting Related			
MECP Species at Risk Branch	175	Additional discussion is required regarding the method for identify potential new Category 1 habitat (i.e., nursery areas, winter use areas, and travel corridors). Section 3.1.1.3 of Attachment C in Appendix M – Ungulates states, “Each biological year began on the first day of the calving season and included the calving, summer, fall, and winter seasons, as well as the pre-calving	The Final EA/IS and Appendix M Ungulate Technical Support Document have been updated to provide details on the approach to identify relevant cutoff dates for potential new Category 1 habitat. In addition, a discussion has been provided to clarify the difference between this approach and that identified in the provided reference. The Final EA/IS and associated Appendices have been updated to	Section 8, 9 and 10 of the Final EA/IS; Appendix M	1878

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		season for the subsequent year's calf (Berglund et al., 2014). Although the first day of the calving season varied by individual and year, the calving season was always a 14-day period. Summer, fall, and winter seasons were each 90 days, in consecutive order. Because the pre-calving season ended when the subsequent biological year began, the duration of the pre-calving season varied by individual and year." MECP SARB understands that the Project used the Calving and Summer seasons to identify potential new Category 1 nursery areas, the Winter season to identify potential new Category 1 winter use areas, and the Pre-calving and Fall seasons to identify potential new Category 1 travel corridors. However, the timeframes identified by the Project for the Seasonal Ranges analysis differ from the time periods identified in the General Habitat Description for the Forest-dwelling Woodland Caribou for Category 1 habitat (i.e., nursery areas, winter use areas, travel corridors); and, as such, may over estimate or under estimate the amount of potential new Category 1 habitat within the study areas and/or inappropriately identify areas of "potential new Category 1 habitat".	include Caribou collar data collected by Webequie First Nation to inform the Webequie Supply Road, and collected by Webequie First Nation and Marten Falls First Nation to inform the Northern Road Link.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Additionally, neither the Draft EA/IS Report or Appendix M – Ungulates discusses these differences and/or how this may influence the results. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include a discussion of how the methods used to identify potential new nursery areas and wintering areas differ from the dates identified in the General Habitat Description for the Forest-dwelling Woodland Caribou; and how these differences may influence the results. A - Required for EA			
MECP Species at Risk Branch	176	Insufficient information was provided on the seasonal ranges that were not estimated. Specifically, Attachment C within Appendix M – Ungulates of the Draft EA/IS states, “of the possible 1,666 seasonal ranges that could have been produced from caribou telemetry data, 554 seasonal ranges were not estimated because caribou had less than 20% of their seasonal telemetry locations	The Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to include Caribou collar data collected by Webequie First Nation to inform the Webequie Supply Road, and collected by Webequie First Nation and Marten Falls First Nation to inform the Northern Road Link. In addition, Section 8.2.7 of the Final EA/IS and Appendix M have been updated to include a table that summarizes the season and ecotype associated with	Section 8.2.7 of the Final EA/IS; Appendix M	1879

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		occurring within the caribou RSA." Additional information should be provided to describe how many of the 544 seasonal ranges that were not estimated were assigned to calving, summer, fall, winter, or pre-calving; and how many were assigned to Boreal Caribou or Eastern Migratory Caribou. Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to include a table that summarizes the season and ecotype associated with the 544 seasonal ranges that were not estimated. B – Recommended for EA	seasonal ranges there were not estimated.		
MECP Species at Risk Branch	177	Additional information should be provided regarding which specific collared Caribou switched ecotypes among years and clarity on ecotype assignment. Attachment C within Appendix M – Ungulates of the Draft EA/IS states, "Two individual Caribou switched ecotypes among years and were ultimately classified as eastern migratory." It is unclear if both of these individuals	The Final EA/IS and Appendix M Ungulates Technical Support Document have been updated to include Caribou collar data collected by Webequie First Nation to inform the Webequie Supply Road, and collected by Webequie First Nation and Marten Falls First Nation to inform the Northern Road Link. In addition, Section 8.2.7 of the Final EA/IS and Appendix M have been updated to clarify which Caribou switched ecotypes during the time period of the study.	Section 8, 9 and 10 of the Final EA/IS; Appendix M	1880

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		were classified as eastern migratory caribou for all years, or if they were treated as eastern migratory during the year(s) in which they spent >50% of the calving season in the Hudson Bay Coast Ecoregion (0E) or the Northern Taiga Ecoregion (1E); and boreal caribou during the year(s) in which they spent <50% of the calving season in the Hudson Bay Coast Ecoregion (0E) or the Northern Taiga Ecoregion (1E). Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clarify specifically which two collared caribou switched ecotypes among years and if these two collared Caribou were classified as eastern migratory Caribou in all years or just the years in which they spent >50% of the calving season in the Hudson Bay Coast Ecoregion (0E) or the Northern Taiga Ecoregion (1E). B – Recommended for EA			
MECP Species at Risk Branch	178	Clarity is required on how the telemetry data and parturition dates were used to inform the caribou survival and recruitment indicators.	The Final EA/IS and Appendix M Ungulates Technical Support Document have been revised to clarify the terminology associated with telemetry data and parturition dates, and the	Section 8.2.7 of the Final EA/IS and Appendix M	1882

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		Attachment C within Appendix M – Ungulates of the Draft EA/IS states, "Telemetry data were successfully analyzed to estimate parturition dates, which were sued to inform seasonal ranges and the caribou survival and reproduction indicator." [emphasis added] Based on the information provided, it appears the telemetry data was used to identify parturition dates and calf mortality (within the calving period). However, these measures are not equivalent to caribou survival and recruitment rates which are associated with adults (i.e., adult female survival as measured by the percent of collared adult female caribou mortalities each year) and calf recruitment (i.e., measured mid to late winter of their first winter). Table 8-14 of the Draft EA/IS Report (pg. 162) identifies the measure of change to inform the survival and reproduction indicator will be "Changes in animal abundance from altering survival and/or recruitment". Please update this section of Appendix M, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clarify how the	relationship between the parturition movement analysis and survival and recruitment indicators.		

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		telemetry data and parturition dates were used to inform the caribou survival and recruitment indicators. A - Required for EA			
MECP Species at Risk Branch	179	MECP SARB notes the Project has indicated there is no anticipated pathway for indirect effect between Wildlife (Ungulates) (i.e., Caribou) and Aboriginal and Treaty Rights and Interests as a result of the Community Access Road. However, given potential impacts to Boreal Caribou (e.g., habitat loss, nursery areas, etc.) and Eastern Migratory Caribou (e.g., movement/travel, habitat loss, etc.) it appears there may be potential for the Community Access Road to affect traditional harvest. Please update this section of Appendix O, and all other relevant locations within relevant Appendices and Final EA/IS Report as appropriate, to clarify how the Project considered the potential effects of the Community Access Road on Caribou (both Boreal Caribou and Eastern Migratory Caribou) and the interactions this may have on Aboriginal and Treaty Rights and Interests (i.e., traditional harvest).	Table 9-4 (now Table 8-4) of Appendix O Aboriginal and / or Treaty Rights and Interests (ATRI) Technical Support Document demonstrates and example of what results may be presented in the Community-specific ATRI reports. Results of the ATRI assessment are confidential and will not be provided in the Final EA/IS, therefore, Appendix O has not been updated.	Comment noted; see response for details.	1883

Table: Summary of Feedback Received and Response / Action – MECP Species at Risk Branch

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
		A - Required for EA			