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6.23 Built Heritage Resources and Cultural Heritage Landscapes

Built heritage resources (BHRs) are a constructed feature associated with a property's cultural heritage value; cultural heritage landscapes (CHLs) are a geographic area identified as having cultural heritage value. BHRs and CHLs are identified as a valued component (VC) in recognition of the interests of government agencies, responsible for the effective management of these resources, and potentially affected Indigenous communities and parties that have an interest in resources related to their history and culture.

The effects assessment in this section has been scoped to include physical buildings and landscape elements that are 40 years old or older[1] with known or potential cultural heritage value or interest (CHVI).

In the absence of mitigation, the assessment of potential changes to BHRs and CHLs is directly linked to other VCs and is informed by the following sections:

- **Outdoor Recreation (Section 6.18):** The assessment of potential effects on outdoor recreation includes changes in navigation during construction of the Project that may affect BHRs and CHLs.

- **Traditional Land and Resource Use (Section 6.21):** The assessment of potential effects on traditional land and resource use includes traditional habitation, cultural and spiritual sites / areas during construction of the Project, which may affect changes in the presence or alteration of BHRs and CHLs.

In addition, the assessment of potential changes to BHRs and CHLs is also directly linked to other VCs and informs the analysis of the following sections:

- **Archaeology (Section 6.22):** The assessment of potential effects on archaeological resources is informed by the presence or alteration of BHRs and CHLs during construction of the Project, which may affect historic travel routes.

The assessment of potential changes to BHRs and CHLs from the Project are compared to relevant provincial and federal criteria (Section 6.23.1.4) and existing conditions (Section 6.23.2). The assessment is informed by the built heritage resources and cultural heritage landscape technical support documentation, including the Cultural Heritage Research Report (Appendix S-6), and the Cultural Heritage Evaluation Reports (Appendix S-7 to Appendix S-11).

6.23.1 Assessment Approach

The approach to the assessment of potential changes to BHRs and CHLs includes a description of the relevant regulatory and policy setting, a description of the input obtained through consultation specific to this VC; the identification of criteria and indicators along with the associated rationale, a description of the spatial and temporal boundaries used for this VC, and a description of the attributes used to determine the significance of any residual, adverse effects. The assessment of potential effects is supported by a description of the existing conditions for the VC (Section 6.23.2), the identification and description of applicable pathways of potential effects on the VC (Section 6.23.3) and a description of applicable mitigation measures for the VC (Section 6.23.4). An outline of the analytical method conducted for the assessment and

[1] The 40-year rule is a preliminary screening measure for CHVI (MCM 2022). Professional judgment of WSP's cultural heritage specialists was used during the creation of the inventory and later screening to apply the 40-year rule and identify properties with potential CHVI.

the key assumptions and/or conservative approach is found in Section 6.23.5. With the application of mitigation measures to the potential effects on the VC, the residual effects are then characterized in Section 6.23.6 and the significance of the residual effects is determined in Section 6.23.7.

6.23.1.1 Regulatory and Policy Setting

The effects assessment for BHRs and CHLs has been prepared in accordance with the requirements of the federal Environmental Impact Statement (EIS) Guidelines (Appendix B-1) and the provincially approved Amended Terms of Reference (Appendix B-3). Concordance tables, indicating where EIS Guidelines and Terms of Reference requirements have been addressed, are provided in Appendix B-2 and B-5, respectively. Government policies, objectives, standards and guidelines most relevant to the VC are summarized below.

Federal

For federal environmental assessments (EAs), the *Canadian Environmental Assessment Act*, 2012 (SC 2012, c. 19, s. 52) requires the consideration of environmental effects on physical and cultural heritage (section 5(1)(c)(ii)) and on any structure, site or thing that is of historical, archaeological, paleontological or architectural significance (section 5(1)(c)(iv)). Technical guidance for assessing effects on BHRs and CHLs is provided in *Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act*, *2012* (CEAA 2015).

Provincial

The Government of Ontario recognizes the importance of conserving the province's BHRs and CHLs in the *Ontario Heritage Act* (R.S.O. 1990, c. O.18; OHA) and in the Provincial Policy Statement (MMAH 2024).

The OHA provides a framework for the protection of cultural heritage resources in the province and gives municipalities and the provincial government powers to identify and designate properties of heritage significance; provide standards and guidelines for the conservation of provincial heritage properties; and enhance protection of heritage conservation districts, marine heritage sites and archaeological resources.

The Ministry of Citizenship and Multiculturalism (MCM) is responsible for the administration of the OHA and has developed checklists, information bulletins, standards and guidelines, and policies to support the conservation of Ontario's cultural heritage resources, including BHRs, CHLs and archaeological sites. The MCM fulfills a lead role in directly conserving and protecting BHRs and CHLs in Ontario, which is triggered through other legislated processes, such as the *Planning Act* (R.S.O. 1990, c. P.13) and the *Environmental Assessment Act*, 1990 (RSO 1990, C. E.18), rather than directly through the OHA itself.

In the event that residual effects are anticipated on potential BHRs and CHLs, the subject property is to be evaluated to determine the CHVI of the property. The OHA includes two regulations for determining CHVI: Ontario Regulation (O. Reg.) 9/06 (R.S.O. 1990, c. O.18; as amended by O. Reg. 569/22) and O. Reg. 10/06 (R.S.O. 1990, c. O.18). Under O. Reg. 9/06, criteria are described to determine the CHVI of a property at a local level, while under O. Reg. 10/06, criteria are described to determine if a property has CHVI of provincial significance.

For properties that have been evaluated using the criteria of O. Reg. 9/06 and/or 10/06 and determined to not have CHVI, no further mitigation measures or studies are required. If the property is determined to have CHVI, a Heritage Impact Assessment (HIA), or other equivalent study, is to be prepared, identifying specific mitigation measures to be implemented, which may include documentation, salvage or applying buffer zones, as appropriate (MCM 2006, 2014).

Guidance Documents

The MCM has developed a series of information sheets to support the assessment of BHRs and CHLs. During the preparation of the BHRs and CHLs technical studies the following MCM guidance documents were used:

- *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes Checklist* (MCM 2022);
- Standards and Guidelines for the Conservation of Provincial Heritage Properties – Heritage Identification & Evaluation Process (MCM 2014); and
- Heritage Resources in the Land Use Planning Process, InfoSheet #5, Heritage Impact Assessments and Conservation Plans (MCM 2006).

The Checklist was developed to support the screening of known (or recognized) heritage properties and properties with potential CHVI. It includes consideration for local or Indigenous Knowledge that supports a property being a landmark, having special historical associations or is part of a cultural heritage landscape (MCM 2022).

The MCM's *Standards and Guidelines for the Conservation of Provincial Heritage Properties – Heritage Identification & Evaluation Process* (MCM 2014) provides detailed direction on the application of O. Reg. 9/06.

InfoSheet #5 (MCM 2006) outlines the process for identifying direct impacts (such as destruction or alteration) and indirect impacts (such as shadows, isolation, obstruction of views, change in land use and land disturbance) to BHRs and CHLs.

In 2010, in collaboration with provincial and territorial governments, Parks Canada developed the *Standards and Guidelines for the Conservation of Historic Places in Canada: A Federal, Provincial and Territorial Collaboration* (Parks Canada 2010) a pan-Canadian guidance document considered in addressing the conservation of cultural landscapes, archaeological sites, buildings and engineering works.

6.23.1.2 Influence of Consultation with Indigenous Communities, Government and the Public

Consultation has been ongoing for several years, prior to and throughout the environmental assessment process, and will continue with Indigenous communities, government agencies and the public through the life of the Project. Section 2 provides more detail on the extensive consultation process. The Record of Consultation (Appendix D) includes detailed comments received, and responses provided, during the development of the final EIS/EA.

Feedback received from consultation has been addressed through direct responses (in writing and follow-up meetings) and incorporated into the final EIS/EA, as appropriate. Key comments that influenced the assessment of BHRs and CHLs between the draft and final EIS/EA is provided below.

Incorporation of Traditional Knowledge / Traditional Land Use Information

As part of the draft EIS/EA review process, Cat Lake First Nation (CLFN), Lac Seul First Nation (LSFN) and Northwestern Ontario Métis Community (NWOMC) requested clarification on how Indigenous Knowledge will be incorporated into future BHRs and CHLs studies. As part of the same review, the Impact Assessment Agency of Canada (IAAC), the Ministry of the Environment, Conservation and Parks, and the MCM noted the importance of the collection of further land and resource use and socioeconomic conditions to support the effects assessment. As part of the information sharing throughout the consultation and engagement process, Project-specific information was provided by Indigenous communities in the form of Traditional

Knowledge / Traditional land use (TK/TLU) information (further described in Section 6.21). This TK/TLU information has been considered as part of the evaluations of potential BHRs and CHLs against O. Reg. 9/06, all of which are included as part of the final EIS/EA (Appendix S-8 to S-11). Opportunities to review the Cultural Heritage Evaluation Report (CHERs) will be provided to Indigenous communities during the review of the final EIS/EA.

Transmission Route Optimization

Through discussions and follow-up communications with SFN, MON and others, the transmission line route that was selected in the draft EIS/EA (Alternative 3) was requested to be replaced with Alternative 1 which would follow the existing E1C transmission line corridor through the northern portion of the SFN Reserve lands. The draft EIS/EA determined that Alternative 1 and Alternative 3 were both evaluated as being a preferred transmission line route, but subject to further engagement and discussion with the SFN and others in optimizing the route. Traditional land use information shared by MON identified potentially conflicting harvesting and ceremonial areas southwest of the community with Alternative 3, which could be avoided with Alternative 1. In addition, MECP Species at Risk Branch through their review of the draft EIS/EA and in follow up meetings noted that an emphasis should be placed on minimizing new linear corridors. As a result, Alternative 1 has been selected as the preferred transmission line route for the final EIS/EA. In addition to selecting Alternative 1, the transmission line has been optimized to follow the mine access road more closely, thereby reducing the overall corridor width through this segment. Details on the transmission line are provided in Section 5.18. An review of potential BHRs and CHLs on the preferred transmission line route is provided in Section 6.23.2.

Distinction between Cultural Heritage Resources and Archaeological Resources

The MCM noted that while cultural heritage resources are inclusive of archaeological resources, BHRs and CHLs, this VC specifically addresses BHRs and CHLs; accordingly, the name of this VC has been replaced with BHRs and CHLs.

CLFN and LSFN requested clarification on the pictographs identified in the local study area for BHR and CHL. Per MCM guidance, pictographs are addressed under the Archaeology VC (Section 6.22). Further information on the pictographs is included in the Stage 2 Archaeology Assessment for the Mine Site (Appendix S-2, page 13), and addressed in Appendix S-6 (Section 5.1).

Portage Route

Traditional land use information shared by CLFN identified a portage between Birch and Springpole Lake. This transportation route was identified by CLFN as an active transportation route supporting Traditional land and resource use (TLRU) and commercial harvesting activities. Additionally, CLFN has identified the ability to freely travel between preferred harvesting sites as a critical component to the continuation of TLRU activities such as hunting and trapping (CLFN 2024).

Members of CLFN, including Trapline Holder SL197, visited the Springpole site on June 13, 2023, to discuss the Project and traditional land use areas as well as participate in the water quality sampling. The portage trails in the area were discussed and the CLFN visitors suggested a route for use after construction begins. First Mining Gold Corp. (FMG) noted that CLFN members are always welcome to go through the exploration camp to cross from Birch Lake to Springpole Lake. The first issue of the Community Bulletin was circulated to Indigenous communities on July 4, 2023; it included an overview of the field programs planned for 2023 as well as the cultural heritage field work. This email also included a notice for FMG maintenance to clear

out the Portage Trail between Springpole Lake and Birch Lake at the existing exploration camp, to provide easier access for land users.

Further, IAAC requested clarification of cultural heritage resources that are of importance to Indigenous peoples. Information from non-confidential TK/TLU studies has been reviewed and cultural heritage resources have been identified for further study, as described in Section 6.23.2. This information has been carried forward into Section 6.26, for further assessment of the potential effects on Indigenous people.

Additional BHR and CHL Studies

CLFN, LSFN requested clarification on the appropriate guidelines for the preparation of BHR and CHL studies to support the environmental assessment process. The Ontario Heritage Tool Kit has superseded the 1992 Guidelines for Preparing the Cultural Heritage Resource Component of Environmental Assessments. As a result, the following guidelines were used in the preparation of the report: Canadian Environmental Assessment Agency's Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the *Canadian Environmental Assessment Act* (CEAA 2012); MCM Infosheet #5 (MCM 2006); and Standards and Guidelines for the Conservation of Historic Places in Canada: a Federal, Provincial and Territorial Collaboration (Parks Canada 2010).

MCM requested further clarification on the potential effects of the Project on BHRs and CHLs, and the results of heritage studies included the EIS/EA. Section 6.23.3 includes a detailed description of the potential effects of the Project on BHRs and CHLs. The CHERs consider these potential effects in the evaluation of each BHR and CHL, and the results of the CHERs are used to inform subsequent studies and mitigation measures, as described in Section 6.23.4.

CLFN, LSFN and MCM requested further information on the BHR identified in the draft EIS/EA, specifically the cabins/camps. The cabins and camps identified in the Cultural Heritage Research Report (Appendix S-4) are shown in Figure 6.23-2 and are further described in the CHERs (Appendix S-6, and Appendix S-8 to Appendix S-11). The CHERs are further described below in 6.23.2.

Involvement of Indigenous Communities

MCM and Indigenous Services Canada requested clarification of how Indigenous communities have been given an opportunity to review this Cultural Heritage Report and how their comments were incorporated or addressed. Further, MCM requested further updates on the status of ongoing BHR and CHLs studies conducted since the draft EIS/EA. Indigenous communities have been provided an opportunity to review the report through their review of the draft EIS/EA, and comments received have been considered in preparing the final EIS/EA. Importantly, non-confidential TK/TLU information has informed the assessment and further study of BHR and CHLs. A summary of the incorporation of this information in Section 6.23.2.

CLFN, LSFN and NWOMC requested further involvement in the associated BHRs and CHLs assessments and ongoing engagement with future cultural heritage resource assessment and management. FMG has provided opportunities for Indigenous communities to participate in field work, including support to hire environmental monitors to work with FMG on behalf of their community in the field work planning and implementation. FMG remains committed to providing opportunities for community members to participate in various facets of future fieldwork and is interested in working together to establish a monitoring committee for all phases of the mine. Additionally, the receipt of TK/TLU information and community studies provides an opportunity to incorporate this information into future cultural heritage studies.

6.23.1.3 Spatial and Temporal Boundaries

The Project Development Area (PDA) is defined as the footprint of the Project, including the mine site area, mine site access road and the transmission line corridor, as well as a buffer to allow flexibility for design optimizations during Project permitting. The buffer includes approximately 250 metres (m) around the mine site area. The buffer for the transmission line is included within the 40 m wide corridor and within the 30 m wide corridor for the mine access road. Where the mine access road and transmission line are aligned together, the buffer is included within a 60 m wide corridor.

The spatial boundaries used for the assessment of BHRs and CHLs are shown in Figure 6.23-2 and defined as follows:

- **Local Study Area (LSA):** the LSA for BHRs and CHLs is defined by the potential effects of the Project on nearby heritage resources. The LSA is defined as a 2 kilometre (km) buffer around the mine site and mine access road, and a 1 km buffer on either side of the preferred transmission line alignment.
- **Regional Study Area:** the Regional Study Area for BHRs and CHLs is the same as the LSA, as Project interactions are not anticipated to extend beyond the LSA. *Background information collected for the LSA provides regional context for the significance of residual effects.*

The temporal boundaries for the assessment of BHRs and CHLs are defined as:

- **Construction Phase:** Years -3 to -1, representing the construction period for the Project;
- **Operation Phase:** Years 1 to 10, with the first year potentially representing a partial year as the Project transitions from construction into operation. Mining of the ore from the open pit will end in Year 10, at which time the pit will begin refilling with water; and
- **Decommissioning and Closure Phase:**
    - Active closure: Years 11 to 15, when final decommissioning and the majority of active reclamation activities are carried out; and
    - Post-closure: Years 16+, corresponding to the post-closure monitoring period and when the filled open pit basin will be reconnected to Springpole Lake.

Effects on the VC are assessed for each Project phase (i.e., construction, operation and closure).

6.23.1.4 Criteria and Indicators

In undertaking the assessment of effects on BHRs and CHLs, the following criteria were used:

- Presence of buildings / landscape features 40 years old or older; and
- Alteration or destruction of BHRs or CHLs.

The specific criteria, measurable indicators and the rationale for the selection of criteria are described in Table 6.23-1.

6.23.1.5 Description of Residual Effect Attributes

The residual effects for BHRs and CHLs are characterized in terms of the following:

- Magnitude;
- Geographic extent;

- Duration;
- Frequency; and
- Reversibility.

These attributes, along with the rankings, are further described in Table 6.23-2.

In addition, the residual effects for BHRs and CHLs are characterized according to the ecological and/or social context within which the VC is found. This is a qualitative measure of the sensitivity and/or resilience of the VC to potential change. The following ranking is applicable:

- **Level I:** The VC may or may not be sensitive but is capable of supporting the predicted change with typical mitigation measures;
- **Level II:** The VC is sensitive and requires special measures to support the predicted change; and
- **Level III:** The VC is sensitive and unable to support the predicted change even with special measures.

As noted in Section 6.1, a residual effect is defined as significant if both of the following criteria are satisfied:

- A Level II or III rating is attained for all of the attributes involving magnitude, extent, duration, frequency and reversibility; and
- A Level II or III rating is attained for ecological and/or social context.

Conversely, if a Level I rating is achieved for any of the attributes involving magnitude, extent, duration, frequency or reversibility—or if a Level I rating is achieved for the ecological and/or social context—then the residual effect is considered to be not significant.

In the event there is a significant adverse effect, the likelihood of occurrence is further described.

6.23.2 Existing Conditions

A description of the baseline conditions is presented below to characterize the existing conditions for BHRs and CHLs, based on several years of study that has resulted in a comprehensive surface water dataset for this stage of Project planning. The existing conditions are used to support the assessment of potential effects from the Project on BHRs and CHLs and will support long-term monitoring for the Project. Further baseline information on BHRs and CHLs can be found in the technical support documentation, including:

- Cultural Heritage Research Report (Appendix S-6);
- Cultural Heritage: Existing Conditions and Preliminary Impact Assessment Report (Appendix S-7);
- Cultural Heritage Evaluation Report for CHR 2 (Appendix S-8);
- Cultural Heritage Evaluation Report for CHR 3 (Appendix S-9);
- Cultural Heritage Evaluation Report for CHR 4 (Appendix S-10); and
- Cultural Heritage Evaluation Report for CHR 5 (Appendix S-11);

A Cultural Heritage Research Report (Appendix S-6) was conducted between 2020 and 2021 to develop an inventory of known and potential BHRs and CHLs in the investigation area based on the background research and fieldwork. Fieldwork conducted as part of that investigation identified the following known and potential BHRs and CHLs:

- Inferred travel route (with portages);
- Mineral exploration camp and activities located within the LSA; and
- Six outfitter camps or cabins located within the LSA.

In 2022, a subsequent Cultural Heritage: Existing Conditions and Preliminary Impact Assessment Report (hereafter referred to as 'Cultural Heritage Report'; Appendix S-7) was completed. The Cultural Heritage Report identified the following potential BHRs and CHLs within the LSA:

- Springpole Lake to Birch Lake travel route (CHR 1);
- Springpole exploration camp (CHR 2)[2];
- Five previously identified outfitter camps or cabins (three are located within the PDA [CHR 3, CHR 4 and CHR 5] and two within the LSA [CHR 6 and CHR 7])[3]; and
- Three outfitter camps or cabins within the LSA (CHR 8, CHR 9 and CHR 10) were identified during background research.

The locations of these potential BHRs and CHLs inventoried in the Cultural Heritage Report are depicted in Figure 6.23-2.

The Cultural Heritage Report determined that assessments were required for resources located within the PDA. These include: CHR 1, CHR 2, CHR 3, CHR 4 and CHR 5. While no further assessments are recommended for CHRs located outside of the PDA, it was recommended that these locations be identified on Project mapping.

In 2023, a property inspection was completed at CHR 2 to determine whether the resource had potential CHVI. The inspection confirmed that there are no building or landscape elements that are 40 years old or older with known or potential CHVI. It was consequently determined that CHR 2 is not a potential cultural heritage landscape, and no further mitigation measures are proposed.

CHR 1, CHR 3, CHR 4 and CHR 5 were evaluated for CHVI in standalone Cultural Heritage Evaluation Reports (CHERs) (Appendix S-8 to Appendix S-11). The results of these evaluations are noted below:

- CHR 1 was evaluated for CHVI (Appendix S-8) using the criteria of O. Reg. 9/06. The results found the resource meets four O. Reg. 9/06 criteria for its historical or associative value and contextual value. Accordingly, an HIA will be completed during detailed design prior to construction.
- CHR 3 was evaluated using the criteria of O. Reg. 9/06 and the results determined that the property did not meet the criteria of O. Reg. 9/06 and does not have CHVI. Based on this evaluation, no further mitigation measures are proposed (Appendix S-9).
- CHR 4 was evaluated using the criteria of O. Reg. 9/06 and the results determined that the property did not meet the criteria of O. Reg. 9/06 and does not have CHVI. Based on this evaluation, no further mitigation measures are proposed (Appendix S-10).

[2] There are no known structures at the Springpole exploration camp dating back more than 40 years.
[3] Of the five previously identified outfitter camps / cabins, two are owned by FMG and FMG intends to purchase the remaining three.

- CHR 5 was evaluated using the criteria of O. Reg. 9/06 and the results determined that the property did not meet the criteria of O. Reg. 9/06 and does not have CHVI. Based on this evaluation, no further mitigation measures are proposed (Appendix S-11).

Since the completion of the 2022 Cultural Heritage Report, the transmission line has been optimized, which has resulted in an updated PDA and LSA for BHRs and CHLs. One additional BHR (CHR 11) and one additional CHL (CHR 12) have been identified within the updated PDA and LSA for BHRs and CHLs and mapped in Figure 6.23-2. A review of 1976 topographic mapping and google earth imagery identified a bridge crossing situated between Bamaji Lake and Fry Lake (CHR 11; NRCan 1976c). As CHR 11 is located outside of the PDA and there is no anticipated direct or indirect impacts, further cultural heritage assessment is not required. However this resource will be identified to Project personnel during construction to promote awareness of potential heritage properties in the adjacent LSA.

In 2023 and 2024, additional TK/TLU information was provided by Indigenous communities which was reviewed in accordance with MCM guidance (MCM 2022). Based on the review:

- TK/TLU information shared by CLFN (CLFN 2024) validated CHR 1, as described in Appendix S-8.
- TK/TLU information shared by LSFN in 2024 was similar to information previously shared by NWOMC and WFN, which identified resources and harvesting areas that broadly intersect with CHR 1 however no direct or significant ties with these resource areas and CHR 1 have been noted at present.
- TK/TLU information shared by MON identified land use values located along the southern end of Alternative 3 for the transmission line route (MON 2023) which supported the optimization and selection of Alternative 1 as the transmission line route for the final EIS/EA.

TK/TLU information shared by SFN identified a large 'cultural heritage area' in proximity to Alternative 1 for the transmission line route (CHR 12; SFN 2024). The selected transmission line route for the final EIS/EA (Alternative 1) was informed by discussions with SFN and their request to follow the existing E1C transmission line corridor through the northern portion of the SFN Reserve lands. Although portions of CHR 12 may be identified as a potential CHL, the transmission line route for Alternative 1 avoids overprinting CHR 12 with a new disturbance along the majority of the route. However, potential interactions with CHR 12 and the Project have been identified and additional heritage assessment work such as a CHER or HIA may be undertaken prior to construction, if impacts to CHR 12 are identified.

6.23.2.1 Traditional Knowledge

As part of the Project, all eight Indigenous communities were contacted to participate in the EA process, and to provide TK/TLU information. To date, six Indigenous communities, Cat Lake First Nation, Lac Seul First Nation, Mishkeegogamang Ojibway Nation, Slate Falls Nation, Wabauskang First Nation and the Northwestern Ontario Métis Community, have provided TK/TLU information. Specific TK/TLU information relevant to built heritage resources and cultural heritiage landscapes is described below and incorporated into the assessment.

CLFN identified a navigational route in Springpole and Birch Lake (CHR 1; CLFN 2024). MON identified land use values located along the southern end of Alternative 3 transmission line route (MON 2023). SFN identified a large identified 'cultural heritage area', which may be either a landmark, may have special association with a community, person, or historical event or contains or is part of a CHL (SFN 2023). Wabauskang First Nation and Pikangikum First Nation did not identify potential BHRs or CHLs within the LSA.

6.23.3 Identification of Pathways to Potential Effects

The initial step in the assessment process is to identify interactions between the Project and the VC that can result in pathways to potential effects. These potential effects may be direct, indirect and/or positive, where applicable. Table 6.23-3 includes the potential interactions of the Project with BHRs and CHLs prior to the application of the mitigation measures. The professional judgment of technical experts with experience in mine projects in Ontario and Canada as well as input from Indigenous communities, government agencies and the public informed the identification of those interactions that are likely to result in a pathway to a potential effect due to a measurable change to BHRs and CHLs. These pathways to potential effects are further described below for each phase of the Project, along with the rationale for those interactions excluded from further assessment. Section 6.23.4 and Table 6.23-4 provide a description of the mitigation measures applied to these pathways to potential effects during all phases of the Project. The residual effects, after the application of the mitigation measures, are then described and further evaluated in Section 6.23.6 using the criteria and indicators identified in Section 6.23.1.4.

It should be noted that CHR 2, CHR 3, CHR 4 and CHR 5 were evaluated against O. Reg. 9/06 and determined to not have CHVI. Accordingly, there is no potential effect pathway or interaction with these features. Further, CHR 6, CHR 7, CHR 8, CHR 9 and CHR 10 will not interact with the Project, so these interactions are not assessed. The description of potential effect pathways is therefore focused on CHR 1.

Construction Phase

The construction phase of the Project is expected to occur over a three-year period and will include preparation of the site and the construction of mine infrastructure. The following interactions with the Project result in pathways to potential effects on BHRs and CHLs, as described below. After mitigation is applied to each pathway, as described in Table 6.23-4, the residual effects are assessed using the criteria identified for each pathway:

- The site preparation activities in the mine site area of the PDA, including clearing, grubbing and bulk earthworks, interact with BHRs and CHLs. These activities result in pathways to potential effects on BHRs and CHLs due to surface disturbances and the removal of CHR 1, which may affect the cultural heritage landscape. The assessment of potential effects on BHRs and CHLs includes the presence of buildings / landscape features 40 years old or older, and the alteration or destruction of BHRs and CHLs from these pathways.
- The construction of a fish habitat development area, onsite haul and access roads, buildings and onsite infrastructure interacts with BHRs and CHLs. These activities result in pathways to potential effects on BHRs and CHLs due to surface disturbances and the removal of CHR1. The assessment of potential effects on BHRs and CHLs takes into account the presence of buildings / landscape features 40 years old or older and the alteration or destruction of BHRs and CHLs from these pathways.
- The construction of the dikes and central water storage pond, and subsequent controlled dewatering of the open pit basin, interacts with BHRs and CHLs. These activities result in a pathway to a potential effect due to the disturbances of the associated waterbodies with the potential to change CHR 1 and CHR 12. The assessment of potential effects on BHRs and CHLs includes the alteration or destruction of BHRs and CHLs from this pathway.

All other Project interactions will not disturb CHR 1 once the initial disturbance described above has been completed, so these interactions are not assessed. There is no plausible interaction between the employment and expenditures activities and CHR 1 during any Project phase.

Operation Phase

No pathways to potential Project effects on VCs of BHRs and CHLs were identified during the operation phase of the Project because the disturbances would have already occurred during construction.

Decommissioning and Closure Phase

The post-closure phase predominantly involves monitoring activity, with occasional maintenance and limited equipment use. No pathways to potential effects on VCs of BHRs and CHLs were identified during the post-closure phase of the Project because the disturbances would have already occurred during construction.

6.23.4 Mitigation Measures

Measures to be implemented to avoid or minimize the effects of the Project on BHRs and CHLs with known or potential CHVI include the following:

- Heritage properties will be noted on applicable Project maps to identify the heritage status of the property to Project personnel.
- CHR 1 was evaluated for CHVI using the criteria of O. Reg. 9/06 and found to meet four O. Reg. 9/06 criteria. Based on this evaluation, an HIA will be prepared for CHR 1 during detailed design prior to construction to determine specific mitigation measures such as documentation or applying buffer zones as appropriate. The HIA will consider an alternative portage site selection as an option as per the mitigative recommendations presented during consultation with members of CLFN (see Section 6.23.1.2).

In addition to the mitigation measures to reduce potential effects, FMG is committed to maintaining alternate access to a portage for navigation routes that traverse the PDA during the construction and operation phases. During the closure phase, portage route(s) will be re-established in a suitable location based on feedback from known land and resource users.

The application of mitigation measures to specific pathways and phases is illustrated in Table 6.23-4. Mitigation measures described in this section are expected to be effective for their intended purposes given their effective implementation at similar projects.

6.23.5 Analytical Method

In keeping with best practice, the Standards and Guidelines for the Conservation of Historic Places in Canada: A Federal, Provincial and Territorial Collaboration were considered during the preparation of the technical studies of BHRs and CHLs.

A high-level screening for properties with cultural heritage value or interest (CHVI) was used during the preparation of the Cultural Heritage: Existing Conditions and Preliminary Impact Assessment Report (Appendix S-7) to identify potential BHRs and CHLs. InfoSheet #5 was used in preparing the Cultural Heritage Report preliminary impact assessment (Appendix S-7).

As part of the CHERs, in 2023, site visits for CHR 1, CHR 2, CHR 3, CHR 4 and CHR 5 were conducted to confirm and document the existing conditions. Indigenous communities in close proximity, including CLFN,

Lac Seul First Nation, SFN, and Mishkeegogamang Ojibway Nation were invited to have full-time environmental monitors participate in the environmental fieldwork for the Project and all Indigenous communities were provided the workplan for the cultural heritage fieldwork. The completion of the CHERs was informed by the MCM's Standards and Guidelines for the Conservation of Provincial Heritage Properties – Heritage Identification & Evaluation Process (2014; Appendix S-8 to Appendix S-11). A review of non-confidential TK/TLU information was completed to identify potential BHRs and CHLs. The results of this exercise are provided in Section 6.23.2. Available TK/TLU information, was also utilized to inform the evaluations of potential BHRs and CHLs against O. Reg. 9/06 (Appendix S-8 to S-11), all of which are included as part of the final EIS/EA submission.

6.23.5.1 Assumptions and the Use of the Conservative Approach

No known or protected heritage properties were identified in the PDA or LSA.

Potential BHRs and CHLs were identified within the PDA and LSA. A 40-year criterion was used to identify properties with the potential to have CHVI. This criterion is generally accepted by federal and provincial agencies as a preliminary screening measure. Potential heritage properties must be evaluated against O. Reg. 9/06 to establish if they have CHVI.

Although BHRs and CHLs have been researched, investigated and documented during baseline data collection within the LSA, the possibility remains that undocumented features may still exist.

6.23.6 Characterization of Potential Residual Effects

As part of the Cultural Heritage Report (Appendix S-7), a preliminary assessment for known and potential BHRs and CHLs was completed.

Additional fieldwork was conducted in 2023 to establish existing conditions for CHR 2 (Springpole Exploration Camp) and property-specific CHERs for CHR 1 (Springpole Lake to Birch Lake travel route), CHR 3 (Site 2), CHR 4 (Site 1) and CHR 5 (Site 3). From this, it was determined that four of the potential heritage properties did not meet the criteria of O. Reg. 9/06 and do not have CHVI under the OHA. Therefore, no further cultural heritage work is recommended for these properties.

However, CHR 1 (inferred travel route with portages) was found to meet O. Reg. 9/06 and a property-specific HIA will be conducted during detailed design prior to construction. This property will be affected by the Project through alteration / demolition and measures will be developed to provide conservation guidance to mitigate potential effects. Through the completion of an HIA for CHR 1, and the implementation of appropriate conservation guideance, the potential for residual effects to CHR 1 will be unlikely.

No residual effects are anticipated for CHR 2, CHR 3, CHR 4 and CHR 5 since these properties do not have CHVI. Further, as CHR 6, CHR 7, CHR 8, CHR 9, CHR 10 and CHR 11 are located outside the PDA, no residual Project effects are anticipated.

The potential for residual effects to CHR 12 are unlikely to occur, but will be confirmed once the required cultural heritage work is complete (such as a CHER and, if necessary, an HIA).

6.23.7 Significance of Residual Effects

With the proposed design and mitigation measures, residual effects on the known and potential BHRs and CHLs, is not anticipated and therefore a determination of significance is not required.

6.23.8 Confidence Prediction

A comprehensive background research and field work program was completed to identify potential BHRs and CHLs in the LSA. Further, a Cultural Heritage Report (Appendix S-7) was prepared to assess the potential effects of interactions between the Project and known and potential BHRs and CHLs. A cultural heritage screening was conducted for CHR 2 (Springpole Exploration Camp) and property-specific CHERs were completed for CHR 1 (Springpole Lake to Birch Lake travel route), CHR 3 (Site 2), CHR 4 (Site 1) and CHR 5 (Site 3). Of the five potential heritage properties, four did not meet the criteria of O. Reg. 9/06 and do not require further cultural heritage work. CHR 1 was found to meet O. Reg. 9/06 and a property-specific HIA will be completed during detailed design, as part of the final EA.

The existing and outstanding BHRs and CHLs work has been prepared according to applicable guidance documents and legislative requirements. Accordingly, the level of confidence in the effects prediction is high.

6.23.9 References

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Table 6.23-1: BHR and CHL Criteria, Indicators and Rationale

Criteria	Indicators	Rationale
Presence of buildings / landscape features 40 years old or older	• Number of known or potential BHRs and CHLs in the PDA and LSA	• Preliminary screening measure for CHVI, that has been accepted by federal and provincial agencies
Alteration or destruction of BHRs or CHLs	• Changes in the quality, quantity or access to BHRs or CHLs	• The indicator is consistent with the guidance provided by the MCM in InfoSheet #5 related to Heritage Impact Assessments and Conservation Plans (2006)

Table 6.23-2: Significance Determination Attributes for BHRs and CHLs

Attribute	Description	Category
Magnitude	A qualitative or quantitative measure to describe the size or degree of the residual effects relative to baseline conditions	**Level I:** The Project is not predicted to directly or indirectly affect known BHRs or CHLs. **Level II:** The Project results in the removal of small portions of BHRs or CHLs, or limited changes to context and accessibility of sites. **Level III:** The Project results in direct adverse (destruction or alteration) or indirect adverse impacts (shadows, isolation, obstruction of views, change in land use and land disturbance) to known BHRs or CHLs, as defined in the MCM's (2006) InfoSheet #5.
Geographic extent	The spatial extent over which the residual effect will take place	**Level I:** The effect is restricted to the LSA. **Level II:** The effect extends beyond the LSA. **Level III:** The effect extends beyond the Regional Study Area.
Duration	The time period over which the residual effect will or is expected to occur	**Level I:** The effect occurs over the short term: less than or equal to 3 years. **Level II:** The effect occurs over the medium term: more than 3 years but less than 20 years. **Level III:** The effect occurs over the long term: more than 20 years.
Frequency	The rate of occurrence of the residual effect	**Level I:** The effect occurs once, infrequently or not at all. **Level II:** The effect occurs intermittently or with a certain degree of regularity. **Level III:** The effect occurs frequently or continuously.
Reversibility	The extent to which the residual effect can be reversed	**Level I:** The effect is fully reversible. **Level II:** The effect is partially reversible or potentially reversible with difficulty. **Level III:** The effect is not reversible.

Table 6.23-3: Potential Interactions of Project Components with BHRs and CHLs

Project Component / Activity	BHRs and CHLs
Construction Phase	
Site preparation activities in the mine site areas, including clearing, grubbing and bulk earthworks	Yes
Construction of the mine site access road and airstrip, including the development and operation of aggregate resource areas	-
Development of temporary construction camp and staging areas	-
Construction of the fish habitat development area	Yes
Construction of the transmission line to the Project site	-
Construction of the onsite haul and access roads	Yes
Construction of the dikes in the north basin of Springpole Lake	Yes
Construction of buildings and onsite infrastructure	-
Construction of the central water storage pond	Yes
Controlled dewatering of the open pit basin	Yes
Construction of the starter embankments for the co-disposal facility	-
Stripping of lake bed sediment and overburden at the open pit	-
Development of the surficial soil stockpile	-
Initiation of pit development in rock	-
Initiation of stockpiling of ore	-
Establishment and operation of water management and treatment facilities	-
Commissioning of the process plant	-
Employment and expenditures	-
Operation Phase	
Operation of the process plant	-
Operation of open pit mine	-
Management of overburden, mine rock, tailings and ore in designated facilities	-
Operation of water management and treatment facilities	-
Accommodations complex operations	-
Operation and maintenance of mine site infrastructure	-
Progressive reclamation activities	-
Employment and expenditures	-
Decommissioning and Closure Phase	
Removal of assets that can be salvaged	-
Demolition and recycling and/or disposal of remaining materials	-
Removal and disposal of demolition-related wastes in approved facilities	-
Reclamation of impacted areas, such as by regrading, placement of cover and revegetation	-
Filling of the open pit with water	-
Monitoring and maintenance	-
Employment and expenditures	-

Note:
"-" = interaction is not expected and no further assessment is warranted.

Table 6.23-4: Proposed Mitigation Measures for Potential Effects on BHRs and CHLs

	Phase			
Pathways to Potential Effects / Criteria	**Con.**	**Op.**	**Cl.**	**Proposed Mitigation Measure**
Change in the presence of buildings / landscape features over 40 years old	●	–	–	• Potential heritage properties in the LSA will be noted on applicable Project maps to identify the heritage status of the property to Project personnel.
Alteration or destruction of BHRs or CHLs	●	–	–	• If potential heritage properties may be directly impacted, the property will be evaluated in a CHER. If that report determines that the property has cultural heritage value or interest, an HIA will be prepared to determine specific mitigation measures to be implemented, such as documentation, salvaging or applying buffer zones, as appropriate.

Notes:

Con. = construction; Op. = operation; Cl. = closure; "●" = mitigation is applicable; "–" = mitigation is not applicable.

550000 565000 580000 595000 610000 625000

5690000 5675000 5660000

Casummit Lake
Penson Lake
Flannery Lake
Jackpine Lake
Hammerton Lake
Wellein Lake
Meen Lake
Simard Lake
Birch Lake
Dole Lake
Keigat Lake
Zionz Lake
Cluderay Lake
Dorothy Lake
Durkin Lake
Fawcett Lake
Nabemakoseka Lake
Satterly Lake
Springpole Lake
Gull Lake
Obaskaka Lake
Cromarty Lake
Superstition Lake
Graydarl Lake
Kezik Lake
Scanes Lake
Seagrave Lake
Skingle Lake
Burley Lake
Bertha Lake
Ruddy Lake
Deaddog Lake
Christina Lake
Strachan Lake
Kaginot Lake
Fry Lake
Bumpy Lake
Fawthrop Lake
Wesleyan Lake
Upper Kaginot Lake
Senior Lake
Marsh Lake
Hailstone Lake
Rockmere Lake
Drum Lake
Latreille Lake
Margaret Lake
North Bamaji Lake
SLATE FALLS NATION
Tarpley Lake
Sesikinaga Lake
Bamaji Lake
Snelgrove Lake
Austin Lake
Allison Lake
Jeanette Lake
Coyston Lake
Roadhouse Lake
Blackstone Lake

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LEGEND

- Proposed Mine Feature
- Project Development Area
- Local Study Area for Built Heritage Resources and Cultural Heritage Landscapes
- First Nation Reserve
- Existing Road
- Existing Winter Road
- Existing Transmission Line
- Watercourse
- Waterbody

NOTES:
- Topographic information extracted from LIO, MNRF.
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1, 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.

0 5 10 20 30 40 50 Kilometres

Datum: NAD83
Projection: UTM Zone 15N

N W E S

First Mining Gold

wsp

SPRINGPOLE GOLD PROJECT

Local Study Area for BHRs and CHLs

PROJECT N°: ONS2104

FIGURE: 6.23-1

SCALE: 1:215,000

DATE: September 2024

550000 565000 580000 595000 610000 625000

5705000 5690000 5675000 5660000

Casummit Lake
Penson Lake
Flannery Lake
Jackpine Lake
Birch Lake
Keigat Lake
Zionz Lake
Dole Lake
Cluderay Lake
Durkin Lake
CHR 10
Fawcett Lake
Satterly Lake
Springpole Lake
Gull Lake
Superstition Lake
Graydarl Lake
Seagrave Lake
Skingle Lake
Bertha Lake
Ruddy Lake
Deaddog Lake
Christina Lake
Strachan Lake
Kaginot Lake
Bumpy Lake
Fawthrop Lake
Upper Kaginot Lake
Wesleyan Lake
Senior Lake
Rockmere Lake
Marsh Lake
Hailstone Lake
Latreille Lake
Margaret Lake
Tarpley Lake
SLATE FALLS NATION
North Bamaji Lake
Bamaji Lake
Sesikinaga Lake
Snelgrove Lake
Allison Lake
Jeanette Lake
Coyston Lake
Fry Lake

CHR 9
CHR 8
CHR 2
CHR 4
CHR 3
CHR 5
CHR 6
CHR 7

CHR 11

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LEGEND

- Proposed Mine Feature
- Project Development Area
- Local Study Area for Built Heritage Resources and Cultural Heritage Landscapes
- First Nation Reserve
- CHR 11

2022 Assessment Results

- Travel Route (CHR 1)
- Inventoried Property

0 5 10 20 30 40 50 Kilometres

NOTES:
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.

First Mining Gold

WSP

SPRINGPOLE GOLD PROJECT

Identified BHRs and CHLs in the LSA

Datum: NAD83
Projection: UTM Zone 15N

N W E S

PROJECT N°: ONS2104 | **FIGURE: 6.23-2**

SCALE: 1:220,000 | DATE: October 2024