Appendix C5

Feedback and Response Log - Interested Person – WCS Canada

Table: Summary of Feedback Received and Response / Action – WCS Canada

Group Name	Comment ID from source	Comment Raised	Response	Addressed in the EA / IS	Internal ID
WCS Canada	1	Growth-inducing effects that are missing from the cumulative-effects analysis: The Project is proposed within a landscape of global ecological importance, given its large extent of high-integrity forest and peatland ecosystems, including the second largest peatland complex in the world, and at the headwaters of the Albany River, which is one of the few remaining long free-flowing rivers in the world4. These ecosystems play a critical role in maintaining ecological integrity5 and support both biodiversity conservation – including habitat for several species at risk – and the mitigation of climate change6 through above- and below-ground carbon storage and ongoing carbon sequestration. Marten Falls First Nation has the right to pursue community-led infrastructure development. The responsibilities for ensuring that the Project then aligns with international and national environmental commitments lie with the provincial and federal governments, which includes upholding Canada's commitments to addressing the interconnected of biodiversity loss and climate change crises, particularly as they relate to	The cumulative effects assessment methodology used in the Final EA/IS was not developed in isolation by MFFN. Throughout the assessment process, the MFFN CAR Project Team has shared information and consulted with Indigenous communities, government agencies and interested persons on cumulative effects. The activities undertaken to consult and engage, as well as feedback received on the cumulative effects assessment methodology are included in Section 11.8.1 of the Final EA/IS. This information was used to develop the cumulative effects assessment methodology described in Section 6.8 of the Final EA/IS. The scenario-based analysis proposed was not part of the feedback received during consultation and engagement activities dedicated to finalize the methodology. No updates to the Final EA/IS were required in response to this comment.	Comment noted; see response for details	121

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		forests and peatland ecosystems (2015 Paris Agreement7, 2021 Glasgow Declaration on Forests and Land Use8, 2022 Kunming-Montreal Global Biodiversity Framework (KMGBF)9, Canada's 2030 Emissions Reduction Plan10, and Canada's 2030 National Biodiversity Strategy (in progress)11 which is the domestic response to the KMGBF). Meeting these obligations requires that ecosystems maintain their integrity and resilience, avoiding shifts toward degraded or potentially irreversible states. We have concerns that the Project, and the other proposed roads and industrial development it will enable in the RoF area, will cause irreversible negative impacts to ecological integrity that will be more significant than the direct impacts, and we contend that these impacts are reasonably foreseeable for this Project. Potential effects of the Project, including anticipated growth-inducing effects12, must therefore consider a reduction in ecological integrity of forest, peatland, and aquatic ecosystems that support biodiversity and may be compromised across a spectrum of degradation due to changes in ecosystem structure and function that exceed the natural range of			

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		variation. Currently in the draft EA/IS, many residual effects for valued components (VCs) that are not predicted to be significant, with only a localized residual effect (e.g., in the construction disturbance area and/or in the local study area), despite it being clear that there will be numerous local (due to the proposed road) and regional (due to altered hydrology and fragmentation) effects for forest, peatland, and aquatic ecosystems, as well as growth-inducing effects. As such, it is important that these additional anticipated effects are considered in the Cumulative Effects Assessment (CEA). While it is not possible to predict which projects will be developed or when, a forward-looking approach is needed that develops a range of potential future cumulative effects scenarios to determine what might happen, given what is currently known, and to select the preferred scenarios with identified thresholds for VCs. As the MFCAR is the first road segment of what is what is functionally an industrial access road to the RoF, the EA/IS has the obligation to conduct a more comprehensive			

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		assessment of plausible cumulative effects and growth-inducing impacts. These must address the reality that the proposed MFCAR could reasonably enable future development in the broader region, including new mining activities and associated infrastructure in the RoF area, expansion of forestry roads and related activities in the Ogoki Forest, and potentially other exploration activity and mining proposals within the region. We provide the following recommendation to address these concerns: 1. We recommend that the CEA include scenario-based analysis of future development pathways, including subsequent road segments and industrial activities likely to be induced by the MFCAR. The Impact Assessment guidance on “reasonably foreseeable” developments should not be treated as a constraint on meaningful assessment. Rather, the assessment should explore a range of plausible scenarios — including those that reflect the known intent to establish an industrial supply corridor to the RoF — in order to adequately inform decision-making and risk management in the future.			

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WCS Canada	2	Impacts to vegetation, hydrology, and soils, including forests, and peatlands, with related implications for long-term carbon storage and climate change: Comprehensive assessment of GHG emissions: As noted above, the project area encompasses high ecological integrity boreal forests and peatlands that comprise globally significant carbon stores. However, the EA/IS currently focuses only on greenhouse gas (GHG) emissions from vehicles associated with the construction, maintenance and operation of the proposed road. This narrow scope fails to account for GHG emissions resulting from direct disturbances to carbon-rich vegetation and soils, including emissions from the clearing, drainage and conversion of forests and peatlands. A complete assessment must include GHG emissions from disturbance and loss to total above-ground carbon (e.g., vegetation), including from harvest and/or conversions of forests and peatlands to other land uses, and GHG emissions from disturbance, drainage, and loss of below-ground carbon (soils, roots) due to disturbance and/or conversion of forests and peatlands to	1. Greenhouse gas emissions related to carbon sinks (i.e., biomass, deadwood, organic soil/peatland) is provided in Section 8.3.7.2.2 of the Final EA/IS. 2. A peatland assessment has been completed for the Final EA/IS and is included in Appendix I Peatlands Technical Support Document and summarized in Section 8.1.8 of the Final EA/IS. 3. Appendix W Engineering Memos provides additional engineering information on floating roads. Furthermore floating road construction methods using geotextiles under gravel/rock and culverts will be refined during detail design. 4. Refer to response 3. 5. Refer to response 3.	Comment noted; see response for details.	125

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		other land uses. Changes to GHG removals (carbon sequestration) due to disturbance should also be included in the assessment. Peatlands: We are unclear why there is a distinct separation between peatland and wetland ecosystems given that peatlands are a type of wetland. Given the importance of peatlands in the region and large proportion of the Local and Regional Study Areas that are covered by wetlands and particularly peatlands, there should also be a peatland-specific summary included in the EA/IS. We are also concerned throughout the EA/IS about the presentation of the floating road methodology as a mitigation approach to road construction through peatlands with insufficient information or detail to assess the relevance or potential efficacy. The descriptions of this methodology in the EA/IS report and Peatland Technical Summary are inadequate both in terms of the construction design and how the approach intends to mitigate impacts. In addition, the evidence provided to support this approach to mitigation is inadequate. The report identifies only a single case study on the use of a floating			

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		road in a Manitoba peatland which found no noticeable impacts on hydrology, but using only one case study to conclude that there will be no residual effects on groundwater and surface water movement in the construction disturbance area and local study area is not appropriate. Furthermore, Appendix I indicates that only minimal change to the carbon stored in the peatlands (and other carbon dynamics) is anticipated because of the floating road mitigation technique. However, there is no evidence provided to support this conclusion. We provide the following recommendations to address these concerns: 1. Include GHG emissions from vegetation and peatland disturbance in the EA/IS, encompassing both above-ground (e.g., biomass loss) and below-ground (e.g., soil and peat carbon) carbon affected by land clearing, drainage, or conversion. 2. Include a peatland-specific summary in the EA/IS. 3. More detail should be provided about the proposed floating road construction			

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		methodology using geotextiles under gravel/rock, and culverts, as well as case studies documenting the successes and failures of floating roads in other areas, (including other countries where relevant), such that the potential impact of the MFCAR on hydrology and peatlands degradation can adequately be assessed. Case studies should include information on factors such as length of road, peat type and depth, number and positioning of culverts for maintain water flows, typical vehicle weights for the road use, and the period post-construction, since all these factors contribute to compression and settlement of peat under roads constructed using geotextiles under gravel/rock. As floating roads cannot be constructed over wetter peatlands, peatlands with floating mats of vegetation, and peatlands with large open water areas including pools, locations where a cut road will be required should also be included in the assessment. 4. Although detailed soil survey data is presented in Appendix N, including maps of surficial geology, more information needs to be presented on peat types and depths in the local study area and construction disturbance area.			

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		Specifically, a map of peat depths should be presented to understand the amount of organic material that may need to be excavated to reach subgrade for road construction, or depth of organic material that may be compacted should a floating road design be chosen. 5. Use existing peat depth maps to assess peat depth along the proposed routes, and use collected soil profile information to verify validity of the above map for this specific region.			
WCS Canada	3	Barriers to wildlife and fish movement created by a road located at the ecotone between the Hudson Plains and Boreal Shield ecozones: We provide specific concerns below related to the barriers to wildlife and fish movement created by a new road at the ecotone between the Boreal Shield and Hudson Plains ecozones. Ecotones, or the transition zones between ecozones, are particularly important habitat for fish and wildlife because they can offer diverse habitats for a range of species from both ecozones and can often serve as important connectivity and migratory corridors. In this case, we have concerns that the EA/IS as currently drafted does	1. The effects of the placement of water crossing structures on fish migration were assessed in Section 7.3.2.6 of the Appendix G Fish and Fish Habitat Technical Support Document under the pathway of “Residual Effects on Fish Survival, Reproduction, and Distribution from the Placement of Waterbody Crossing Structures, Affecting Fish Access to Habitats”. During the detail design, bridges and culverts will be designed for each crossing (temporary and permanent). As discussed in this Section 7.3.2.6, culverts in fish bearing waterbodies will be designed and installed to allow for fish movement as appropriate to meet Ministry of Natural Resources and Fisheries and Oceans	Comment noted; see response for details.	129

Table: Summary of Feedback Received and Response / Action – WCS Canada

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		not adequately consider the barriers to terrestrial and aquatic movement of species created by a new linear feature in this ecologically important ecotone or adequately consider how to minimize or mitigate these impacts. Barriers for freshwater: With reference to aquatic barriers, the MFCAR crosses the headwaters of the Albany River, a currently free-flowing river, and includes multiple stream and rivers crossings. Road crossings have been demonstrated to reduce fish biodiversity and abundance upstream of road crossings, and maintaining fish passage is important for fish to access necessary habitat, as well as to access climate refugia as habitat is changing with climate change. In northern Ontario, there is also higher diversity of freshwater fish at the ecotone relative to more northern areas. In this case, while culverts and bridges are proposed for these road crossings, the number of culverts described seems insufficient for the number of crossings required in this landscape. We have concerns that both connectivity of waterways and lateral connectivity of riparian areas to waterways may be	Canada guidelines, and as indicated in Section 7.3.1.6.2 of Appendix G, where a channel allows for fish passage, culverts will be designed and installed in fish-bearing waterbodies to allow for fish passage to meet Fisheries and Oceans Canada fish passage guidelines (Katopodis and Gervais, 2016; Di Rocco and Gervais, 2024). As described in Section 7.3.1.1.2 of Appendix G, during detail design, site-specific fish and fish habitat and surface water surveys will be completed to support engineering and Fisheries and Oceans Canada and the Ministry of Natural Resources permitting at waterbody crossings where work below the high water mark is proposed. The fish passage requirements for each proposed crossing will be determined during detail design. Designs of waterbody crossings will be submitted as required in Fisheries and Oceans Canada and Ministry of Natural Resources permit applications. Monitoring and maintenance with respect to fish passage are described in Section 7.3.1.1.2 of Appendix G. 2. Section 7.3.1 Appendix M Ungulates Technical Support Document includes a		

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		disrupted through direct and growth-induced effects. Further, the selection of culvert locations is also described only relative to equalizing water levels on each side of the roads, without adequate consideration of ensuring that road crossing retain connectivity for fish passage. While there is monitoring described for fish populations with reference to whether culverts are successful in retaining fish habitat and fish populations, this limited monitoring will be insufficient for understanding impacts to fish habitat and populations if this monitoring is solely focused on culverts. Monitoring needs to be expanded to understand impacts to fish habitat, fish passage, and fish populations along the length of the MFCAR in order to identify if there are areas where connectivity and fish passage has been disrupted due to insufficient culverts or inappropriate water crossings. Finally, there also needs to be more information provided about rehabilitation of temporary waterbody crossings during construction, as all of these can contribute to barriers to fish movement at	detailed description of the potential Project-environment interactions related to caribou movement, including habitat loss and alteration, sensory disturbance, linear barriers, increased predator access, increase in public access, and collisions with vehicles and equipment. This assessment utilized telemetry data, habitat mapping and knowledge from the scientific literature about caribou response to linear disturbances to evaluate the potential residual effects on habitat connectivity and movement. This included specific analyses on the changes to Category 1, Category 2, and Category 3 habitats and different quality habitats (high, moderate, low, poor) during different seasons (pre-calving, calving, summer, fall, winter). While this analysis was used to guide design mitigations to allow for increased permeability of the road to wildlife movement, the residual effects from habitat loss and alteration and linear barriers were determined to be significant. Future year-round monitoring of caribou movement behaviour during and after construction has been recommended in Section 9 of Appendix M. 3. The EA/IS evaluates indirect habitat		

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		the regional scale. Fragmentation of intact forests and peatlands: With reference to terrestrial species, our primary concern is that the intact forest and peatlands in the region are home to numerous species that are sensitive to disturbance, most notably Boreal and Eastern Migratory caribou populations. For caribou, the ecotone is particularly important17,18. The documentation of movements and intensive use by animals of this region means that overall landscape-level impacts for caribou at the landscape scale need to be considered, in addition to the range-specific effects that are discussed in the EA/IS. The assessment in the EI/IA focuses on current habitat availability and telemetry data from collared caribou within a largely unaltered landscape but does not evaluate how the proposed road could affect future caribou movement, habitat connectivity, or avoidance behavior (in other words, it does not consider the extent to which the new road will serve as a barrier). The EA/IS presents information that caribou currently use the northern and central parts of the study area with good connectivity and observes	loss for caribou, by applying a 500 m buffer on all anthropogenic disturbances as per Environment and Climate Change Canada (ECCC 2020). Methods and results of this approach are described in Sections 4.3.4.2 and 7.3.1.2.2 of Appendix M. This includes specific analyses of changes to Category 1 (i.e., nursery areas, winter use areas, travel corridors) and Category 2 and 3 habitats. Changes to the amount of different quality habitats among pre-calving, calving, summer, fall, and winter seasons were also calculated. Guidance in ECCC 2020 was followed to account for the direct loss of habitat and indirect loss of functional habitat, which may remain physically intact but is no longer used by caribou because of associated sensory disturbance. The impact of the road on caribou movement due to avoidance of a linear barrier as well as the risk of vehicle collision have been assessed and are documented in Sections 7.3.1.2.3 and 7.3.1.2.6 of Appendix M, respectively. 4. Mitigation to minimize the residual effects of vehicle traffic on caribou have been described in Section 7.3.1 of Appendix M. Examples include concentrating construction activities spatially and temporally to minimize		

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		that there is limited fragmentation and low linear feature density under existing conditions and concludes that these factors are not currently limiting caribou movement or increasing predation risk. What is missing, however, is any assessment of the consequence to movement that will result for this wide-ranging species, which is a significant gap given that road avoidance behaviour is well- documented for caribou19. What is most relevant for sustaining caribou populations in the landscape is how the proposed road and associated infrastructure and traffic will affect caribou movement patterns, particularly during sensitive life stages (e.g., calving and migration), and this analyses is currently missing from the draft EA/IS. There is also no modelling or scenario testing of how the road could fragment Category 1 travel corridors, especially newly identified ones from telemetry. The region where the MFCAR is located near the transition between the Boreal Shield ecozone and Hudson Plains ecozones also coincides with the eastern edge of wolverines' distribution in Ontario where they may occur in low densities20 and could limit the ability of displaced female wolverines to establish territories	fragmentation and barriers to movement, reduced traffic speeds for heavy trucks during construction, leaving gaps in road berms and snowbanks to allow for movement across construction areas and the road, and signage in areas where wildlife are regularly observed and reduced speed limits in Category 1 caribou habitat areas. Monitoring during construction and operation phases of the Project has been proposed in Section 9 of Appendix M. Additional mitigations to reduce effects of traffic on caribou movement and survival and reproduction are included in the Final EA/IS. 5: It is acknowledged that locating wolverine dens is difficult, and that there is uncertainty in how female wolverines will respond to human activities associated with locating den sites. To minimize the risk of sensory disturbance and incidental take on denning wolverines, aerial surveys will be completed prior to construction activities occurring during the denning period. Due to the difficulty in locating dens, and the uncertainty in how a female wolverine will respond to human activities associated with the surveys, a precautionary approach will be taken with the interpretation of the survey results (i.e.		

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		north and east of the area and reduce reproductive success in an already low-density population. Given how difficult it is to identify dens and uncertainty in how females will respond to human activity associated with locating den sites, a conservative approach is to assume negative effects for any displaced females. Finally, relevant to fish and wildlife, we also wish to convey our general concern that the draft EA/IS does not include any detail on protection or monitoring for any fish or wildlife or their habitat. We strongly recommend that monitoring plans are developed prior to finalization of the EA/IS and before construction begins. Pre-construction monitoring that was undertaken for a limited period should be continued to establish a more robust baseline against which impacts of construction, operation, and maintenance can be compared. Environmental protection plans including details such as definitions of sensitive features and afforded protections to wildlife species should also be developed. These should include wildlife-vehicle collision reporting systems, anticipated impacts to populations due to increased access for fishing, hunting, and trapping from the	use a weight of evidence approach). A 4 km buffer will be applied to 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. 6. Proposed monitoring activities during the construction and operation phases of the are described in Section 9 of Appendix K Wildlife Technical Support Document and Appendix M of the EA/IS. Examples include ground-based pre-clearing surveys with Indigenous Environmental Monitors, and deploying and maintaining collars on caribou to compare seasonal movement patterns and habitat use with data collected during baseline studies. The final monitoring programs will be developed before construction begins, through engagement and consultation with Indigenous communities and federal and provincial regulators.		

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		road, and incidental take. We provide the following recommendations to address specific concerns: 1. There should be more robust consideration of fish passage and maintenance of hydrologic connectivity for fish and fish habitat, including justification of selection of culvert and bridge locations and types relative to maintaining fish passage, and monitoring of fish habitat and populations at all crossings rather than restricted to those with culverts. 2. For caribou, we recommend incorporating a movement permeability analysis using telemetry data, habitat mapping, and known caribou movement behavior to evaluate how the road may fragment habitat or restrict seasonal migration, calving, or dispersal. 3. The EA/IS should evaluate indirect habitat loss from road avoidance, using scientifically supported buffer distances (e.g., 500 m to >1 km), to account for the functional loss of habitat that may remain physically intact but is no longer used by caribou, and assess the proposed road's			

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		potential as a movement barrier for caribou, including both physical and functional impacts (e.g., road avoidance, noise, vehicle presence), especially in areas identified as Category 1 travel corridors or high-use seasonal habitat. 4. Mitigation and associated monitoring should focus on strategies that minimize traffic volume or provide breaks in traffic for caribou. 5. Due the time and expertise required to identify dens, and because displaced female wolverines may be at the edge of available habitat, habitat should be protected where female wolverines are known to be present and not solely where dens are successfully located. Further, construction activities and quarry operations should be avoided within 4 km of known female wolverine sites and wolverine den sites at any time and not just during the active denning period. 6. Monitoring plans for fish and wildlife should be developed prior to the finalization of the EA/IS and before any construction begins.			