APPENDIX C

EIS/EA CONCORDANCE WITH RESPONSES TO COMMENTS RECEIVED

(Provided digitally on USB flash drive with Volume 1 binder and on website address: https://www.firstmininggold.com/springpole-ea)

C-1 Federal Impact Assessment Agency of Canada and Environment and Climate Change Canada Comments on Baseline Study Reports and the Draft EIS/EA

C-2 Ontario Ministry of the Environment, Conservation and Parks; Ministry of Northern Development and Mines; Ministry of Natural Resources and Forestry; Ministry of Mines, and Ministry of Tourism, Culture and Sport Comments on Baseline Study Reports and the Draft EIS/EA

C-3

C-4 Shared Territory Protocol Nations Comments on Baseline Study Reports

C-5 Cat Lake First Nation and Lac Seul First Nation Comments on the Draft EIS/EA Mishkeegogamang

C-6 Ojibway Nation Comments on Baseline Study Reports and the Draft EIS/EA Slate Falls Nation

C-7 Comments on Baseline Study Reports and the Draft EIS/EA
Northwestern Ontario Métis Community Comments on the Draft EIS/EA

Table C-2.1: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
MECP-BL-SARB001	Overall comment	MECP recommends that further species-specific field survey work be conducted to cover the area within the newly defined LSA and RSA to collect sufficient data to evaluate the impact(s) of new linear features on the landscape.	Species-specific surveys for avian, bat, plant, herpetological and mammalian communities were expanded in 2021 to assess newly defined areas within the LSA and RSA including new linear features and mine components. The RSA for Caribou (Boreal population) has been revised and circulated to MECP-SARB. The RSA uses provincial data including satellite telemetry, kernel and habitat classification and boundaries.	Acknowledging that species-specific surveys were expanded in 2021, it is unclear what studies were conducted, what protocols were applied and whether or not survey locations were sufficient to identify SAR use of the LSA and RSA and potential intersection with project components.	The plans for the 2021 studies, including the survey locations, were summarized in the workplan memo provided to MECP with the baseline reports. The results of the 2021 aerial caribou (ungulate-wolf) survey were provided in a technical memo to MECP and was based on an RSA extend informed by discussion with MECP. This aerial survey also documented wolverine occurrence. Additional details on field methods, analytical methods, results (including SAR use of the LSA and RSA) and discussion of the 2021 field program is included in the draft EIS/EA.	Sections 3.4.10, 6.12 to 6.16 Appendix P
MECP-GWBL-001	L-1 Hydrogeology Baseline Report	The hydrogeology baseline study is inadequate currently. The MECP North Region TSS has previously offered to provide support regarding the baseline study (February 2021). MECP maintains the previous recommendations that a detailed technical work plan be submitted for the ministry's review to ensure that the hydrogeology baseline characterization is comprehensive enough to support all project-related undertakings that may impact groundwater quality and/or quantity for the EA.	A 2021 workplan was provided for MECP review along with the 2020 baseline report. FMG met with provincial representatives to present the results of the baseline work and the proposed 2021 scope of work on July 19, 2021. The results of the 2021 baseline work is being presented in the draft EIS/EA.			Appendix L-1
MECP-HYD-BL001	L-1 Hydrogeology Baseline Report	It is unclear how the effects on the surrounding environment of overprinting of a portion of Springpole Lake will be considered. The proponent should ensure there are adequate baseline hydrology (flow & level) stations to assess the effects on the remainder of Springpole Lake and the surrounding watershed.	The current (2021) field program was outlined in the Technical Workplan that was submitted for review and adds to the existing baseline hydrology for the Project area. The program includes lake level and flow stations at the inlet and outlet of Springpole Lake as well as lake level stations within Springpole Lake, including the southern portion of the north basin and the southeast arm. The effects of the Project is being assessed and presented in the draft EIS/EA.	It is recommended that the 2021 field program and results of this program be submitted to the ministry for review within the draft EIS/EA.	The results of the 2021 field program are included in the draft EIS/EA.	Appendix L-1
MECP-HYD-BL002	M-1 Hydrology Baseline Report	The cumulative effect of the pit dewatering and the change in storage volume within Springpole Lake should also be assessed, and adequate monitoring stations should be established to monitor these effects. The proponent should clarify which established baseline station(s) will be used to evaluate these effects.	This is being included in the draft EIS/EA.	Comment noted.	Acknowledged	Appendix M-1
MECP-HYD-BL003	M-1 Hydrology Baseline Report	It is unclear which stations will be used to establish hydrometric trigger values. The proponent should clarify which of the proposed stations will be used to establish trigger values for mitigative actions or contingency measures (if necessary).	This is being included in the draft EIS/EA.	Comment noted.	Acknowledged	Appendix M-1

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MECP-HYD-BL004	M-1 Hydrology Baseline Report	The proposed discharge location does not appear to be presented within the baseline documentation. Based on discussions with the proponent and various ministries held on July 19, 2021 it was understood that one of the discharge locations is proposed to be within the Springpole Lake Arm (where the Birch River discharges into Springpole Lake); however, there is no Ground Penetrating Radar (GPR) surveys of this location included in the report. The proponent should ensure adequate baseline data is collected at all of the proposed discharge locations to allow for an adequate comparison of the various alternatives for this project component.	The proposed discharge location is being presented in the draft EIS/EA. The current (2021) field program was outlined in the Technical Workplan that was submitted for review and is ongoing. The program will provide adequate monitoring to characterize flow and level conditions at the preferred and alternative discharge locations. This is being presented in the draft EIS/EA.	It is recommended that the 2021 field program and results of this program be submitted to the ministry for review within the draft EIS/EA The proponent should confirm if the field program includes monitoring of the placement location of the diffuser if required (i.e., GPR).	The results of the 2021 field program are included in the draft EIS/EA Although a GPR survey was conducted as part of geotechnical investigations, it is not required at the proposed discharge location because flow monitoring and rating curve development are being carried out at the inlet and outlet of Springpole Lake. Based on this data, flows at the proposed discharge location will be pro-rated accordingly which provides a level of conservatism, as flow monitoring at the proposed discharge location would be lower due to the lower velocity associated with a channel of this width (approx. 200 m). There is a strong degree of confidence in the flow data collected at the inlet and outlet of Springpole Lake. The additional watershed area between the proposed discharge location and Springpole Lake inlet is small (approximately 20 km^2) as compared to the area reporting to the Springpole Lake inlet (1,289 km^2).	Appendix M-1
MECP-HYD-BL005	M-1 Hydrology Baseline Report	The proponent should provide an explanation of all hydrometric stations that will be used to characterize the baseline conditions for the site in one document and this document should include, but not be limited to, the following: – the monitoring parameters (i.e., water level, flow, rating curve if present, etc.); – the timeseries of the data available; – the in-situ and manual monitoring frequency of the station (i.e., 15-minute, daily, weekly, etc.); – the status of the station (i.e., discontinued, relocated, stalled); – the purpose of the station (i.e., baseline, continuous monitoring, impact monitoring, etc.); – the period of record; – the installed instrumentation (i.e., data logger, staff gauge, stilling well, etc.); and – the catchment area of the station (if appropriate).	This is being included in the draft EIS/EA.	It is recommended that the characterization of baseline be explicitly defined prior to baseline being finalized.	Comment noted.	Appendix M-1
MECP-HYD-BL006	M-1 Hydrology Baseline Report	It is unclear how the WSC stations and associated data is being incorporated into the baseline data for the site. The proponent should clarify how the WSC station data is used to derive data for the site. The proponent should explain how the low flow statistics (such as the 7Q20 value) were derived from the WSC station and how they will be incorporated into the statistics for the site. Table 1 (above) identifies the WSC prorated 7Q20 values	This is being included in the draft EIS/EA.	This is not a sufficient response. It is recommended that the proponent confirm how the WSC station data is used on site. Confirmation of how the WSC stations and subsequent data have been used is critical to confirm how the low flow events have been determined and this should be clarified prior to baseline being finalized.	The baseline report (Section 4.4) describes the methodology in which WSC flow data is used to characterize runoff conditions for the Project site. Table 4-4 summarizes the pro-rated flows for the Springpole Lake catchment areas (F7-HS1 and F8-HS7). Also detailed in Section 4.4 is how the average annual runoff from the representative WSC station was used to estimate a natural ground runoff coefficient for the Project site.	Appendix M-1

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		versus the reported values in Table 4-6 of the Hydrology Baseline Report.			The baseline report (Section 4.5) describes the methodology in which WSC flow data was used to estimate low flow conditions for the Project site's catchment areas. The low flow indices for the WSC stations considered are summarized in Table 4-5 and the estimated low flow indices for the Project site's catchment areas are summarized in Table 4-6.	
MECP-HYD-BL007	M-1 Hydrology Baseline Report	It is unclear if adequate baseline data has been collected in the receiver to complete the Assimilative Capacity Assessment for proposed project discharge(s) (this can be completed with a program such as CORMIX). The proponent should comment on the baseline data needed to develop the Assimilative Capacity Modelling for the receiver of effluent discharge and explain the timelines for collecting this data to prevent project delays. While detailed modelling is typically required as part of the Environmental Compliance Approval (ECA), it is difficult to assess the extent of project effects without understanding how far downstream project effects could extend. The EA should include an estimate of the extent of these effects for the proposed project discharge(s), this estimate will require robust baseline hydrology and surface water quality data.	Baseline studies have been ongoing since 2011 and have been completed using standard field protocols and scientific methodology to document the spatial and temporal variability of surface water quality and hydrology as required for the environmental assessment. Further, the extent and scope of baseline studies considers the anticipated information needs to undertake assimilative capacity modelling. The predicted effects to surface water features, including the effluent discharge, is provided in the draft EIS/EA.	It is recommended that flow monitoring data for the proposed effluent outfall location be provided, including the proposed modelling platform to be utilized. Flow data for the receiver will be important for determining the worst case scenario of the mixing zone size.	Flow monitoring and rating curve development are being carried out at the inlet and outlet of Springpole Lake. There is a strong degree of confidence in the flow data collected at the inlet and outlet of Springpole Lake. Based on this data, flows at the proposed discharge location will be pro-rated accordingly. This provides a level of conservatism, as flow monitoring at the proposed discharge location would be lower due to the lower velocity associated with a channel of this width (approx. 200 m). The additional watershed area between the proposed discharge location and Springpole Lake inlet is small (approximately 20 km^2) as compared to the area reporting to the Springpole Lake Inlet (1,289 km^2). As previously stated, the modeling platform and model results are provided in the draft EIS/EA which provides an opportunity for review by MECP.	Appendix M; EIS Sections 6.6 to 6.9
MECP-HYD-BL008	M-1 Hydrology Baseline Report	Once potential effects of the project are more clearly understood by the ministry, further refinement to the baseline data monitoring programs may be required.	Comment noted.	Comment noted.	Acknowledged	Appendix M-1; EIS Sections 6.6 to 6.9
MECP-IWBL-001		At this time, there is too little information to comment It is unclear in the undertaking how the open-pit gold and silver mine will be dealing with waste. If the proponent proposes to dispose of waste in a manner that would require a waste approval, the proponent should outline this and make sure that it follows the appropriate EA planning and EPA Regulations, such as Ontario Regulations 347, 101/07 and 232/98.	Comment noted.			EIS Section 5.14 and 5.15

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MECP-NSBL-001	Leaves-Off, Figures 1-1 and 2-1	Update to show existing and proposed access road(s) should be shown. All noise receptors should be identified and distances to both the access road(s) and the project site should be tabulated for the chosen receptors.	Existing and proposed access roads, noise receptors and distances to chosen receptors are planned to be included in the draft Environmental Impact Statement / Environmental Assessment (EIS/EA).			EIS Sections 5.17; 6.3
MECP-NSBL-002	Leaves-Off, Section 4.1	"A summary of the monitoring results can be found in Table 4-1. The metrics presented in the table correspond to the arithmetic average of the hourly LAeq, minimum of the hourly value of LASmin and maximum of the hourly value of LASmax." Please clarify how the average hourly LAeq was obtained.	The average (arithmetic) hourly LAeq was calculated via the following formula: $L_{Aeq,avg} = \frac{1}{n}\sum_{i=1}^{n} L_{Aeq,i}$. Hourly LAeq, which coincides with the inclement weather condition, has been excluded from the dataset.			N/A
MECP-NSBL-003	Leaves-Off	Add table showing lowest hourly LAeq (and corresponding L90 value) for the daytime (7am to 7pm), evening (7pm to 11pm) and nighttime (11pm to 7am) periods over the entire monitoring program.	The table is planned to be included in the draft EIS/EA.			Appendix H-1
MECP-NSBL-004	Leaves-Off	Add table showing lowest hourly Average Peak Vibration Velocity for the daytime (7am to 7pm) and nighttime (7pm to 7am) periods over the entire monitoring program.	The table is planned to be included in the draft EIS/EA.			Appendix H-1
MECP-NSBL-005	Leaves-Off	Include discussion on noise and vibration applicable limits and area classification in accordance with Ministry Publications NPC-300 and NPC-207, respectively.	Applicable noise and vibration limits were not discussed in the baseline report(s) as the focus of the report(s) was to provide information on the existing conditions. Discussions of noise and vibration limits are be referenced in the draft EIS/EA.			Appendix H-1
MECP-NSBL-006	Leaves-On, Figures 1-1 and 2-1	Update to show existing and proposed access road(s). All noise receptors should be identified and distances to both the access road(s) and the project site should be tabulated for the chosen receptors.	Existing and proposed access roads, noise receptors and distances to chosen receptors are planned to be included in the draft EIS/EA.			Appendix H-2
MECP-NSBL-007	Leaves-On, Section 4.1	"A summary of the monitoring results can be found in Table 4-1. The metrics presented in the table correspond to the arithmetic average of the hourly LAeq, minimum of the hourly value of LASmin and maximum of the hourly value of LASmax." Please clarify how the average hourly LAeq was obtained.	The average hourly LAeq was calculated as an arithmetic average (mean), as noted in the response to MECP (Noise) 2.			Appendix H-2
MECP-NSBL-008	Leaves-On	A table should be added to show for each receptor: Lowest hourly LAeq (and corresponding L90 value) for the daytime (7am to 7pm), evening (7pm to 11pm) and nighttime (11pm to 7am) periods over the entire monitoring program.	The table is included in the draft EIS/EA.			Appendix H-2
MECP-NSBL-009	Leaves-On	A table should be added to show, for each receptor: Lowest hourly Average Peak Vibration Velocity for the daytime (7am to 7pm) and nighttime (7pm to 7am) periods over the entire monitoring program.	The table is included in the draft EIS/EA.			Appendix H-2

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MECP-NSBL-010	Leaves-On	Include discussion on noise and vibration applicable limits and area classification in accordance with Ministry Publications NPC-300 and NPC-207, respectively.	Discussions of noise and vibration limits are relevant to the EA and referenced in the draft EIS/EA.			Appendix H-2
MECP-NSBL-011	Leaves-On	Please provide a justification and clarifications on the use of different receptors and different instrumentation for the June leaves-on monitoring program.	As noted in Table 2-1 of the report (table note #1), the exact locations were shifted due to constraints of access during the field work given the remote nature of the site. The SP1 receptor was shifted by approximately 700 m and SP2 was shifted by approximately 60 m. Given that the Project area is remote and dominated by natural sounds without significant noise / vibration sources, the offsets are insignificant for measuring the baseline. The offsets were necessary as the exact locations of the leaves-off receptors were not accessible in June (leaves-on program) due to the seasonal change of site condition and constraints of transportation. The use of different instrumentation (vibration monitors) was due to the fact that the initially selected equipment was not available from the supplier for the leaves-on monitoring timeframe (this was also noted in footnote #1 on page 9 of the leaves-on report). As such, a different vendor was used and provided equivalently suitable equipment for the vibration measurement.			Appendix H-2
MECP-NSBL-012	Leaves-On	Add section and table comparing the leaves-off and leaves-on program, and conclusions should be drawn, where possible, in regard to the two monitoring programs.	This information is being included in the draft EIS/EA.			Appendix H-2
MECP-SARB-BL002	Section 1.1, Figure 1.1-1	The RAI used in previous studies was not sufficient to assess impacts to boreal caribou. MECP acknowledges that there have been updates to both the LAI (LSA) and caribou RAI (RSA).	Comment noted.			EIS Section 6.13.1.3, Figures 6.13-1, 6.13-2, 6.13-3
MECP-SARB-BL003	Section 1.1, Figure 1.1-1	The acknowledgement of a 10 km buffer being appropriate to evaluate sensory impacts to boreal caribou is correct, however, the LAI as described in the baseline reports does not appear to cover all potential mine components. A 10 km LSA around all mine components would be acceptable to evaluate site level impacts to boreal caribou.	The LSA for Caribou (Boreal population) has been revised, as optimization of Project mine components has occurred. The LSA is presented in the draft EIS/EA.	MECP understanding is that the project components, LSA and RSA are evolving. To avoid delays in future ESA permitting, should it be required, it is important that the LSA and RSA are biologically relevant to the species at risk being considered. MECP review and agreement with the final LSA and RSA being applied for each SAR that may intersect with the project area is recommended.	An RSA memo was provided to MECP for comment (October 22, 2021) which was informed by additional data provided by MECP, additional discussion with MECP and 2021 aerial survey results. The LSA and RSA extents for SAR species are based on best practice, scientific literature on disturbance ecology of specific SARs, best available science and data (historical, baseline studies), ongoing discussion with MECP, available traditional knowledge, and community consultations (which are ongoing). The information is included in the draft EIS/EA.	EIS Section 6.13.1.3, Figures 6.13-1, 6.13-2, 6.13-3

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MECP-SARB-BL004	Section 2 – Methodology 2.1 – Vegetation, page 2, Table 1.1-2, Table 1.1-3	The Trout Forest FRI used in 2011 was based on 1997 photo interpretation and since that time FRI's have been update using new imagery from 2008-2010. MECP recommends utilizing the most recent data (FRI, fire) to describe the baseline habitat condition.	As noted during the discussion with MECP regarding the Memo, entitled "Advice regarding Species at Risk criteria for consideration of alternatives for the Springpole Mine Environmental Assessment" dated September 23, 2021, FMG will utilize recent available data to describe baseline habitat conditions. This information is presented in the draft EIS/EA, and updated for the final EIS/EA, if necessary.	In the interest of avoiding delays in permitting it is recommended that any information sources being used to describe the baseline condition for SAR habitat be endorsed by MECP prior to the draft EIS/EA.	Baseline conditions for SAR habitat were informed by MECP guidance provided on 23 Sept 2021, which included direction on available data sources. In addition, baseline field programs (informed by historical data, previous baseline studies and available science literature) provided supplemental data at appropriate scales, using scientifically accepted methods, to support a rigorous assessment of baseline condition. The baseline field programs are intended to establish a basis for study designs to support the EIS/EA, permitting processes, and future monitoring programs. Additional details pertaining to information sources used is included in the draft EIS/EA.	EIS Section 6.11
MECP-SARB-BL005	P-3 2021 Terrestrial Resources Baseline Report	The report does not name the survey protocols employed in the 2011 EWPW survey and only references what survey conditions should be. Only 2 field surveys and ARU's were used to detect EWPW. MECP recommends further EWPW surveys be conducted in the area of all potential mine development activities following the "DRAFT Survey Protocol for Eastern Whip-poor-will (Caprimulgus vociferus) in Ontario" 2014. Survey standards require a total of 3 survey efforts in one season (mid May to June 30) to confirm presence/absence and determine territories.	Comment Noted. Within the LSA, survey locations for the terrestrial and wildlife program, particularly along the linear corridor components are only safely and logistically accessible via helicopter. Helicopters can not fly after dusk, therefore evening surveys in these remote locations were conducted using Audio Recording Units (ARU's). ARU's were deployed during the period between May 28 and June 30, in suitable Eastern Whip-poor-will (EWPW) habitat within the LSA to monitor and record the presence / absence of EWPW. ARU's were removed on July 1st to avoid being lost in the forest fire and the associated data was recovered. Due to safety and access considerations with this remote site, any avian or wildlife surveys that must occur after dark will be undertaken using ARU's or acoustic devices for bird and bat communities.	MECP acknowledges that access is a challenge and that safety is of the utmost concern. The use of ARU's may be helpful in determining presence/absence but it will not aid in identifying the location(s) of Category 1 nesting habitat. The ARU's were placed in "suitable Eastern Whip-poor-will (EWPW) habitat within the LSA" however there was no definition provided to describe what was considered "suitable" EWPW habitat. To avoid delays in ESA permitting, resulting from insufficient ARU sampling for the EA, FMG is encouraged to share the ARU sites selected and the selection criteria applied with MECP in advance of the completion of baseline data collection. MECP can assist in providing advice on the identification of potential Category 1 EWPW nesting habitat within the LSA for ARU sampling. This approach to identifying potential nesting habitat may be beneficial for the assessment of alternatives in the EA/EIS. It is unclear how sites were selected for the placement of ARU's for bat detection to determine if it is sufficient to aid in a	A habitat-based approach was used to inform deployment of bird detectors in 2021. Two recent Ontario studies provide additional information about site occupancy in the northwestern part of the province and highlight that burned stands and wetlands are important habitats for Eastern Whip-poor-will. Farrell et al. (2017) found that occupancy by Eastern Whip-poor-will in the boreal forest was similar across burned stands, recent clearcuts, and open wetlands, all of which may provide the ecological functions of early successional habitats used for breeding. However, Farrell et al. (2019) found that site occupancy was unrelated to the amount of clearcut areas in the surrounding landscape at any scale, indicating that the association of the species with clearcut habitats at a local scale does not indicate that higher amounts of this cover would be beneficial at the landscape scale. By contrast, Farrell et. al. (2019) showed that Eastern Whip-poor-will occupancy was positively correlated with the proportion of open wetland in the surrounding landscape at multiple scales, highlighting the importance of boreal wetlands as important foraging areas for the species. As per the general understanding of Whip-poor-will habitat needs, in 2021 Wood placed ARU'S in areas with a mix of open early successional,	Appendix P; EIS Section 6.15, 6.16

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				determination presence/absence. A habitat-based approach is recommended to identify potential bat maternal roosting habitat for ARU sampling within the LSA. Site selection should focus on the ecosites listed in the "Technical Note Species at Risk (SAR) Bats" and include the broader mine development area (including linear corridor alternatives) to inform baseline condition. Once species have been identified, bat habitat is not limiting in the NW, as such, if habitat is suitable to provide maternal roost habitat MECP considers it used for that function.	burned, logged stands in proximity to wetlands and older forest tracts. Whip-poor- will were detected at two locations in 2021 and additional survey work is planned for 2022. The methods and results from the 2021 Whip-poor-will survey efforts are included in the draft EIS/EA. We would like to discuss the plan for 2022 with MECP prior to the 2022 field season. A habitat-based approach was used to inform deployment of bat detectors in 2021. All bat detectors were deployed near a forest edge with most in proximity to a source of water. These conditions are optimal for detecting SAR bats and therefore optimal for a determination of presence/absence of SAR species. Additionally, site selection did include linear corridor alternatives, as well as areas outside the broader mine development area to be used as control sites for determining potential Project associated effects on bat acoustic activity trends. Current MECP guidelines recommend focusing on "any coniferous, deciduous or mixed wooded ecosite, including treed swamps, that includes trees at least 10cm diameter-at-breast height (dbh)". Four of 37 sites monitored with bat detectors were on the edge of one of these forest types. Although bat acoustic surveys were conducted near mostly coniferous forest, SAR bats were detected in all monitored areas except for one. Given that coniferous forest is less optimal for maternity roosting than mixed or deciduous forest, and that all mixed/deciduous forest in the Project area harboured a high density of cavity trees, the collected acoustic data provide a conservative estimate of use of the LSA and RSA by SAR bats. Nevertheless, in 2022, areas surveyed for acoustic bat activity will include the mixed/deciduous forests targeted in 2021 bat habitat surveys in addition to the original 2021 acoustic survey sites. In line with the Technical Note Species at Risk (SAR) Bats, these surveys will target optimal roost trees.	

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					The methods and results from the 2021 Bat survey efforts are included in the draft EIS/EA. We would welcome a discussion with MECP regarding the plan prior to the 2022 field season.	
MECP-SARB-BL006	Section 2.3.2.2.1, Ungulate Surveys, Page 19-25	The baseline caribou surveys (timing, area covered) included this report are insufficient to evaluate range level impacts to boreal caribou. MECP acknowledges that there have been recent changes to the RSA area for boreal caribou and recommends that further survey work continues in the RSA within the recommended survey window of February 1 to March 15 on days with optimal survey conditions	Comment noted. The LSA and RSA for Caribou (Boreal population) has been adjusted in 2021. The LSA includes a 10 km buffer around all potential mine and linear components. The RSA considers range level impacts to Caribou (Boreal populations) for portions of the Churchill, Kinloch and Berens ranges. These boundaries are defined by Caribou (Boreal population) that occur in these regions and use calving areas within 40 km of the proposed Project. In February 2021, an aerial survey was completed within areas of this RSA boundary to quantify the distribution and abundance of Caribou (Boreal population) at a larger landscape scale than what had been completed to date for the Project. This information will be considered in the development of a satellite telemetry program, which is planned to be implemented in 2022, after consultation with MECP.	MECP would like to note the current caribou LSA and RSA may be sufficient to describe sub-range level impacts to caribou for the EA/EIS, however, it is a requirement that impacts to caribou be addressed at multiple scales as outlined in the memo, entitled "Advice regarding Species at Risk criteria for consideration of alternatives for the Springpole Mine Environmental Assessment" dated September 23, 2021, not the least of which are range level impacts. It remains unclear how results from the caribou surveys and collaring work will be used to describe impacts to the 3 ranges which overlap with the project RSA.	An RSA technical memo was provided to MECP (22 Oct 2021) which applies the guidance provided by MECP (23 Sept 2021). The technical memo provides a science-based rationale for assessment of impacts at appropriate spatial scales (local and landscape) relative to caribou disturbance ecology. The RSA was informed using previous collaring data from MECP to map the expected extent of boreal caribou interaction at LSA scale from 3 caribou ranges (Churchill, Kinloch and Berens) based on MECP recommendation (MECP-SARB-3-18). Impact assessment will include assessment of range level habitat based impacts to the Churchill range (where the project is located) as advised by MECP. The technical memo adheres to the Ontario caribou range management policy (RMP) guidance and principles with respect to cumulative disturbance, habitat amounts & arrangement and sub-range habitat features. The results of the aerial surveys and telemetry study are focused on collecting data at appropriate spatial and temporal scales that are important to caribou and relevant to the project location with respect to the criteria and indicators specified in the MECP 23 Sep 2021 guidance memo for portions of all 3 caribou ranges that overlap the RSA (per 22 Oct 2021 technical memo), including potential Project incremental effects on the Churchill range specifically.	EIS Section 6.13, Figure 6.13-4
MECP-SARB-BL007	Figure 2.3.2.2.2	There is no rationale provided in the terrestrial report supporting the selection of the seven locations surveyed in 2013. As a result of changing footprint and changing habitat since 2012, MECP recommends that potential calving/nursery areas within the RSA should be revisited and further surveys completed to inform the baseline condition. Surveys should be expanded to lakes/peatland that may be impacted by linear corridor alternatives.	The LSA and RSA for Caribou (Boreal population) has been adjusted in 2021. The LSA includes a 10 km buffer around all potential mine and linear components. The RSA considers range level impacts for portions of Churchill, Kinloch and Berens ranges. These boundaries are defined by Caribou (Boreal population) that occur in these regions and use calving areas within 40 km of the proposed Project. Calving and nursery areas will be identified through the satellite telemetry program that is planned to be implemented during the winter of 2022. Kernel density estimators will be applied to telemetry data to identify where collared	The project RSA for caribou needs to be confirmed. Collaring work is looking at areas within 50 km of the project, while calving and nursery areas within 40 km are being considered? It is also MECP's understanding that the RSA is evolving based on data collection. To clarify, the current RSA does not consider "range level impacts" for the Churchill, Kinloch	Respectfully, we contend that the current RSA delineation (RSA memo of 22 Oct 2021) does consider impacts at appropriate spatial and temporal scales that are important to local caribou populations that may interact with the Project from potentially 3 open/connected caribou ranges (Churchill, Kinloch and possibly Berens). The RSA delineation is also consistent and more conservative than what has been implemented for other similar EAs in Ontario.	EIS Section 6.13, Figures 6.13-1 to 6.13-28

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
			Caribou (Boreal population) are calving and these locations can be considered for use in a Resource Selection Function Model to predict other probable calving areas in the RSA.	or Berens ranges, rather it can be used to assess the sub-range impacts. Range level impacts need to be addressed at a larger scale. Although the intent is that the proposed collaring work will aid in identifying critical habitat features within the RSA, the collared caribou can only be viewed as a sub-sample of animals in their winter habitat that may potentially identify calving and nursery areas and confirm use of previously delineated areas, however, it cannot be expected to provide complete coverage of potential calving and nursery areas within 10 km of the project, or those that will intersect the access and transmission corridors. FMG is encouraged to seek MECP review and endorsement of model inputs prior to the reliance on Resource Selection Function modelling to predict calving areas. As with all SAR habitat, the understanding is that known (evidence-based) delineated habitat will be of greater importance in the assessment of alternatives as compared to areas derived from model outputs.	This includes direct habitat-based impacts to Churchill range as well potential population-based impacts to Kinloch and Berens ranges that essentially contain caribou which move into the Churchill Range to calve. The mechanism through which there could be "range – level" impacts from the Project to Berens and Kinloch ranges is therefore through impacts to calving areas; one of the ways these impacts can be measured through monitoring/assessing calf recruitment. Known wintering areas in Kinloch and Berens ranges used by caribou that move into the Churchill Range to calve within 40 km of the Project have been included in the RSA; these wintering areas will be targeted for future collaring efforts to support permitting and long term monitoring, however aerial surveys are also helpful where calf recruitment can be assessed in the EA. A minimum sample size of 50 cows and calves is required for calf recruitment estimates (Rodgers 2018). To measure recruitment in Churchill, Berens and Kinloch a minimum target sample of 50 cows and calves per range will be the goal during aerial surveys. A future collaring program would focus on the survey blocks identified in the RSA memo (22 Oct 2021) with priority deployment of groups located during the aerial surveys, particularly those detected in Category 1 habitat within 40 km of the Springpole Project and/or 20 km of the linear disturbance alternatives but will also include deployment to adjacent Category 1 caribou habitat areas within the RSA bounds to support future permitting and long-term monitoring. Wood adheres to a science and evidence-based approach to field programs, EIS/EA and associated /subsequent activities (e.g., monitoring studies, ESA permitting) for SAR species and their habitat. Data collected from telemetry programs (MNRF 2011 – 2013) and a future satellite telemetry program will supplement information on seasonal used areas (wintering and nursery areas).	

Table C-2.1: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
					We agree that further discussion on the use of Resource Selection Function modelling to predict calving areas (outside of those detected via satellite telemetry) should be undertaken. Details pertaining to the extent to which an MECP based RSF model for calving habitat already exists and/or the availability of existing data on target parameters needs to be discussed more thoroughly.	
MECP-SARB-BL008	Caribou-LSA	Research has demonstrated that boreal (woodland) caribou will distance themselves from mine sites during construction and operations. This appeared to have the greatest impact on pre-calving, calving. For this reason, it is important to have a detailed understanding of caribou presence/use in for all seasons within the 10 km LSA. MECP recommends that further detailed monitoring documenting caribou use be conducted within the LSA to inform permitting.	The survey effort in the LSA and RSA for Caribou (Boreal population) has been adjusted in 2021 to document the seasonal distribution and abundance of Caribou (Boreal population) potentially interacting with the Project. The LSA includes a 10 km buffer around all potential mine and linear components. The proposed RSA considers range level impacts for portions of the Churchill, Kinloch and Berens ranges. These boundaries are defined by Caribou (Boreal population) that occur in these regions and use calving areas within 40 km of the proposed Project. In February 2021, an aerial survey effort was expanded to measure calf recruitment, abundance and distribution of Caribou (Boreal population) within the LSA and portions of the proposed RSA. In addition, a satellite telemetry program is planned to be implemented in 2022, to inform the permitting requirements related to Caribou (Boreal population) use in the LSA and RSA.	To clarify, the current RSA does not consider "range level impacts" for the Churchill, Kinloch or Berens ranges, rather it can be used to assess the sub-range impacts. Range level impacts need to be addressed at a larger scale. The limitation of the aerial surveys is that they only can identify areas of winter habitat use. The area around the Springpole Mine site has been delineated as caribou calving and nursery area, it will be important that the EIS/EA have sufficient baseline data to support an assessment of alternatives that sufficiently considers the impacts to caribou calving and nursery habitat in all three ranges. This is will be imperative arriving at a determination of impacts on population trends that might be expected from project alternatives.	The specific type of range level impacts being assessed in the draft EIS/EA varies depending on the range. As per the comment response above (MECP SARB-7), direct habitat-based impacts to Churchill range (where the Project occurs) as well as potential for population-based impacts to calf recruitment in Kinloch and Berens ranges (as well as Churchill Range) can be measured within this RSA. The mechanism through which there could be "range – level" impacts from the Project to Berens and Kinloch ranges is through impacts to calving areas in Churchill Range that are used by Berens and Kinloch animals. These potential impacts can be measured by monitoring calf recruitment. Known wintering areas in Kinloch and Berens ranges used by caribou who move into the Churchill Range to calve within 40 km of the Project have been included in the RSA. Therefore, these areas will be targeted for aerial surveys where calf recruitment can be assessed. A minimum sample size of 50 cows and calves is required for calf recruitment estimates (Rodgers 2018). To measure recruitment in Churchill, Berens and Kinloch a minimum target sample of 50 cows and calves per range will be assessed through aerial surveys (i.e., minimum target of 150 cows, approx. 15 to 25 groups). Data collected from telemetry programs (MNRF 2011 – 2013) will identify seasonal used areas (wintering and nursery areas). We agreed that further discussion on the use of Resource Selection Function modelling to predict calving areas can be undertaken between FMG and MECP through the draft EIS/EA review.	EIS Section 6.13, Figures 6.13-1, 6.13-2, 6.13-3, 6.13-4

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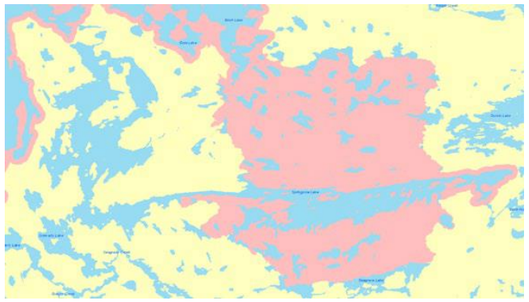
MECP-SARB-BL009	2.3.2.4 Bats, Figure 2.3.2.4	MECP recommends that ARU's be deployed at a minimum of 10 locations per potential maternal roost ecosite type (4 ARU's/ha as range is 20-30m), per the "Technical Note Species at Risk (SAR) Bats". The baseline terrestrial report listed a total of 2138 ha of maternal roost habitat within the Wildlife LAI, which equates to 60 sites. MECP recommends further acoustic surveys be conducted, per the "Technical Note Species at Risk (SAR) Bats", in the broader mine development area (including linear corridor alternatives) to inform baseline condition.	Comment noted. In 2021, bat survey effort was significantly expanded to include hibernacula and maternal roost site surveys and acoustic detectors, which were deployed from the end of May to mid-September to document bat use in these specialized habitats. This information is included in the draft EIS/EA.	It is unclear how sites were selected for the placement of ARU's for bat detection to determine if it is sufficient to aid in a determination presence/absence. A habitat-based approach is recommended to identify potential bat maternal roosting habitat for ARU sampling within the LSA. Site selection should focus on the ecosites listed in the "Technical Note Species at Risk (SAR) Bats" and include the broader mine development area (including linear corridor alternatives) to inform baseline condition. Once species have been identified, bat habitat is not limiting in the NW, as such, if habitat is suitable to provide maternal roost habitat MECP considers it used for that function. Availability of maternal roost habitat should be considered in the comparison of alternatives.	As per the MECP Bat Survey Standards Note 2021, the broad extent of the project required a scoped design for identifying maternity roost habitat, which included targeting ecosites with the greatest potential for harbouring maternity roosts and subsampling ecosite polygons via a plot-based approach. MECP's recommendation to have four (4) ARUs/ha (as per MECP guidelines) equates to an unfeasible number of ARUs to be deployed at this scale (2,138 ha). In such cases, MECP Bat Survey Standards Note 2021 recognizes a subsampling approach as valid. Acoustic survey efforts were greatly improved in 2021 compared to previous years. Data collected were adequate for determining presence of Little Brown Myotis throughout the project and the extent to which it uses forested habitat in the project area. Additional acoustic monitoring will be undertaken in 2022 which will include the addition of 10-20 monitoring stations (50-60 total), and deployment at cavity trees in potential maternity habitat identified in 2021 in addition to monitoring the original 2021 acoustic survey sites. The addition of ARUs in the forest interior will favor confirmation of Northern Myotis, this effort will occur in 2022.	Appendix P, EIS Section 6.15
MECP-SARB-BL010	Section 2.3.2, ss. 2.3.2.2.3, Figure 2.3.2.2.3 - Remote Cameras	Trail camera map does not provide camera numbers making it impossible to relate observations found in Table 3.2.2.2.3 to a specific location. Include camera id's in Figure 2.3.2.2.3	This information is included in the draft EIS/EA.	N/A	N/A	EIS Section 6.11, Appendix P
MECP-SARB-BL011	Figure 2.2, Table 3.2 – page 34	Figure 2.2 depicting wetland survey areas does not provide the wetland id making it impossible to relate observations found in Table 3.2 to a specific location. Include wetland id's in Figure 2.2.	This information is included in the draft EIS/EA.	N/A	N/A	EIS Section 6.11, Appendix P
MECP-SARB-BL012	Section 3, ss. 3.3.2.2.1, page 47	"The area around Springpole Lake was found to have some high-quality moose habitat interspersed with large areas of medium quality caribou habitat." It is unclear what is meant by "medium quality caribou habitat" and how this determination was made. MECP determines the relative importance of caribou habitat through	As noted during the discussion with MECP regarding the Memo, entitled "Advice regarding Species at Risk criteria for consideration of alternatives for the Springpole Mine Environmental Assessment" dated September 23, 2021, FMG will utilize the MECP categorization of habitat in baseline reporting. This information is being presented in the draft EIS/EA, and updated for the final EIS/EA, if necessary.	N/A	N/A	EIS Sections 6.12, 6.13; Appendix P

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
		the General Habitat Description (GHD). The GHD depicts the area around Springpole Lake as being Category 1 (low, pink) and Category 2 (moderate, yellow).  MECP acknowledges that recent (within 5 years) habitat changes may have occurred that might alter the habitat categorization in the GHD, however, changes to the categorization of habitat must be rationalized and supported by MECP.				
MECP-SARB-BL013	Section 3.3, ss. 3.3.2.4, Page 53	"With a high likelihood of false Northern Myotis observations from the 2012 analyses, these ultrasonic recordings were re-analysed using Kaleidoscope ver. 5.1.8. Upon re-analysis, only Little Brown Myotis were identified in the 2012 data set (Table 3.3.2.4). "Given the range boundaries of the two species and the abundance of Eastern Red Bat observations in the 2018 and 2019 data sets, we are confident that the Tri-colored Bat observations were erroneous and have been omitted from this summary." As we increase data collection through bat surveys, we are developing a better understanding of SAR bat distribution in the province. "Bat species distribution and habitat associations in northern Ontario, Canada" Layng, et al 2019 documented the presence of both Northern and Tri-colored bats in the Far North (north of 50). MECP recommends further acoustic surveys be conducted, per the "Technical Note Species at Risk (SAR) Bats", in the broader mine development area (including linear corridor alternatives) to confirm the presence/absence of all SAR bats.	As noted in MECP (SARB) 9, this information is being included in the draft EIS/EA.	To avoid delays in ESA permitting, resulting from insufficient ARU sampling for the EA, FMG is encouraged to share the ARU sites selected, the selection criteria applied and data collected to date with MECP in advance of the completion of baseline data collection.	Over 25,000 bat passes were collected in June, and over 10,000 passes in August/September (see below) within and around the Project area. No Tricolored Bat was identified by automated or manual classification methods in either survey period. This is strong evidence that Tricolored Bat does not occur in the Project area. Surveys in 2021 were conducted in optimal areas for detecting presence of both Tricolored Bat and Little Brown Myotis and for obtaining clear recordings that promote accurate species confirmation. Supplemental acoustic monitoring is planned in 2022 and monitoring is envisioned at certain times during the life of mine.	Appendix P

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MECP-SARB-BL014	Section 3.3, ss. 3.3.2.4, Page 55	Four potential bat hibernacula were identified in the Springpole Mine area, however, the sites have not been monitored to confirm use. MECP SARB finds the desk top exercise results of these to be insufficient and recommend further ARU field monitoring, per the "Technical Note Species at Risk (SAR) Bats", during the spring emergence and fall swarming period to confirm use.	As noted in MECP (SARB) 9, this information is being included in the draft EIS/EA.	To avoid delays in ESA permitting, resulting from insufficient sampling for the detection of hibernacula for the EA, FMG is encouraged to data collected to date with MECP in advance of the completion of baseline data collection.	In comparison to previous years, efforts to identify and monitor potential bat hibernacula in 2021 were expanded to cover all abandoned mine sites within the RSA and extending beyond the RSA. Cliff areas were identified through desktop and field surveys and assessed for suitability to bats during field surveys. Potential talus and cliff areas identified during groundwork and from the air during the August field visit were assessed for suitability to bats. Sites deemed potentially suitable to bats was monitored acoustically. Comparisons of trends in activity and acoustic call parameters at all sites, including control sites, were used to put results into perspective to accurately assess use by bats. Supplemental spring emergence surveys are being undertaken in 2022 to further monitor use of potential hibernacula in the project area.	Appendix P
MECP-SARB-BL015	Section 3.3, Table 3.3.1.9	It is highly likely that barn swallow will be attracted to Springpole mine facilities, a response plan should be developed and supported by MECP in the EA. MECP acknowledges the likelihood of barn swallow presence in future and recommend the development of a response strategy.	Comment noted.	N/A	N/A	
MECP-SARB-BL016	Appendix B, 2012 Wetland Scoring	Without being able to identify wetland MECP cannot confirm if the scoring is accurate. MECP suggests that the scoring is revisited taking into consideration caribou observations and the GHD.	As noted in MECP (SARB) 11, this information is presented in the draft EIS/EA.	Acknowledge the response, however, it remains unclear if the wetland score will be corrected to include known calving and nursery areas as delineated in the GHD?	The draft EA/EIS incorporates the known calving and nursery areas into the wetland assessments.	Appendix P, EIS Section 6.13
MECP-SARB-BL017	Wolverine	The baseline report discussion and studies to date are insufficient to developing an understanding of wolverine use of the landscape relative to the Springpole Mine development project. More data at a relevant scale is required to provide an understanding of wolverine use of the landscape at baseline. MECP recommends the proponent uses average wolverine home range size to develop a wolverine specific RSA and develop a monitoring strategy to apply to the RSA that will inform the baseline condition and provide longer term impact monitoring.	An RSA will be developed for Wolverine and presented in the draft EIS/EA. The boundaries of the RSA will be informed by existing data that can be obtained from the baseline investigations conducted for the Project, scientific literature on the home range for Wolverine, and any other readily available studies conducted by government and/or Indigenous communities that are relevant to the species in the area.	The approach proposed is insufficient to characterize the baseline conditions and assess the direct and indirect impacts to wolverine. Wolverine utilize large landscapes with minimal overlap between male home ranges. Evidence specific to Ontario estimated average home range sizes for males and females of 2,563 km^2 and 428km^2 respectively (Dawson et al., 2010). Additionally, wolverine are very sensitive to human-caused disturbances, particularly during the denning period. Human contact may cause females to abandon den sites (Myrberget 1968,	Wolverine and caribou conservation are complimentary because both species share the same boreal landscape (May et al. 2006) and have similar characteristics (i.e., low rate of population increase (λ), cumulative disturbance sensitivity that can affect recruitment, landscape occurrence at low natural population densities, large home ranges with large landscape requirements, preference for intact and mature conifer forest). Therefore, the approach applies the same RSA extend for caribou and wolverine. In addition, the caribou aerial survey design is used to also detect wolverine presence within the RSA, supplemented with focused 100%	EIS Section 6.14, Appendix P

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
				Copeland 1996; both cited in Copeland and Krucera 1997). Available information suggests that dens are generally located considerable distances from roads, generally supporting large buffers between dens and human activities that range from 2 to 8 km (e.g., Univ. Wyoming 2000, BCMWLAP 2002, Blouin 2006). Recent work in NW Ontario has identified that denning areas can be anywhere from 5-8 km from the den site. Furthermore, one of the largest effects on wolverine from linear feature development is the potential for Table 2: FMG Responses (dated November 10, 2021) to Comments from the Ministry of the Environment, Conservation and Parks – SARB (dated September 2021) Page 10 increased access and subsequent harvest (Krebs et al. 2010, J. Wildl. Manage. 68(3):493-502). While trapping of wolverine is not legal in Ontario, incidental harvest still regularly occurs. And there may also be some traditional harvest by local Indigenous communities. As such, MECP recommends that FMG apply the same LSA as the one selected for caribou (10 km buffer on all project components) to measure the direct and indirect (e.g., den abandonment, incidental/ intentional harvest, etc.) impacts of the Project and that a biologically relevant RSA be developed. Wolverine specific considerations, such as their geographic extent within and across the study areas (e.g., broad use of large landscapes, etc.) should be considered in the development of a wolverine RSA. This approach will ensure that the effects of all project components will be measured, regardless of where the final Project Footprint (i.e., access roads, transmission line) are sited. Consistent to other recent EA's MECP recommends that a hair snag/camera trap study be implemented following the camera trap design guidance from "Integrating Motion-Detection Cameras and Hair Snags for Wolverine Identification" Magoun et al and applying the sampling intensity of one	coverage of the Project and alternatives (including a 2 km buffer) for den detection. Available traditional knowledge for the RSA indicates wolverine are not a focal species to trap by Indigenous communities, nor do historical trapping records (per previous baseline studies) indicate wolverine has low representation. Collectively this information suggests that wolverine was not historically common in the RSA, and the local population appears to be growing over the recent 10-20 years The Project effects on Wolverine are being assessed at the same spatial scales (LSA and RSA) as used for caribou. This information is presented in the draft EIS/EA.	

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
				trap/100km^2 as outlined in "Surveying and Monitoring Wolverine in Ontario and other Lowland, Boreal Forest Habitats: Recommendations and protocols" Koen et al. This study is focused on the identification of individuals and denning females. This information will be used to identify the number individual territories and the number of potential den sites that may be impacted by all project components. FMG is encouraged to consult with MECP on the RSA development and the data collection prior to the draft EIS/EA to ensure the information will be sufficient to assess impacts to the species to avoid the need further data collection when it comes to permitting.		
MECP-SARB-BL018	Section 2.1-Aerial Survey, Page 2	MECP recommends that the RSA be developed using previous collaring data to map the expected extent of boreal caribou interaction with the LSA to assess range level impacts to the Churchill, Kinloch and, potentially, the Berens Ranges.	The RSA for Caribou (Boreal population) has been adjusted in 2021. The proposed RSA considers range level impacts for portions of the Churchill, Kinloch and Berens ranges. These boundaries are defined by Caribou (Boreal populations) that occur in these regions and use calving areas within 40 km of the proposed Project. This proposed RSA boundary was presented to MECP. In February 2021, an aerial survey was conducted within this proposed RSA boundary to quantify the distribution and abundance of Caribou (Boreal population) at a larger landscape scale than what had been completed previously for the Project. This information will be considered in the development of the satellite telemetry program, which is planned to be implemented in 2022, after consultation with MECP.	FMG has stated that the proposed RSA is adapting as required and it is understood that collaring may result in a need to update the RSA.	Understood and agreed. This is consistent with a science-based, evidenced based and adaptive management approach which is part of the draft EIS/EA.	EIS Section 6.13, Figures 6.13-1, 6.13-2, 6.13-3, 6.13-4
MECP-SARB-BL019	Section 2.0 – Monitoring Program, Page 3	The selection of sites is said to have been "representative of sensitive receptors", however, it does not appear that consideration of sensitive caribou habitat was included in site selection. MECP recommends that further baseline, and operational monitoring consider the locations of sensitive caribou calving and nursery habitat features in the LSA to be included in further monitoring.	See the response to comment MECP (SARB) 7	SARB 7 does not pertain to this comment. As sensory impacts within 10 km of Category 1 caribou habitat would be considered to result in a s. 9 contravention of the ESA, and recognizing that there is presently Category 1 habitat immediately adjacent to and surrounding the project area, MECP encourages FMG to include these habitat features as "sensitive receptors" for baseline noise level data collection.	A noise assessment is a component of the draft EIS/EA, which considers Category 1 habitat within the ZOI of the Project.	EIS Section 6.13.3
MECP-SARB-BL020	Section 4 - Figure 4-1 (in both reports)	The location of SP1 was not consistent between sampling periods. Selection of an alternate control site representative of a similar natural environment pre-mine activity would provide a more realistic representation of baseline. MECP recommends noise monitoring (leave-on and leave-off) in an area that would better reflect the noise level expected to	As noted in MECP (Noise) 11, the exact locations were shifted due to constraints of access during the field work. The SP1 receptor was shifted by approximately 700 m. Given that the Project area is remote and dominated by natural sounds without significant noise / vibration sources, the offsets are insignificant for measuring the baseline. The offsets were necessary as the exact locations of the leaves-off receptors were not accessible in June (leaves-on program) due to the seasonal change of site condition and constraints of access.	N/A	N/A	Appendix H-2

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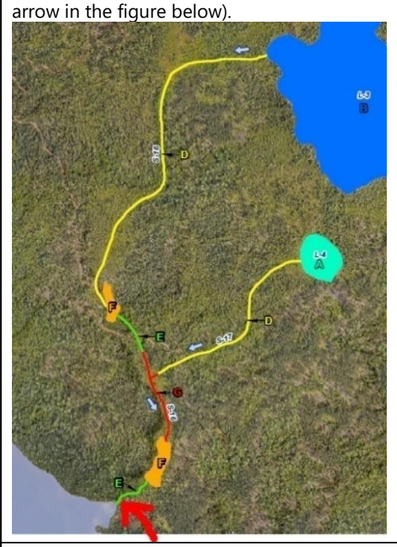
		occur in the natural environment pre-mine development activity (early ex camp, drilling helicopters etc.).	The use of different instrumentation (vibration monitors) was due to the fact that the initially selected equipment was not available from the rental supplier for the leaves-on monitoring timeframe (this was also noted in footnote #1 on page 9 of the leaves-on report). As such, a different vendor was used and provided equivalently suitable equipment for the vibration measurement.			
MECP-SW-BL001	N-1 Surface Water Quality Baseline Report, Cumulative (2011-2020)	It appears that several small lakes and streams will be over-printed by the TMF/waste rock area. MECP recommends adding an additional in-stream sampling location near the discharge point of the small stream that originates from lakes L-3 and L-4, adjacent the SW-18 in Birch Lake. This additional sampling location should be sampled for surface water quality, sediment quality and BIC.	The 2019-2020 Aquatic Resources Assessment Report conducted detailed fish habitat characterization studies within Stream 9 and utilized the FMG baseline data collected in the other stream habitat within the project area to define habitat types. The habitat types were extended to all local watercourses and waterbodies (Table 2-3 and Figure 3-7 series in the Report)). Benthic invertebrate community and sediment quality data collected during the baseline studies are expected to represent existing conditions within the local area habitat types. As such, no further benthic invertebrate or sediment quality sampling is proposed at this time. However, an additional sampling location is planned to be added to future field programs (as noted by the red arrow in the figure below). 	FMG response satisfies the intent of my recommendation indicating an additional sampling location will be added in-stream near the discharge point adjacent SW-18 (stream that originates from lake L-3).	Acknowledged	Appendix N-1, N-2; EIS Sections 3.4.7, 6.6 to 6.9
MECP-SW-BL002	N-1 Surface Water Quality Baseline Report, Cumulative (2011-2020)	Additional sampling locations in the northern basin of Springpole Lake should be sited south of the proposed coffer dam. Currently, there is only one surface water sampling location (SW-1) located in the northern basin near the proposed dam. The nearest surface water sampling location (SW-6) to SW-1 is located more than 1 km south.	Three surface quality stations (SW-01, SW-06 and SW-02) are monitored to characterize the baseline condition of the north basin of Springpole Lake to support the effects assessment for the Project. Similarly, a program was implemented to collect information on the benthic invertebrate community, sediment quality, and the water quality profile from three locations (L-15_B1, L-15-B3, L-15-B2), as described in the 2020 Aquatics Baseline Report. This data is expected to represent existing conditions within the local area habitat type, and no further sampling is proposed at this time. Data collected from 2011 through 2021 sampling program will also be available in the draft EIS/EA.	My recommendation was to add more sampling stations in the northern basin near where the proposed dam is to be constructed. Figure 2 (pg. 121) indicates that there are 5 distinct basins with depths greater than 12m in the northern arm (basin) of Springpole Lake. The proponent indicates that the 3 SW monitoring stations located in the northern arm of Springpole Lake are adequate. However, I re-iterate that there is only one monitoring	There are 2 monitoring locations (SW-01/L-15-B1 and L-15-B2) that characterize Springpole Lake water quality in the vicinity of the proposed cofferdams in the north basin of Springpole Lake. There are 4 additional locations in the north basin of Springpole Lake (SW-25, SW-06/L-15-B3, L-15-B6 and SW-02/L-15-B4), which characterize surface water quality in the remainder of the north basin of Springpole Lake. Monitoring of these 6 locations in the north	Appendix N-1, N-2; EIS Sections 3.4.7, 6.6 to 6.9

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
		These additional sampling locations should also be sampled for surface water quality, sediment quality and BIC.		location (SW1) near the proposed dam location. SW-6 appears to be located more than 1 km south of the proposed dam location (SW-1) and SW-2 is even further south (approximately 3+ km away) and located on the backside of the large island in the north arm. Also, SW-6 has only 3 years of data separated by eight years (2011, 2012 and 2020). The location of SW-2 and SW-6 are adequate for establishing baseline conditions in the northern basin; however, I still recommend the establishment of additional SW monitoring locations adjacent the proposed dam/site. The baseline conditions for the site are currently a sample size of one within 1+ km of the proposed mine site (proposed dam). Note: FMG states that data collected between 2011-2021 will be provided in the draft EIS/EA.	basin of Springpole Lake indicates there is little spatial heterogeneity across the north basin; water quality at all stations is circumneutral with low concentrations of nutrients and anions, and very low concentrations of total and dissolved metals. Available data (2011 through 2021) are more than sufficient to characterize baseline conditions to support the effects assessment. It is not expected that additional monitoring locations would yield water quality results outside the geospatial/temporal range of what is currently captured by the database; i.e., to be informative in characterizing baseline water quality conditions to support the draft EIS/EA. An additional sampling location, immediately downstream of SW-01/L-15-B-1 has been added as part of the ongoing monitoring program in 2022 (L15-B1b), as SW-01 will be overprinted by Project development. Coincident monitoring at SW-01 and the new station is part of the workplan in 2022.	
MECP-SW-BL003	N-1 Surface Water Quality Baseline Report, Cumulative (2011-2020)	Previous communication with the proponent indicated that a proposed effluent discharge location into the southern basin of Springpole Lake, near the Birch River inlet was being considered as one alternative for this project component. The Baseline report indicates there are no surface water monitoring stations near this proposed location. The nearest downstream monitoring location is more the 5 km downstream and is situated in an embayment. MECP recommends including several additional sampling locations in the vicinity of the proposed discharge location to ensure that the baseline condition is adequately characterized to allow for a proper assessment of project alternatives. These additional stations should be sampled for surface water quality, sediment quality and BIC.	A surface water quality station SW-07a was added in the vicinity of the proposed effluent discharge location for routine monitoring and has been sampled monthly since June 2021. The 2019-2020 Aquatic Resources Assessment Report presents sediment quality and benthic invertebrate community data collected during 2019 within the southeast arm (Section 3.5 of Report). Additional sediment and benthos samples were collected in fall 2021 and results are being presented in the draft EIS/EA.	The baseline reports did not provide the information subsequently provided in the FMG response. I recommended including additional baseline SW sampling locations near the proposed discharge locations(s). FMG subsequently added one SW sampling location (SW-07a) in the vicinity of the proposed discharge and samples have been collected monthly since June 2021. As stated in Comment 2, I still recommend the establishment of additional SW monitoring locations adjacent the proposed (or possible) discharge location(s) to better characterize baseline conditions. Note: the response states that additional sediment and benthos samples were collected in the Fall of 2021 and will be presented in the draft EIS/EA.	The SW-07a station was added to the 2021 program to characterize baseline water quality in the vicinity of the proposed discharge location (in the southeast arm of Springpole Lake). These data are included and discussed in the draft EIS/EA.	Appendix N-1, N-2; EIS Sections 3.4.7, 6.6 to 6.9
MECP-SW-BL004	O-3 2021 Aquatic Resources Baseline Report	Additional sediment and BIC sampling locations should be sited in the area immediately downstream of the proposed coffer dam. This is an area that will likely experience significant disturbance and potential inputs from both the placement of the dam material (rock) as well as potential site runoff.	As described in the 2021 workplan, the 2021 aquatic program included sediment quality and benthic invertebrate community sampling with the north basin of Springpole Lake at station L-15-B1, near the proposed coffer dam location. These results are being presented in the draft EIS/EA.	The baseline reports did not provide the information subsequently provided in the FMG response nor did it mention the 2021 workplan. The response from FMG is sufficient and FMG indicates that results from the aquatic program	Acknowledged	Appendix O; EIS Sections 3.4.8, 6.6 to 6.9

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
				(sediment quality and BIC sampling) will be presented in the draft EIS/EA.		
MECP-SW-BL005	O-3 2021 Aquatic Resources Baseline Report	Additional sediment and BIC sampling locations should also be sited within the deeper basins downstream of both the mine site proper and the proposed effluent discharge location(s) (as was conducted for the one candidate treated mine effluent outfall location described in the assessment report).	As described in the 2021 workplan, the 2021 aquatic program included sediment quality and benthic invertebrate community sampling with the six (6) Springpole Lake deep basins; five (5) within the northern lake areas and one (1) within the southeast arm (between the potential discharge location and Springpole Lake outlet). These results are being presented in the draft EIS/EA.	The baseline reports did not provide the information subsequently provided in the FMG response nor did it mention the 2021 workplan. FMG indicates that the 2021 aquatic program included sediment quality and BIC sampling within the six (6) deep basins in the northern arm of Springpole Lake and one (1) in the deep basin in the southern basin (which satisfies the MECP SW comment 5). FMG states that these results will be presented in the draft EIS/EA.	Acknowledged	Appendix O; EIS Sections 3.4.8, 6.6 to 6.9
MECP-SW-BL006	O-3 2021 Aquatic Resources Baseline Report	No sediment, BIC and/or fish tissue contaminant sampling was conducted in background reference areas upstream or downstream of the proposed mine effluent discharge. MECP recommends including additional background sampling locations for sediment, BIC and fish tissue contaminants upstream and downstream of the site (Birch Lake, Seagrave Lake and at the eastern end of the southern Springpole Lake basin.	As described in the 2021 workplan, the 2021 program included sediment quality and benthic invertebrate community sampling with two (2) Birch Lake locations. These results will be presented in the draft EIS/EA. 	The baseline reports did not provide the information subsequently provided in the FMG response nor did it mention the 2021 workplan. The 2021 program included sediment quality and BIC sampling at two (2) Birch Lake locations. FMG states that these results will be presented in the draft EIS/EA. FMG also states that future aquatic sampling programs will consider the collection of additional data to support future effects monitoring.	Acknowledged	Appendix O; EIS Sections 3.4.8, 6.6 to 6.9

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
			Additional sediment quality and benthic invertebrate community sample collection is not necessary for the effects assessment, however future aquatic programs will consider the collection of additional data to support future effects monitoring studies. 			
MECP-SW-BL007	O-3 2021 Aquatic Resources Baseline Report	Fish tissue contaminant sampling should include both small and large-bodied fish species and should focus particularly on walleye, yellow perch, northern pike and lake trout that are likely to be consumed in Springpole Lake and upstream/downstream reference areas. Fish tissue contaminant sampling should be carried out in accordance with standard ministry sampling procedures to ensure adequate sample sizes of appropriate species are collected.	The baseline aquatic resources studies included fish tissue contaminant assessments for Walleye, Northern Pike, Yellow Perch (young-of-the-year) and small-bodied fish species. It was proposed to sample tissues (muscle, liver and gonads) for Lake Trout and Lake Whitefish in fall of 2021 program; however, the lethal and non-lethal sample collection of these species was not permitted by MNDMNRF. We would appreciate receiving the specific reference to the ministry's sampling procedure that specifies species-specific sample sizes for comparison to the baseline data.	FMG indicates that NDMNRF did not allow for lethal and non-lethal sample collection of Lake Trout and Whitefish in 2021. More information as to why this was not permitted is required. As stated in my review of the baseline studies, fish tissue contaminant sampling should include both small and large-bodied fish species and should focus particularly on walleye, yellow perch, northern pike and lake trout. These are species that are most likely to be consumed in Springpole Lake and upstream/downstream reference areas. Also, fish tissue contaminant sampling should be carried out in accordance with standard ministry sampling procedures to ensure adequate sample sizes of appropriate species are collected (see attached). As stated in my previous review, the ministry typically requires at a minimum, three years of baseline data collection depending on sampling frequency, to characterize habitat conditions. A consistent and long-term data record is required to ensure meaningful and appropriate seasonal, annual and spatial background conditions are available to compare against future conditions during mine operation and post closure. The proponent must ensure that they are collecting sufficient information and carrying out adequate studies to support the proposed development as well as for future applications for any additional permits and/or approvals that may be required. This will also ensure that project options are not limited in the event of unforeseen circumstances and/or a change in future development plans.	In response to feedback received through engagement from regulatory agencies, Indigenous communities, and other stakeholders, a Broadscale Monitoring (BsM) study within Springpole Lake is planned for 2022 to supplement fish tissue contaminant sampling of culturally significant fish species (Lake Trout, Lake Whitefish, Walleye, Northern Pike, and Yellow Perch), targeting appropriate fish size ranges as per the sportfish sampling guidance from the MECP.	Appendix O; EIS Sections 3.4.8, 6.6 to 6.9

Table C-2.2: First Mining Gold Response to the Ministry of Northern Development and Mines Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
MNDM-BL-001	N-1 Surface Water Quality Baseline Report, Cumulative (2011-2020)	The Surface Water Quality Baseline Report Cumulative (2011-2020) compared all surface water data to Provincial Water Quality Objectives (PWQO), interim PWQO (iPWQO), or Canadian Water Quality Guidelines (CWQG). In consideration of the preparation of a Closure Plan, the site should consider whether the project will influence site surface waters such that water quality discharging will no longer meet PWQO on its own. It is mentioned in the baseline studies that contact water will be collected and re-used for various purposes during operations. However, there will most likely be an excess and that the appropriate environmental permits will be sought to discharge excess water to the environment. A water treatment plant will be necessary for the discharge to meet effluent limits once these are established. In terms of water quality guidelines for the closing of a mine, a site must first consider Part 5 39(1) of O.Reg. 240/00 which states that during closure the contaminant concentrations in water draining from the site will not exceed concentration limits determined from existing environmental compliance approvals. Second, in order for a site to be considered 'closed-out' Part 5 38(2) of O.Reg. 240/00 states that the surface water quality of a site shall meet PWQO or, where the proponent establishes that it is not practicable to meet PWQO, shall meet the background levels if the proponent establishes scientifically what those levels are. Therefore while this site is intending on treating during operations, and may treat during 'closing' while rehabilitation and reclamation activities are taking place, in order for the site to reach a closed-out state the water quality must meet PWQO objectives or background levels. The surface water quality from the three major lakes associated with this site (Birch, Springpole, and Seagrave) currently generally meets PWQO and indicates water quality typical of oligotrophic lakes found in northwestern Ontario. In looking ahead to mine closure, the site should consider whether it will be feasible to eventually reach PWQO guidelines and what rehabilitation measures (i.e. cover designs, revegetation) may be required to reach those water quality goals.	Comment noted, additional information is being included in the draft EIS / EA.			Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9

Table C-2.2: First Mining Gold Response to the Ministry of Northern Development and Mines Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
MNDM-BL-002	N-1 Surface Water Quality Baseline Report, Cumulative (2011-2020)	During mine closure certain requirements are outlined in O.Reg. 240/00 Part 5 in terms of surface water monitoring programs. O.Reg. 240/00 47(2) lists the minimum parameters to be included in surface water monitoring programs. The current baseline study includes these parameters except for cyanide. If the project proceeds further, and cyanide is used on site in the processing of ore, it should be included in routine surface water monitoring so that a consistent database of measurements has been established before mine closure even begins. Section 2.3.4 of the Surface Water Baseline Study does indicate that cyanide will be added to the monitoring program for 2021.	Cyanide was added to the 2021 surface water program and the results are being discussed in the draft EIS / EA.			Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNDM-BL-003	N-1 Surface Water Quality Baseline Report, Cumulative (2011-2020)	Time series graphs are presented in Appendix C of the Surface Water Quality Baseline Report Cumulative (2011-2020). As the site proceeds towards production and is required to complete a closure plan in the future, the compilation of water quality data over time should be continued. The closure plan should include a discussion of temporal and spatial trends in water quality supported by historical data and time-series graphs. Data summaries of recent result should also continue to be provided which present results of individual samples collected as well as basic statistical analysis (i.e., number of samples, data ranges, mean concentration, 75th percentile concentration etc.). The Surface Water Baseline report for the Springpole site is a good starting point for the continued collection, analysis, and presentation of surface water quality data for the site.	Comment noted.			Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
MNRF-BL-001	Hydrogeology Baseline Report (May 2021), Section 3.1, p 7	Soil classification (e.g. compactness for non-cohesive soil, consistency for cohesive soil) is not indicated. Please ensure that the soil classification is indicated.	Reference to tables of geotechnical descriptions of site overburden, based on test pit surveys are being included in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-002	Hydrogeology Baseline Report (May 2021), Section 5.1.1, p 22	"Hydraulic conductivity estimates of the shallow bedrock zone ranged from 1.6E-7 m/s to 2.6E-5 m/s although it should be noted that in three of the intervals tested by Tetra Tech (2019) the flow rate was too low to be accurately measured during pressure injection which indicates that the bedrock is of very low hydraulic conductivity and likely well below 10E-7." The statement is inconsistent with Table 5-1. Also, the discussion refers to the field program conducted in 2019, which was considered a screening program. Please consider the 2020 field program for the purpose of this assessment. Further, please incorporate the RQD results for the Trachyte Porphyry Intrusive and Andesite bedrock as the two main bedrock categories for their corresponding range of hydraulic conductivities at the Site.	The screening level estimates were conducted using the Hazen method and from backfilling of test pits as reported by FracFlow (2020, 2021a). These screening level analyses have been excluded from this assessment. Results from packer testing of shallow bedrock and laboratory analysis of permeability reported by Knight Piésold (2021) and Tetra Tech (2019) are referenced in Section 5.1.1 and considered representative and therefore included in the data reported in the baseline report. Table 5.1 lists the hydraulic conductivity estimates for the overburden types and shallow bedrock. The range 1.6E-7 m/s to 2.6E-5 m/s refers to shallow bedrock only and is consistent with what is shown in Table 5.1 for shallow bedrock. Discussion of representative hydraulic conductivity estimates and RQD values for the intrusive porphyry and host andesite are provided in sections 5.2.3 and 5.2.4, respectively.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-003	Hydrogeology Baseline Report (May 2021), Section 5.1.2, p 22-23	Groundwater flow direction is divided to shallow and deep pathways. Please clarify as to whether deeper pathways refer to regional groundwater flow directions.	In this case, shallow flow (characterized by overburden and shallow bedrock) is directed to the nearest streams / pond while deeper pathways are directed to the largest surface water features at site (Springpole Lake and Birch Lake). Regional scale groundwater flow is directed to Hudson Bay (site falls within the extent of the Hudson Bay drainage basin). As such, deep pathways, as described in the text, do not constitute regional groundwater flow.	Please include the additional information provided in the response to: the current report (Section 5.1.2), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-004	Hydrogeology Baseline Report (May 2021), Section 5.1.3, p 23	Although Table 5-2 shows which wells were used for the calculation of the vertical gradient, it is recommended to cite the wells for gradients stated in this section.	Comment noted. The suggested presentation will be considered for future reporting and is being included in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-005	Hydrogeology Baseline Report (May 2021), Section 5.3, p 28-29	While groundwater cannot be directly compared to the Provincial Water Quality Objectives (PWQO), the objectives can nevertheless be used for description purposes. The reported groundwater quality results were not compared to PWQO guidelines for the protection of aquatic life, and the Canadian Environmental Quality Guidelines (CEQG) for the	A comparison of groundwater quality to the appropriate guidelines will be included in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
		protection of aquatic freshwater life. These comparisons are recommended.				
MNRF-BL-006	Hydrogeology Baseline Report (May 2021), General, p 46	It is understood that precipitation has limited influence on groundwater as noted in Section 6.0. Hydrographs are required for near-surface, overburden, and bedrock to account for groundwater level seasonal variations and major influencers (via head variations since this is a confined or semi-confined aquifer versus precipitation recharge).	Monitoring locations equipped with multi-level dataloggers in bedrock are being established at approximately 10 locations as part of investigations currently underway at site. The installation depth for the vibrating wire piezometers ranges from approximately 5 m to >350 m. In addition to the automated monitoring data, spot measurements are being acquired from other locations to provide sufficient geographic coverage and confirm the relationships between overburden and bedrock water levels.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-007	Hydrogeology Baseline Report (May 2021), Section 5, p 30	Table 5-1 does not indicate the year of the field program for the hydraulic conductivity values reported. Please update accordingly.	Table 5-1 is being updated with the sources for value estimates in the draft EIS EA.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-008	Hydrogeology Baseline Report (May 2021), Section 3, p 15	Figure 3.5 (referred to in text as 3-5) requires acronym definition on the figure; RQD and SW are defined in the text.	Comment noted.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-009	Hydrogeology Baseline Report (May 2021), p 15	Please provide cross sections of overburden and shallow bedrock showing, but not limited to, installed boreholes and monitoring wells, groundwater levels, pit boundary, elevations, etc.	This information is being included in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix L-1, EIS Sections 3.4.5, 6.5
MNRF-BL-010	2021 Groundwater Technical Workplan	No comments	Comment noted.	No further comments at this time.	Acknowledged	N/A
MNRF-BL-011	2021 Surface Water Quality Technical Workplan, p 1	PSI parameters to include ORP and turbidity.	During the 2021 sampling program, ORP and TDS were collected in the field. TSS, a parameter that represents clarity similar to turbidity, was also submitted for laboratory analysis.	Please indicate that ORP, TDS, and other stabilization data were measured in the field in the current report, future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-012	Surface Water Quality Baseline Report (May 2021), p i	There are no "pH units".	Comment noted.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-013	Surface Water Quality Baseline Report (May 2021), Section 2.0, p 5	Please indicate the total number of sampling locations.	Baseline water quality monitoring locations over the period between 2011 and 2020 are presented in Figure 2-1 and summarized in Table 2-2 of the Surface Water Quality Baseline Report and included 27 sampling locations.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-014	Surface Water Quality Baseline Report (May 2021), Section 2.3.1, p 5	Please indicate specific guidelines and/or protocols followed for sampling.	All sampling was conducted using industry standards. Several protocols and guidelines were referenced within the 2011-2013 sampling reports, including: - Guidance on Sampling and Analytical Method for Use at Contaminated Sites in Ontario. 1996. - Analytical testing in accordance with ISO 17025	Please include all regulations, guidelines, and policies followed for sampling in: the current report (Section 2.3.1), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
			- Protocol for Analytical Methods Used in the Assessment of Properties under Part XV.1 of the Environmental Protection Act.			
MNRF-BL-015	Surface Water Quality Baseline Report (May 2021), Section 2.3.1, p 5	Confirmation is required for accreditation by the Canadian Association for Laboratory Accreditation (CALA).	All laboratories providing analysis support for the baseline programs for the Project are appropriately accredited. Maxxam Analytics is accredited by the Canadian Association for Laboratory Accreditation (CALA)/Standards Council of Canada (http://bvlabs.ftdev.ca/our-story/quality/certifications-accreditions) Flett Research Ltd. is accredited by CALA (http://www.flettresearch.ca/Reference/CALA-certificate.pdf)	Please include the additional information provided in the response to: the current report (Section 2.3.1), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-016	Surface Water Quality Baseline Report (May 2021), Section 2.3.1, p 6	Reagent water should have been used between sampling locations instead of lake water. The used approach promotes potential for cross-contamination.	Comment noted. Samples were rinsed at the sampling location to reduce cross contamination. Other procedure to reduce cross contamination used in the 2011 and 2012 program include rinsing field meters with lake water between sampling locations.	Future procedures shall include use of reagent water instead of lake water for rinsing	Ongoing and future surface water quality sampling efforts follow industry best practice as outlined in applicable sampling protocols, including: CCME. 2011. Protocol Manual for Water Quality Sampling in Canada. ISBN 978-1-896997-7-0 BC MOE. 2013. British Columbia Field Sampling Manual, Part E: Ambient Freshwater and Effluent Sampling.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-017	Surface Water Quality Baseline Report (May 2021), Section 2.3.1, p 6	Laboratory reports (including Chains of Custody) are not attached. Please include these reports.	Available laboratory reports including chain of custody are being provided in the draft EIS/EA,	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-018	Surface Water Quality Baseline Report (May 2021), Section 2.3.1, p 6	The document title is: "Mercury in Water by Oxidation, Purge and Trap, and Cold Vapor Atomic Fluorescence Spectrometry". "Clean Hands / Dirty Hands" is the sampling technique.	Comment Noted.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-019	Surface Water Quality Baseline Report (May 2021), Section 2.3.1, p 6	Please clarify as to whether Flett Research Ltd. is accredited by CALA.	Flett Research Ltd. is accredited by CALA (http://www.flettresearch.ca/Reference/CALA-certificate.pdf)	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-020	Surface Water Quality Baseline Report (May 2021), Section 2.3.2, p 7	While pH, temperature, and electrical conductivity were measured, there is no indication as to whether ORP and turbidity were measured. If YSI was used, these readings shall be recorded.	ORP and turbidity were not collected during the 2015 to 2018 sampling programs. Total suspended solids, a parameter that represents clarity similar to turbidity, was submitted for laboratory analysis. During the 2020 and 2021 surface water programs, physicochemical water quality parameters including water temperature, dissolved oxygen, ORP, TDS, pH and	Please include the additional information provided in the response to: the current report (Section 2.3.2), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
			conductivity were measured at one-metre intervals, from surface to bottom, using a portable meter (e.g., YSI multi-parameter sonde) with a 40-metre cable prior to sample collection.			
MNRF-BL-021	Surface Water Quality Baseline Report (May 2021), Section 2.3.2, p 7	Please specify the type of equipment used for sampling as well as measures taken for the cross-contamination control.	Surface water samples collected during 2018 used industry standards. This included: Rinsing field meters with lake water between sampling locations; Using new nitrile gloves, field filters, and syringes between sampling locations; Using a separate bottle to collect the samples at each location; and, Rinsing the Kemmerer water sampler at each sampling location with lake water.	Please include the additional information provided in the response to: the current report (Section 2.3.2), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-022	Surface Water Quality Baseline Report (May 2021), Section 2.3.2, p 7	Ice packs shall be used to maintain a temperature of less than 10 °C in accordance with the Protocol for Analytical Methods Used in the Assessment of Properties under Part XV.1 of the Environmental Protection Act.	Samples were stored in an insulated container for transportation. Below is the summarized procedure for shipping samples: Sample sets were inspected before leaving each field location to confirm all containers were filled. The sets were stored in coolers with ice packs or wet ice to maintain sample integrity until being transferred to refrigerators at the exploration camp. The coolers were packed with ice packs and/or wet ice prior to shipment and delivered to ALS Laboratories in Thunder Bay. A laboratory Chain of Custody was completed for sample submission including the sample IDs, date and time collected, as well as the in-field temperature and pH measurements.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-023	Surface Water Quality Baseline Report (May 2021), Section 2.3.2, p 7	Duplicate samples must be collected in accordance with Part II, Section (3), Clauses (3) and (4) of Ontario Regulation 153/04. Furthermore, there is no indication as to whether trip blanks were submitted.	Appendix B Table 1 and 2 of the Surface Water Quality Baseline Report summarizes the results from the duplicates, trip blanks and field blanks results. During the 2021 water sampling program, one duplicate sample was collected for every 10 samples taken, in addition to trip blanks and field blanks.	Please indicate QA/QC measures, including response to Section 2.3.2, in the body of the current report, future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
MNRF-BL-024	Surface Water Quality Baseline Report (May 2021), Section 2.3.2, p 7	Calibration of instruments and cross-contamination control measures are not indicated.	Surface water samples collected in 2018 were collected using industry standards, including instrument calibration and procedures to minimize cross-contamination between samples. These procedures included: Rinsing field meters with lake water between sampling locations; Using new nitrile gloves field filters, and syringes between sampling locations; Using a separate bottle to collect the samples at each location; Rinsing the Kemmerer water sampler at each sampling location with lake water. In addition, the sampling procedure followed the field meter manual's calibration and maintenance requirements.	Please include the additional information provided in the response to: the current report (Section 2.3.2), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-025	Surface Water Quality Baseline Report (May 2021), Section 2.3.3, p 7	There is no indication of use of ice packs and maintaining the temperature as per the MECP protocols.	· Samples were stored in an insulated container for transportation. Below is the summarized procedure for shipping samples: Sample sets were inspected before leaving each field location to confirm all containers were filled; The sets were stored in coolers with ice packs or wet ice to maintain sample integrity until being transferred to refrigerators at the exploration camp; The coolers were packed with ice packs and/or wet ice prior to shipment and delivered to ALS Laboratories in Thunder Bay; and, A laboratory Chain of Custody was completed for sample submission including the sample IDs, date and time collected, as well as the in-field temperature and pH measurements.	Please include the additional information provided in the response to: the current report (Section 2.3.2), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-026	Surface Water Quality Baseline Report (May 2021), Section 2.4.3, p 10	The relative sampling locations at the Seagrave Lake were not provided in Table 2-1. Please update accordingly.	This information is being provided in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

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MNRF-BL-027	Surface Water Quality Baseline Report (May 2021), Section 2.4.3, p 11	L-1, L-5, and L-16 sampling locations were never sampled. Please provide clarification.	L-1 and L-16 are both sampling locations added to the 2021 surface water sampling program and reported on the draft EIS / EA. The L-5 sampling location is the same as SW-26 and has therefore been renamed SW-26 Surface Water Quality Baseline Report.	Please include the additional information provided in the response to: the current report (Section 2.4.3), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-028	Surface Water Quality Baseline Report (May 2021), p 21-29, Tables 3-1a – 3-1d	Please use clear highlighting of exceedances in Tables 3-1a to 3-1d.	Comment noted. This is being provided in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-029	Surface Water Quality Baseline Report (May 2021), Section 4.0, p 35	The list of parameters that exceeded the referenced guidelines include silver and cobalt in addition to the 5 other parameters mentioned.	Section 3 and 4 of the Surface Water Quality Baseline report provide a discussion of the water quality results for all surface waters, and identify those parameters with exceedances, as well as the frequency of exceedances. Silver and cobalt were omitted from the summary list in Section 4.0 due to the nature of their exceedances, in which there was a single instance of exceedance during the period between 2011 and 2013, and no exceedances from 2015 through to 2020.	Please include additional information provided in the response to: the current report (Section 4.0), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-030	Surface Water Quality Baseline Report (May 2021), Appendix C, p 1-33	Figure titles should be at the bottom of figures.	Comment noted.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-031	Surface Water Quality Baseline Report (May 2021), Appendix D, p 1-15	Exceedances are not pointed in the tables.	Discussion on the exceedances can be found in Section 3 and summarized in Section 4 of the Surface Water Quality Baseline Report. Exceedances found in the summary tables are highlighted with grey.	Exceedances in Tables 1 to 15 of Appendix D should be highlighted. Please update accordingly, in the current report, future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-032	Surface Water Quality Baseline Report (May 2021), General	It is recommended to perform a Mann-Kendall trend analysis for exceeding sampling locations (either per exceedance for all sampling locations, or per sampling location for all exceedances) in order to determine (probable) increasing, (probable) decreasing, stable, or no trends.	The Surface Water Quality Baseline documents the spatial and temporal variability of surface water quality in order to characterize the existing conditions within the local area. As this assessment is sufficient to provide an adequate baseline, no further analyses are required or proposed. Note, concentrations greater than applicable water quality guidelines occur at an extremely low frequency in the overall dataset and a Mann-Kendall trend analyses would not be informative. However, to support the effects assessment, trends in surface water quality and effects to surface waters are being quantitively assessed by predictive modelling.	The determination of trends shall be statistically significant. Statistical assessment should include the correlation coefficient in relation to the determination of trends.	The draft EIS includes 2011 through 2021 surface water quality baseline data to more than adequately characterize baseline conditions within the local area to support an effects assessment. There are no evident trends in the surface water quality database; concentrations greater than applicable water quality guidelines occur at an extremely low frequency. Monitoring continues through the EA, permitting and life of mine. Statistical trend analyses requested by the reviewer, including Mann-Kendall trend analysis, are more appropriate to discharging/operating mines, where such analyses would be informative (e.g., if receiving water quality was changing over time due to discharges from the Project). Integrating trend analyses into future monitoring and reporting can be considered during life of mine.	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9

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					No further analyses are required or proposed to support surface water quality baseline characterization for the draft EIS/EA.	
MNRF-BL-033	Surface Water Quality Baseline Report (May 2021), General	There are grammatical errors throughout the report.	Comment noted.	No further comments at this time.	Acknowledged	Appendix N-1, N-2, N-3; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-034	Hydrology Baseline Report (May 2021), General	Regarding Quality Assurance and Quality Control measures, it is understood that laboratory QA/QC was addressed. While there are no hydrology QA/QC standards in Ontario at this time, and while both combining manual readings with continuous flow measurements constitute a quality control measure, it is recommended to use the Resource Information Standards Committee (RISC) hydrometric standards and methods outlined in the Manual of British Columbia Hydrometric Standards and prepared by the Ministry of Environment - Science and Information Branch for the Resource Information Standards Committee (BC MOE, 2009) throughout the hydrometric monitoring program for additional QA/QC (i.e. Data Grades).	Comment noted.	No further comments at this time.	Acknowledged	Appendix M; EIS Sections 3.4.6, 6.6 to 6.9
MNRF-BL-035	Hydrology Baseline Report (May 2021), Section 5.1.4, p 5-4	It is not clear whether samples' temperature was maintained in accordance with the MECP Protocol for Analytical Methods Used in the Assessment of Properties under Part XV.1 of the Environmental Protection Act, throughout transit in Sioux Lookout then Thunder Bay.	Samples were stored in an insulated container for transportation. Below is the summarized procedure for shipping samples: Sample sets were inspected before leaving each field location to confirm all containers were filled; The sets were stored in coolers with ice packs or wet ice to maintain sample integrity until being transferred to refrigerators at the exploration camp; The coolers were packed with ice packs and/or wet ice prior to shipment and delivered to ALS Laboratories in Thunder Bay; and, A laboratory Chain of Custody was completed for sample submission including the sample IDs, date and time collected, as well as the in-field temperature and pH measurements.	Please include the additional information provided in the response to: the current report (Section 5.1.4), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix M; EIS Sections 3.4.6, 6.6 to 6.9
MNRF-BL-036	Hydrology Baseline Report (May 2021), Section 4.2.2, p 20	It is stated that no Leveloggers were established outside of the Springpole Lake during the 2020 field program.	Section 4.2.2. of the Hydrology Baseline Report (Wood 2021) summarizes the previous 2020 hydrology field program carried out prior to the 2021 field program. The hydrology field program being conducting in 2021	Please include the additional information provided in the response to: the current report (Section 4.2.2), future reporting, and/or the draft EA, as appropriate.	The information is provided in the draft EIS/EA and future reporting, as applicable.	Appendix M; EIS Sections 3.4.6, 6.6 to 6.9

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ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
		Please consider installing Leveloggers at surface water bodies anticipated to be affected by the project.	which was outlined in the Technical Workplan that was submitted for review, includes the installation of lake Leveloggers in Birch Lake, L-1, L-19 and Dole Lake. Field data collected during the 2021 monitoring program is being included in the draft EIS/EA.			
MNRF-BL-037	Hydrology Baseline Report (May 2021), Section 4.2.6, p 4-12 – 4-16	The maximum and minimum elevations were determined for Springpole Lake only. The following shall be measured for each watershed and subwatershed affected by the project: drainage area (km^2), minimum elevation (masl), maximum elevation (masl), and mean elevation (masl).	The current hydrology field program being conducted in 2021 includes the monitoring of lake levels in Birch Lake, Lake 1, L-19 and Dole Lake. Field data collected from the 2021 hydrology field program, including the minimum, maximum and mean water levels is being presented in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix M; EIS Sections 3.4.6, 6.6 to 6.9
MNRF-BL-038	Hydrology Baseline Report (May 2021), Section 5.0, p 5-1 – 5-20	It is relevant to integrate this section with the Surface Water Quality Baseline Report.	This is part of the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix M; EIS Sections 3.4.6, 6.6 to 6.9
MNRF-BL-039	Hydrology Baseline Report (May 2021), General	Please provide individual description for each watershed and subwatershed.	This is being provided in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix M; EIS Sections 3.4.6, 6.6 to 6.9
MNRF-BL-040	2021 Hydrology Technical Workplan, General	1) It is recommended to additionally install: Flow measuring station at inlet stream of L-5 (pending prior NDMNRF review regarding any potential permits/authorizations for installation) Levelogger at L-3, L-5, L-4, and L-17.	Monitoring stations have been established where they can provide long-term data in support of the Project. Waterbodies L-3, L-5, L-4 and L-17 are to be overprinted as a result of the Project, and there will be little value in continuously monitoring lake levels prior to development.	No further comments at this time.	Acknowledged	Appendix M; EIS Sections 3.4.6, 6.6 to 6.9
MNRF-BL-041	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.2, p 19	"Dissolved mercury levels exceeding PWQO were detected at several stations in Springpole Lake. Although dissolved mercury concentrations were highly variable, and mostly below lab detection, these exceedances are likely due to contamination through sample handling or lab error." Dissolved mercury levels are a critical measure in the evaluation of the impacts of the project on lake trout and other fish species. New baseline studies of dissolved mercury should be conducted, to eliminate variability and potential human error.	The 2021 surface water quality sampling program includes sample analysis for total and dissolved mercury, ultra-low level mercury and methylmercury to provide improved analytical rigour and confirm concentrations less than the previously reported detection limits. The results are provided in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1; EIS Sections 3.4.7, 6.6 to 6.9
MNRF-BL-042	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.3, p 20	"Data were collected from the six deepest basins in Springpole Lake during the months of July and August, when the lake was stratified". Hypolimnetic dissolved oxygen should be measured in mid-August through mid-September, which is the time of year at which oxygen levels are lowest. New baseline studies of hypolimnetic dissolved oxygen should be conducted, to collect more appropriate data.	The 2021 biological surface water quality sampling program within Birch Lake and Springpole Lake includes measurement of in-field physicochemical parameters including water temperature, dissolved oxygen, pH, conductivity, total dissolved solids, and ORP at 1-metre interval profiles between surface and near-bottom at each location. These profile measurements include the period between August and September. The results are provided in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10

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MNRF-BL-043	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.3, p 24	"The group of smaller basins (4, 5, and 6) had lower D.O. concentrations in the hypolimnion when compared to basins 1, 2, and 3. The average D.O. below the thermocline in basins 4, 5, and 6 were 5.12, 4.89, and 5.46, respectively". These values are all well below the 7ppm threshold necessary for lake trout, highlighting the importance of the deeper basins (i.e., Basin 1) in providing late summer lake trout habitat.	As per response to MNRF 42, physicochemical profiles were collected within each of the Springpole Lake basins (n=6) during the spring, summer and fall of the 2021 program to better understand seasonal variability and assess suitability for Lake trout and other coldwater species. 	No further comments at this time.	Acknowledged	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-044	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.3, p 25	"In general terms the conditions measured throughout the water column in Springpole Lake are suitable to support fish populations." The dissolved oxygen in basins 4,5, and 6 values are all well below the 7ppm threshold necessary for lake trout, highlighting the importance of the deeper basins (i.e. Basin 1) in providing late summer lake trout habitat.	As per response to MNRF 42, physicochemical profiles were collected within each of the Springpole Lake basins (n=6) during the spring, summer and fall 2021 to support further assessment of seasonal variability and suitability for Lake Trout and other coldwater species.	No further comments at this time.	Acknowledged	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-045	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.3, p 25	"In Springpole Lake, average D.O. concentrations were above 3 mg/L throughout the water column, and at depths less than 30 m, averaged more than 7 mg/L". On p 24, the reported mean hypolimnetic dissolved oxygen values for basins 1-6 as 6.97; 6.51; 6.99; 5.12; 4.89; 5.46 (respectively). If all of the individual basins are below 7ppm, the statement that the lake average is more than 7ppm is not correct.	The physicochemical profile data collected within each of the Springpole Lake basins (n=6) during the spring, summer and fall of the 2021 program is being used to support further assessment of seasonal variability and hypolimnetic dissolved oxygen. The results are provided in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-046	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.4.1, p 33	"The FWIN is the preferred fall fishery assessment protocol and has been widely used by the OMNRF". This statement is not correct. FWIN was the preferred assessment protocol for walleye prior to 2008 when the broadscale monitoring protocol was implemented. Using FWIN to assess a lake trout lake is not appropriate. The FWIN data should be disregarded, and appropriate studies to evaluate the status of the lake trout population should be conducted.	The baseline fisheries studies conducted in the Existing Conditions Report utilized various gill nets mesh sizes (not just FWIN-specific nets) to sample various fish species at various life stages, including Lake Trout. The data presented as "FWIN" results were summarized to show the catch relative to the FWIN net sizes and were not intended to replicate a formal FWIN program. Walleye are a valued Indigenous cultural and sportfish species, which supported the use of Walleye sampling gear. It is understood the broadscale monitoring (BsM) protocol is the preferred MNDMNRF method for fish community assessments.	The baseline report represents the data as following the FWIN protocol (e.g. specific references to the FWIN method are made throughout 3.1.4.1). Additionally, "various gill net sizes" being utilized does not follow an acceptable index netting protocol. Also, although walleye are a valued species, an index of lake trout is necessary. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	In response to feedback received through engagement from regulatory agencies, Indigenous communities, and other stakeholders, a Broadscale Monitoring (BsM) study within Springpole Lake is planned for 2022 which includes supplemental fish tissue contaminant sampling of culturally significant fish species (Lake Trout, Lake Whitefish, Walleye, Northern Pike, and Yellow Perch), targeting appropriate fish size ranges as per the sportfish sampling guidance from the MECP.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10

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MNRF-BL-047	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.4.1, p 34	"Only two net sets were conducted during the 2011 FWIN survey (Figure 15). Due to a high Walleye catch averaging 40 individuals per net, it was decided that fishing should stop". Two FWIN nets in a 2800ha lake cannot be used as a representative sample of the fish community. The 2011 FWIN data are invalid and should not be included in the report.	As per response to MNRF 46, the data presented as "FWIN" results were summarized to show the catch relative to the FWIN net sizes and were not intended to replicate a formal FWIN program.	Please refer to the response to comment #46, above. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	Please refer to the response to MNRF 46.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-048	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.4.1, p 34	"There were 12 age classes among the 80 fish catch, from young of the year (YOY) to 18 years old". On p 33, it is noted that John Tost provided ageing services. In the past, NDMNRF noted inconsistencies in walleye ages provided by John Tost, when the same fish have been aged by the NDMNRF fish ageing lab. It may be inappropriate to compare age-related data from this study to other netting surveys conducted by NDMNRF. That said, the 2011 FWIN data are invalid and should not be included in this report, as noted above.	Jon Tost is an industry recognized fish ageing expert. The fish ages, as well as length and weight data for these fish, are included in the baseline report and can be used to compare size at age from other sources. Please provide specific sample data within the report that show significant difference compared to the MNDMNRF species-specific size at age data for Springpole Lake.	Providing such specific sample data will not be possible; in order to evaluate any discrepancies, the same structures would need to be aged by both John Tost and the NRF ageing lab (this has been done in previous circumstances). The point of comment #48 is not to dispute Mr. Tost's ability as a fish ager, but rather to note that the technique used by Mr. Tost does not always provide results consistent with NRF, and that consequently, side-by-side comparisons may not be appropriate.	Comment noted.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-049	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.4.1, p 38	"A total of 11 broad-scale (BSM) nets were fished in Springpole Lake (Figure 20)" The Broad-scale Monitoring Protocol (BsM) has not been followed. For lakes 1500-5000 ha, with a maximum depth 35-50m, the protocol prescribes 18 large mesh nets and 19 small mesh nets; Figure 20 describes that the 6 large mesh and 5 small mesh nets were set. Further, the protocol prescribes that the entirety of the lake should be sampled; however, only the western portion of the lake was sampled. As such, the data cannot be used as a representative sample of the fish community. The 2012 BsM data are invalid and should not be included in the report.	The baseline results present fish catch from BsM nets (multi-panel, multi-mesh size nets). The BsM nets target a variety of species and life stages to support general community assessments; however, the studies did not propose to complete a formal BsM survey as per the MNDMNRF protocol (i.e., depth strata-based sampling per areal proportion). The data is valid in support of the characterization of the fish community in Springpole Lake.	The baseline report represents the data as following the BsM protocol (e.g. specific references were made to the BsM method throughout 3.1.4.1). The BsM protocol only provides a characterization of a fish community when set in appropriate locations, in appropriate strata, and with appropriate net density based on the surface area and depth of the lake, which the netting program did not follow. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	Please refer to the response to MNRF 46.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-050	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.4.1, p 41	"Comparison between FWIN and Broadscale catches". Notwithstanding that both the FWIN and BsM data presented in the report are invalid, as described above, FWIN has only been calibrated to BsM for walleye. It is inappropriate to compare data for any other species. Moreover, where walleye data have been compared, the method of comparison has not accounted for the calibration of the two protocols. (e.g. Walker et al. 2013, Giacomini et al 2020)	As noted in responses to MNRF 46, MNRF 47 and MNRF 49, the baseline studies did not propose to complete formal BsM or FWIN surveys. The net mesh sizes specific to these protocols were used, and inherently targeted different fish sizes. The comparison presents the difference in catch relative to protocol-specific gear and support the characterization of the fish community.	The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	Please refer to the response to MNRF 46.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10

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MNRF-BL-051	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.4.3, p 42	"Table 8. 2011 Springpole Lake minnow trap catch summary". Minnow traps are useful for presence/absence data only. Reporting on relative abundance and size distribution is not appropriate.	Minnow traps are valuable to show presence/absence and the catch data is not intended to show relative abundance of species within the sample location. Rather, abundance in this context refers to the relative proportion of fish species caught within the traps.	The minnow trap data should only be utilized for presence/absence purposes, as noted in the previous comment.	Comment noted.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-052	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.4.2, p 42	Based off of section 3.1.4.2 and appendix 8, no lake sturgeon were detected. However, as lake sturgeon have been found both upstream and down-stream, it is expected that they may be utilizing this system to, at a minimum, travel to areas important to their life cycle while remaining undetected.	The baseline fish community surveys specifically targeting Lake Sturgeon did not detect any individuals. Further, the three cycles of MNDMNRF BsM data from Birch Lake (2009, 2014, 2019) have not detected Lake Sturgeon either. As such, these data suggest a low likelihood of Lake Sturgeon presence within Springpole Lake. Should MNDMNRF confirm additional Lake Sturgeon observation locations, the assessment of potential project interactions with this species will be considered in the draft EIS/EA.	In general, BsM does not result in many lake sturgeon being caught. This is because BsM does not use XL mesh sizes, designed to catch sturgeon, and also due to the rarity of sturgeon. Of note, Birch Lake is listed in the Atlas of Lake Sturgeon Waters in Ontario (Kerr 2002). Written info will be provided to the proponent about the additional observations, as per the recent request from FMG's consultant. Additionally, lake sturgeon home ranges are enormous; as noted in Auer 1996, "A barrier-free 250–300 km combined river and lake range is suggested as a minimum distance to support self-sustaining populations and distances of 750–1000 km should not be considered unusual".	The recently provided Lake Sturgeon data is appreciated and being reviewed.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-053	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.5, p 48	"Tissue samples were collected from Walleye captured in Springpole Lake in conjunction with the Broad scale Monitoring program (nets 1, 6, 7, and 11; Figure 20) in the summer of 2012". The BsM results (which are not a representative sample) indicate that 134 walleye were captured, but Hg testing was only conducted on ~40 fish. Notwithstanding that the results are not representative of the lake, why was Hg testing not conducted on all the samples? Please clarify.	A sample size of 40 was sufficient to characterize mercury in Walleye tissue, while minimizing mortality and potential impact to the valued fisheries resource. Federal guidance for the Metal and Diamond Mining Effluent Regulations (MDMER) for fish usability studies requires tissue sampling of 20 adult male and 20 adult female fish from a study area to assess difference between the sexes. As such, a sample size of 40 fish is suitable for characterizing mercury in Walleye tissue within the sampled range of sizes. Further, these data can be used to extrapolate a predicted mercury concentration at a specific length following the MECP sportfish contaminants protocols.	Although this sampling might be considered sufficient for the MDMER regulations, the mercury reporting thus far is not sufficient to support the appropriate assessment of the impacts of the proposed project on the fish communities of Springpole and Birch Lakes. Additional mercury sampling during an index netting program is recommended, to provide a more representative sample.	A Broadscale Monitoring (BsM) study within Springpole Lake is planned for 2022 which includes supplemental fish tissue contaminant sampling of culturally significant fish species (Lake Trout, Lake Whitefish, Walleye, Northern Pike, and Yellow Perch) targeting additional fish size ranges. Tissue sampling is conducted as per the sportfish sampling guidance from the MECP.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-054	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.5, p 48	"Tissue samples were collected from Walleye captured in Springpole Lake in conjunction with the Broad scale Monitoring program (nets 1, 6, 7, and 11; Figure 20) in the summer of 2012". The inappropriate implementation of the BsM protocol, as described above, invalidates the tissue sampling. New tissue sampling should be conducted, following a properly implemented index netting project.	As noted in response to MNRF 53, the tissue data collected from Walleye in Springpole Lake provide mercury tissue concentrations of the various size classes that were sampled. The MECP sportfish data analysis protocols can be used to predict mercury concentrations at other Walleye lengths, and therefore additional index netting for Walleye is not necessary to assess mercury in Walleye tissue concentrations.	Although this sampling might be considered sufficient for the MDMER regulations, the mercury reporting thus far is not sufficient to support the appropriate assessment of the impacts of the proposed project on the fish communities of Springpole and Birch Lakes. Additional mercury sampling during an index netting program is recommended, to provide a more representative sample.	Please refer to the response to MNRF 53.	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-055	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.6.1, p 52	"To identify Lake Trout spawning habitat within the northern portion of Springpole Lake". It is not understood why only the northern portion of the lake would be surveyed. In order to gain an understanding of the impact of the project on Springpole Lake, the impacted area needs to be	The 2021 baseline studies included habitat mapping with specific interest in identifying Lake Trout spawning habitat within Springpole Lake, including the northern basins and southeast arm. This data is presented in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10

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		considered in the context of the entirety of the lake, not an isolated portion.				
MNRF-BL-056	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.6.1, p 52	"scan the bottom substrates along each shoreline (Figure 28) segment for spawning groups of trout." Lake trout also spawn on offshore reefs and in deep water.	As per the response to MNRF 55, spawning habitat surveys completed during the 2021 baseline studies included nearshore and offshore areas. This data is presented in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1 EIS Sections 3.4.7, 6.6 to 6.10
MNRF-BL-057	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.6.2, p 57	"The 2015 survey was completed on May 16th and 17th. The survey area was broken into six separate transects. In 2017, the survey was done in five transects on the night of May 25th." Three nights in mid-May is a narrow survey, as walleye spawning season spans a two-month period. These observations should not be relied on as definitive. Spawning surveys should be conducted that cover the entirety of the spawning period.	In addition to the nighttime Walleye spawning surveys, an extensive acoustic telemetry tracking program was also completed. The telemetry data were collected during the complete spawning period in 2013, 2014 and 2015. These results show most of the tagged Walleye leave Springpole Lake, travelling to the Birch River inflow (southwest corner), likely travelling to conventional fast-flowing, riverine spawning habitat commonly preferred by Walleye. As a result, additional Walleye spawning surveys within Springpole Lake are not necessary for the purpose of the environmental assessment.	No further comments at this time.	Acknowledged	N/A
MNRF-BL-058	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.6.3, p 59	Only the north basin was surveyed for northern pike spawning areas. To outline a complete picture of the potential impacts to the fishery, the entire lake should be surveyed.	Habitat assessments have been completed within the nearshore areas of Springpole Lake that are typically utilized by Northern Pike. Potential project-related impacts will be considered using this data, and the results are provided in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1 , F, EIS Sections 3.4.7, 3.4.8, 6.6 to 6.10
MNRF-BL-059	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.6.4, p 62	Existing Conditions Report Fish: Community and Habitat (March 2018), only the north basin was surveyed for whitefish spawning areas. To outline a complete picture of the potential impacts to the fishery, the entire lake should be surveyed.	As per the responses to MNRF 55, and 56, spawning habitat surveys completed during the 2021 baseline studies included nearshore and offshore areas. This data is presented in the draft EIS/EA	No further comments at this time.	Acknowledged	Appendix N-1 , F, EIS Sections 3.4.7, 3.4.8, 6.6 to 6.10
MNRF-BL-060	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.1.7.4, p 79	"Table 23. Number of tagged trout utilizing one or more of the major July-August areas." It is worth noting that the proposed mine area is the site most frequented by lake trout in this table.	Comment noted.	No further comments at this time.	Acknowledged	N/A
MNRF-BL-061	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.2.3, p 84	"Temperature, dissolved oxygen, and pH measurements were recorded at the same location in Birch Lake every summer over a period of 6 years, from 2011 to 2016 (SW-4,/15 U 543178, 5693762). These were collected as part of the aquatic baseline and surface water field programs at the project site. The maximum sampled depth at this location was 11 m". This approach to determining the baseline data for Birch Lake is not adequate. Multiple sites, with depths representative of the basins of the lake, should have been sampled.	The 2021 baseline study design included two deep basins in Birch Lake, near the Project area where physicochemical profiles and water quality samples were collected (see figure below). This data is presented in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1 , F, EIS Sections 3.4.7, 3.4.8, 6.6 to 6.10

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ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
MNRF-BL-062	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.2.4, p 85	"Fish community data for Birch Lake were collected as part of the OMNRF Broad-scale Monitoring Program, which was completed between July 16th, and 19th, 2009." Birch Lake was also sampled by NDMNRF's BsM Program in 2014 and 2019. It is unclear why the more recent results have not been included.	A summary of the MNDMNRF broadscale monitoring results collected in Birch Lake during all three cycles is presented in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix N-1 , F, EIS Sections 3.4.7, 3.4.8, 6.6 to 6.10
MNRF-BL-063	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.2.5, p 89	"Only six Lake Trout were caught in Birch Lake. Although this confirms that they are present in the lake, it provides little insight into the characteristics of their population." Birch Lake will be directly impacted by the proposed project. More sufficient baseline data should be collected.	The 2021 baseline study design originally included fall sampling of Lake Whitefish and Lake Trout to characterize the population and collect lethal tissue samples of muscle, liver and gonads for baseline fish tissue contaminants. The proposed lethal and non-lethal sample collection of these species was not permitted by the Red Lake District of MNDMNRF.	The proposed fall 2021 sampling was not permitted out of concern for disruption of spawning activities. Sampling outside of the fall spawning season would have been permissible. This does not preclude the need for more suitable baseline data.	Comment noted.	Appendix N-1 , F, EIS Sections 3.4.7, 3.4.8, 6.6 to 6.10
MNRF-BL-064	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 3.2.4, p 89	"Lake Trout were the least common sport fish in all net catches". The 2009 BsM survey was designed to target walleye. More sufficient data to assess lake trout should be collected by the proponent.	As per the response to MNRF 63.	As noted above (in response to comment #63), the proposed fall 2021 sampling was not permitted out of concern for disruption of spawning activities. Sampling outside of the fall spawning season would have been permissible. This does not preclude the need for more suitable baseline data.	Please refer to the response to MNRF 46.	Appendix N-1 , F, EIS Sections 3.4.7, 3.4.8, 6.6 to 6.10
MNRF-BL-065	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 5, p 139	"In all, nine small watercourses that flow into Springpole Lake were surveyed for fish community and habitat" It is not clear why the nine watercourses were selected. There are more than nine watercourses flowing into Springpole Lake. Additionally, there are watercourses in closer proximity to the proposed mine site were not sampled.	The baseline studies surveyed watercourses potentially impacted by the Project. Additional studies on other watercourses are undertaken in response to updates in the mine planning (see Wood March 2021). Additionally, the report provides a characterization of the aquatic habitat for Springpole Lake and the Project area watercourses. This information was presented in the 2019-2020 baseline aquatic resources assessment report (Wood 2021).	No further comments at this time.	Acknowledged	N/A
MNRF-BL-066	Existing Conditions Report Fish: Community and Habitat (March 2018), Section 5.1, p 142	"providing qualitative assessments of species abundance". It is unclear what is meant by "qualitative assessment of ab2undance" Abundance, by definition, is a quantitative measure. Single-pass electrofishing is useful for presence/absence surveys only; it cannot provide a measure of abundance.	To clarify, this statement refers to the relative proportion of species caught by electrofishing. This data represents species-presence data for the sample locations and illustrates the relative proportions of individual species. The data is not to be interpreted to represent total fish abundance.	No further comments at this time.	Acknowledged	N/A

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MNRF-BL-067	2019-2020 Aquatic Resources Assessment (March 2021), Figure 2-1, p 11	The 2020 sampling locations do not adequately represent the entirety of Springpole Lake. Fish are mobile organisms and will use the entirety of the waterbody. Concentrating sample sites in one basin is not appropriate for baseline studies.	The 2020 study design was not intended to sample the entirety of Springpole Lake. As noted in the aquatic resources assessment report (see Section 2.1, bullet #5; Wood 2021), the objective was to sample fish habitat and fish community near a candidate treated effluent outfall location. Since the completion of the 2020 studies, the proposed discharge location has been re-evaluated and the optimized location is proposed for the southeast arm of Springpole Lake. However, the 2020 fisheries data will contribute to the overall baseline fish habitat and fish community dataset.	No further comments at this time.	Acknowledged	N/A
MNRF-BL-068	2019-2020 Aquatic Resources Assessment (March 2021), Section 3.1.2.1 / General, p 16	"The summer temperature suggests the thermal guild classification for S-9-US01 represent cool water fish habitat". NDMNRF and DFO have not used thermal regimes for fish habitat management since 2013. Work-in-water timing windows are based upon species assemblages.	Fish species assemblages are commonly categorized using thermal regime to describe the habitat used by the fish, within the context of surrounding waterbodies. These thermal regimes are conducive to supporting specific fish species during their life stages. The fish species associated with these thermal regimes may be used to support the determination of the appropriate in-water work timing restrictions.	During the permitting phase of a project, in the absence of verifiable, species-specific data, the most restrictive timing windows are to be applied.	Existing and potential future studies are anticipated to provide a comprehensive, verifiable species-specific dataset to be used during the permitting phase to inform the appropriate in-water timing work windows.	Appendix N-1 , F, EIS Sections 3.4.8, 6.6 to 6.10
MNRF-BL-069	2019-2020 Aquatic Resources Assessment (March 2021), Section 3.3.1 / General, p 24	"represented by nine species with Yellow Perch as the most abundant." There was no reliable sampling technique described in this baseline report that would give an accurate measure of abundance in Springpole Lake.	To clarify, the noted statement more accurately refers to Yellow Perch as the fish species caught in the greatest numbers during that study and was not intended to represent a measure of abundance within Springpole Lake.	No further comments at this time.	Acknowledged	N/A
MNRF-BL-070	2019-2020 Aquatic Resources Assessment (March 2021), Section 3.3.3, p 25	"Radio telemetry tracking of Walleye documented most of the tagged fish left Springpole Lake, moving upstream toward Birch Lake in spring (FMG and C. Portt 2018). The seasonal timing of these movements align with Walleye spawning periods and aerial imagery suggests suitable spawning habitat (fast flowing riffles and narrows) are present within the Birch River between Birch and Springpole lakes". This means that the proposed project design will inhibit access to the primary walleye spawning area in the lake.	The Walleye telemetry study illustrated that spring movement occurred at the southwest corner of Springpole Lake where it meets Cromarty Lake which is also referred to as the Birch River (see the blue circle on the figure below). The waterflow in this system starts in the Birch Lake, flows west and then southeast towards Cromarty Lake and then discharges into the southeast arm of Springpole Lake. As the proposed Project is located in the north basin of Springpole Lake, the Project will not impact Walleye access to the spawning areas in the Birch River.	The location of the Birch River was misunderstood. As such, the previous comment can be disregarded.	Acknowledged	N/A

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
MNRF-BL-071	Existing Conditions Report Fish: Community and Habitat (March 2018) / 2019-2020, and Aquatic Resources Assessment (March 2021), General	There is little useable baseline fisheries data for Springpole Lake, apart from the bathometry and telemetry work, as per the comments above regarding the validity of the FWIN and BsM data collected. Given the nature of the proposed project and potential impacts, new index netting surveys should be conducted to support the Environmental Assessment process.	Multi-year and multi-season fish sampling was conducted as approved by Red Lake District MNDMNRF scientific collection permits. The gear types and sample sizes for the recent studies (2019 to 2021) were limited by collection permit conditions that specified very low incidental mortality targets for Lake Trout, Northern Pike, Walleye, Lake Whitefish, as well as a cumulative mortality of 50 small and large bodied fish per day. These permit conditions have not supported index netting as per the BsM. We will consider the use of the Birch Lake BsM data as a surrogate for comparison to the existing Springpole Lake baseline data in the interim. The results are being presented in the draft EIS/EA.	As a point of clarification, the issuance of a License to Collect Fish for Scientific Purposes does not indicate endorsement for a given methodology, such as with regards to the appropriateness of a study in relation to the intended use of the data. The information provided through the reports thus far are not sufficient to support the appropriate assessment of the impacts of the proposed project on the fish communities of Springpole and Birch Lakes. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	A Broadscale Monitoring (BsM) study within Springpole Lake is planned for 2022 to supplement the fish population data, including culturally significant fish species (Lake Trout, Lake Whitefish, Walleye, Northern Pike, and Yellow Perch).	Appendix N-1 , F, EIS Sections 3.4.8, 6.6 to 6.10
MNRF-BL-072	Existing Conditions Report Fish: Community and Habitat (March 2018) / 2019-2020, and Aquatic Resources Assessment (March 2021), General	The bathometry and telemetry work thus far provides confirmation that the project proposal, specifically draining the north basin of Springpole Lake and creating the open pits within the drained basin, would eliminate the most important lake trout summer habitat in Springpole Lake, and would also prevent access by walleye to their most important spawning habitat. Therefore, it seems prudent for First Mining Gold to consider alternatives to the open pit concept within the Environmental Assessment.	Lake Trout spawning habitat surveys within Springpole Lake (north and south basins) were conducted during the 2021 studies to identify other potential Lake Trout spawning areas and to support the assessment of Project effects. As noted in the response to MNRF 70, the proposed Project is located within the north basin of Springpole Lake; whereas the Birch River, where Walleye telemetry has shown spring movement is located further south. As a result, the Project will not impact Walleye access to the spawning areas in the Birch River.	For greater clarity, NRF is concerned with potential impacts of the open pit proposal on lake trout spring juvenile and summer adult habitat, as well as forage habitat, within the north basin which additional spawning surveys would not address. Also, of note, is the Fisheries Management Zone (FMZ) 4 objectives for lake trout which includes the objective of maintaining lake trout abundance; reducing the volume of Springpole lake will reduce its productive capacity. The FMZ objectives inform NRF planning and decision making with regards to fish. Additionally, the comment with regards to the location of walleye spawning areas can be disregarded (as described above).	In response to feedback received through engagement from regulatory agencies, Indigenous communities, and other stakeholders, a Broadscale Monitoring (BsM) study within Springpole Lake is planned for 2022 which includes supplemental fish tissue contaminant sampling of culturally significant fish species (Lake Trout, Lake Whitefish, Walleye, Northern Pike, and Yellow Perch) targeting appropriate fish size ranges as per the sportfish sampling guidance from the MECP. Further, the BsM protocol requires the survey to be conducted when surface water temperature is greater than 18°C which coincides with the summer adult habitat use assessment.	Appendix N-1 , F, EIS Sections 3.4.8, 6.6 to 6.10

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
					The additional juvenile Lake Trout habitat use surveys planned for spring 2022 is being reviewed with NDMNRF.	
MNRF-BL-073	Aquatic Studies Technical Workplan (2021), General	As mentioned above, there are some large outstanding issues with the baseline studies completed in previous years. As such, the proponent should aim to complete new index netting programs in Springpole Lake.	See response to MNRF 71	The information provided through the reports thus far are not sufficient to support the appropriate assessment of the impacts of the proposed project on the fish communities of Springpole and Birch Lakes. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	In response to feedback received through engagement from regulatory agencies, Indigenous communities, and other stakeholders, a Broadscale Monitoring (BsM) study within Springpole Lake is planned for 2022 which includes supplemental fish tissue contaminant sampling of culturally significant fish species (Lake Trout, Lake Whitefish, Walleye, Northern Pike, and Yellow Perch), targeting appropriate fish size ranges as per the sportfish sampling guidance from the MECP. Birch Lake is not anticipated to receive treated effluent discharge. However, the additional fish community surveys planned for 2022 within Birch Lake follow a targeted study design at the nearshore locations around the Project as opposed to a lake-wide assessment. NDMNRF is being engaged to scope the Birch Lake studies appropriately.	Appendix N-1 , F, EIS Sections 3.4.8, 6.6 to 6.10
MNRF-BL-074	Cultural Heritage Research Report (March 5, 2021) / Stage 1 Archaeological Assessment Report (December 30, 2020), General	It appears that part of the proposed access road may fall just outside of the Local Study Area, as per Map 2 in the Cultural Heritage Research Report. Additionally, Map 3 in the Cultural Heritage Research Report and Map 4 in the Stage 1 Archaeological Assessment Report, which details the proposed layout of the mine, does not include the proposed access road. Additionally the Cultural Heritage Research Report describes that "The proposed tailings management facility, transmission line, access road and aggregate sources were not considered as part of the 2020 fieldwork" (p. 6); however, the 2021 technical work plan only mentions an additional Stage 1 for the transmission line route. Please ensure that all project components, including alternatives, are included within the study area for cultural heritage and archaeological resources as appropriate.	Archaeology and Cultural Heritage work will be ongoing as the project progresses. Information is included in the draft EIS/EA.	Assuming that the response implies that the appropriate Archaeology and Cultural Heritage work will be carried out as "project planning" progresses (i.e. to support the EA process), then there are no further comments at this time.	N/A	Appendix S-6, to S-11
MNRF-BL-075	Baseline Terrestrial Biology Summary Report for the Springpole Gold Project (March 2021), p 3 – 4, Figures 1-1, 1-2	The project area of investigation and local areas of investigation appear to be missing the larger transmission line areas/alternatives. The aerial survey report (p. 12) shows a much larger area of the proposed transmission line than what is identified in the local areas of investigation in the terrestrial baseline study (figures 1.1-1 and 1.2-2).	Correct, this additional work has been ongoing as noted in the 2021 Terrestrial Technical Workplan.	Noted. Please ensure clarity regarding the project area of investigation and local areas of investigation in technical workplans and reports going forward.	Comment noted.	Appendix P

Table C-2.3: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Baseline Reports submitted in July 2021

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Commenter Response	FMG Response 2	Where Addressed
		However, during the multi-agency meeting on July 8th (regarding the terrestrial environment meeting) it was described that the new study area will now incorporate the larger transmission line and proposed alternatives. Please confirm in the technical workplans going forward.				
MNRF-BL-076	Baseline Terrestrial Biology Summary Report for the Springpole Gold Project (March 2021), Section 2.2, p 10	Please include information on how boundaries were delineated for the different wetlands. Also, please include information visualizing the different wetland delineations.	This additional information is included in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix P
MNRF-BL-077	Baseline Terrestrial Biology Summary Report for the Springpole Gold Project (March 2021), Section 2.3.3, p 30	The effort for characterizing amphibian and reptile use of the area may not be sufficient. Figure 2.3.3 identifies some survey locations, but further assessment should be carried out on areas that will be directly impacted.	Work has been ongoing as noted in the 2021 Terrestrial Technical Workplan, with additional amphibian and reptile surveys considered for the spring of 2022.	No further comments at this time.	Acknowledged	Appendix P
MNRF-BL-078	Baseline Terrestrial Biology Summary Report for the Springpole Gold Project (March 2021), Section 3.3.2.2.4, p 48	It would be valuable to delineate the moose aquatic feeding areas (MAFAs) in this area, to aid in understanding potential impacts. This information may already be complete, but not included in the baseline report so far.	Work has been ongoing as noted in the 2021 Terrestrial Technical Workplan, with additional surveys to classify MAFA's considered for 2022.	No further comments at this time.	Acknowledged	Appendix P
MNRF-BL-079	Technical Memo – Summary of Winter Aerial Wildlife Survey Results (Apr 27, 2021), General	The report lists some additional surveys along the larger transmission line route / proposed alternatives, but MAFAs and wetlands (if crossing waterbodies) appear to be missing. At the Terrestrial Environment meeting on July 8th, we asked about the MAFA and wetlands being included in the larger study area. It was described that these would be included, but would be targeted. We mentioned that the areas potentially directedly affected by the proposed route/alternatives should be included. Please confirm in the technical workplans going forward.	Work has been ongoing as noted in the 2021 Terrestrial Technical Workplan. A winter aerial survey was conducted in February 2021 and targeted the distribution and abundance of Caribou (Boreal populations), moose and wolves relative to Project components. Wetlands and MAFA's will be illustrated on figures to be included in the draft EIS/EA.	No further comments at this time.	Acknowledged	Appendix P

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-AQ-001	Page 3-3, Section 3.1.5.2 of Appendix-G3: 2021 Air Quality Baseline Report	The report indicates that the analytical results for ambient NO_2 concentrations were adjusted based on the meteorological parameters measured during the exposure period, and the required meteorological data were taken from ECCC meteorological station. It is unclear which ECCC weather station is referred to, and how far the station is away from the Project site. An on-site weather station was established based on the information from the report. It makes more sense to use on-site meteorological data instead of data from a station away from the site if the on-site meteorological data are available and accurate.	Provide detailed information on which ECCC weather station is referred to in the report. Adjust the ambient NO_2 concentrations using on-site meteorological data if on-site meteorological data are available, accurate and reliable.	The laboratory Bureau Veritas used ECCC's Sioux Lookout Airport data when determining the appropriate sampling rates from the passive samplers. The algorithm used to calculate the sampling rates is based on temperature, relative humidity and wind speed. In evaluating the sensitivity of the measured concentrations, the higher wind speed at Sioux Lookout (relative to the site) may have resulted in an underestimation of NO_2 and SO_2 concentrations. However, the onsite measurements were only used to inform the use of data from regional ECCC National Air Pollution Surveillance (NAPS) stations (e.g., Winnipeg and Thunder Bay) to establish appropriate background concentrations for the remote site in the context of evaluating the cumulative air quality effects. Background concentrations of NO_2 and SO_2 onsite are primarily driven by long-range transport; the long-range contribution is assumed to be comparable at these urban stations. The urban stations however are also influenced by several local sources (e.g., traffic, industry, residential heating) that wouldn't be applicable to the Project. As a result, the selected values (90th percentile of data from Winnipeg and Thunder Bay) would overestimate background concentrations and result in a conservative assessment of effects.	No additional comments at this time.	Acknowledged.				N/A

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-AQ-002	Pages 4-4 - 4-7, Section 4 of Appendix G-3: 2021 Air Quality Baseline Report	It appears there are not enough valid samples for statistical analysis based on the on-site measurement data provided in the report so far. It is understood that more samples are being collected from the on-site station(s). If the on-site monitoring data are used to establish background concentrations for the Project, the company must ensure enough valid samples are available to conduct statistical analysis.	Ensure sufficient valid samples are obtained for statistical analysis if the on-site monitoring data are used to establish background concentrations.	An ambient air monitoring program was ongoing throughout 2022 since submission of the draft EIS/EA An additional ten months have been collected since the 2021 Air Quality Baseline Report (Appendix G-3) was prepared for the draft EIS/EA. This provides sufficient valid samples and will be used in the final EIS/EA for the establishment of background concentrations.	No additional comments at this time.	Acknowledged.			EIS Section 6.2.1.2, Appendix G-1 Section 4.
MECP-AQ-003	Table 4-9, page 4-7, Section 4.6 of Appendix G-3: 2021 Air Quality Baseline Report	Three passive VOC samples were collected, and the sampling duration was either approximately 14 days or 2 months as indicated in the report. The reported values for VOC components are based on the sampling duration, either around a 14- day average, or a two-month average. The AAQCs of some VOC components shown in Table 4-9 are based on the 24- hr averaging period. It is inappropriate to compare these measured values with the corresponding AAQCs as they are based on different averaging periods.	Ensure the averaging time periods are the same when comparing the measurement data with applicable criteria/standards.	The on-site VOC monitoring serves as a screening for the presence of target species, and a general comparison of VOC concentrations to background values from regional National Air Pollutant Surveillance Program stations. Where detection limits are appropriately low, concentrations will be compared to the relevant AAQC by using the averaging time conversion methodology of the Ministry of the Environment, Conservation and Parks Guideline A11: Air Dispersion Modelling Guideline for Ontario (Version 3.0). This use of the VOC data collected on-site by passive sampling will be described in the final EIS/EA.	It is hard to say whether the VOC data from on-site sampling can be used for screening purposes as there are not enough VOC samples collected for this case (only three VOC samples were collected as mentioned in the previous comment). The limited on-site data can not be representative of the study area. It is recommended more VOC samples be collected even for screening purposes.	Data from the NAPS regional background station in Simcoe will be used to establish background concentrations for the final cumulative effects assessments. Seven additional samples since the draft EIS/EA was prepared were taken for a total of ten onsite for comparison with the regional NAPS data.	No additional comments at this time.	Acknowledged.	EIS Sections 6.2.1.1, 6.2.1.2, Appendix G-2 Section 4.1.3.
MECP-AQ-004	Table 5-3, page 5-2, Section 5.3 of Appendix G-3: 2021 Air Quality Baseline Report	The mean SO_2 concentration is 0.1 ppb for Winnipeg Ellen St in 2018, while the 90th percentile of the 1-hour average SO_2 concentration is 0.0 ppb as shown in Table 5-3. It does not make sense that the 90th	The value shown in the table should either be corrected or an explanation should be provided.	The 90th percentile value for 1-hour average SO_2 will be updated in the final EIS/EA.	No additional comments at this time.	Acknowledged.			Not applicable

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		percentile concentration is less than the average concentration.							
MECP-AQ-005	Pages 2-2 and 2-3, Section 2 of Appendix G-2: Air Quality Modelling Report.	The report states that precipitation data (2013 to 2017) are used in the air dispersion model to incorporate plume depletion. However, the report does not provide any information on the particle size distribution and particle density etc. used to assess the deposition of particulate matter.	Provide any necessary supporting assumptions used to assess the deposition of particulate matter and the rationale for the selection of parameters used to assess the deposition in the air dispersion modelling.	The particle size distribution and characterization used in this assessment is based on the available data derived from the USEPA documents for ore processing and mining processes (AP-42, various sections1). The deposition parameters were determined based on the type of sources (e.g., unpaved roads, blasting, ore handling and crushing) and the associated activities. The final EIS/EA will include the calculations used to determine the equivalent diameter (De) and the basis for the particle density for each source or source type.	No additional comments at this time.	Acknowledged.			EIS Section 6.2.1.2, Appendix G-2 Section 3.5.1.
MECP-AQ-006	Page 3-2, Section 3.1.3 of Appendix G-2: Air Quality Modelling Report	The report states that new, more stringent O. Reg. 419/05 air quality standards for SO_2 are being introduced in 2023 for the 1-hour and 24-hour averaging times, with equivalent AAQCs. In addition, Ontario has an annual AAQC for SO_2. It should be noted that the new SO_2 standards are for the 1-hour and annual averaging periods, instead of 1-hour and 24-hour averaging periods. In addition to the 1-hour and annual SO_2 AAQCs, the ministry also has a 10-min AAQC for SO_2.	Correct these sentences in the report about SO_2 standards and AAQCs.	The SO_2 standards will be updated in the final EIS/EA.	No additional comments at this time.	Acknowledged.			Not applicable
MECP-AQ-007	Page 3-4, Section3.2 of Appendix G-2: Air Quality Modelling Report	The Ozone Limiting Method (OLM) was used to predict ambient NO_2 in the assessment, but the report did not provide any details on how this method was used in the assessment. There are several options available within the AERMOD	Provide a rationale for the selection of the OLM for the conversion of NO to NO_2. Also, provide details on the use of the OLM, and any supporting data or assumptions used for this method (i.e., background ozone concentrations, the	The OLM method was used to model NO/NO_2 conversion from sources emitting NO_X from internal combustion engines using diesel fuels. NO to NO_2 conversion was not used for blasting emissions. The other two available options	It is recommended maximum instead of 90th percentile of the hourly O_3 concentrations for each month be used in the model to obtain more conservative modelling results of NO_2.	For the Springpole Gold Project, seasonal variation was considered by using the quarterly 90th percentile O_3 concentration. The final EIS/EA will refine this to use the monthly 90th percentile concentrations.	No additional comments at this time.	Acknowledged.	EIS Sections 6.2.1.1, 6.2.1.2, Appendix G-2 Section 3.5.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		model (i.e., OLM, PVMRM, and ARM) for the conversion of NO to NO_2, but the rationale for the choice of OLM was not provided in the report.	rationale for initial NO/NO_2 fractions in the emissions, etc.) In addition, all of the supporting information and assumptions used should be provided in the report.	for NO/NO_2 conversion in AERMOD are: (i) Ambient Ratio Method (ARMs), a Tier 2 technique with no chemical transformation scheme in the calculation and with less accurate predictions than the OLM; and (ii) Plume Volume Molar Ratio Method (PVMRM) which is a Tier 3 technique. According to the USEPA, the PVMRM method is recommended for relatively isolated and elevated sources, and not appropriate for the line / area and near surface releases. Therefore, the OLM was selected as the chemical transformation technique for this project. Using OLM is a preferred method in other Canadian provinces (such as Alberta, British Columbia and Newfoundland) when chemical transformation is required. An average value of 0.1 NO_2/NO_X was used in the model and this value was obtained from the USEPA In-Stack-Ratio (ISR) database, for all OLM sources in this assessment, as they were all internal diesel combustion engines. For the background ozone concentration, the hourly ozone measured at the Pickle Lake Airport over a three-year period 2017 to 2019) was processed, and the 90th percentile of the hourly values for each month		The use of maximum measured ambient concentrations for the assessment of cumulative effects would be overly conservative for these shorter averaging periods, as the assumption would be that the worst-case emissions from the site would coincide with unfavorable weather (and ozone) conditions in the direction of the receptor and maximum contributions from all regional sources. For this reason, the 90th percentile concentration is more appropriately used as a conservative baseline, as a concentration that is expected to be exceeded only under certain weather conditions or other air quality influences. This approach has been accepted by MECP and ECCC for air quality studies reviewed as part of the environmental assessment process for similar mining projects in Ontario, and is specifically cited in the both the Alberta and Saskatchewan Air Quality Modelling Guides (Alberta Environment Air Quality Model Guide (2021), Saskatchewan Air Quality Modelling Guideline (2012)); the Alberta guide cites the use of the 90th percentile to allow for some variability due to anthropogenic or unusual local sources. This method avoids the use of potential outliers which may overly bias the predictions. Reference: Government of Alberta. (2021). Air quality model guideline.			

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				were used in the model as monthly ozone background concentrations.		Government of Saskatchewan. (2012). Saskatchewan Air Quality Modelling Guideline.			
MECP-AQ-008	Page 3-6, Sections 3.4.8 and 3.4.9 of Appendix G-2: Air Quality Modelling Report	A silt content of 3.9% was used to estimate emissions from bulldozing at stockpiles as mentioned in the report. The report also indicates that a silt content of 3.9% for taconite mining was used to estimate fugitive road dust emissions for SPM, PM_{10} and $PM_{2.5}$ based on the method in US EPA AP-42 Chapter 13.2 Unpaved Roads. It is not clear where the silt content of 3.9% is from. As indicated in Table 13.2.2-1, US EPA AP-42 Chapter 13.2.2, the mean silt content is 5.8% for haul roads to/from a pit used for taconite mining. The proponent should ensure that the silt content used in the emission estimates is appropriate, conservative and expected to be representative of emissions for the proposed site. It should be noted that the typical silt content values for roadways at Ontario mining sites range from 0.10% to 36.80% with a mean value of 9.14% based on the information from the Centre for Excellence in Mining Innovation (CEMI). Silt content of 9.14% is usually recommended by MECP for conservative estimates if site-specific silt content is not available.	The proponent should provide a rationale for the use of the silt content assumption of 3.9% in the emission estimation. The report should present a discussion concerning the difference in the modelled results with a more conservative silt content assumption of 9.14% and the implication of this difference.	The US EPA AP-42 Chapter 13.2.2 provides a silt content range of 3.9 to 9.7% with a mean of 5.8% for Taconite (lean iron ore) mining and processing haul roads to/from the pit. The supporting report (Cuscino, T., (1979) also notes that the "silt content of mine haul and service roads (approximately 5%) is generally lower that that of public unpaved road in rural area" attributing this difference possibly to surface material type and/or more frequent road maintenance. Keeping an unpaved road surface's silt level ~1% below what was typical in the 1970s is considered feasible using modern practices. Considering the proximity of the planned haul road to the property line, it has been assumed that highly effective road surface design and maintenance (including a robust fugitive dust management plan and monitoring program) would be required. An onsite crushing and screening plant will be able to provide coarse aggregate product to an engineered specification with less than 3.9% silt for use as road surface. The recommendation to use a mean silt content of 9.14% per the Guide to the Preparation of a Best Management Practices Plan for the Control of Fugitive Dust for the Ontario Mining Sector, Version 1.0 (CEMI 2010), has the following drawbacks:	The lowest silt content value of 3.9% for Taconite mining and processing haul roads leading to/from the pit was used to estimate emissions from bulldozing at stockpiles and from unpaved haul roads, although the mean silt content is 5.8% for the Taconite mining. Further, it is unclear whether the silt content for Taconite mining fits the situation of the proposed project and can be representative of the silt content for this project. An appropriate silt content value should be used in the emission estimates for conservative results if a site-specific silt content value is not available at this stage. Conducting road dust sampling should be included in the monitoring program to verify the silt content used for unpaved roads.	There is precedent for using Taconite mining values for unpaved roads in gold mining operations as the most representative. Taconite mining values have been used for several Ontario gold mining projects, for both environmental assessment and permitting and has been approved by MECP review engineers and federal agencies. An onsite crushing and screening plant will provide coarse aggregate product to an engineered specification with less than 3.9% silt for use as road surface. The silt content of unpaved haul roads will be sampled at the start of operations to validate the silt content value used in the air quality modelling report.	A silt content for taconite mining was used to estimate dust emissions from unpaved haul roads for some mining projects as indicated in the Proponent's response. It should be noted that, however, an average silt content of 5.8% instead of a low-end value of 3.9% was used in the EAs for unpaved haul roads for these mining projects. MECP raised a concern even for using the silt content of 5.8% to estimate PM emissions from unpaved haul roads.	The Air Quality Model for the final EIS/EA includes a sensitivity analysis for both 95% dust control efficiency and 85%, which is typical of other mining EAs. As well, the model will include a sensitivity analysis using silt content values of both 3.9%, and 5.8% which is typical of other mining EAs. Note, although the geographic extent of the predicted air quality effects increases when dust control efficiencies are reduced to 85% and road silt is increased to 5.8%, the characterization of geographic extent attribute for the residual effect remains low (Level I). A frequency analysis was undertaken for the point of reception (POR) with the high predicted concentration under the 85% dust control and 5.8% silt content scenario. Exceedances of the PM10 AAQC at this POR were predicted 0.3% of the time (6 days) in a 5-year period; all exceedances were predicted in December and January during frozen conditions and no exceedances were predicted for PM2.5. An ambient air monitoring program measuring particulate is expected as a condition of the Project's ECA and in support of a dust best management practices plan would allow for real-time management of fugitive dust emissions. This will achieve the overall	EIS Sections 6.2.1.2, 6.2.4, 6.2.6, Appendix G-2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				– The silt content data presented in Table 2 of the report for maximum, minimum and mean unpaved road silt contents are 36.8%, 0.1% and 9.14%, respectively. The difference between the maximum silt content (36.8%) and the mean silt content (9.14%) is significantly larger than that between the mean (9.14%) and minimum (0.1%) values. This suggests that there are anomalous maximum silt content sample(s) which are outlier(s) that are skewing the mean to a higher value relative to the majority of the samples. It is likely that the median value of the samples, which would be a more representative statistic, would be lower and more consistent with the silt content used in the Springpole Gold Project analysis. – Section 2.3 of CEMI (2010)2, which discusses the silt content data, notes that "the source sampling data has not been Quality Assurance/Quality Controlled (QA/QCd) for consistency in analytical methods and has been taken from sources with a variety of testing methods." There is no information on what types of sites the samples were taken from, nor whether they would be applicable to the Springpole Gold Project site. – The report does not include a reference section to document the data sources used to develop any of the data presented in the report. In addition, there is no indication that the document has been independently peer-reviewed.				objective of preventing offsite air quality effects.	

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-AQ-009	Section 3.4 and Appendix C of Appendix G-2: Air Quality Modelling Report	Control efficiency of 95% was used in the emission estimates for unpaved roads. 95% is in the high-end range of the control efficiencies for unpaved roads. The typically used control efficiencies for unpaved roads range from 75-85%. A control efficiency of 85% would be more conservative.	A lower control efficiency should be used in absence of supporting information. It is also recommended that the proponent provide a table with all assumed control efficiencies and rationale/justification with supporting documentation.	The control efficiency was selected as it is known that the haul roads are located along the northern boundary of the property in close proximity to waterbodies and therefore require highly effective dust control measures (including a robust fugitive dust management plan and monitoring program with real-time feedback). Control efficiencies of 85% to 95% have been successfully applied to other mining projects in northern Ontario. Control efficiencies are multiplicative, meaning that an overall control efficiency may be estimated considering the expected efficiency of individual control measures as follows: Control Efficiency (CE) CE_{Total} =1 – (1-CE_1)*(1-CE_2)Not applicable…(1-CE_N) Considering the following individual CEs, an overall CE of more than 95% is justified where an effective dust management and monitoring plan is implemented: – Watering: 70 to 75% – Chemical dust suppression: 80 to 84% Limit vehicle speeds: 44%. The rationale for the selection of the control efficiency for unpaved roads representative of the emissions from the Project, will be provided in the final EIS/EA.	The effectiveness of dust control depends on the appropriate implementation of mitigation measures. For the real situation, it is probably hard to achieve a control efficiency of 95% all the time even with all three control measures mentioned in the response. It is recommended that appropriate control efficiency for mining sites in Ontario be used for emissions calculations for unpaved roads for the proposed Project.	The final EIS/EA will include results with 95% control efficiency of unpaved road dust as the objective is to achieve this level of control. For comparison, modeling results using 85% will also be included.	Control efficiency of 95% is in the high-end range of the control efficiencies for unpaved roads and it is probably hard to be achieved all the time for the real situation as mentioned in the MECP's previous comments. A study to assess and verify the control efficiency may be required for the ECA application when extremely high control efficiency was used in the estimation of emissions from unpaved roads.	See Response #8. It is not expected that a program to verify the control efficiencies would be necessary or feasible if an ambient air monitoring program were a condition of the ECA.	EIS Sections 6.2.1.2, 6.2.4, 6.2.6, Appendix G-2.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-AQ-010	Draft EIS/EA report and Appendix G-2: Air Quality Modelling Report	The report indicates that air quality effects from the construction phase will be less, and of shorter duration, compared to those from the operations phase, but no quantitative air quality assessment was conducted for the construction phase.	A quantitative air quality assessment for the construction phase should be conducted to support the statements provided by the Proponent. The air quality assessment for the construction phase should include TSP, PM_{10}, $PM_{2.5}$, silica, SO_2 and NOX and compare with relevant applicable criteria/standards.	Air dispersion modelling for construction phase activities, including the development of site infrastructure, the construction of the transmission line, and mine access road will be included in the final EIS/EA.	No additional comments at this time.	Acknowledged.			EIS Sections 6.2.1.2, 6.2.5, Appendix G-2 Section 5.1.
MECP-AQ-011	Page 6- 15, Section 6.2.1.2 of Draft EIS/EA report and page 4-1, Section 4.1 of Appendix G-2: Air Quality Modelling Report	The report states that when there are no site-specific values or measurements, it is appropriate for the air quality assessment to apply 1.8 µg/m³ as the average background level of $PM_{2.5}$ for the annual averaging period. It should be noted that regional differences likely exist in the background concentrations, but are ignored, and only very low concentrations at rural and remote sites were used to establish the background concentrations based on the specific method(s) as indicated in the reference. The average $PM_{2.5}$ concentration from a station in the Ring of Fire area is 3.0 µg/m³ , higher than the referred value of 1.8 µg/m³. Also, it appears the on-site annual $PM_{2.5}$ concentration is a few times higher compared to the referred value of 1.8 µg/m³ although not enough on-site data are available so far.	Provide more details on the estimation of the background levels of $PM_{2.5}$ indicated in the reference, including definition, assumptions and specific methods used to specify this referred value. Provide a discussion about the difference among the measured $PM_{2.5}$ levels from the Ring of Fire, on-site station(s) and the referred value in the reference.	The use of 1.8 µg/m³ as a background concentration was specific to diesel particulate matter (see Table 6.2-1 in the draft EIS/EA). Diesel particulate matter (DPM) is of a smaller size fraction than $PM_{2.5}$ and should exclude other sources of $PM_{2.5}$. Additional discussion on the selected concentration for DPM and $PM_{2.5}$ background will be included in the final EIS/EA.	No additional comments at this time.	Acknowledged.			EIS Sections 6.2.1.2, 6.2.2.2.
MECP-AQ-012	Page 6- 16, Section 6.2.1.2 of draft EIS/EA report and Appendix G-2	The report states that background concentrations for metals were established based on the background air concentrations of particulate and the conservative assumption of the particulate	Clarify the conservative assumption of particulate matter composition used to estimate background concentrations of metals. Review and correct the numbers	The concentration of trace metals on the particulate matter were estimated using geochemistry data for mine rock and ore samples, specifically the 90th percentile concentration for each metal.	No additional comments at this time.	Acknowledged.			EIS Sections 6.2.1.2, 6.2.1.5, Appendix G-2 Section 2.1.5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		matter composition. It is unclear what assumption of the particulate matter composition in the mine rock was used, whether it was the average or the 90th percentile. Also, the background concentrations for metals shown in Table 6.2-1 (EIS/EA) and Table 4-2 (Appendix G-2) do not match those shown in Tables B1- and B-2 (Appendix G-2).	of background concentrations of metals shown in all the tables.	There were no exceedances of the AAQCs for metals, as a result of the changes to the background concentrations for metals. The approach to quantifying air concentrations of metals will be described in the final EIS/EA, and the concentrations for each metal in the applicable tables of the draft EIS/EA will be reviewed for consistency in the final EIS/EA.					
MECP -AQ- 013	Tables 6.2-5 and 6.2-6, Section 6 of draft EIS/EA, and page 3-7, Section 3.4.10 and Tables 5- 3, 5-4, 5-6, B-1, B-2, B-4, B-6 of Appendix G-2	The report states that the predicted air concentration for each of the speciated metals was determined by assuming a conservative particulate matter composition: using the 90th percentile concentration of each metal measured in the mine rock. It appears that the predicted concentrations of metals and/or the emission rates of metals shown in the Tables do not match the concentrations and/or emission rates of metals based on the assumption, the 90th percentile used in the calculations.	Review, verify and correct the numbers shown in the tables including modelled concentrations and emission rates of metals.	The applicable tables of the draft EIS/EA will be reviewed for consistency in the final EIS/EA.	No additional comments at this time.	Acknowledged.			Not applicable
MECP -AQ- 014	Section 6.2.4.4, Tables 6.2-5 of draft EIS/EA, and Page 3-3, Section 3.4, and page 3-7, Section 3.4.11, and Tables 5- 3, 5-6, B-1, and B-4 of Appendix G-2	To assess the impacts of silica, it is assumed that the modelled PM_{10} concentrations are comprised of 7.5% silica. It should be noted that the ratio between respirable quartz and respirable dust has high variability from 0.1 to 37.5% and the ratio changes from site to site based on the results from the reference. 7.5% of silica may or may not be representative of that for the proposed mine site. In addition, it seems the modelled silica concentrations shown in Tables 5-3 and 5-6 do not match the silica	Review, verify and correct the modelled silica concentrations shown in the tables.	The use of 7.5% is an appropriate silica concentration for an air quality assessment, based upon the Ministry of Labour study (Verma et.al. 20143) in the draft EIS/EA. This has been accepted by MECP for a number of Environmental Compliance Approvals for other mining projects in northern Ontario and has therefore been used as a default value in the absence of site-specific data.	No additional comments at this time.	Acknowledged.			Not applicable

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		concentrations based on the assumption of 7.5% of silica used in the calculations.		Consistency between the noted tables will be reviewed for the final EIS/EA					
MECP-AQ-015	Pages 5- 7- 5-8, Table 5-3 and Table 5-4 of the Appendix G-2	The modelled maximum POI 10-min and 1-hour SO_2 concentrations are 30.8 µg/m³ and 18.6 µg/m³, respectively, which are much lower compared to those at Site 18 (120 µg/m³ for 10-min average and 72.6 µg/m³ for 1-hour average). It is expected that the modelled maximum POI concentrations would be higher or equal to those at sensitive receptors.	Review the modelling results and revise the modelled SO_2 concentrations for the project.	The meteorological anomalies were not removed in Table 5-4 of Appendix G-2 of the draft EIS/EA, as there were no exceedances at the receptors, and further refinements to the model were not required. The anomalies were removed in Table 5-3. This will be clarified in the final EIS/EA.	No additional comments at this time.	Acknowledged.			Not applicable
MECP-AQ-016	Figures 5- 11, 5-12 and Table 5-3 of Appendix G-2	The figures of modelled 10-min and 1- hour SO_2 isopleths indicate AAQC exceedances, however, the modelled maximum POI concentrations for SO_2 shown in Table 5-3 were well below the applicable AAQCs, i.e., 20% of AAQC for 10-min average, and 21% of AAQC for 1- hour average.	Review the modelling files and results and revise the modelled concentrations if required	The meteorological anomalies have been removed from the maximum point of impingement (POI) concentrations in Table 5-3 of Appendix G-2 of the draft EIS/EA. The isopleths are not adjusted in the same manner that the maximum POI concentrations are because the anomalies do not affect all receptors. The isopleths shown in Figures 5-11 and 5-12 may suggest an exceedance which is the result of these meteorological anomalies, but which cannot be removed from the concentration plot. This will be clarified in the final EIS/EA.	No additional comments at this time.	Acknowledged.			Not applicable
MECP-AQ-017	Table 7-1 of Appendix G-2	Silica was not included in the recommended follow-up ambient air monitoring program.	Silica should also be included in the recommended ambient air monitoring program based on the predicted results.	The air dispersion model will include silica in the final EIS/EA. Silica will be considered as a recommended parameter for ambient air monitoring based on the results of the assessment.	No additional comments at this time.	Acknowledged.			Not applicable
MECP-AQ-018	Appendix C of Appendix G-2	Sample calculations for emission estimates were not provided. Sample calculations are required for review/verification.	Ensure sample calculations are provided for emission factors and estimate calculations for both construction and operational phases	Sample calculations will be included in the final EIS/EA	No additional comments at this time.	Acknowledged.			EIS Section 6.2.1.2, Appendix G-2 Section 3.5.1.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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MECP-AQ-019		Dispersion Model – no electronic files (project file, input files, output files) were provided for model verification.	Provide modelling files including input and output files to the ministry with the final EIS/EA report	Although the input and output modelling files are proprietary, the review of specific aspects of the modelling can be arranged.	No additional comments at this time.	Acknowledged.			Not applicable
MECP-CC-001	Section 6 and Appendix I Greenhouse Gas Assessment	Scope of MECP staff review of GHG assessment: Staff were not able to reproduce calculations as full data and assumptions were not provided. The review focused on flagging areas of the assessment that were unclear or could be improved through edits or additional rationale or detail. Ontario's Considering climate change in the environmental assessment process was referred to in conducting the review (available at: and https://ero.ontario.ca/notice/012-5806).	Consider noting where / how detailed data, calculations and assumptions can be obtained / reviewed. Recommend adding reference to Ontario's guide at the end of s. 2.0 (Methodology) in Appendix I (e.g., Preparation of the GHG Assessment also included consideration of Ontario's guide, Considering climate change in the environmental assessment process.)	The final EIS/EA will provide sample calculations, assumptions, and references for emission factors in order to provide transparency as recommended in the Greenhouse Gas Protocol, specifically the GHG Accounting and Reporting Principles. The final EIS/EA will also reference Ontario's guide Considering climate change in the environmental assessment process and how it was applied to the Project assessment.	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			EIS Section 6.4.2.1, Appendix I-1 Sections 2, 4.4.
MECP-CC-002	Climate/weather data used in assessment; see examples in next column.	Examples: Section 3.3.1.1 indicates climate data are summarized as Climate Normals for 1981 to 2010 for Sioux Lookout A, Red Lake A and Pickle Lake A, and for 1971 to 2000 for Ear Falls. Section 3.3.1.2 states Climate Normals for the Red Lake Airport Station are 1971 to 2000. The wind data set uses data from 2013-2017. Section 4.18.3.1 water transfer rates cite 2011 and 2013 sources.	Consideration of weather data and weather data trends to the present time and projections for future weather conditions (e.g., temperature, wind speed, precipitation, evaporation) taking into account climate change are helpful in describing existing conditions, identifying potential vulnerabilities of the project, and identifying potential impacts of the project on the environment. Checking / noting that older guidance is applicable given current and future conditions is also helpful for reviewing the EA. (See s. 4 of Considering climate change in the environmental assessment process, https://www.ontario.ca/page/considering-climate-change-environmental-assessment-process (hereinafter "Ontario guide") and	The greenhouse gas assessment in Appendix I of the draft EIS/EA includes consideration of the potential effect of the Project on climate change, in terms of the potential greenhouse gas emissions and land use changes associated with the Project, as required by the approved Amended Terms of Reference and the Federal Environmental Impact Statement Guidelines. Climate change is discussed in Section 8.7 of the draft EIS/EA and describes the changes that are projected as a result of climate change (e.g., increased year-round temperatures at the Project), and the associated potential effects on the Project (e.g., higher frequency of extreme weather events). As the operational life of the Project is comparatively short (12 years),	No further comment.	Acknowledged			EIS Sections 6.4.1.2, 8.

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			https://ero.ontario.ca/notice/012-5806.	the effects of climate change are unlikely to be material on the Project. Potential effects of climate change on the Project during the construction, operation and closure phases have been considered in Section 8.7 of the draft EIS/EA and incorporated in the planning and design of Project and related infrastructure. In addition, monitoring will be ongoing throughout the Project, and modifications will be made to infrastructure or operations through an adaptive management approach if required (e.g., the co-disposal facility design has been made with consideration of future climate conditions). Appendices M-2 (Mine Site Water Balance) and M-3 (Receiver Water Balance) of the draft EIS/EA also consider the potential effects of climate change on the water balance (i.e., a net reduction of runoff compared to current climate conditions for the final closure phase).					
MECP-CC-003	Section 6.4.2.1	Indicates that GHG quantification is not included for: – construction of temporary construction camp, commissioning of the process plant, controlled dewatering and operation of water management facilities and construction of the transmission line. – operation of water management and treatment facilities, process plant,	Including energy sources to be used (e.g., electricity, other energy / GHG source, or that no energy is needed) and GHG emissions associated with these activities would provide a more complete picture of the GHG emissions resulting from the Project. (See s. 3 of Ontario guide.)	Greenhouse gas (GHG) emissions were estimated using fuel consumption forecasts available at the time of the draft EIS/EA preparation. These estimates included the total diesel fuel combusted during the construction phase. As a result, all construction activities in the mine site area were considered in the GHG emission estimates. The assessment of GHG emissions	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			EIS Section 6.4.4, Appendix I-1 Section 4.4

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		accommodations complex, initial filling of the open pit basin with water and other mine site infrastructure and maintenance activities associated with transmission line and mine access road.		for the construction and maintenance of the transmission line and mine access road will be added and provided in the final EIS/EA. Additional details on the energy use projections will be provided in the final EIS/EA as available, and identify which Project elements have been included with justification given for any elements excluded.					
MECP-CC-004	Section 6.4.2.1	Indicates "remaining interactions" were not included in determining potential environment effects as the preceding interactions would have captured the effects, or there is anticipated to be limited generation of GHGs due to the nature of the component or activity.	It would be helpful to indicate the types of interactions in this category.	Table 6.4-2 in the draft EIS/EA includes a list of potential interactions, including the "remaining interactions". A description of each interaction is provided in Table 6.1-1.	Suggest reviewing Table 6.4-2 and either adding "Yes" in any row that may have associated GHGs and now indicates "-".= (for example: Operation and maintenance of mine site infrastructure) or indicating threshold/rationale for the "-" indication.	Table 6.4-2 will be reviewed and updated to include "Yes" for the applicable interactions in the final EIS/EA.			EIS Section 6.4 Table 6.44.
MECP-CC-005	Appendix 1, Greenhouse Gas Assessment	The following are noted as indirect emissions (2.3, 3.0, Table 3-1) and not included in emissions estimates: – transporting workers to mine site – transportation of product from site, raw materials to site – offsite waste disposal – offsite transport including transport of dore, reagents, non-hazardous wastes, bus service to local communities – GHG emissions released from landfill gas created as a result of disposing non-hazardous wastes that will be disposed of at an offsite landfill – carbon emissions or removals which are a consequence of the Project within the PDA but occur at GHG sources or sinks not owned or controlled by FMG.	Further discussion of GHG emissions associated with these activities would provide a more complete picture of the GHG emissions resulting from the Project. (See s. 3 of Ontario guide.)	The final EIS/EA will include further discussion on the indirect GHG emissions resulting from Project activities. Where appropriate and reasonable, additional quantification of GHG emissions will be provided in the final EIS/EA on these indirect GHG sources.	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			EIS Section 6.4.2.2, Appendix I-1 Sections 3, 6.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		– landfill gases generated and released at an offsite landfill.							
MECP-CC-006	Section 4 (Project Description), section 4.6.4	Indicates that tailings treatment results in carbon dioxide. It is not clear that this carbon dioxide is included in the GHG assessment, or if not, why it is excluded.	Please include discussion of GHGs associated with tailings and their management in the GHG assessment. (See s. 3 of Ontario guide.)	Acknowledged, CO2 emissions from the cyanide destruction process will be documented in the final EIS/EA.	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			Appendix G-1, Attachment 1
MECP-CC-007	Section 6	The GHG assessment does not appear to include emissions intensity of the project (emissions per unit product), or a comparison of emissions intensity with other gold mines.	It is helpful to demonstrate GHG emissions have been factored into project planning by comparing GHGs of the project to that of similar existing facilities. (See s. 3 of Ontario guide.)	The Project will be compared with other mining benchmarks in the final EIS/EA. Canada has set the Scope 1 benchmark for gold mining at 7.71 tonne CO2e per kilogram of gold; CO2e emissions beyond this are subject to a carbon tax. For a high-level comparison of Scope 1 emissions from open pit mining (including on-site haulage), publicly available data from four operating open pit mines was collected through the Canadian GHG reporting program and were reviewed for the 2018 to 2020 reporting years. Using this data, the GHG intensity per kilogram ore produced ranges from 5.3 to 14.8 tonne CO2e per kilogram of gold produced. Globally, the value for an on-grid gold mine average was estimated at 27.7 tonne CO2e per kilogram of gold equivalent, based on Scope 1 and 2 data from 2018. Gold mines in Canada are closer to 9.2 tonnes CO2e per kilogram of gold equivalent (Ulrich, Sam et.al. 2022). The total GHG intensity of the Project was estimated at 7.2 for	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			EIS Section 6.4.7.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Scope 1 emissions, 8.2 for Scope 1 and 2 emissions, and 8.5 tonnes CO2e per kilogram of gold for Scope 1, 2 and land use, respectively. The GHG intensity of a gold mine will vary based on factors including energy source, gold grade, type of mine, and emission scopes included. As noted in Section 6.4.5, based on a review of Canadian facilities that reported annual GHG emissions over 50 kilotonnes CO2e between 2014 and 2019, the Project would be considered a moderate emitter of GHG emissions. A low emitter would be a facility with less than 50 kilotonnes CO2e emitted annually, and a high emitter would be considered a facility with greater than 1,000 kilotonnes CO2e emitted annually.					
MECP-CC-008	Section 6; Appendix I GHG Assessment	No emissions intensity estimates provided. Appendix s. 7.1 states that GHG estimates suggest that the OBPS benchmark of 7.7 t CO2e /kg gold may be exceeded.	It is useful to provide an estimate of emissions of the project and compare it to similar projects / facilities (i.e. emissions intensity) to demonstrate how project planning took into account measures to reduce GHGs. (See s. 3 of Ontario guide.)	An estimate of emissions is provided in Section 6.4 of the draft EIS/EA. A comparison to similar projects will be provided in the final EIS/EA as described in the response to Comment #7.	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			EIS Section 6.4.7.
MECP-CC-009	Section 6 and Appendix I GHG Assessment	Section 6 and Appendix I include four identical tables, with different Table numbers.	Recommend only providing these tables once to reduce confusion.	These tables are relevant to both Section 6.4 of the draft EIS/EA and Appendix I Greenhouse Gas Assessment and provide important information and context for the reader of each report. They will be presented in each of these documents for the final EIS/EA.	No further comment.	Acknowledged			
MECP-CC-010	Section 6.4.4 and Tables 6.4-3 and 6.4-5,	– S. 6.4.4 indicates that loss of forested areas within the PDA will result in an additional 2.8	Please provide clarification or make revisions as appropriate.	The total loss of CO2 uptake by phase was included in Table 6.4-3 of the draft EIS/A. No	Recommend including in footnote 2 of Table 6.4-3 the information about the land use	In the final EIS/EA, Table 6.4-3 will include an expanded footnote with information			EIS Section 6.4, Table 6.4-2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
	Appendix (Treatment of emissions du to loss of forested areas)	kt/yr. Table A1 in the GHG Assessment Appendix indicates this will continue all years of the project. – -S. 6.4.4 then indicates mobile equipment will be used to decommission and remove Project components and for other activities, and states net emissions for the closure phase will be 2.8 kt/yr. Comment: This is confusing – propose noting in 6.4.4 text that mobile equipment activity is not quantified, as per Table 3-1 in Appendix I GHG Assessment, or adding an estimate for mobile equipment, and/or indicating the net emissions reflect land use change emissions only. – Table 6.4-3 indicates emissions during the closure phase are 2.8 kt CO2e. Question: Should the 2.8 kt in the table for Land Use Change be multiplied by years for the total in that phase? – Table A1 (appendix of the App. I GHG Assessment) shows 2.8kt due to loss of forest every year but does not seem to include them in GHG totals per year. Comment: Please confirm the 2.8kt/yr is accounted for appropriately in totals for each phase and for the project in relevant tables and text.	(Changes to the landscape which alter the ecosystems' ability to remove carbon dioxide from the atmosphere are part of the assessment of a project's impacts on climate change. See s. 3 of Ontario guide.)	revegetation was assumed to be conservative. The total lost CO2 uptake during the closure phase was not included beyond the first year as details regarding the closure plan and revegetation will be developed as part of the environmental approvals process. The description of total lost carbon uptake will be re-evaluated in the final EIS/EA, and clarified, where applicable. Closure phase GHG emissions and Land Use Land Use Change Forestry (LULUCF) will be described in the final EIS/EA, with the information available to quantify emissions with reasonable accuracy for the Project. The carbon sink (lost uptake) was presented quantitatively, but intentionally kept distinct from the net GHG calculation as this is the recommended approach from the recently published Strategic Assessment of Climate Change (ECCC 2021[1]).	changes figure in closure phase, regarding number of years reflected and rationale. Please check that ECCC 2021 is correct reference for SACC (MECP finds 2020 online).	about the land use change figures and rationale. The reference for the Strategic Assessment of Climate Change has been revised to reflect the 2020 publication; the DRAFT Technical Guide Related to the Strategic Assessment of Climate Change was published in 2021.			

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-CC-011	Table 6.4-5	Table excludes land use change number from total annual emissions; sets them out separately.	Please include annual emissions from land use change in emissions total for table or explain why they are listed after the total. (Changes to the landscape which alter the ecosystems' ability to remove carbon dioxide from the atmosphere are part of the assessment of a project's impacts on climate change. See s. 3 of Ontario guide.)	The Land Use Land Use Change Forestry (LULUCF) estimates were described in Section 6.4 of the draft EIS/EA, in addition to the Scope 1 and 2 GHG emissions, as this a component of the assessment of potential Project effects on climate change. There are different ways of presenting the data and to avoid misinterpretation, the affect of land use changes on the carbon and CO2 balance (i.e., the loss of CO2 uptake) was kept distinct from the net GHG emissions; this is to be consistent with guidance provided in the Strategic Assessment of Climate Change. Carbon stored in the cleared biomass was not included in the total but presented as CO2e for comparison purposes and should not be considered as a release to the atmosphere as the fate is currently unknown (i.e., whether it would be released as methane from anaerobic decomposition, would decompose aerobically, or would be burnt in situ or as a fuel releasing predominantly CO2 emissions).	The proponent's deck (Springpole Gold Project: Draft EIS/EA Comments and Responses – Atmospheric, March 2023, hereinafter 'the Deck") indicates: "Land use change related to GHG emissions from biomass removed will be included in net GHG calculations for the final EIS/EA." We would expect to see this reflected in the final EIS/EA. Regarding carbon stored in cleared biomass, recommend including a range depending on "fate" of the biomass.	A range of emissions from biomass removed (considering potential GHG emissions should the biomass be left on-site [in-situ decomposition], as well as GHG emissions where the vegetation is to be burned as a fuel) will be included in the net GHG calculations with the associated assumptions about fate. Carbon content will also be provided with the text clarifying the fate is currently unknown.			Appendix G-1, Section 6.1
MECP-CC-012	Section 6.4.4; Appendix I GHG Assessment, 6.1	Section 6.4.4 indicates 113 kt CO2e from carbon stored in biomass removed. This number does not appear to be included in net GHGs. Appendix, s. 6.1, states that this carbon is not a GHG emission for the purpose of this assessment.	It would be helpful to explain why emissions from loss of stored carbon are not included in total project emissions. (See s. 3 and App. B, Glossary of Ontario guide.)	The Land Use Land Use Change Forestry (LULUCF) estimates were described in Section 6.4 of the draft EIS/EA, in addition to the Scope 1 and 2 GHG emissions, as this a component of the assessment of potential Project effects on climate change. There are different ways of presenting the data and to	Regarding carbon stored in cleared biomass, recommend including a range depending on "fate" of the biomass.	The final EIS/EA will include a range that would consider potential GHG emissions should the biomass be left on-site (in-situ decomposition), as well as GHG emissions were the vegetation to be burned as a fuel.			EIS Section 6.4.2.1, Appendix I-1 Section 4.4.3.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				avoid misinterpretation the lost CO2 uptake was kept as a distinct line when calculating totals. Regarding carbon stored in the biomass cleared, this was not included in the total but presented at CO2e for comparison purposes and should not be considered as a release to the atmosphere as the fate is currently unknown (i.e., whether it would be released as methane from anaerobic decomposition, would decompose aerobically, or would be burnt in situ or as a fuel releasing predominantly CO2 emissions).					
MECP-CC-013	Section 6.4.5	Indicates residual effect from GHG emissions is considered low, as the project contribution is less than 0.1%. Please note 0.1% of what / when.	Please include further detail / clarity.	The 2030 target for Canada's GHG emissions is described in Table 6.4-6 of the draft EIS/EA. This will be clarified in the final EIS/EA.	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			EIS Sections 6.4.8, 6.4 Table 6.48,
MECP-CC-014	Section 6.4.5; Table 7.2-1	Indicates: "the residual effects are predicted to be fully reversible….The likelihood of residual effect is moderate based on the assumptions used in the modelling." As well, Table 7.2-1 in the Cumulative Effects section states that no residual effects are predicted for GHGs. This is confusing.	Suggest adding clarifying language / further discussion here; consideration of timeline post-closure may be helpful (e.g., area reclaimed / land use change reversed / how long GHGs remain in atmosphere). Also, please describe if / how land use change is taken into account in the residual effects assessment. Discussion of mitigation measures considered would be helpful. Note whether the result is different if emissions categorized as "indirect" are considered (e.g., landfill gas).	The approved Amended Terms of Reference require quantification of GHG emissions, however, the quantification of GHG emissions does not require adherence to the guidance provided by the federal Strategic Assessment of Climate Change. Section 6.4.5 of the draft EIS/EA will be revised in the final EIS/EA to reflect that the Project's residual effects (the emission of GHGs) relative to Canada's inventory and commitments under the Canadian Net-Zero Emissions Accountability Act will be fully reversable (i.e., after Project end, there will be no contribution to the Canada's annual emission inventory).	The Deck indicates: "Wording on residual effects will be updated to reflect that the Project's residual effects on atmospheric GHGs are not fully reversible but contribution to inventory is." We would expect to see that reflected in the final EIS/EA.				EIS Section 6.4.8.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Therefore, the residual effects of the Project are predicted to be reversible. The cumulative effects assessment in Section 7 of the draft EIS/EA will be updated to be consistent with Section 6.4, as necessary. A description of the mitigation measures is provided in Section 6.4.3 of the draft EIS/EA. The final EIS/EA will be described Scope 3 indirect GHG emissions and post-closure considerations.						
MECP -CC-015	Section 6.4.4 and Table 6.4-3	Section says net emissions during preparation and construction phase is estimated at 40.4 kt. Table indicates 41.2 kt for this phase. As well, section says average net emissions during operations is estimated at 67 kt/yr. Multiplied by 12 years = 804 kt. Table indicates 808.1.	Consider whether these numbers should be consistent / explain difference or check whether there is an error. Also, suggest revising table name to note "Net" Emissions, if that is correct. And perhaps "Total" by Phase, if that is correct.	The values in Table 6.4-3 of the draft EIS/EA will be confirmed or revised if needed, in the final EIS/EA. As net-GHG emissions are specifically defined and required by the federal Strategic Assessment of Climate Change used under the new federal Impact Assessment Act, the GHG emissions are referred to as Total by Phase to avoid confusion and remain consistent with requirements of the Canadian Environmental Assessment Act, 2012.	No further comment at this time; MECP will review the changes on the final EIS/EA.	Acknowledged			EIS Section 6.4, Table 6.4-6
MECP -CC-016	Section 6.4.5 and Table 6.4-5	Likely typo: Section states that emissions comparisons are provided in Table 6.4-5. Comparisons appear in Table 6.4-6.	Change section text to refer to 6.4-6, if correct.	This will be corrected in the final EIS/EA to state Table 6.4-6 (or the revised table number).	No further comment at this time; MECP will review the changes on the final EIS/EA.				EIS Section 6.4
MECP -CC-017	Table 6.4-6	Table uses 0.086 for SGP Emissions, which excludes land use change.	Please include land use change emissions in Project emissions or rationale for excluding.	Land use change was excluded from the comparisons in Table 6.4-6 of the draft EIS/EA as the inventories provided for comparison also did not include land use change.	No further comment.	Acknowledged			Not applicable

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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MECP-CC-018	Table A1 of Appendix I GHG Assessment	Shows emissions from access road construction after Total GHGs.	Please indicate why these GHGs are not included in Total GHGs or add them to Total GHGs.	As Project engineering is ongoing, details of the construction schedule or construction fleet for the mine access road construction are not yet available. As a result and based on common practice for a Project at this stage, a GHG emission estimate was developed based on the length of the access road, which provided an order-of-magnitude estimate for the construction phase. This estimate was not added to the total GHGs from the mine site construction site due to the level of detail available for the estimate. An estimate of GHG emissions will be provided in the final EIS/EA, and included in the overall Project net-GHG.	The Deck indicates an estimate of associated GHG emissions will be included in the final EIS/EA which reflects a more developed construction schedule and fleet, and the access road estimate will be included in the overall net-GHG estimate. We look forward to seeing this reflected in the final.	The final EIS/EA will include an estimate of construction phase net GHG emissions including for the access road and transmission line.			EIS Section 6.4 Table 6.46, Appendix I-1 Sections 4.4.1, 6.1, Table 6-1.
MECP-CC-019	Sections 4, 6, Appendix I GHG Assessment	There are a number of references to potential use / commitment to seek opportunities to use renewable power to mitigate GHGs of the Project. For example: Sections 4.16, 4.18.3.2, 6.4.3, Appendix I s. 1.1, 7, 8. Section 7 indicates mitigation measures that may be included in a GHG management plan that will be developed prior to operations.	To demonstrate that GHGs have been factored into project planning, describe mitigation measures considered in project design in the EA. (See s. 3 of Ontario guide.)	[No response provided]	Suggest adding a note as to why these potential mitigation opportunities are to be explored in a future GHG management plan, rather than in the EIS/EA.	Mitigation measures considered in the Project design will be included in Section 6 of the final EIS/EA. As part the Springpole Feasibility Study, FMG continues to assess electrification options to further reduce GHG emissions with major equipment manufacturers for the Project. While current technology remains limited for the larger open pit equipment, significant advances in battery technology and electrification, as well as hydrogen-powered mine trucks are currently being advanced. Based on discussions with the major equipment providers, it is expected that further advancements and first-generation equipment coming off assembly lines as early as 2025.			EIS Section 6.4.5, Appendix I-1 Sections 4.4.1, 6.1.1, 6.2.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
						First Mining continues to assess opportunities to reduce GHG emissions through electrification and use of alternative technologies, which will be detailed in a future GHG management plan.			
MECP-ERP-001	6.20.2, page 6-462	During the construction and operation phase for the project, both a water treatment and sewage treatment facility are needed at the site.	Future permits and approvals will be required.	These approvals are identified in Section 11.2 of the draft EIS/EA.	It is noted that Section 11.2 of the draft EIS / EA does identify future permits and approvals, including an ECA for sewage treatment, but it does not include approvals for water treatment. This section does include the potential requirement for an ECA for the waste transfer site (if required) that is referenced in First Mining Gold's second response.	An effluent treatment plant for contact is proposed to be on site and will be permitted under an ECA (Industrial Sewage Works). Domestic sewage and grey water from the camp will be treated by an appropriately sized packaged sewage treatment plant. Treated effluent from the domestic sewage treatment plant will be discharged to the environment with the treated site effluent. It is understood that ECA's will be required for operation of the integrated water management system to provide for discharge to the environment, including but not limited to: water storage pond, plant site pond and effluent treatment plant (see Table 11.2 in the draft EIS/EA).			Not applicable
MECP-ERP-002	6.20.4.3, page 6-466	Waste material will be transported to off-site local municipal landfills (Red Lake, Ear Falls and Sioux Lookout). These landfills are over 100 km from the project site. Are there plans for holding interim waste on-site before trucking to local municipal landfills?	Information request. Will waste be transported daily, weekly? And if so, what additional concerns would onsite interim storage mean for the project?	A waste storage facility will be located onsite to allow for the nonhazardous waste materials to be collected and sorted appropriately as well as the storage of the hazardous waste materials. Hazardous waste materials will be appropriately handled, stored and segregated within this facility.	Please include more information about the sources and amounts of waste to be handled and stored at the onsite waste storage facility. Please note that a site at which waste is handled, treated or processed and, on an annual average basis, an average of more than 1,000 tonnes per day is transferred from the site for final disposal, would be subject to requirements under the Waste Management Projects Regulation (Ontario Regulation 101/07).	It is expected that the Project will produce approximately 45,000 to 65,000 m^3 total through construction to closure. This information will be incorporated into the final EIS/EA. Less than 1,000 tonnes per day will be transferred from the site for final disposal.			EIS Section 6.20.1.2, Appendix D.

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MECP-ERP-003	6.20.4.3, page 6-466	A commitment from local municipal landfills to accept waste from the project site should be included in the EIS (ie. Appendix).	A commitment/ letter from the Red Lake, Ear Falls and Sioux Lookout municipal landfills to accept additional waste from the project site should be included/attached in the EIS.	Comment noted.	MECP understands that FMG has noted this comment; however, it is unclear whether FMG intends to provide a commitment / letter for the final EIS/EA submission. MECP continues to recommend that a commitment / letter from the municipal landfills be included in the final EIS/EA submission.	A commitment/ letter from a municipality will be included in the final EIS/EA.			EIS Section 6.20.1.2, Appendix D.
MECP-GW-001	Environmental Impact Statement (EIS) 3.3.6.1	Inappropriate water quality criteria have been used to assess groundwater quality and suitability for discharge to surface water. The MECP Site Condition Standards were specifically developed for, and are intended to be used as, remediation criteria for the re-development of contaminated "brownfield" sites. They are inappropriate for use at proposed greenfield mine projects.	Groundwater quality shall be compared to appropriate surface water quality standards such as PWQOs, supported where appropriate by Canadian Water Quality Guidelines. Further guidance on the specific water quality criteria applicable to this project can be obtained through consultation with Regional Technical Support staff.	Provincial Water Quality Objectives (PWQO) and Canadian Water Quality Guidelines (CWQG) are specific to fresh surface waters, and protection of aquatic biota therein. PWQO are not appropriate benchmarks of groundwater quality or predictions of seepage quality. As noted in Section 6.5.2 of the draft EIS/EA, to support the effects assessment, predicted groundwater quality results were compared to the Ontario Generic Site Condition Standards for Use within 30 m of a Water Body (Table 9; MOE 2011). These aquatic protection values (APV) were selected as a basis of comparison for groundwater quality predictions as they are designed to provide a scientifically defensible and reasonably conservative level of protection for most aquatic organisms from the migration and discharge of impacted groundwater to surface water. The APVs were applied in Section 6.5 of the draft EIS/EA to support the assessment of potential effects on groundwater that ultimately discharges to surface water. Sections 6.6 through Section 6.9 provide the corresponding effects assessment of	As per MECP policy, standards developed for the assessment and remediation of contaminated sites are not appropriate for application at greenfield developments. Furthermore, there are no groundwater users in the area and the CDF is close to surface water bodies along its entire perimeter. Future approvals issued by MECP will focus on the protection of surface water quality and base groundwater quality performance conditions on PWQOs and/or CWQGs.	Acknowledged.	-	-	EIS Sections 6.5.1.1, 6.5.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				groundwater discharges to surface waters, wherein PWQO are appropriately applied to the surface water receiving environment.					
MECP-GW-002	EIS Tables 5.7-1 & 5.8-1	The Natural / Biological Environment Criterion does not consider impacts to water quality (or quantity). Long term changes to water quality and quantity will be one of, if not the primary, long term environmental impacts of mine waste disposal.	Impacts to water quality (and quantity) should be a primary consideration when choosing mine waste disposal locations.	Water quality and quantity were fully considered for all Project alternatives / alternative methods, in the selection of the preferred alternative method. Note that consistent with the provincial requirements (i.e., Are they consistent with other relevant planning objectives, policies and decisions?) there has been an assumption with the identification and assessment of all alternatives, that regulatory requirements including those associated with water quality and quantity, would need to be met. Water quality and quantity were fully considered through the assessment of indicators. They are not unique criteria or indicators, as they are intrinsically interconnected with many other criteria. The Effect on Fish and Aquatic Habitat, and Effect on Wetlands criteria (associated with the Natural and Biological Performance objective), have the following indicators interconnected with water quality and quantity (Section 5.2.1.1 of the draft EIS/EA): – Attainment or maintenance of surface water quality guidelines for the protection of aquatic life, or where pre-Project water quality does not meet Provincial Water Quality Objectives for protection of aquatic life (PWQO), not further degraded	This FMG response to the MECP comment is sufficient. It still seems inconsistent that such an important consideration is not considered explicitly.	Acknowledged.	-	-	EIS Section 4.1.2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				– Maintenance or provision of fish habitat – Maintenance of water flows or conditions suitable for fish passage – Maintenance of groundwater flows, levels or quality – Maintenance of wetland connectivity It is also considered under the Effects to the Human Environment Performance objective (Effect on Local Residents and Recreational Users, and Public Health and Safety Criteria; Section 5.2.1.2): – Non-interference with water well supply systems – Non-interference with surface water drinking supply – Maintenance or attainment of the quality of drinking water supply systems. – The Amenability to Reclamation Performance objective, also has a water quality / quantity-related criteria of Effect on Environmental Health and Sustainability with indicators of: – Attainment or maintenance of water quality guidelines for the protection of aquatic life, or where pre-Project water quality does not meet the PWQO, not further degraded – Restoration of passive drainage systems. It should be noted that Table 5.7 and 5.8 of the draft EIS/EA are summary tables that identify only the differentiators between the assessed alternatives according to the performance objectives. The detailed					

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				evaluation tables are included in Appendix T-1. The draft Mine Waste Management Alternatives Assessment report completed in accordance with the federal requirements (Metal and Diamond Mining Effluent Regulations) as required by Environment and Climate Change Canada (Appendix E of the draft EIS/EA), also fully considered impacts to water quality (and quantity). Water quality and water flows are considered either directly or indirectly, under several accounts, and multiple sub-accounts: – Flexibility for Water Treatment and Recycle – Loss of Fish Habitat (waterbodies; ha) – Loss of Fish Habitat (watercourses; m) – Loss of Wetlands (ha) – Volume of Reclaim Water – Complexity of Seepage Management – Water Treatment Requirements – Seepage Collection Infrastructure Costs – Post-Closure Water Treatment Costs – Loss of Indigenous Fishing Areas (ha).					

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MECP-GW-003	EIS 5.11.2 (Alternative 2)	The statement in this section that the North CDF will be lined across its base is not consistent with other documents, such as the Groundwater Modelling Report. Lining is important to minimize the volume of seepage that will discharge to the lake through the groundwater. The proposed CDF location is very close to Springpole and Birch Lakes, as a result there is minimal space for natural attenuation processes to take place in the subsurface and for seepage collection. To allow for a fulsome review of potential water quality and quantity impacts, commitments regarding CDF lining must be clearly stated.	The company needs to confirm that the CDF will be lined. If modelling scenarios (e.g. in the Groundwater Modelling Report) are presented where a liner is not included in the interests of conservatism, that assumption must be clearly stated.	As described in the Groundwater Modelling Report (Appendix L-2 of the draft EIS/EA), a conservative approach to modelling was purposefully utilized in the draft EIS/EA, pending the completion of additional field investigation and progression of the engineering design of the co-disposal facility (CDF). For that reason, a liner was not included in the north cell of the CDF (Section 2.1 of Appendix L-2). Controlling seepage is an important environmental management aspect that is continuing to be fully considered in the design of the CDF. Design of the CDF is being optimized based on comments received from technical reviewers on the draft EIS/EA, as well as additional engineering, and field investigations. The CDF description will be revised as needed in the final EIS/EA to reflect the progression of the Project design since the draft EIS/EA was prepared. The optimized strategy includes the production of a thickened non-acid generated tailings, instead of the previously considered filtered tailings. The thickened tailings provide a more robust operation for co-mingling, reduced energy consumption and reduced air emissions. Further, additional geotechnical investigation has also confirmed that the natural foundations	FMG has provided an adequate response to the MECP comment.	Acknowledged.	-		Section 5.10.3 and Appendix L-2, Section 6

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				conditions for the CDF are equal to or better than previously assumed conditions. This is largely due to the low hydraulic conductivity of the andesite bedrock which provides highly favourable foundations to limit seepage emanating from the CDF without a liner under the south cell. The perimeter dams will be designed during detailed engineering with embankment liners and where required with engineering controls (such as bedrock grouting, seepage interception wells, etc.). There are no changes anticipated to seepage water quality as a result of the CDF optimization. In addition to the favourable foundation conditions, seepage mitigation will include perimeter seepage capture and management in the contact water collection system. The final EIS/EA (and any future environmental approval applications) will be clear with respect to a commitment to lining of the CDF and/or and equivalency with respect to base permeability. Where the groundwater model or any models simulate different potential site conditions such as for an assessment of alternatives, we will also clearly differentiate the proposed design from scenarios which have been modelled for illustrative or comparative purposes, including sensitivity variants.					

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-GW-004	EIS 5.3.2	The placement of NAG filtered tailings within the North CDF is described as isolating PAG mine rock from atmospheric oxygen. Whether or not oxygen interacts with PAG mine rock will strongly influence the quality of water within the North CDF and eventually the quality of impacted groundwater discharging to adjacent lakes.	It is understood that co-disposal of mine rock and tailings is not a widely applied method. As a result, further evidence of its predicted performance should be provided.	The primary advantage of a single co-disposal facility (CDF) as compared to the use of a separate mine rock stockpile and tailings management facility is a significant reduction in the Project footprint, and greenhouse gas emission reduction from reduced haulage of construction and mine waste materials. Importantly, the co-disposal method provides an effective method to minimize the potential for acid generation from potentially acid generating mine rock by infilling the void spaces, and covering the surface of the mine rock, with non-acid generating tailings. The tailings will serve to create a low permeability barrier around the mine rock to isolate it from atmospheric oxygen (Section 4.7.3 of the draft EIS/EA). This will help mitigate potential acid generation and metal leaching concerns. Project-specific conditions make co-disposal / co-managing of mine rock and tailings ideal where it may be an economically viable alternative (i.e., a technically viable location that is close to the mine), and provides sufficient environmental benefit to justify the additional cost as compared to single-purpose facilities. The design of the CDF also provides a robust storage facility for mine rock, as mine rock storage areas typically do not have perimeter embankments. A case study is available for the Greens Creek Mine in Kennecott, Alaska (Golder	FMG has provided an adequate response to this MECP comment. CDF design will remain an important consideration during the review of the final EIS/EA and during permitting.	Acknowledged.			Appendix E

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Associates 2012) which utilizes tailings co-managed with mine rock. The geochemical assessment found that: – Reduced oxidation of the mine rock by blending with tailings will extend the duration over which the rock is able to neutralize acidity (extended lag period) – Co-disposal of acid generating rock with tailings, significantly reduces metals leaching and the tailings are capable of neutralizing the acidity present. Design of the CDF is being optimized based on additional engineering, field investigations and comments received on the draft EIS/EA. The CDF description will be updated as needed to reflect the progression of the Project design since the draft EIS/EA was prepared. This includes additional information regarding the geochemistry benefits of co-managing tailings and mine rock. See also the response to Comments 37 and 38.					
MECP-GW-005	EIS 6.5.2.1	The disposal of demolition-related wastes in an on-site landfill will likely have a minor affect on local groundwater quality.	Groundwater impacts will very likely be minor because demolition waste is relatively inert; however, this section should be updated to reflect the likelihood of minor impacts to groundwater flow and quality.	As described in Section 4.18.3.7 of the draft EIS/EA, demolition-related wastes will be transferred off site for disposal at an approved facility, and therefore there will be no interaction with groundwater as noted in Section 6.5.2.1	FMG has provided an adequate response to this MECP comment.	Acknowledged.			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-GW-006	EIS 6.5.2.5	This section should include the assumptions made regarding the caps applied to the CDF in the closure phase of the model (given the number of abandoned mines in the province, the assumption that a low permeability cap will be constructed is not conservative). Appropriately capping mine waste is a very important control on water quality in the CDF, and that released to groundwater and receiving water bodies. Therefore, it is important that the assumptions made in the EIS are clearly described.	All assumptions made regarding capping of mine wastes must be clearly stated.	The Project is being designed to meet federal and provincial regulatory requirements, including filing of a Closure Plan and provision of financial assurance in advance of construction that fully addresses reclamation of the Project and where applicable, ongoing monitoring and maintenance of the site after operations cease (as required by the Mining Act). While there are abandoned mines across Ontario, they were not approved under the current regulatory regime and the Province's application of the Mining Act requirements. Section 4.18.3.2 of the draft EIS/EA includes a description of the measures to be implemented for the co-disposal facility (CDF) at closure. These include applying a thick layer of non-acid generating tailings on the north cell, regrading the surface to promote surface runoff, and revegetation. The water in the south cell will be pumped down, a low permeability cover will be placed on the surface, and it will be subsequently revegetated. Note that the preliminary design and construction of the CDF was determined in part through an assessment of alternative locations, methods and technologies to manage mine waste, as described in Sections 5.7 to 5.11 and Appendix E of the draft EIS/EA. The preferred approach to closure of the CDF was similarly	FMG has provided an adequate response to the MECP comment.	Acknowledged.			EIS Sections 5.19.3.2, 6.5.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				determined in part through an assessment of alternative closure approaches as described in Section 5.32 and Appendix T-1 (Tables T1-16 and T1-17) of the draft EIS/EA. Design of the CDF is being optimized based on additional engineering, field investigations and comments received on the draft EIS/EA. The CDF description will be updated as needed to reflect the progression of the Project design since the draft EIS/EA was prepared. This includes additional information regarding the geochemistry benefits of co-managing tailings and mine rock.						
MECP -GW-007	EIS 6.5.3	Bullet point 2: All of the water will not be collected as clearly described in the Groundwater Modelling Report. It is important to recognize that not all water will be captured and that some will migrate to adjacent receiving water bodies.	Update this point to state that some water will not be captured and will eventually discharge to adjacent receiving water bodies.	Sections 6.6 and 6.7 of the draft EIS/EA include an assessment of water quality in Birch Lake and the north basin of Springpole Lake. To provide a conservative approach to the assessment (only), it has been assumed that groundwater recharge originating from the co-disposal facility and stockpiles, would not be captured by the contact water collection system included in the proposed design. It is recognized that all regulatory requirements will need to be met. Ditching and seepage management is proposed as part of the integrated site management system. Contact water from the site is collected in ditches, sumps and constructed ponds and transferred into the integrated site water management system for	FMG has provided an adequate response to the MECP comment.	Acknowledged.			EIS Section 6.5.4.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				containment, treatment and discharge as needed (Section 4.10 of the draft EIS/EA). The mitigation measures will be revised to remove 'all' in the final EIS/EA.					
MECP-GW-008	EIS 6.5.3 Third Bullet Point Mine Site Water Quality Modelling 2.2.1 Paragraph 2	The fate of water captured by the trenches during closure is not described. During closure the water treatment plant will not be in operation so it is important to know where the water collected in the trenches, which originated in the CDF and will be impacted, will be discharged.	Describe the fate to water captured by the trenches during closure and any potential impacts on water quality.	In the response that follows, it has been assumed that the comment author is referring to runoff water collection ditches (note that there are no mining / exploration or other constructed trenches proposed for the Project). As described in Section 4.18.3.8 of the draft EIS/EA, the effluent treatment plant will continue to be used if needed during the initial decommissioning / closure phase, or will remain available for contingency use. Water management infrastructure will be decommissioned when no longer needed. This approach has not changed, and will be clarified in Section 6 as needed, in the final EIS/EA.	The initial MECP should have specified ditches, not trenches. FMG has provided an adequate response to the MECP comment.	Acknowledged.			EIS Sections 6.5.1.2, 6.5.4.
MECP-GW-009	EIS 6.5.4	Bullet point 2: Surface water quality will be affected because disposal facilities, especially at this scale, will always leak. It is important to recognize that surface water quality will be influenced by these facilities.	Update this point to state that water quality will be affected.	Section 6.5.4.2 of the draft EIS/EA assesses seepage from the co-disposal facility and ore stockpiles. The results are carried forward into the assessment of surface water quality in Birch Lake in Section 6.6, and for Springpole Lake, north basin in Section 6.7. With the implementation of proposed mitigation measures, including seepage capture with perimeter ditching around the co-disposal facility and the ore stockpiles, the residual effect for water quality of the Birch and Springpole Lake systems is an	This project plans to place 80 Mm^3 tailings as well as PAG waste rock in a facility whose embankments are within 150 metres of two lakes. In the opinion of the MECP reviewer it is not realistic to only conclude that this 'could potentially' effect surface water quality in the adjacent lakes.	As noted in Section 6.5.4.2, the potential effects on surface water features as a result of identified changes in groundwater flow regime and seepages, are further assessed in Sections 6.6 through 6.9.	-		EIS Sections 6.5.1.2, 6.5.4, 6.5.6, 6.9, Appendix V.

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				increase in concentrations above baseline conditions for some parameters in the project development areas, but no exceedances of applicable water quality guidelines. The residual effect is characterized as low magnitude, and with a low geographic extent that is constrained to the within the local study area. The residual effect is predicted to fully reversible for Birch Lake and partially reversible for north basin of Springpole Lake, however given the highly conservative nature of the predictive mass-balance model and the assumptions utilized until such time as additional design information is available, this residual effect is considered to have a low likelihood.					

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-GW-010	EIS 6.5.5	The duration of impacts to groundwater quality should be Level III because impacts will last for decades or more.	Update the specified level.	As noted in Section 6.5.4.2 of the draft EIS/EA, the design of the co-disposal facility in the final closure phase includes a low permeability cover placed on top of the south cell. The results of the hydrogeological model in Appendix L-2 indicate that concentrations of water quality parameters in seepage improve during closure, and no parameters are estimated to be both greater than baseline groundwater values and applicable water quality guidelines. As a result, the duration of residual effects to groundwater quality is considered to be Level II.	Liners and covers inevitably fail. Plans are not always implemented as originally proposed. In the opinion of the MECP reviewer the duration of impacts to groundwater quality will last for more than 20 years, which is Level III.	Design of the CDF is being optimized based on comments received from technical reviewers on the draft EIS/EA, as well as additional engineering, and field investigations. The CDF description will be revised as needed in the final EIS/EA to reflect the progression of the Project design since the draft EIS/EA was prepared. The optimized strategy is supported by the additional geotechnical investigation which confirmed that the natural foundations conditions for the CDF are equal to or better than previously assumed conditions. This is largely due to the low hydraulic conductivity of the andesite bedrock which provides highly favourable foundations to limit seepage emanating from the CDF without a liner under the south cell. The perimeter dams will be designed during detailed engineering with embankment liners and where required with engineering controls (such as bedrock grouting, seepage interception wells, etc.). There are no changes anticipated to seepage water quality as a result of the CDF optimization. In addition to the favourable foundation conditions, seepage mitigation will include perimeter seepage capture and management in the contact water collection system. As noted in the previous response, the duration of the residual effects to groundwater quality is considered to be Level II as the effects are predicted to	The MECP's preferred groundwater quality protection approach is to appropriately line the CDF to limit the seepage of leachate into groundwater and ultimately to the adjacent surface water bodies. The FMG proposed approach is not to line the CDF but rather rely on the natural physical properties of the bedrock. This represents a potential high risk of migration of tailings and waste rock leachate to the adjacent surface water receptors unless a detailed inspection of the bedrock surfaces for fractures and discontinuities, hydraulic conductivity testing, and grouting of fractured bedrock within the CDF boundary is undertaken. FMG must submit a detailed plan outlining their proposed plan to inspect and identify all bedrock fractures within the CDF boundary and details of proposed grouting program. The results of the hydraulic conductivity testing of the bedrock within the CDF should also be submitted. Seepage collection/capture systems are usually shallow, installed in overburden and may not be able to intercept groundwater flow and seepage within fracture bedrock. Since the seepage interception system is an essential component of the groundwater impact mitigation on the adjacent water bodies it is necessary that the operation of the seepage interception	The information gathered as part of site characterization and subsequently used in the groundwater model is based on recent and historic site investigation programs carried out in 2019, 2021 and 2022, utilizing a range of methods to assess the hydrogeological conditions across the site with a specific focus of assessing the effects/interactions of key site infrastructure on the local groundwater environment. This is sufficient to confidently draw conclusions for the purpose of the environmental assessment. As part of detailed engineering design of the CDF, a supplemental geotechnical investigative program will be developed for specific areas of the CDF to verify the assumptions used in the conceptual design. The specific engineering controls to manage seepage will be further developed for implementation during construction and may include such measures as bedrock grouting and seepage interception wells, where required, depending on site specific conditions. In addition, a groundwater monitoring program including overburden and bedrock monitoring wells will be developed to verify the groundwater flow and quality outside of the seepage interception ditches during all phases of the Project. This information will be provided as part of the provincial permitting process for the approval of the CDF design.	EIS Sections 6.5.1.2, 6.5.4, 6.5.6.2, 12, Appendix L-2 Sections 3.2, 6, Appendix L 1 Section 5, Appendix A.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
						occur throughout the operation phase and closure phases of the Project (<20 years). The design and construction of a cover for the CDF will be subject to permitting requirements and a monitoring program will be implemented to assess the effectiveness of the cover during the closure period, and validate the predicted effects.	ditches is incorporated into the groundwater flow model to assess their effectiveness in intercepting groundwater from the CDF. Details of the seepage interception system including its design and operation and model predictions, and their limitations should be discussed. Eventually, all engineered solutions must be monitored for their performance to protect the groundwater quality migrating out of the CDF to the surface water receptors. It is strongly recommended that groundwater monitoring program including overburden and bedrock monitoring wells is developed characterize the groundwater flow and quality outside of the seepage interception ditches.	Updated bedrock characterization conducted to support the environmental assessment is being provided in the updated baseline hydrogeology report for the final EIS/EA. A summary memo of the hydraulic conductivity for the CDF area is provided in Attachment MECP -10. The seepage interception ditches will be included and their implementation described in the hydrogeological model report for the final EIS/EA. This will also include discussion of their effectiveness in intercepting groundwater from the CDF.	
MECP -GW-011	EIS 6.5.5	The likelihood of groundwater quality impact is certain (Level III).	Update the specified level.	As noted in Section 6.5.5 of the draft EIS/EA, the likelihood of effects to groundwater quality is considered to be moderate with the implementation of mitigation measures such as a low permeability cover placed on top of the south cell at closure.	Liners and covers inevitably fail. Plans are not always implemented as originally proposed. In the opinion of the MECP reviewer the likelihood of groundwater quality impact is certain (Level III).	As noted in the response to Comment #10, the design and construction of a low permeable cover for the CDF will be subject to permitting requirements and a monitoring program. As a result, a conservative assessment of the likelihood of groundwater quality impact is considered to be likely or reasonably expected to occur, which is Level II per the definition is Section 6.5.5 of the draft EIS/EA.	The likelihood of groundwater quality impacts from the CDF remains high due to the fact that all engineering solutions do fail at some point. Indeed there are ample evidence of tailings facilities and waste rock storage areas impacting downgradient groundwater quality after several decades. As noted in the response to FMG Response 2 (July 2023) #10, FMG must submit a	See the response to #10.	EIS Sections 6.5.1.2, 6.5.4, 6.5.6.2, 12, Appendix L-2 Sections 3.2, 6, Appendix L 1 Section 5, Appendix A.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
							detailed plan outlining their proposed plan to inspect and identify all bedrock fractures within the CDF boundary and details of proposed grouting program. Details of the seepage interception system including its design and operation and model predictions, and their limitations should be discussed. It is strongly recommended that groundwater monitoring program including overburden and bedrock monitoring wells is developed characterize the groundwater flow and quality outside of the seepage interception ditches.		
MECP-GW-012	EIS Tables 6.5-5 and 6.5-6	Since the North Basin of Springpole Lake is a 'headwater bay' and not downstream of the lake's primary inflow, it is misleading to compare groundwater discharge to the North Basin to the flow through the Southern Basin which receives the flow from Birch Lake. The current value greatly overestimates the flow of water in the relevant portion of Springpole Lake.	Provide a more appropriate value, such as the flow out of the North Basin.	Table 6.5-5 and Table 6.5-6 of the draft EIS/EA support the effects assessment for groundwater and summarize predicted changes to local groundwater catchment area and flow regime as a result of the Project. Predicted (reductions) to groundwater inflows to Springpole Lake are presented relative to the overall water balance as a means to, conceptually, benchmark estimated changes in groundwater-surface water interactions relative to the overall lake system. Effects to Springpole Lake, including these predicted changes to groundwater flows, are separately assessed in Section 6.7 of the draft EIS/EA. As discussed in Section 6.7, the results of baseline hydrology studies indicate that Springpole Lake functions as one continuous body of water, and the north basin is not isolated. As a result, the estimated	Given the hydrology results cited in the FMG response (the North Basin is not isolated) using the outflow of the North Basin may not be appropriate. However, given the configuration of the lake it does not seem reasonable that the entire flow entering Springpole Lake would circulate through the North Basin. The MECP comment that a more appropriate value should be used remains.	The water levels in Springpole Lake are outlet controlled. As such, the water levels in the North Basin are equal to those observed throughout the rest of Springpole Lake. Therefore, any change to groundwater flows in the North Basin would be distributed through the entire Springpole Lake. Comparing groundwater changes in the North Basin to only runoff generated by the North Basin would not be appropriate, as the water levels within Springpole Lake and its North Basin are sustained by the much larger drainage area entering from Cromarty Lake. A dynamic routing model has been prepared that simulates this and is attached (Memo – Springpole Lake Hydrologic Routing Assessment, dated June 23, 2023). Groundwater flows are only presented relative to the overall water balance as a means to, conceptually, benchmark the	Response acknowledged. FMG has submitted additional hydrology routing modelling report. A review by the Ministry Hydrologist is recommended. There may be other requirements for monitoring of Springpole Lake flows and water levels as condition of mine dewatering PTTW.	Acknowledged.	Appendix M-3, Attachment A

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				changes in outflow of the north basin alone do not represent an appropriate indicator of effects from groundwater drawdown. Accordingly, the predicted changes to the groundwater regime do not result in significant effects to Springpole Lake. Water level monitoring of Springpole Lake will occur throughout the Project to ensure lake levels are maintained within natural variation such that Springpole Lake is protected.		change in groundwater flows. Regardless of the surface water flows provided as a comparison, the conclusions of the effects assessment would remain the same.			
MECP -GW-013	Baseline Report - general	MECP hydrogeologists have repeatedly stated that sufficient baseline data has not been collected and no new data has been presented in this report (although some new data appears to have been incorporated into the EIS report and the Groundwater Modelling Report). Two overburden types have had hydraulic conductivity values across the site assigned to them based on a single in-situ test each. Lake bed sediment hydraulic conductivity has been assigned based on two laboratory tests (Table 5-1). In section 7.0, paragraph six references groundwater flow and the spring freshet yet groundwater levels have not been measured earlier in the year than July. MECP must be confident that the pre-development state of the environment is understood as a pre-condition of assessing the magnitude and extent of future impacts.	More data must be collected, and any data collected since the publication of the Baseline Report must be shared. Section 8.0 – References in the Hydrogeology Modelling Report includes Wood Environment & Infrastructure Americas (Wood). 2022a. 2021 Hydrogeological Field Investigation, Springpole Gold Project, Red Lake District, Northwestern Ontario. Project# ONS2014. January 2022. DRAFT. Based on the date on the Hydrogeology Baseline Report (May 2021) it seems likely that this report contains additional information.	Field studies have been ongoing since the issuance of the hydrogeology baseline and modelling reports in Appendix L of the draft EIS/EA. Information gathered as part of these studies generally include additional monitoring well installations, investigative boreholes and test pits, hydraulic testing and water levels monitoring. This information will be utilized to update the hydrogeology baseline and modelling information in the final EIS/EA, and will be provided in updated reports appended to the final EIS/EA. dDspite these advancements in the characterization of site hydrogeological conditions, no fundamental departures from the site conceptual hydrogeological model presented in the draft EIS/EA have arisen. Further information on this is provided in the following responses. Overburden hydraulic testing is less extensive compared to that of the bedrock system. This is	FMG has provided an adequate response to the MECP comment. Groundwater data collection and analysis will continue to evolve with the progress of the project.	Acknowledged.			Appendix L-1, Section 5

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		If pre-development and predicted impacts are not well understood at this stage, the MECP cannot complete a fulsome review of potential impacts and necessary mitigation during the EA stage and might be unable to assess the potential for future issuance of its approval instruments.		because characterization efforts have focused on the bedrock flow system, which is the primary hydrostratigraphic unit of interest, since: overburden depths are generally quite thin (typical values less than 5 m on land); no major overburden aquifers (e.g., large eskers) are present; and for key facilities, such the CDF embankments, ditches and the open pit, the overburden will be removed. This approach is supported by sensitivity analysis conducted as part of hydrogeological modelling provided in the hydrogeological modelling report appended to the draft EIS/EA (Appendix L-2), which shows that the primary sensitivity of the groundwater flow system is to the hydraulic conductivity of bedrock.					
MECP-GW-014	Baseline 3.1	The observation that "overburden is frequently absent along the shoreline of Springpole Lake and Birch Lake…" is not consistent with the total overburden thickness contours on Figure 3.2 where the overburden is often thickest at the shoreline. Overburden thickness, especially near the shoreline, may influence the flux of groundwater (and mine related contaminants) into Springpole Lake and Birch Lake.	Update the figure to be consistent with the text.	The figure will be revised in the final EIS/EA. The updated analysis and hydrogeological modelling for the final EIS/EA will consider observations of bedrock outcropping along the shorelines in overburden thickness mapping.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Figure 5-3
MECP-GW-015	Baseline 4.4	The recharge estimates provided in this section are very approximate because many variables necessary to utilize the water balance method applied here are not known. The creek that gauging station F4 is on, flows atop fault SW2	The limitations of these recharge estimates should be discussed in the report.	Recharge estimates in Section 4.4 of the baseline hydrogeology report in Appendix L-1 of the draft EIS/EA, are based on estimated baseflows / low flows in streams, rather than a soil-water balance calculation (i.e., a backwards calculation of	The MECP comment called the applied method a 'water balance method' because it assumes that the baseflow is balanced by recharge. Specific reasons why this may not be the case were then provided: The creek that gauging station	Acknowledged.			Appendix L-2, Section 5.4

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		so water may be preferentially flowing through the shallow bedrock to the lake at times when the creek is dry. Gauging station F3-HS4 is immediately down stream of lake L-2 and it is not apparent that evaporation from this lake has been accounted for in the calculation is this section. Given the large amount of uncertainty around the calculations provided in this section, it does not appear appropriate to attempt to quantify groundwater recharge in this manner. Groundwater recharge values are very important inputs into the groundwater flow model because recharge (essentially the portion of precipitation that does not evaporate or get taken up by plants) is the primary input of water into the model. Limiting recharge in the model could artificially limit the volume of groundwater discharging to receiving water bodies.		recharge rather than a forward calculation). This will be clarified in the final EIS/EA. This method simply equates the catchment-normalized baseflow to recharge. As such, quantification of detailed soil-water balance terms is not necessary. This methodology is most appropriate for streams with consistent flows, which is the case for station F5-HS5. It is agreed that groundwater recharge is generally an important input to groundwater models. In the case that recharge / groundwater discharge to receivers is underestimated, simulated impacts could be considered as conservative since the simulated seepage originating from the CDF or flow reduction induced by pit dewatering would represent a higher proportion compared to the case with higher baseflow / recharge. It should also be noted that groundwater model sensitivity analysis indicates that groundwater recharge is a relatively minor factor compared to the hydraulic conductivity of bedrock in this Project location. This is because the site features of interest are close to large waterbodies such as Birch Lake and Springpole Lake.	F4 is on, flows atop fault SW2 so water may be preferentially flowing through the shallow bedrock to the lake at times when the creek is dry. Gauging station F3-HS4 is immediately down stream of lake L-2 and it is not apparent that evaporation from this lake has been accounted for in the calculation is this section. It is not necessarily the case that if recharge is underestimated, the simulated impacts would be considered conservative because if recharge is higher then the model would likely need to be recalibrated, which may result in higher modelled bedrock hydraulic conductivity which could then lead to higher contaminant fluxes into the lakes. The FMG response to the MECP comment is considered adequate for this stage in the process; however, it is likely that consideration of groundwater recharge will remain important during the review of the final EIS/EA and during permitting.				
MECP-GW-016	Baseline 5.1.2	Groundwater levels naturally fluctuate between different seasons and years. An effective groundwater level measurement event must therefore measure all groundwater monitoring locations over the shortest	Groundwater elevations need to be measured more consistently at the site and that data provided in support of the EA and future permitting processes.	Supplemental monitoring well installations and water level monitoring were conducted subsequent to preparation of the groundwater reports supporting the draft EIS/EA. These more recent site investigations, include both	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1, Section 5.3

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		possible time interval to yield meaningful results. In contrast to this, the provided groundwater levels were measured at different times at different locations over several months during two different years. This impedes the interpretation of true groundwater levels across the project area and confounds independent third-party verification of groundwater flow patterns in three dimensions. The reliable delineation of groundwater flow patterns underpins MECP's informed judgement of environmental risk.		spot measurements and transient data collected with dataloggers. Substantial changes in the previously measured flow pathways (i.e., typical flow from inland topographic highs towards lows/surface water) are not expected with the new data, although it is agreed that incorporation of the new data/information will provide further refinement in the assessment. This information will be described in the final EIS/EA and associated technical support documents, and fully considered in the effects assessment.					
MECP -GW-017	Baseline 5.2.2 (also 5.2.4)	In the third paragraph, it is stated that hydraulic conductivity results from long intervals 'can be misleading' and that they should not be 'used to draw inferences about the bulk hydraulic conductivity of the bedrock'. However, the bulk hydraulic conductivity of the bedrock over the target interval is precisely what has been measured. The fact that the measured hydraulic conductivity is dominated by a few fractures is just the nature of the medium and the measurement. These values represent hydraulic conductivity over more than one model layer so this discussion does not influence model results. However, for clarity this section should be clarified.	This section should be clarified.	Packer testing constant discharge test analysis by the standard Thiem equation (or rising / falling head test analysis) effectively assumes a single flow zone (i.e., one material type and one static water level). It is agreed, particularly for short interval tests, that the computed hydraulic conductivity is reflective of the arithmetic average of hydraulic conductivity for that interval. Note, however, that long open intervals may have large vertical hydraulic gradients across them (i.e., aquifer heads at the depth of the bottom of the hole may be quite different than those near the top). In this case, test results tend to bias towards the highest zone of flow (i.e., the product of hydraulic conductivity and drawdown / draw-up). This effect would be quite minor in cases where the	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1, Section 5.2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				total test head perturbation is large compared to the overall vertical head gradient but may conversely be quite significant. This will be clarified in the final EIS/EA.					
MECP-GW-018	Baseline 5.3 & Appendix A	It is difficult to scale up the results of the pumping test to the influence of the open pit on surrounding groundwater and surface water due to the difference in drawdown (20 metres vs. 300+ metres) and duration (one month vs many years). It is unsurprising that lake water was not detected in the pumping well because even at the full drawdown, groundwater velocity from the lake to the pumping well would only have been on the order of one or two metres per year based on the data provided.	Additional context around this pumping test is necessary so that inappropriate conclusions are not drawn from the fact that lake water did not migrate to the pumping well over the duration of the test.	The pumping well for the test is completed in fracture rock; therefore, groundwater velocities are potentially quite high, depending on the number of water producing fractures and their average aperture. A more detailed discussion of the pumping test data and its implications will be provided in the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1, Section 5.3.1
MECP-GW-019	Baseline Table 5-1	Hydraulic conductivity values for the bedrock below 50 metres are not provided. Full documentation of results is necessary for a meaningful review.	Provide values, including rationale.	The intent of this table is to summarize information relating to the shallow subsurface flow system. Results from packer tests conducted in deeper boreholes / intervals are shown in Figures 5.6 and 5.7 of the baseline hydrogeology report (Appendix L-1 of the draft EIS/EA). These figures will be updated with the most recent results as needed in the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1, Figure 5-7
MECP-GW-020	Modelling Report Section 2.2	The highest reported hydraulic conductivity value for the upper bedrock is reported as 2.3 x 10-5 m/s while in Table 5-1 of the Baseline Report it is 2.6 x 10-5 m/s. Inconsistent reporting of results decreases confidence in	Update as necessary.	This is acknowledged. The updated hydraulic conductivity database will be used to verify consistency of reporting between the hydrogeology baseline and modelling reports in the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1, Attachment B

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		the product and raises questions about missing data.							
MECP-GW-021	Modelling Report Figures 2-7 & 4-5	More data points are plotted within the upper 50 metres on these figures than are included in Table 5-1 of the Baseline Report. Inconsistent reporting of results decreases confidence in the product and raises questions about missing data.	Update as necessary for consistency.	The updated baseline report and hydrogeology modelling report will be cross checked for the final EIS/EA to ensure consistency of reporting.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1 and L-2
MECP-GW-022	Modelling Report 4.1.2	It is unclear how the overburden thickness was determined along the shore of Birch Lake because there are no boreholes, monitoring wells or test pits in that area. It is unknown whether the observation of little to no overburden at the shore was taken into account. Overburden thickness, especially near the shoreline, may influence the flux of groundwater (and mine related contaminants) into Birch Lake.	Update this section to describe the methodology applied and ensure that all relevant data has been taken into account, including visual observations.	This is acknowledged. Available information on shoreline stratigraphy (mostly visual observations of bedrock outcrops) will be incorporated into the analysis and described accordingly in the updated hydrogeology modelling report with the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1, Section 5.1
MECP-GW-023	Modelling Report 4.1.2	The Figure 3.5 in the Baseline Report shows several structural features (W1, W2, SW1 and SW2) extending from beneath the CDF into the open pit. Structural features, such as faults and fractures, can act as preferential flow pathways for groundwater. As a result, they may have significant influence on the flux of groundwater into the open pit and receiving water bodies.	Explain how these structural features are accounted for in the groundwater flow model.	Since release of the draft EIS/EA, additional information has continued to be collected and the bedrock hydrostratigraphy model for the site will be updated for the final EIS/EA. The current data indicates that, a 'sand zone' (i.e., a zone of highly altered / disintegrated rock) associated with the ore zone is surrounded by / adjacent to a zone of low RQD. These zones are surrounded by a more competent host rock. The sand zone and low RQD zone likely have a more significant effect on groundwater flows around the pit, although it is agreed that the E-W trending structures may have some influence on interaction of the CDF with the open pit. Sensitivity analysis will	FMG has provided an adequate response to the MECP comment.	Acknowledged.			EIS Section 6.5.1.2, Appendix L-1 Section 5.1.1, Appendix L-2 Section 7.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				be conducted to assess the potential effect of these faults and included in the updated hydrogeological modelling report appended to the final EIS/EA. These structures are planned to be tested in future programs as part of pit slope stability assessments. Also, as overburden is removed from the pit slopes, along ditches around the CDF, and for the CDF dam foundations during pit development and these structures are potentially exposed, a grouting program may be employed to seal these surficial expressions.						
MECP-GW-024	Modelling Report 4.1.3	The final recharge vales applied in the model are not documented. Full documentation of final inputs, especially a vital value such as recharge, is necessary for a meaningful review.	Provide the final recharge values in the report.	The simulated recharge values are provided in Figure 4-2 of the hydrogeology modelling report (colour scale) found in Appendix L-2. The report text will be revised to also include these in table format in the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 5
MECP-GW-025	Modelling Report 4.2	Groundwater elevations from the winter of 2021 are not documented in the Baseline Report. Inconsistent reporting of results decreases confidence in the product and raises questions about missing data.	Update the report as necessary to accurately describe the work completed.	The updated baseline report and hydrogeology modelling report will be cross checked for the final EIS/EA to ensure consistency of reporting. Both reports will be revised for the final EIS/EA to include the most recent data / information.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-1 and L-2
MECP-GW-026	Modelling Report 4.2	The spatial distribution of residuals is not provided. Knowing if the calibrated model is consistently accurate over the model domain is a key component of model review. It is important to know if there are areas of the model where it is less accurate. There may be instances where it would be preferable to decrease the overall accuracy of the	Provide a figure showing the spatial distribution of residuals.	A map showing calibration residuals spatially will be included in the updated hydrogeological modelling report appended to the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Figure 5-9

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		calibration if the calibration at key locations were improved.							
MECP-GW-027	Modelling Report 4.2	Exploration boreholes are much longer than monitoring wells and can be open across multiple model layers. When water levels in exploration boreholes are used in model calibration, it is not clear at which point along the borehole is the water level considered to be representative of. Full documentation is necessary for a meaningful review.	Provide a description of how the exploration boreholes are represented in the model.	The reference point for plotting purposes was taken as the mid-point of the open interval for each of these holes. Note, however, that the resource exploration holes were not included for calibration statistical analysis. This will be clarified in the hydrogeological modelling report text with the final EIS/EA. Additional information is provided below in the response to Comment #34.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 5.2
MECP-GW-028	Modelling Report Table 4.2	The hydraulic conductivity of the glaciolacustrine clay/silt is two orders of magnitude lower in the model than reported in the Baseline Report and the shallow bedrock is an order of magnitude lower. The shallow bedrock value is of particular concern given its importance to groundwater flow and the number of hydraulic conductivity tests performed on it. Significant deviations in values used in the model from those measured in the field raise questions about the validity of the model. This is a key concern given that the model is the basis for assessing groundwater impacts and a component of site water balances as well as water quality impact predictions.	Provide a rationale for these significant deviations from the measured values.	The glaciolacustrine at site is generally thin, consisting primarily of clay and silt sized particles, and to be occasional varved. Only one hydraulic test was available at the time of baseline report preparation, which is markedly lower than would be expected for clay/silt. Due to the horizontally layered nature of the varves, the silt provides horizontal permeability while the clay particles inhibit vertical flow / permeability. As such, while the vertical hydraulic conductivity value used for modelling is likely representative, the horizontal may be markedly higher (i.e., a significant anisotropy ratio may exist). This will be considered / implemented in the hydrogeological modelling report with the final EIS/EA. It should be noted, however, that this is unlikely to produce substantial departures in the model results as the glaciolacustrine is relatively thin at site. Satisfying the measured shallow	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 5.2

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				bedrock hydraulic conductivity values during model calibration is balanced with the measured water levels and applied recharge. In this case, shallow bedrock hydraulic conductivity was generally lowered during calibration in effort to retain water levels at the topographic highs, whilst also maintain recharge rates within a realistic range. Further to this, shallow bedrock hydraulic conductivity values are based on single hole test (i.e., packer tests and rising / falling head tests). While these tests are valuable for inferring localized conditions, the zone of influence for these types of tests is small compared to, for example, a pumping test. The likelihood that the permeable fractures intersecting the test wells are persistent over large scales (as represented in the model), is questionable. This is evidenced by the occurrence of shallow water levels observed in topographic highs which have thin to no overburden. If shallow bedrock contained persistent fracture networks, it would tend to drain rather than retain water. Nonetheless, further consideration for the updated dataset of bedrock hydraulic conductivity will be considered / implemented in updated hydrogeological modelling report with the final EIS/EA and described accordingly.					

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

<table>
<tr><th>ID</th><th>Reference</th><th>Initial Comments & Rationale</th><th>Proposed Action / Solution</th><th>FMG Response</th><th>Commenter Response</th><th>FMG Response 2</th><th>Commenter Response 2</th><th>FMG Response 3</th><th>Where Addressed</th></tr>
<tr><td>MECP-GW-029</td><td>Modelling Report Figure 4.3</td><td>The hydraulic conductivity values of the transition zones (especially the green zone adjacent to the Portage Zone) are not provided. Full documentation is necessary for a meaningful review.</td><td>Provide hydraulic conductivity values for the transition zones.</td><td>Transition zones hydraulic conductivities were computed as weighted averages between layers (provided in the table below). The details of this calculation and the resulting values will be provided in the updated hydrogeological modelling report appended to the final EIS/EA.

<table><tr><th>Layer</th><th>K_H</th><th>K_V</th></tr><tr><td>Shallow Host Rock</td><td>3.0E-07</td><td>8.0E-08</td></tr><tr><td>Shallow Transition 1</td><td>1.1E-06</td><td>2.3E-07</td></tr><tr><td>Shallow Transition 2</td><td>5.6E-07</td><td>1.4E-07</td></tr><tr><td>Intermediate Host Rock</td><td>2.3E-07</td><td>5.0E-08</td></tr><tr><td>Intermediate Transition 1</td><td>9.7E-07</td><td>2.0E-07</td></tr><tr><td>Intermediate Transition 2</td><td>4.7E-07</td><td>1.0E-07</td></tr><tr><td>Deep Host Rock</td><td>6.0E-08</td><td>3.0E-08</td></tr><tr><td>Deep Transition 1</td><td>6.2E-07</td><td>1.7E-07</td></tr><tr><td>Deep Transition 2</td><td>1.9E-07</td><td>7.1E-08</td></tr><tr><td>Basement Host Rock</td><td>1.0E-08</td><td>1.0E-08</td></tr><tr><td>Basement Transition 1</td><td>3.4E-07</td><td>1.2E-07</td></tr><tr><td>Basement Transition 2</td><td>5.8E-08</td><td>3.4E-08</td></tr><tr><td>Portage Zone</td><td>2.0E-06</td><td>4.0E-07</td></tr></table></td><td>FMG has provided an adequate response to the MECP comment.</td><td>Acknowledged.</td><td></td><td></td><td>Appendix L-2, Section 6.1</td></tr>
<tr><td>MECP-GW-030</td><td>Modelling Report 5.0</td><td>Given that the values for tailings hydraulic conductivity and recharge over the area formerly beneath Springpole Lake and proposed to be between the coffer dams and the open pit are estimates, sensitivity analyses should be performed on them.</td><td>Provide these sensitivity analyses.</td><td>Sensitivity analysis will be conducted on the hydraulic conductivity and recharge values for the co-disposal facility and described in the updated hydrogeological modelling report appended to the final EIS/EA.</td><td>FMG has provided an adequate response to the MECP comment.</td><td>Acknowledged.</td><td></td><td></td><td>Appendix L-2, Section 7</td></tr>
</table>

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		When values used in the model are not based on measurements, it is important to assess how sensitive the model is to those values. Tailings hydraulic conductivity could have a significant influence on the flux of impacted water out of the CDF so it is vital that it be determined how sensitive the model is to the value assigned.							
MECP-GW-031	Modelling Report 5.1.1	Given the model sensitivity to Variant 1, further exploration of the impacts of increasing the hydraulic conductivity of the country rock within the model are necessary (e.g., where is the increased volume of water coming from?). Given the large increase in the volume of water predicted to enter the open pit in this variant, it is important to understand the origin of the water to consider potential mitigation plans.	The source of the additional modelled water inflow to the pit should be investigated, perhaps through reverse particle tracking, and provided.	Given the proximity of the open pit to Springpole and Birch Lakes, these represent the most likely sources of the additional flows in this sensitivity variant. However, a breakdown of the water budgets will be conducted and described in the updated hydrogeological modelling report appended to the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 6.1
MECP-GW-032	Modelling Report 5.1.1	The hydraulic conductivity value in Variant 1 is lower than the shallow bedrock value reported in Table 5-1 of the Baseline Report. For variants to be meaningful, they need to capture a fairly wide range of possible values.	Provide a sensitivity analysis for increasing the hydraulic conductivity of the shallow bedrock to a value greater than 8 x 10-6 m/s (half an order of magnitude greater than the value from the baseline report).	Please refer to the response for Comment #28 for discussion on shallow bedrock hydraulic conductivity. It is agreed that a larger hydraulic conductivity may be employed for the shallow country bedrock as part of sensitivity analysis. However, a value of 8×10-6 m/s would exceed approximately 90% of values for this interval, and would not be physically realistic over the modelled spatial scale given the likely occurrence of dead-end fractures.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 7

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MECP-GW-033	Modelling Report 5.1.1	Sensitivity analyses should include other factors than pit filling rate and many significant variables were not considered. Sensitivity analyses need to include a wider array of potentially important variables that could influence groundwater flow prediction and the water quality predictions that follow. From an environmental impact perspective, groundwater discharge to receiving water bodies is a more important result than flow to the open pit. Therefore, sensitivity analyses should also be conducted on groundwater discharge to receiving water bodies.	Sensitivity analyses of the influence of factors such as recharge, liner effectiveness, cap effectiveness, overburden hydraulic conductivities, shallow bedrock hydraulic conductivity and overburden thickness/presence on groundwater discharge rates to receiving water bodies should be conducted and provided.	Inclusion of additional sensitivity variants will be fully considered in the updating of the hydrogeological model for the final EIS/EA. Seepage rates to surface water receivers will be assessed as part of this. Outputs of the sensitivity analysis will be meaningfully selected, based on the anticipated effect.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 7
MECP-GW-034	Model Report Figure 4.4	Simulated water levels in exploration boreholes are clustered around 395 masl while there is a much wider variation in measured water levels. This result is anomalous and requires further discussion as the use of these boreholes may influence the validity of the model.	Provide an explanation of the use of exploration boreholes in the model, including why there is such a lack of variation in modelled water levels and what value their inclusion adds to the model.	Similar to the response to Comment #27, the reference point used from these long intervals holes for plotting was taken as the mid-point of the open interval. The observed blended-heads in the open holes, however, tend to be dominated by the primary flow zones (i.e., the blended head in an open hole is the effectively a weighted average of interval specific hydraulic heads against the corresponding interval hydraulic conductivities). As such, a disconnect exists between the modelled reference point and the representative reference point for these long-interval holes. Due to this, the resource exploration holes were not included in statistical analysis of the calibration. This data was included in the initial modelling report in the interest of	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 5.2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				transparency, though it is agreed that further explanation is needed if it is to be of benefit. This aspect will be further considered / elaborated in the updated hydrogeological modelling report with the final EIS/EA.					
MECP-GW-035	Model Report Figure 4.4	Based on a visual inspection of this figure, the model seems to underpredict groundwater levels. A key component of the evaluation of the model calibration (and therefore the model's validity) is determining if the model mostly overpredicts water levels, mostly underpredicts water levels or does both equally.	Provide quantitative data (e.g. mean error) and a discussion.	Agreed. The mean-error will be provided and additional discussion on the distribution of residuals will be provided in the updated hydrogeological modelling report with the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Section 5.2
MECP-GW-036	Mine Site Water Quality Modelling 2.1.1	Bullet Point 1 states that the North CDF is unlined, which seemingly contradicts the EIS. Seemingly inconsistent mine plans make evaluating impacts very difficult.	Clearly state whether or not modelling the North CDF was undertaken as being unlined to provide a conservative assumption.	The predictive models for mine site water quality and hydrogeology for the draft EIS/EA assumed that a liner will only be placed in the south cell of the co-disposal facility and the north cell will be unlined.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Not applicable
MECP-GW-037	Mine Site Water Quality Modelling 2.1.1	Bullet Point 1: The assumption that PAG mine rock will not contribute any load despite being exposed to infiltrating precipitation while buried in tailings is not conservative and may not be realistic. Water quality seeping out of the CDF is an important factor in modelling downgradient water quality, including in receiving water bodies, and must be estimated in a conservative manner.	Provide evidence of the effectiveness of this proposed method.	Co-disposal of mine rock and tailings is an effective method of managing mine wastes. During mine operations potentially acid generating (PAG) mine rock will be placed in the co-disposal facility (CDF) and subsequently covered and encapsulated within non-acid generating (NAG) tailings as described in (Section 4.7.3). Tailings will be placed prior to acidification of the PAG mine rock. Tailings deposition will occur for an additional two years after the last mine rock is placed in the CDF. This will be	FMG has provided an adequate response to this MECP comment. Mine waste management and CDF design will remain an important consideration during the review of the final EIS/EA and during permitting.	Acknowledged.			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				adequate to fully cover any PAG rock to minimize ongoing oxidation and prevent the onset of metal leach / acid rock drainage. The oxidation of fine-grained sulphidic materials such as tailings is primarily driven by the molecular diffusion of oxygen gas through the tailings surface. Oxygen gas that diffuses into the tailings is rapidly consumed by the oxidation of sulphides within the tailings. This process is also highly influenced by the saturation level of the tailings, which slows the rate of sulphide oxidation in the tailings and limits oxygen diffusion. For PAG materials to become net acid generating, both water and oxygen are required. While water may infiltrate through the CDF surface, the PAG rock within the CDF will be isolated from oxygen. As noted in the response to Comment 3, thickened NAG tailings will be saturated upon initial deposition which will limit oxygen diffusion into the tailings and underlying PAG rock. At closure the vegetated cover will shed a substantial proportion of the precipitation on the CDF, reduce the oxygen content of percolating water, and help to maintain the tailings pore space water content. As the remaining seepage water percolates downward through the tailings, sulphides within the NAG tailings will consume oxygen that diffuses through the					

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				vegetated cover into the tailings, keeping the underlying PAG rock isolated from atmospheric oxygen.					
MECP-GW-038	Mine Site Water Quality Modelling 2.1.1	Bullet Point 2: The assumption that PAG tailings will not release any load is not conservative and may not be realistic. Water quality seeping out of the CDF is an important factor in modelling downgradient water quality, including in receiving water bodies, and must be estimated in a conservative manner.	Provide evidence for the assertion that PAG tailings will not release any load.	The PAG tailings slurry in the south cell of the CDF will be stored beneath a water cover such that the tailings are isolated from atmospheric oxygen. The cell will be underlain by a low permeability liner to minimize seepage. Tailings will be managed during mine operations such that the water cover is maintained over the tailings, preventing ARD from developing. Subaqueous tailings disposal is an effective method for managing ARD onset in PAG tailings and has been used successfully for decades at mine sites. At closure, water overlying the tailings in the south cell will be drained, and a low permeability cover will immediately be placed prior to acidification of the tailings. In this configuration the PAG tailings will be isolated from water and oxygen within the lined and covered south cell. As part of the mine site water quality model, pore water from the PAG tailings, representing mill water, was assumed to be released into the seepage out of the CDF.	FMG has provided an adequate response to this MECP comment. Mine waste management and CDF design will remain an important consideration during the review of the final EIS/EA and during permitting.	Acknowledged.			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-GW-039	Mine Site Water Quality Modelling 2.1.1	Bullet Point 3: The groundwater flow model does not contain ditches. Seemingly inconsistent mine plans make evaluating impacts very difficult.	Provide a description of how seepage to ditches is quantified.	Seepage to ditches in the mine site water quality model was based on the site water balance (Appendix M-2 of the draft EIS/EA). It states: – As described in the Hydrogeological Modelling Memo (Wood 2022), a conservative set of assumptions surround the CDF were adopted to assess the worst case scenario for the purposes of the EIS/EA. These include the assumptions that a liner will only be applied beneath the smaller South Cell and that there are no seepage collection ditches surrounding the CDF. Note that ditches are proposed to be constructed. Without the presence of seepage collection ditches, the hydrogeological model finds that groundwater will daylight at the ground surface (near the CDF) as overland seepage (i.e., interflow). This mine site water balance model assumes that this overland seepage (interflow) is representative of what would collect in seepage collection ditches. Please refer to Section 4.10 of the draft EIS/EA for additional clarity on the proposed water management and treatment facilities, including ditching.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Not applicable
MECP-GW-040	Mine Site Water Quality Modelling 2.1.1	Bullet Point 4 states that seepage from the South CDF is through imperfections in the low permeability liner. The groundwater flow model report does not mention these imperfections. Seemingly inconsistent mine plans make evaluating impacts very difficult.	In the groundwater flow model, the liner is reported to be 1 metre thick and have a hydraulic conductivity of 10-8 m/s. Confirm whether or not this hydraulic conductivity value accounts for imperfections described in the Mine Site Water Quality Modelling report.	Design of the CDF is being optimized based on comments received from technical reviewers on the draft EIS/EA, as well as additional engineering, and field investigations. The CDF description will be updated as needed in the final EIS/EA to reflect the progression of the	FMG has provided an adequate response to the MECP comment. Mine waste management and CDF design will remain an important consideration during the review of the final EIS/EA and during permitting.	Acknowledged.			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Project design and additional field investigations since the draft EIS/EA was prepared. The optimized strategy includes the production of a thickened non-acid generated tailings, instead of the previously considered filtered tailings. The thickened tailings provide a more robust operation for co-mingling, reduced energy consumption and reduced air emissions. Further, additional geotechnical investigation has also confirmed that the natural foundations conditions for the CDF are equal to or better than previously assumed conditions. This is largely due to the low hydraulic conductivity of the andesite bedrock which provides highly favourable foundations to limit seepage emanating from the CDF without a liner under the south cell. The perimeter dams will be designed during detailed engineering with embankment liners and where required with engineering controls (such as bedrock grouting, seepage interception wells, etc.). There are no changes anticipated to seepage water quality as a result of the CDF optimization. In addition to the favourable foundation conditions, seepage mitigation will include perimeter seepage capture and management in the contact water collection system.					

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MECP -GW-041	Mine Site Water Balance 5.7	The second paragraph describes the CDF water balance as a 'worst case scenario'. Given the lack of data on shallow bedrock hydraulic conductivity and overburden thickness near the lake shore, the scenario described is not the worst case. While this does not affect the quantitative evaluations, it may give general readers an incorrect impression.	Update this description.	"Worst case scenario" in this statement (second paragraph of Section 5.7 of the Mine Site Water Balance in Appendix M-2 of the draft EIS/EA) refers to the assumptions related to the design / construction of the CDF and modelling of the CDF within the groundwater model. It does not refer to the parameterization of the groundwater model. This section of the text will be revised to provide further clarification in the final EIS/EA. Please note that additional information on shallow bedrock hydraulic conductivity and overburden mapping at site are to be provided as part of the final EIS/EA. Additionally, potential uncertainties associated with parameterization of the groundwater model will be analyzed / discussed in the revised hydrogeological model with the final EIS/EA.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix M-2, Section 5.8
MECP -GW-042	Mine Site Water Balance 5.7	The third paragraph states that during closure, water captured in trenches will be recirculated to the CDF or ore stockpile water management pond, depending on the location. Recirculating impacted water could affect source water quality by concentrating contaminants and therefore decreasing un-captured seepage quality which will eventually discharge to receiving water bodies.	Confirm and detail whether or not the impact of recirculating impacted water to the facilities has been assessed.	The text in Section 5.7 of this report will be revised in the final EIS/EA for additional clarity. Ongoing recirculation was not intended. It is acknowledged that ongoing recirculation actions can result in increasing degradation of water quality. The intent of this paragraph was to identify that interflow from the co-disposal facility and ore stockpiles would be captured with surface runoff by their respective ditching and collection systems, and managed with the rest of the site contact water within the water management system and effluent treatment plant.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix M-2, Section 3

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Additional information regarding the proposed integrated water management system is provided in Section 4.10 of the draft EIS/EA. This section will be updated in the final EIS/EA to reflect the optimization of the Project design based on additional engineering, field investigations and comments received on the draft EIS/EA.					
MECP -GW-043	Existing Conditions Report: Fish Community and Habitat: Section 3.1.3 & Figure 13	The nature of the lake-bed, especially near the shore where groundwater discharge would be expected to be concentrated, described in this report is not consistent with the application of a very low hydraulic conductivity layer in the groundwater model. The Existing Conditions Report describes bedrock outcrops on the lake-bed of Springpole Lake, which is consistent with observations in the Baseline Report of minimal overburden and outcropping bedrock along the shoreline. However, these observations are not consistent with the characterization of the lake-bed in the groundwater flow model where a uniform very low hydraulic conductivity layer is assumed. These differences could significantly influence the flux of groundwater into Springpole and Birch Lakes.	The manner in which the lake-bed sediments are modelled needs to be re-evaluated given their likely influence on groundwater discharge to nearby surface water receptors and the data presented in this report. Provide cross sections of the upper ~100 metres of the closure model, including NW-SE through the NW portion of the pit, NW-SE through the CDF and NE-SW through the CDF.	Additional information on shoreline stratigraphy will be incorporated into the updated groundwater model and described in the revised modelling report as part of the final EIS/EA. Additional stratigraphic cross-sections will also be provided as well.	FMG has provided an adequate response to the MECP comment.	Acknowledged.			Appendix L-2, Figure 4-1
MECP -GW-044	2022 Hydrogeologic al Work Plan	The 2022 Work Plan addresses some of the existing data gaps; however, the site will still have relatively few monitoring wells for a modern mine site. Hydrogeologic data is the basis of our understanding of	Additional monitoring wells are required: - Downgradient of the ponds planned to collect seepage and runoff from the ore stockpiles. - Between the CDF and	Supplemental monitoring well installations have been installed and tested at site as part of ongoing investigations and will be incorporated into the final EIS/EA. Additional monitoring well	FMG has provided an adequate response to the MECP comment. However additional monitoring wells and hydrogeologic characterization will likely be required as the project is refined and advanced.	Acknowledged.			EIS Section 6.5.1.2, Appendix L-1 Appendix A.

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		groundwater levels, flows and quality across the site and can vary significantly from place to place. It also forms the basis of the groundwater flow model which informs the site water balance as well as water quality predictions. An accurate hydrogeologic characterization is vital to understanding and predicting key environmental impacts.	open pit. - Between the CDF and L-16. The work plan is not clear on how many monitoring wells will be hydraulically tested; all wells should be tested.	installations are anticipated to be required and defined through the environmental approvals process.					
MECP-HYD-001	Section 6.7.4.1 Change to Surface Water Quantity Page 6-153 Appendix M-3 Tables 5-2 to 5-7 (Page 5-6 to 5-15)	The reduction in flows is modelled within Appendix M-3: Receiver Water Balance (modelling domain encompasses the regional hydrology study area; shown in Figure 3-2 of Appendix M-3). One of the greatest predicted impacts is at assessment node 5 in Springpole Lake (outlet of the north basin) which is identified as having a predicted >400% flow decrease during the pit filling phase (for all flow conditions; average year, 1 in 100 dry year and 1 in 100 wet year) relative to the average baseline flows. This also includes reversal of flow at this location of the lake. The proponent has not adequately identified how the predicted flow decreases will be mitigated. If the impacts cannot be adequately mitigated, the MECP has several concerns regarding the predicted impacts as they relate to provincial permits. Predicted flow decreases permitted under MECP permits to take water (PTTW) are based on the percentage of the low flows (which is defined as the	The impact to the surface water flows at the outlet of the north basin of Springpole Lake (as well as the remainder of Springpole Lake at each assessment node) should be adequately assessed and clearly described within the main document of the EA/EIS. Currently, the proponent has presented that they anticipate a low impact to the remainder of Springpole Lake during the pit filling phase, but based on the information included in the EA, they have greatly underestimated the potential impacts of the water taking associated with this project component. The proponent must discuss how the predicted impacts will be mitigated since the magnitude of the impacts is considered to be high.	A key aspect of the draft effects assessment in Section 6.7 of the draft EIS/EA is the prediction of surface water conditions during the filling of the open pit basin and subsequent re-connection to Springpole Lake. This is informed by the models in Appendices M-2, M-3, N-2 and N-3 of the draft EIS/EA. Water level monitoring of Springpole Lake will occur throughout the refilling process to ensure that lake levels are maintained within natural variation. The assessment will be clarified in the final EIS/EA, however the key points are provided below: – Hydrometric studies conducted over the 2021 and 2022 monitoring period suggest that the connection between the north basin of Springpole Lake and the remainder of Springpole Lake (node 5) behaves as a lake, not as a riverine lake outlet. Consistent directional flows through this section are not believed to be present, nor is there a difference in water level between the north basin and the remainder of Springpole	It is stated that water level monitoring will occur in Springpole Lake throughout the refilling process to ensure that lake levels are maintained within natural variability. However, supporting baseline data has not been submitted to the ministry to characterize the natural variability of Springpole Lake. It is unclear if the proponent has collected enough data to adequately define the long-term natural variability of Springpole Lake. Proceeding without adequate baseline data is at the proponent's own risk. The Ministry continues to recommend that a reference lake station be added to the monitoring program or be proposed based on surrounding WSC stations (with appropriate rationale). The proposed reference station should be included in the final EIS/EA. The following bullets are in response to the proponent's corresponding bullets: – It is noted that further baseline monitoring was completed in the 2021 and	The Hydrology Baseline Report will be updated for the final EIS/EA and will present over two years of monitoring data to support characterization of natural variability of Springpole Lake water levels in the North Basin, Southeast Arm, and at Springpole Lake's outflow. This is considered sufficient for the final EIS/EA. The WSC Sturgeon River station will be used as a reference station, as it has demonstrated a strong correlation to the several years of site data and is outside of the local and regional study areas. The Hydrology Baseline Report will support the selection of this WSC reference station. A dynamic wave routing model has been prepared to characterize the average monthly velocities across Node 5, as well as the impacts of the proposed pit filling phase. The model is currently being refined, however the preliminary results indicate that the estimated change in velocity resulting from the proposed pit filling phase is not predicted to	FMG states that the Hydrology Baseline Report will be updated for the EIS/EA. FMG response includes Attachment – Hydrologic Routing Assessment. FMG prepared a dynamic wave-routing model to characterize velocities across Node 5 and states that the model is being currently refined with summary to be provided in the EIS/EA Since FMG's response indicates that additional information/clarification is forthcoming in the EIS/EA, the response is likely adequate assuming the modelling and predictions described therein are accurate. However, specific comment regarding the Hydrologic Routing Assessment and dynamic wave-routing model should be reserved for hydrologist review.	Acknowledged	EIS Sections 5.19.3.1, 6.1, 6.7.6.1, 6.10.

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		minimum 7-day rolling average flow with a return period of 20 years or 7Q20) of the water feature for rivers and streams; any taking >5% of the 7Q20 is considered to be high risk to the environment and a detailed assessment is needed to support the proposal to show that the impacts of the taking will be minimized. The proposed water taking from Springpole Lake during the pit filling phase is not consistent with provincial policies since the predicted flow decreases are considered to be high in magnitude (i.e., > 5% of the 7Q20), there is predicted to be a temporary reversal of flow within the water feature and adequate mitigation measures to lessen these impacts have not been proposed. The estimated pit filling time is highly dependent on the allowable water taking from Springpole Lake, and the taking currently proposed and assessed in the EA is several magnitudes greater than would be permittable by provincial PTTWs (unless the proponent is able to propose adequate mitigative measures). Therefore, it appears that the pit filling time will increase (in the absence of acceptable impacts and an adequate mitigation plan), extending the duration of the closure phase. The proponent has not discussed the increased pit filling time or alternative pit filling sources and therefore impacts of this project component have not		Lake. As there is a relatively small direct drainage area to node 5, the levels within Springpole Lake and its north basin are sustained primarily by the much larger drainage area entering from Cromarty Lake. With this greater understanding of the hydraulic conditions around node 5, it is understood that the movement of water across node 5 will naturally change direction frequently throughout the year as a result of wind-driven currents and backwater from the larger Springpole Lake watershed area. As such, water takings are not expected to generate velocities (< 0.01 m/s, as per Sectio 6.7.4.1 of the draft EIS/EA) in excess of natural variation. – For clarity, the final EIS/EA will include water level and velocity as indicators in Section 6.6 to 6.9 to assess residual effects on water quantity rather than water flows; – As discussed in Section 6.7.4.1 of the draft EIS/EA, due to the large cross-sectional flow area of the connection between the north basin and remainder of the lake (node 5), the change in velocity caused by the greatest estimated change in flow is expected to be very small (<0.01 m/s). This effect will only be observed during the pit filling period; and, – The assessment of effects to water levels will be refined with 2021 to 2022 baseline hydrology data, and updated in	2022 season. The ministry recommends that all relevant rationale be included in the final EIS/EA to characterize natural conditions at node 5. Although it is understood that water across node 5 will naturally change direction as a result of wind-driven currents and backwater effects, it is assumed that the reversal of flow during the pit filling phase will be of a different magnitude and is not comparable to the natural movement of water. – Acknowledged. All relevant locations that include water flows as indicators should remain within the monitoring program and within the modelling environment. Water level and velocity indicators should be developed for all relevant locations with corresponding monitoring stations and included in the final EIS/EA. – Acknowledged. This potential impact should be confirmed with monitoring. The follow up monitoring program included in the final EIS/EA should be updated to capture this. – As previously stated, it is unclear if the proponent has collected sufficient water level data to define seasonal variability. The final EIS/EA should include all necessary baseline data to support the predicted changes in Springpole Lake.	have an effect on local fish populations. A summary of the model and its findings will be provided in the final EIS/EA. Please see Attachment 1: Springpole Lake Hydrologic Routing Assessment for further information			

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		been adequately assessed in the draft EA.		the final EIS/EA. Potential effects to water level are not predicted to be greater than seasonal variability. As with effects to velocity, the effects to water level will also only be observed during the pit filling period. Therefore, although change in average annual flows are predicted between the north basin and the remainder of Springpole Lake during the pit filling period, the updated resulting change in velocities and water levels are predicted to be low magnitude, temporary, and reversible. Based on the regulations, the proposed water taking is permittable. The active filling rate discussed in the draft EIS/EA (1.15 cubic metres per second) is based on average annual flows. It is understood that a threshold flow will be established during the environmental approvals phase. This threshold flow will limit water takings when the receiver is in a low flow condition and may be based on near instantaneous / real-time flows. As such, during low flow conditions, overall water takings will be less than the 10% previously assumed. However, for the purposes of the environmental assessment, it is a conservative approach to evaluate potential impacts on a monthly basis under average, 1:100 wet, and 1:100 dry year conditions. This assessment is presented in Appendix M-3 of the draft EIS/EA.	It should be noted that based on current regulations the water taking rate appears to be permittable. However, during the provincial permitting stage, further controls on the water taking during the pit filling stage may be considered depending on the potential impacts. Sufficient baseline data has not been submitted as part of the draft EIS/EA, and the potential impacts that may result from the proposed water taking have not been assessed so are unknown as well. This will need to be addressed during the provincial permitting stage.				

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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MECP-HYD-002	Section 6.6.2.4 Analytical Methodology Page 6-111	The proponent has not evaluated the worst-case scenario regarding the "Pit Filling" stage of the project. To enhance pit filling and reduce the time of closure, the proponent has proposed to take water from the remainder of Springpole Lake to reduce pit lake filling times. The proponent has assumed in the site water balance model that a water taking of 10% of the available monthly flow at the inlet of Springpole Lake will be taken to support the pit filling and the proponent has expected this to have a negligible effect on the lake, based on their interpretation of the DFO guidance document. However, the guidance document references a reduction in instantaneous flows rather than monthly flows as they have used in the assessment in the EA. It is important to note that monthly flow reductions are not equivalent to instantaneous flow reductions, which the DFO guidance document is based on Fisheries and Oceans Canada 2013. The result of this assumption is that the proponent would not be able to take as much water as they presented in their assessment, so they have underestimated the expected pit lake filling time. This may extend the duration of the closure phase. Therefore, the water taking volumes should instead be based on the percentage of	The proponent should re-evaluate the impact assessment considering a water taking of 10% of the instantaneous flows (not monthly), at the inlet of Springpole Lake, as the DFO guidance is based on instantaneous flows and these statistics are not equivalent. The proponent must consider that the pit filling stage could be limited by several factors and could result in a longer "initial closure" phase than is currently evaluated within the EA. The proponent has not evaluated the "worst-case" pit filling scenario including lack of available flow, taking only during the ice-free season (or water taking only allowable during a fish timing window), and a lower percent taking. It is recommended that the proponent predict the potential duration of the closure phase based on longer pit filling time within the EA, and explain the implications of this on the extent and duration of project impacts. It is noted that the water from the treated site effluent and site runoff will also be used for pit filling, however, this it is not clearly included in the pit filling time calculation.	The active filling rate discussed in the draft EIS/EA (1.15 m^3/s) is based on average annual flows. It is expected that a threshold flow will be established during the environmental approvals phase. This threshold flow will limit water takings when the receiver is in a low flow condition and may be based on near instantaneous / real-time flows. As such, during low flow conditions, overall water takings may be slightly less than the 10% previously assumed. For the purposes of the EIS/EA, it is a reasonable approach to evaluate potential impacts on a monthly basis under average, 1:100 wet, and 1:100 dry year conditions. This assessment has been captured in Appendix M-3 of the draft EIS/EA. Should flow conditions during the pit filling period be below average, the active filling phase may be extended. For context, if the average annual water taking is reduced by half to 5%, the pit filling period would remain under 10 years (see Section 4.18.3.1 of the draft EIS/EA). This would not impact the significance of the duration of residual effects, as defined as Level II (more than 3 years, but less than 20 years) in Section 6.7.5. As is standard practice, the closure plan is conceptual at this stage in the Project (see Section 4.18) and will be refined through the appropriate provincial approvals process, including development of the Closure Plan. Other potential limitations to	Although the discussion of the sensitivity of the timing of the pit filling phase is appreciated, it is not clear whether reducing the taking by half would be sufficient to assess the worst-case scenario. The original comment speaks to potential expected restrictions (based on known requirements of provincial permitting) and unexpected situations (e.g., drought/low flows) that could occur and delay the pit filling time frame. It is agreed that the formation of ice should not impact water takings. However, accurate flow measurements will still need to be collected during all seasons within the proposed source of the water taking. It is unclear if under ice/ice-covered flow measurements have been measured to date or if an under ice/ice-covered rating curve has been established or will be established through future monitoring efforts. The final EIS/EA should confirm if the flow monitoring has been completed (or when it will be completed) under ice/ice-covered conditions.	Although unlikely to occur for the full duration of the pit filling period, the worse-case scenario would be a 5% water taking during the 5th percentile, as noted in Section 4.18.3. In this scenario, the refilling period would be less than 16 years, which would still not impact the significance of the duration of residual effects, as defined as Level II (more than 3 years, but less than 20 years) in Section 6.7.5. Two winter low-flow monitoring programs have been conducted. Ice formation was not observed at Springpole Lake's hydraulic control (outlet) in the winter of 2022 or 2023. Open water flow measurements were conducted during the winter at this location. The open water rating curve is therefore applicable throughout the year. However under ice/ice-covered measurements were conducted at tributaries which were safely accessible. Findings will be summarized in the updated Hydrology Baseline Report with the final EIS/EA.	FMG indicates that findings of winter low flow and under ice monitoring will be summarized in the updated Hydrology Baseline Report for the final EIS/EA. FMG responses to flow measurement and pit filling duration should be reserved for hydrologist review.	Acknowledged	EIS Sections 6.7.1.2, 6.7.6.1, 6.10.6.1, 5.19.3.1.

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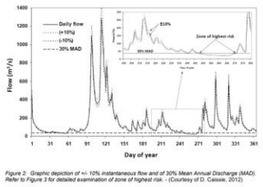
		instantaneous flows at the inlet of Springpole Lake rather than the monthly flows as included in the EA. Example shown below:  Figure 2: Graphic depiction of +/- 10% instantaneous flow and of 30% Mean Annual Discharge (MAD). Refer to Figure 3 for detailed examination of zone of highest risk. - (Courtesy of D. Caissie, 2012) As well, if inflows are limiting, this may further extend the closure phase as pit lake filling may take even longer than they predict. This has not been considered by the proponent and will impact the duration of the closure phase of the project. As an example, if the water taking were limited to the ice-free season (i.e., 244 days per year), low flows (i.e., 5th percentile annual flow) or lower percent taking (<5% of monthly inflows), the pit filling time could be up to approximately 24 years. This estimate does not include groundwater, precipitation, or runoff contributions. A longer closure phase could also be possible depending on reconnection water quality. See comment #1 for further discussion related to provincial permits and approvals.		water takings, such as those during the ice-free season, have not been considered, as the formation of ice should not impact water takings as long as there is measurable flow to determine allowable / permitted water takings. The extension of the pit filling period to allow for a lower water taking rate would reduce the effects to the receiver water balance. From a hydrology perspective, the increased time to closure will not impact the findings or conclusions of the effects assessment as presented in Section 6.7 of the draft EIS/EA. The potential effects to surface waters are open pit overflow once the open pit meets applicable water quality guidelines, the seepage and maximum open pit draw down effects at the end of operations. Thus, from a surface water perspective, running sensitivities on the receiving environment modelling to evaluate alternative closure periods would not generate results outside of which have already been described and assessed as part of the effects assessment. Treated site runoff and effluent discharge is small in comparison to the proposed water takings from Springpole Lake, and therefore does not impact the estimated pit filling time. Effluent discharge has however, been captured by the water balance modeling and impact analysis.					

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MECP-HYD-003	Appendix F Draft Fisheries Act Offset Plan And MDMER Schedule 2 Fish Habitat Compensation Plan Page ii	The largest fish habitat offset and compensation measure proposed is the restoration of the open pit area, including the establishment of a new lake basin in Springpole Lake after mining ceases. This strategy could require a time lag of approximately 17-82 years (based on conservative pit filling estimates and pending reconnection water quality) or greater between the time the impact to fish habitat occurs and the time the restored basin becomes suitable and available fish habitat. The proponent has not adequately quantified the time lag between the impacts to Springpole Lake and the time the habitat is restored. The time lag will increase both the magnitude of impact to the compensation offset habitat (DFO's mandate) as well as the duration of the water level and flow impacts to the remaining portion of the lake.	It is recommended that the proponent consider a longer time lag based on a longer pit filling time frame (i.e., 17-82 years; further discussed in comment #2) and how that relates to offset and compensation measures. It is recommended that the proponent assess how the remaining portion of Springpole Lake has been impacted considering the predicted magnitude of the changes to flows and the time lag of the project site related impacts to Springpole Lake.	The Fish Habitat Offsetting and Compensation Plan in Appendix F of the draft EIS/EA considers lag time in Section 8.1 and as a result, the Project has proposed to expedite the refilling of the open pit basin. Table 8-2 summarizes the time to fill the open pit and dewatered basin based on reasonably expected scenarios, and the time to fill ranges from 2 to 16 years, for an approximate lag time of 12 to 26 years from impacts to reclamation. The baseline fisheries data provides confidence that although the fish habitat present in the isolated basin of Springpole Lake is important and encompasses one of six deeper water basins in the lake, the majority of the Springpole Lake area (94% area and 91% volume) will remain capable of sustaining all species and all life functions present in the lake. The remaining deep-water basins and lake areas support comparable, and in some cases, greater numbers of fish than the isolated basin. Further, the lost productivity from the affected fish habitat is proposed to be offset with the measures identified in the final Plan. As a result of these measures, the effect on fish habitat due to the lag time will be mitigated. As noted in the response to Comment 1, the change in average annual flows predicted between the north basin and the remainder of Springpole Lake during the pit filling period is predicted to have a low magnitude, temporary, and	It is understood that Table 8-2 within the Draft EIS/EA summarized the "reasonably expected" scenarios. However, my original comment discussed the consideration of worst-case scenarios that could potentially happen in tandem. Worst case scenarios could then delay the pit filling time frame and in turn delay the fish habitat compensation measures. The worst-case scenario lag time should be considered within the final EIS/EA.	Appendix N-3 of the draft EIS/EA provides an assessment of the pit lake water quality at closure, including under worst-case scenarios. The results of this assessment demonstrate that the water quality in the isolated pit basin will meet Provincial Water Quality Objectives within five years, and would be suitable for reconnection with the remaining north basin of Springpole Lake. As a result, the assessment of a worse-case scenario of 82 years for fish compensation is not warranted.	FMG's response is adequate assuming the modelling and predictions described therein are accurate.	Acknowledged	Not applicable

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				reversible change on velocities and water levels.					
MECP -HYD-004	Section 5.7.3 Assessment of Alternatives Page 5-20 and 5-21	It is recommended that alternative locations for the co-disposal facility be assessed by the proponent as the preferred option does not appear to minimize impacts to the adjacent surface water features or have considered the potential for accidents or malfunctions on the surrounding environment. It is noted that the eastern alternative offers several benefits when comparing to the western alternative, these being that the east alternative requires less overprinting of waterbodies and fish habitat as well as increased setback distances from natural surface water features that could be impacted by the project. The west alternative includes overprinting of 6 lakes, ~29.2 ha whereas the east alternative includes overprinting of 3 lakes ~18.9 ha. The west alternative also has the tailings pipeline travelling within 50 m of Birch Lake which is a concern due to the potential for accidents or malfunctions that may occur along the pipeline. The preferred alternative for infrastructure placement is assessed during the EA stage, therefore other alternatives and appropriate criteria should be considered now.	It is recommended that location options for the co-disposal facility be re-assessed considering the following points: • Baseline habitat classification at the eastern alternative location; • Seepage concerns from the CDF into Birch Lake at the western alternative location; • Accidents and malfunctions (considering limited setback distances at the western alternative location as opposed to the eastern alternative location); and • Potential impacts to surrounding surface water features (i.e., quality and quantity) for each of the location alternatives. The proponent should consider these points above and any potential calculations (i.e., surface water quantity and quality impacts that could occur at either location) within the EIS/EA documentation to ensure alternative impacts have been evaluated in their entirety.	The assessment of feasible alternatives has been carried out utilizing a series of performance objectives evaluation criteria and indicators, Performance objectives are meaningful attributes that are essential for the Project success, and provide a basis for distinguishing between individual alternatives. Table 5.7 of the draft EIS/EA is a summary table that identifies only the differentiators between the assessed alternatives for the storage locations according to the performance objectives. In assessing habitat considerations, the following criteria identified in Section 5.2.1.1 of the draft EIS/EA, with associated indictors were used: • Effects on fish and aquatic habitat; • Effects on wetlands; • Effects on terrestrial species and habitat; and, • Effects on species at risk. Seepage and potential impacts to surrounding surface water features is also considered with the following indicators: • Attainment or maintenance of surface water quality guidelines for the protection of aquatic life, or where pre-Project water quality does not meet Provincial Water Quality Objectives for protection of aquatic life (PWQO), not further degraded; • Maintenance of groundwater flows, levels or quality;	It is not clear how the proponent considered effects of the placement of infrastructure on valued components including fish and aquatic habitat, wetlands, seepage, and surface water quality. It is also not clear how the proponent considered the potential for accidents and malfunctions with regard to the valued components mentioned above. Specifically, the ministry is seeking clarification on the significance (weight) placed on the effect of those valued components (mentioned above). Further breakdown and clarity on how the alternatives were chosen should be included in the final EIS/EA including the scoring breakdown with specific details about the difference in potential effects between the eastern and western alternatives of the co-disposal facility.	The methodology for the assessment of alternatives is found in Section 5.2 of the draft EIS/EA. Using this method, the alternatives are given an overall evaluation taking into consideration the assessment for all of the performance objectives. An alternative is rejected if it attains a not preferred rating for any single performance objective, with the knowledge that all performance objectives are essential. The findings are summarized in the relevant section of Section 5 and identifies differentiating factors amongst the alternatives assessed. The approach of giving numerical values to individual performance objectives to determine the preferred alternative has not been utilized, with exception of the CDF location and methodology (see below for further information). This approach typically requires weighting to take into account the varying importance of the different performance objectives for each topic. Weighting factors have to be carefully justified and are often open to interpretation. In addition, the numerical approach may result in two or more very different alternatives that have the same, or very similar, overall index values; when intuitively it is clear that one alternative better minimizes	Acknowledged - FMG states that the alternative assessment methods and findings summarized in Section 5. Alternative assessment prepared in accordance with ECCC guidance also described in Section 5 (Appendix E in the EIS/EA).		Not applicable

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				• Potential for adverse health and safety effects; • Non-interference with surface water drinking supply; and, • Avoidance of safety and security risks to the general public. The draft Mine Waste Management Alternatives Assessment report completed in accordance with the federal requirements (Metal and Diamond Mining Effluent Regulations) as required by Environment and Climate Change Canada (Appendix E of the draft EIS/EA), also fully considered impacts to habitat, seepage, the potential for accidents and malfunctions and surface water quality. These were considered either directly or indirectly, under several accounts, and multiple sub-accounts: • Flexibility for Water Treatment and Recycle • Loss of Fish Habitat • Loss of Wetlands (ha) • Species at Risk • Volume of Reclaim Water • Complexity of Seepage Management • Water Treatment Requirements • Seepage Collection Infrastructure Costs • Post-Closure Water Treatment Costs • Indigenous and non-Indigenous land use and heritage value		adverse impacts and meets Project requirements. The Mine Waste Management Alternatives Assessment was prepared in accordance with guidance from ECCC, which requires a detailed and rationalized scoring system to determine the disposal methods and storage locations for tailings and mine rock which is described in Section 5 of that report (Appendix E of the draft EIS/EA).			

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MECP-HYD-005	Section 4.7.2 Overall Approach Page 4-27	It is unclear what setback distances are being committed to by the proponent and what safeguards will be put in place if the setback distance from surface water features cannot be met. The tailings pipeline is proposed to be within 50 m of Birch Lake at its closest point. The western co-disposal facility (CDF) alternative location is proposed to be within 120 m of Springpole Lake at its closest point. Infrastructure placement planning, including setback distances, should be completed at the EA stage so that the potential impacts of these facilities on the adjacent surface water features can be adequately assessed, and appropriate mitigation measures can be developed and included in the EA to minimize potential impacts. Without this information, the project effects of the proximity of mining infrastructure to adjacent surface water features cannot be assessed.	Setback distances and the potential impact of the locations should be included within the criteria of the assessment of alternatives in order to adequately plan for infrastructure impacts based on location, which is required to be included at the EA stage. The proponent must describe and explain the safeguards that will be implemented (i.e., monitoring and mitigation) to ensure that surrounding surface water features are not impacted by the adjacent infrastructure (tailings pipeline impacts to Birch Lake and CDF impacts to Springpole Lake/Birch Lake) as a result of the limited setback distances proposed for the current preferred alternative of infrastructure placement. If impacts cannot be adequately prevented or mitigated, then other suitable alternative infrastructure arrangements need to be considered.	Further clarity regarding setback distances will be provided throughout the final EIS/EA as applicable. The CDF, inclusive of water management infrastructure, will be set back at least 120 m from Springpole Lake. The potential effects of the Project on surface water quality have been assessed in Section 6.6 for Birch Lake, Section 6.7 for the north basin of Springpole Lake and Section 6.8 for the southeast arm of Springpole Lake. With the implementation of mitigation measures, the potential effects will be managed. Relevant mitigation measures to protect surrounding surface water features from potential effects due to adjacent infrastructure include: • An integrated water management system will be designed to collect and control contact water from the stockpiles and CDF, and water from the open pit to be recycled and used in which will be treated at the effluent treatment plant prior to discharge; • During construction, operation and closure phases, an erosion and sediment control plan will be implemented to manage runoff water around disturbed areas as needed, using such measures as: minimize slope length and grade, ditching and diversion berms, contact water management ponds, use of natural vegetation buffers and	The final EIS/EA should include specific commitments on the minimum setback distances from water features to infrastructure. It is noted that the CDF inclusive of water management infrastructure will be set back at least 120 m from all water features (both Springpole Lake and Birch Lake). Updates to the follow-up and monitoring programs need to be included in the final EIS/EA. All water balances developed for the project site need to include the details of the integrated water management system. All water management infrastructure needs to be designed to contain (without overtopping) at least the 1 in 100-year 24-hour event. Because of the potential for a spill from the operation of the tailings pipeline, associated mitigation measures specific to the pipeline placement within 50 m of Birch Lake need to be developed. Mitigation measures could include placement of the pipeline within a ditch system, oversizing the ditch system within close proximity to Birch Lake and lining of the ditch within that area of close proximity. These lined ditches should then drain to a central lined pond. All proposed mitigation measures should be detailed and included in the final EIS/EA so that the potential effects of the project can be properly considered.	A minimum setback distance of 120 metres from water features will be used for most Project infrastructure. For those infrastructure components that are closer, mitigation measures will be described in the final EIS/EA. A conceptual follow-up and monitoring program will be included in the final EIS/EA. The integrated water management system will be considered in the water balance developed for the Project. Operational water management infrastructure will be designed to contain the 1 in 100-year 24-hour event. The malfunctions and accidents section of the EIS/EA includes an analysis of this potential, and associated mitigation.	Acknowledged. FMG indicates that a minimum setback distance of 120-metres from water features (mitigation where not feasible) to be included in the final EIS/EA. FMG response states that water management infrastructure will be designed to contain a 1 in 100-year 24-hour storm event. Malfunctions and accidents section and mitigation provided in the EIS/EA.	Water management infrastructure will be appropriately sized and will comply with regulatory requirements. Operations phase water management structures will be designed to manage a 1 in 100-year event, with engineering expected to be refined as the Project moves from Pre-feasibility to Feasibility level engineering. This includes infrastructure which will be developed during the construction phase and is expected to be present for the life of the mine. Temporary water management structures used during construction will be designed as appropriate to manage water during this three year phase and will comply with all regulatory requirements.	EIS Sections 5.3.4, 5.10.2,

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				runoff controls; • Runoff water collection ditches will be established around the perimeter of infrastructure including the CDF and stockpiles to collect overland flow and seepage. Non-contact water will be diverted away from Project components using ditches, diversion berms and other suitable measures; and, • During construction and operation, co-manage and store potentially acid generating (PAG) mine rock and non-acid generating (NAG) tailings in the north cell of the CDF. PAG mine rock will be encapsulated with NAG tailings to isolate it from atmospheric oxygen and mitigate potential acid generation and metal leaching. A preliminary follow-up and monitoring program is described in Section 12 and will be updated in the final EIS/EA. Section 9 of the draft EIS/EA includes an assessment of the potential for spill from the operation of the tailings pipeline, and a summary of the design and operational safeguards.					

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-HYD-006	Section 6.6.2.5 Assumptions and the Use of the Conservative Approach Page 6-115 Section 6.8 Springpole Southeast Basin, Appendix N-2	The proponent has evaluated the industrial effluent discharge mixing zone and assimilative capacity of the southeast arm of Springpole Lake using several different flow scenarios. However, the proponent has not evaluated the worst-case impacts of the effluent discharge considering MECP Policy B-1-5 (Ministry of the Environment, Conservation and Parks 2021) or considered the overprinting of the upper portion of the watershed by the project site. Policy B-1-5 requires that the maximum mixing zone size be predicted using the maximum effluent treatment plant rated capacity on a daily basis while the receiver is experiencing the 7-day average low flow over a 20-year period (7Q20) low flow condition. The mixing zone and the assimilative capacity of the receiver should be re-assessed using these flow inputs to the model to understand the expected worst-case extent of the project impacts resulting from this project component. Section 6.6.2.5 outlines how the available assimilative capacity of the receiver was evaluated conservatively using the maximum predicted discharge rate from the ETP and the minimum predicted monthly average flow. However, Appendix N-2 indicates that the CORMIX modelling was only evaluated using the average discharge under average precipitation conditions and the 7Q20 for the receiver. This is not considered to be sufficient	It is recommended that the assimilative capacity be modelled using the maximum predicted discharge rate from the ETP and the estimated 7Q20. Re-calculated 7Q20 low flows should be considered in the mixing zone size as well as discussed within comment #9, considering there is some potential error within statistical estimation. The proponent must include discussion on the impacts to the mixing zone size and assimilative capacity considering the elimination of the north portion of Springpole Lake. The Assimilative Capacity and Mixing Zone study will need to be reviewed again and potentially updated using the receiver-based criteria when the project proceeds to permitting/approvals. The corresponding comments from the MECP SW specialist also discuss this issue.	As discussed in Section 4.10 of the draft EIS/EA, discharge of treated effluent from the Project will be protective of the receiving environment, and will occur in accordance with federal and provincial approval requirements. The assimilative capacity assessment, including CORMIX modelling, considered multiple sensitivity scenarios to estimate the likely maximum extent of the mixing zone (<2.0 m). These analyses, supported by the mass-balance model for the Project, are sufficient to support the identification and characterization of residual effects to the receiving environment as a result of Project discharge. This is further described in Sections 6.6 though Section 6.9 of the draft EIS/EA. Additional model runs or iterations of the assimilative capacity study would not affect the characterization of residual effects of Project discharge, nor the conclusions of the effects assessment, as is currently presented in the draft EIS/EA. It is understood that final effluent criteria for the Project will be determined in consultation with the Ministry of the Environment, Conservation and Parks (MECP) during the environmental approvals phase. As water management planning and associated engineering advances, it is understood that additional modelling will likely be required to support the environmental approvals	It should be noted that the maximum mixing zone extent (of <2.0m) has been defined by the consultant using a method that is not entirely consistent with ministry policies. A different mixing zone size may be predicted using the procedure outlined in ministry Policy B-1-5 since the end of the mixing zone is defined as when all parameters of concern reach applicable background receiver criteria or the PWQO. The definition used by the consultant to delineate the maximum mixing zone extent is not clear. It is anticipated that the mixing zone size as defined by B-1-5 could be similar in magnitude (compared to the consultant's calculation) due to the size and potential dilution of the receiver, but this needs to be further evaluated during the provincial approvals process. It is important to note that Policy B-1-5 is applied for any project discharge scenario. This policy encompasses procedures to establish receiving water based effluent requirements for point source discharges to surface waterbodies. Further requirements with regard to mixing zone size and derivation of receiver-based effluent criteria will be discussed during the provincial approvals process. It is acknowledged that the northern portion of Springpole Lake will be removed from the assimilative capacity assessment in the final EIS/EA.	Consistent with MECP policy, the mixing zone will be minimized to the extent practical and final effluent criteria for the Project will be determined in consultation MECP during the environmental approvals phase. CORMIX modelling performed as part of the EIS/EA has served to demonstrate the feasibility of rapid mixing in the receiver; the final maximum extent of the mixing zone will be refined as part of the approvals process, and will follow the procedure outlined in ministry Policy B-1-5.	Acknowledged - FMG states that the final mixing zone extent will be refined as part of the approvals process and will follow the ministry procedure B-1-5 to be provided in the final EIS/EA.	Acknowledged	EIS Section 6.8.1.2, Appendix N-2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		for evaluating the worst-case impacts since the average discharge was used rather than the maximum rated capacity of the effluent discharge. The proponent has not incorporated the removal of the northern portion of Springpole Lake for the development of the open pit into the assimilative capacity assessment. The watershed size of the receiver will be reduced so the 7Q20 should be re-calculated using the reduced watershed size. The proponent appears to have underestimated the potential impacts because of not considering the smaller watershed due to the removal of the upper watershed of Springpole Lake.		process, and could include CORMIX and the consideration of the MECP Policy B-1-5, if the Project intends to discharge in a 7Q20 flow condition. The northern portion of Springpole Lake will be removed from the assimilative capacity assessment for the final EIS/EA. This area is small in comparison to the overall watershed and is not anticipated to result in any changes to the effects assessment.					
MECP -HYD-007	6.7.2.4 Analytical Methodology Page 6-151	To continually assess impacts to the flows in the remaining portion of Springpole Lake several assessment nodes (i.e., SW-25, SW-02 and Node 5) are proposed within the north basin of the lake within the receiver water balance model. The proponent has not quantified the predicted future DFO-authorized decrease in flows, (if granted) within several water bodies surrounding the project site including the outlet of the north basin of Springpole Lake. Based on a range of climate conditions (i.e., average year, 1 in 100 dry year and 1 in 100 wet year), the expected flow decrease at Node 5 (outlet of Springpole Lake) could range from -20% during the construction phase to -28% to -51% during the open pit mining	It is recommended that the proponent assess the potential impacts of the predicted future DFO-authorized decrease in flows (assuming it is granted) and the mitigation measures proposed within the remaining northern portion of Springpole Lake and within the bays of Birch Lake that surround the project site. The EA must include an assessment of all of the potential impacts of the project on all of the areas potentially impacted. The proponent must describe the predicted flow decreases with respect to the predicted future DFO Authorizations (depending on what is granted), and the potential effects of these changes. These predicted allowable decreases should be compared to either baseline	An assessment of the potential effects due to a decrease in flows to Birch Lake and the north basin of Springpole Lake is included in Sections 6.6.4 and 6.7.4 of the draft EIS/EA, respectively. During the construction phase, the development of Project will remove approximately 3 km^2 of the catchment area of Birch Lake, which equates to approximately 0.4% of the natural catchment area reporting to the outlet of Birch Lake (assessment node SW-04). This residual effect is indistinguishable from background for the SW-03 and SW-04 assessment nodes and the magnitude is considered to be low (less than 15% of seasonal norms). In combination with a	Although the potential impacts (related to decrease in flows) are expected to be minimal, it is important to quantify all potential effects related to the project. All potential effects related to flow changes will need to be assessed through monitoring (via manual measurements or desktop estimation depending on the location and federal/provincial requirements) to assess the magnitude of effects relative to those predicted in the EIS/EA. All necessary changes to the follow up monitoring program should be included in the final EIS/EA. It is unclear if the proponent has collected enough data to assess if the flows at the inlet and outlet of Springpole Lake	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and present monitoring data collected throughout the baseline monitoring program. As discussed on May 15, the data shows a strong correlation to the selected WSC reference gauge.	Acknowledged - FMG indicates that the Hydrology baseline report will be updated in the final EIS/EA.	Acknowledged.	EIS Sections 6.7.1.2, 6.7.6.1, 5.7.1.2, Appendix M-1 Section 4.3.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		phase, relative to baseline conditions. Although the proponent suggests that the magnitude of these flow reductions is low, the ministry disagrees and considers these predicted decreases to be significant. The expected flow decreases at Node 6 (outlet of a bay of Birch Lake to the north of the project) could range from -1.3% during the construction phase to -8.2 to -28% during the open pit mining phase relative to baseline conditions. The expected flow decreases at Node 7 (outlet of a western bay of Birch Lake west of the CDF) could range from -13% during construction phase to -0.6 to -9.9% during open pit mining phase relative to baseline. Although the proponent suggests that the magnitude of these flow reductions is low, the ministry disagrees as some of these predicted decreases could be significant. The assessment station nodes should be continuously compared to either baseline data or a reference station node, this comparison will be particularly important at the time of predicted impacts. Additionally (since there is a lack of baseline flow and water level data), the proponent has not adequately described how the changes to water levels and flows are proposed to be monitored and/or mitigated so the magnitude and duration of the predicted impacts are not clear.	data or a reference station. There is insufficient baseline flow data available at the assessment nodes in Springpole Lake. The proponent should collect adequate baseline flow data prior to any project impacts occurring, and flow monitoring at these nodes should continue throughout the mine life to ensure that the project does not result in impacts to the lakes greater than those predicted in the EA. Proposed monitoring is further discussed within comment # 14, 15, 16, and 17.	consideration of the other residual effects attributes, the residual effect is not considered to be significant. The construction of the mine site will temporarily remove approximately 6.3 km^2 of catchment area from the north basin of Springpole Lake, which accounts for approximately 0.5% of the overall catchment area of Springpole Lake system. As this residual effect would be indistinguishable from background conditions, the magnitude is considered to be low (less than 15% of seasonal norms). Overall, in consideration of the other residual effects attributes, the residual effect is not considered to be significant. The results of the assessment due to changes in flows is further considered in the assessment of potential effects on fish habitat in Section 6.10.4 of the draft EIS/EA, which is based on the assessment in the Fish Habitat Offsetting and Compensation Plan (Section 5 of Appendix F). Adequate hydrometric baseline data has been continued to be collected since release of the draft EIS/EA to characterize baseline flow and water level conditions in Springpole Lake. See the response to Comment #13 for further details. The hydrometric data collected to date will be described in the final EIS/EA. The development of a monitoring program will occur	have a strong correlation with the WSC reference gauge data. Proceeding without adequate baseline data is at the proponent's own risk. It is recommended that all hydrometric data collected to date be tabulated in a spreadsheet format and included within the final EIS/EA.				

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		This is needed to ensure the proponent can adequately monitor the potential project impacts, and appropriately mitigate impacts to minimize project effects.		during the environmental approvals process. To support the program, flow monitoring at the inlet and outlet of Springpole Lake has been ongoing and has demonstrated a strong correlation with the selected WSC reference gauge. Additionally, a robust rating curve for the Springpole Lake outlet has been developed. As such, this data would be used to translate the estimated monthly flows to water levels, and provide an understanding of natural variation in Springpole Lake water levels. Responses to specific monitoring requests are provided in comments # 14, 15, 16, and 17.					
MECP-HYD-008	Appendix N-2 Section 2.4.1 Ambient and Effluent Density Page 5	In their assimilative capacity assessment and mixing zone delineation, the proponent has assumed that the ambient density of the receiver is equal to the effluent density, but they have not considered a scenario with differing densities. This assumption may overestimate the ability of the effluent to mix with the receiver, which would underestimate the extent of the mixing zone and buoyancy of the effluent plume. Due to limited available baseline data, it is important to consider the extent of the mixing zone under variable densities so that the proponent is not underestimating the extent of potential impact due to the effluent discharge on the receiver.	The proponent has not adequately quantified the impact of the density of the effluent on its mixing characteristics, and as a result, may have underestimated the impact of the discharge on the receiver. It is recommended that the proponent complete a sensitivity analysis on the density of the effluent as it compares to the density of the receiver as it is assumed that higher total dissolved solids (TDS) within the industrial site effluent will contribute to a higher relative density, which could affect the mixing characteristics of the effluent and the extent of the mixing zone.	It is acknowledged that effluent density may affect mixing, however due to the rapid mixing characteristics of the discharge, it is not expected to have a notable impact on the estimated extent of the mixing zone. Additional CORMIX model runs in this regard are not expected to generate results above and beyond what has already been described by the current analyses, nor would the findings of such a sensitivity run change the findings of the effects assessment as presented in Section 6.9 of the draft EIS/EA. Please note, the definition of an appropriate mixing zone size will be determined during the environmental approvals. Importantly, water that requires discharge during the life of the Project will be protective of the receiving environment and will	The proponent assumes that effluent density is not expected to have a “notable” impact on the estimated extent of the mixing zone. However, the buoyancy of the effluent plume may have an impact on how the monitoring programs are developed. The buoyancy of the plume, and subsequently the expected deposition of contaminants, is a critical piece of information for government reviewers to understand to ensure that monitoring programs for various valued components (e.g., surface water quality, sediment, benthos) are properly designed. Industrial effluent discharges typically have a higher density than the receiver (i.e., are negatively buoyant), therefore an assessment of the effluent discharge mixing characteristics and the plume’s buoyancy	The proponent assumes that effluent density is not expected to have a “notable” impact on the estimated extent of the mixing zone. However, the buoyancy of the effluent plume may have an impact on how the monitoring programs are developed. The buoyancy of the plume, and subsequently the expected deposition of contaminants, is a critical piece of information for government reviewers to understand to ensure that monitoring programs for various valued components (e.g., surface water quality, sediment, benthos) are properly designed. Industrial effluent discharges typically have a higher density than the receiver (i.e., are negatively buoyant), therefore an assessment of the effluent discharge mixing characteristics and the plume’s buoyancy	A high-level sensitivity analysis on effluent density will be carried out and presented in the final EIS/EA.	Acknowledged	Appendix N-2, Attachment 1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				occur in accordance with federal and provincial approval requirements.	should be included in the final EIS/EA.	should be included in the final EIS/EA.			
MECP-HYD-009	6.7.1 Existing Conditions Page 6-145 6.8.1 Existing Conditions Page 6-173 Appendix M-1 Section 4.5 Low Flow Conditions Page 23	The consultant has calculated the low flow indices for various points within Springpole Lake. However, it is not entirely accurate to estimate low flow indices for lakes or lake basins, as these typically apply to riverine systems. To apply this approach to a lake, a defined flow point or channelized section of lake should be used when estimating values such as the 7Q20 flow (i.e., riverine section of a lake or the inflow/outflow). Further on in the documentation, the low flow indices are described to have been calculated using the regression analysis of the surrounding regional Water Survey of Canada (WSC) stations. It is understood that the low flow indices were calculated using a log-normal distribution for all stations; however, it is unclear if this is the most conservative distribution for all stations. Published values from the Ontario Flow Assessment Tool show different 7Q20 values from the same WSC regional stations identified (most likely based on different statistical distributions used in the calculation). There is some inherent error associated with statistical analyses (i.e., different statistical distributions) and the use of pro-rated data. Therefore, it is unclear if the proponent has	It is recommended that the proponent revise the document to ensure that low flow indices are only identified at a defined flow point, being a riverine section of a lake at the inflow/outflow of the lake (not the lake itself), or a channelized section of the lake. It is recommended that the 7Q20 value of the receiver be re-calculated using various statistical distributions which could consider lower 7Q20 values. It is recommended that the 7Q20 analysis be completed in consideration of the smaller watershed area from the elimination of a portion of the north basin of Springpole Lake.	The hydrology baseline report in Appendix M-1 of the draft EIS/EA has considered 7Q20 flows at riverine sections only (Springpole Lake inlet and outlet). The extension of this analysis to lake systems was conducted based on experience with the Ministry of the Environment, Conservation and Parks on other similar projects, which have requested to apply 7Q20 flows to lake systems. This will be removed from the final EIS/EA. A 7Q20 analysis at the southeast arm of Springpole Lake, with a reduced catchment area (as a result of the temporary dewatering of a portion of the north basin of Springpole Lake), can be estimated with the regression analyses described in Appendix M-1, and can be included in the final EIS/EA. Alternative means of estimating 7Q20 flows, such as those presented in the former Ontario Flow Assessment Tool, will be considered in the final EIS/EA.	The ministry has previously requested that the 7Q20 flow metric be applied to lake systems in different ways than the proponent has done. To clarify, I am requesting that the 7Q20 flow metric be applied to the inflows and/or outflows to/from a lake system (or at a riverine section of a lake). The 1 in 20 dry year lake level can also be applied as a metric, which to a certain extent is the equivalent percentile (i.e., 95th). It is acknowledged that the 7Q20 analysis at the southeast arm of Springpole Lake will omit the northern portion of Springpole Lake that will be eliminated during the operations phase of the project. The resource formally known as OFAT was retired on September 7th, 2022, therefore further discussions may be required on alternate methods for the derivation of the low flow statistics for the final EIS/EA.	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and will include: – Characterization of Springpole Lake water levels, including those under dry conditions. – An expanded analysis of 7Q20 flow metrics. A review of methodologies will be included and the most conservative will be applied at riverine sections.	Acknowledged. FMG indicates that the hydrology baseline report will be updated and provided in the final EIS/EA including lake levels and 7Q20 metrics	Acknowledged	Appendix M-1, Section 4.7

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		considered the worst-case low flow indices, and they may have underestimated the impacts that could result from these potentially lower values. The proponent has not re-evaluated the 7Q20 low flow value for the smaller watershed size once the portion of the North Basin of Springpole Lake is removed from the watershed (during mine site development and operations phase). This is important to understand as the impact analysis of the effluent discharge is based on the low flow in the receiver, and once this portion of the watershed is removed, the receiver will have less watershed area and corresponding lower available flows during effluent discharge (i.e., operations phase).							
MECP -HYD-010	Section 6.7 Springpole Lake North Basin Table 6-7.1: Annualized Monthly and Annual Statistics for Springpole Lake, North Basin Page 6-160	Table 6-7.1 summarizes the annualized monthly and annual flow statistics for the North Basin of Springpole Lake (calculated at the outlet of the North Basin). The local flow values are calculated by prorating from flow values from the Water Survey of Canada Station Sturgeon River at McDougall Mills (05QC004); however, this station has a substantially larger drainage area (i.e., 4,440 km^2) than the North Basin of Springpole Lake (i.e., 31.4 km^2 pre-disturbance and 25.1 km^2 post-disturbance). When prorating flows between watersheds, the size of the two watersheds should not differ by more than a factor of 10; using a substantially larger watershed to prorate flows in a much smaller watershed greatly	Smaller project watersheds should be compared to smaller regional watersheds in order to estimate baseline flow values more accurately. An alternate WSC station should be used that has a smaller drainage area that is similar to the project area to calculate the monthly and annual flow statistics for the outlet of the North Basin of Springpole Lake. This may give a more accurate representation of the onsite monthly flows and the predicted impacts such as flow decreases. The proponent is pro-rating WSC station data to estimate long term regional flow statistics. It is important to note that there is not adequate site-	Seven WSC gauges were considered with watershed areas ranging from 619 to 5,390 km^2. WSC does not typically monitor watersheds with 25 km^2 drainage areas. As described in the Hydrology Baseline Report (Appendix M-1 of the draft EIS/EA), Sturgeon River at McDougall Mills was selected as a reference station after taking into consideration watershed size, period of record, proximity to site, and a comparison to monthly runoff yields from the Project site. Hydrometric baseline data collected from the smaller site watersheds (~10 km^2) over the 2021 to 2022 monitoring period has demonstrated a reasonable correlation to the WSC station on Sturgeon River.	Rationale should be provided along with the submission of baseline data to corroborate the reasonable correlation between the on-site watersheds and the WSC station on the Sturgeon River. The Ministry continues to recommend that all baseline monitoring data be submitted in a spreadsheet format for ease of access and review by government reviewers. This data should be included in the final EIS/EA submission.	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and will include rationale and all baseline monitoring data to support the selection of the WSC reference station. The monitoring data will be provided in a spreadsheet format.	Acknowledged FMG indicates that the hydrology baseline report will be updated and provided in the final EIS/EA including rationale and all baseline monitoring data to support the selection of the WSC reference station.	Acknowledged	EIS Section 6.7.1.2, Appendix M-1 Section 4.5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		reduces the accuracy of the estimated flows in the smaller watershed. The proponents' prorated flows for the project site are most likely an over estimation of flow statistics for both baseline and the period of predicted impact. Therefore, the proponent has not adequately evaluated the worst-case flow impacts and the potential extent and magnitude of the project impacts are not clear.	specific baseline flow data to predict site-specific flow changes. The proponent must commit to collecting sufficient baseline flow data (and establishment of a reference station) in order to assess impacts of the project. This should commence as soon as possible.	Hydrometric data collected over the 2021 to 2022 monitoring period is considered to be adequate in establishing site-specific flow data for the Project Site. The results from the ongoing hydrometric baseline program will be described in the final EIS/EA.					
MECP-HYD-011	Section 6.7.5 Significance of Residual Effects Page 6-158	The proponent indicates that the residual effects on surface water quantity within the north basin of Springpole Lake will be a seasonal decrease in local inflows to Springpole Lake as a result of project development (i.e., elimination of ~6 hectares of Springpole lake, mine site watershed area of ~6.33 km^2) and water takings during the initial closure phase to expedite open pit basin filling. This seasonal inflow decrease was stated to be a low magnitude impact following the implementation of mitigation measures. As well, impacts to the lake levels are estimated to be so small that they will not be measurable during the operations phase and will be within 'seasonal normals' during the pit filling stage. From Ontario's Environmental Assessment Act "Net Effects" is defined as "Negative environmental effects of a project and related activities that will remain after mitigation and impact management measures have been applied".	The proponent should revise the document to further explain how they consider the residual effects to be low once the mitigation measures are applied as this is currently unclear. It is unclear what (and when) mitigation measures will be implemented related to surface water quantity impacts. The consultant should discuss how they will develop a potential trigger value for the predicted surface water quantity decreases. The proponent must commit to collect adequate baseline water level data within Springpole Lake in order to characterize the baseline condition and to adequately define seasonal normals. Once adequate baseline has been collected, the impacts of the project can then be predicted.	Hydrometric baseline data has continued to be collected since release of the draft EIS/EA to appropriately characterize baseline flow and water level conditions in Springpole Lake. See the response to Comment #13 for further details. The hydrometric data collected to date will be described in the final EIS/EA. Mitigation measures to reduce effects of a seasonal decrease in local inflows are described in Section 6.7.3 of the draft EIS/EA, and include: • Non-contact water will be diverted away from Project components using ditches, diversion berms and other suitable measures as appropriate; • Cofferdam (dike) placement has been selected to minimize the extent of the dewatered area within the north basin while maintaining dam stability aspects; and • During controlled dewatering of the basin, clean water will be pumped over the cofferdam at a rate consistent with the natural variability of Springpole Lake while water not	It is acknowledged that baseline data collection has continued since the release of the draft EIS/EA. However, it remains unclear if the proponent has collected enough data to characterize baseline conditions (since the data has not been submitted to the ministry). Proceeding without adequate baseline data is at the proponent's own risk. Mitigation measures to reduce effects of a seasonal decrease in local inflows may not be sufficient to adequately mitigate those effects. Further mitigation measures may need to be proposed depending on the magnitude of the predicted effects. Mitigation measures to reduce effects of flow decreases during the pit filling phase may not be sufficient to adequately mitigate those effects. Further mitigation measures may need to be proposed depending on the magnitude of the predicted effects. As previously stated, rationale should be provided along with	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and will present over two years of monitoring data to support characterization of baseline conditions and the suitability of the selected WSC reference gauge. The residual effects on surface water quantity due to a seasonal decrease in local inflows and water takings during initial closure to expedite open pit basin filling, after the application of the mitigation measures summarized in Section 6.7, and were characterized in Section 6.7.5. The magnitude is considered to be low (Level I) as the changes in catchment inflows represent only 0.7% of the total catchment area; and changes to lake levels are estimated to be not measurable during operations and will be within seasonal normals during the basin filling stage. The duration of the residual effects will occur throughout the operations and initial open pit basin filling phase (Level II). The geographic	Acknowledged FMG indicates that the hydrology baseline report will be updated and provided in the final EIS/EA presenting two years of baseline monitoring data to support the characterization of baseline conditions and suitability of the selected WSC reference station. Also, FMG acknowledged they will provide explanation of catchment area surface water conditions and monitoring/mitigation during mine life to validate predictions.	Acknowledged. As part of the ongoing approvals process, FMG acknowledges that appropriate follow-up monitoring will occur as prescribed by the anticipated approvals required for the Project (e.g., monitoring programs developed during the ECA ISW and PTTW permitting process, federal Environmental Effects Monitoring program).	EIS Sections 6.7.1.2, 6.7.6.1, 5.7.1.2, Appendix M-1 Section 4.3.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		This is considered to be equivalent to "residual effects" defined by CEAA 2012, "A residual environmental effects is an environmental effect of a project that remains, or is predicted to remain, after mitigation measures have been implemented". The proponent has not adequately described how the predicted flow decreases (for all flow conditions) during the pit filling phase will be mitigated by the company based on the mitigation measures identified. The proponent does not have adequate baseline water level data to sufficiently characterize "seasonal normals" as discussed in comment #13. Therefore, the proponent cannot adequately predict how they will maintain "seasonal normals" with mitigation measures if they are not first defined by the baseline data.		suitable for direct discharge will be pumped to the WSP to manage suspended sediments prior to discharge. Mitigation measures to reduce the effects of flow decreases during the pit fill phase are described in Section 6.7.3 of the draft EIS/EA, and include: • To reduce the overall volume of water required to refill the open pit basin and support future fish habitat creation, recontouring of a portion of the north end of the open pit basin will be undertaken during operations; • Passive filling with precipitation and groundwater will be supplemented by water transferred from Springpole Lake in a controlled manner to reduce the fill time, while maintaining lake water levels in Springpole Lake within natural variation; and • During filling of the open pit basin, efforts will also be made to minimize water takings during natural periods of low flow, to maintain lake levels within natural variation of Springpole Lake. The development of a monitoring program will occur during the environmental approvals process. To support the program and the development of trigger values if required, flow monitoring at the inlet and outlet of Springpole Lake has been ongoing and has demonstrated a strong correlation with the selected WSC reference gauge. Additionally, a robust rating	the baseline data submission to corroborate the correlation between the on-site watersheds and the WSC station on the Sturgeon River.	extent of the residual effects is within the LSA (Level I) and are reversible (Level I), when the outlet of the north basin returns to baseline conditions in the final closure phase. The frequency of the residual effects to inflows is considered to be moderate (Level II) as the effects will occur throughout the construction, operations and basin filling phase of the Project with a certain degree of regularity. As a result, the residual effect is not significant, and no further mitigation is planned. A monitoring program will be implemented during the life of the mine to validate the impact predictions and assess the effectiveness of the mitigation measures.			

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				curve for the Springpole Lake outlet has been developed. As such, this data would be used to translate the estimated monthly flows to water levels, and provide an understanding of natural variation in Springpole Lake water levels.					
MECP-HYD-012	Section 4.10.1 Water Management Facilities Page 4-33 Figure 4.1-1 Site Plan Page 4-2	Due to the recent more frequent occurrence of larger storms, the standard storm event used to design water management infrastructure requiring MECP OWRA S. 35 approvals is the 1 in 100-year, 24-hour event. Water management infrastructure required for the project should be designed to contain storm events up to and including the 1 in 100-year 24-hour event (100-year event). Currently the contact stormwater drainage ditches are designed for the smaller 1 in 10-year rainfall event. This is not considered to be a sufficient design storm volume and may result in water management infrastructure that is undersized and unable to adequately manage contact stormwater (sewage) from large storm events. Sizing of the ditches using the larger storm event (i.e., 100-year event) could result in a larger footprint of the site and closer proximity to natural surface water features, of which the impacts have not been adequately discussed. The plant site pond and the WSP are designed to contain the 1 in 100-year 24-hour storm event; however, there are also two more "contact water	It is recommended that all site water management infrastructure be designed to contain at least the 1 in 100-year 24-hour storm event (i.e., or other large events such as the Timmins storm) volume to minimize the potential impacts of storm events during all phases of mine life. Other mines in the region have also considered the Timmins storm event in the design of their water management infrastructure. Any changes to the site layout required to adequately size this infrastructure needs to be considered. This could significantly alter the project layout and the size of the overall footprint. This must be discussed by the proponent when considering placement of infrastructure. Any changes to the amount of effluent volume required to be managed should be considered by the proponent due to the increased size of infrastructure. The corresponding comments from the MECP SW specialist also discuss this issue.	Seepage collection and perimeter ditching will be designed during the detailed engineering phase prior to construction, and in support of, and detailed in, the environmental approval applications. It is anticipated that a lower design event (between 1 in 5 and 1 in 25 year) will be used for these features, based on experience with other mining projects in northern Ontario.	The seepage collection and perimeter ditching needs to be designed to contain (without overtopping) at minimum the 1 in 100-year 24-hour storm event (100-year event). This design storm is consistently applied by the mining sector across MECP's Northern Region. Designing infrastructure to manage storm events smaller than the 100-year event will pose a higher risk to the surrounding environment. It is recommended that all contact water conveyance structures and contact water management structures consider this storm event within their design criteria.	Water management infrastructure for the Springpole Project will comply with the *Ontario Water Resources Act*. To clarify, it is anticipated that a lower design event (between 1 in 5 and 1 in 25 year) will be used for construction phase water management features, based on experience with other mining projects in northern Ontario.	FMG states that water management infrastructure will comply with the OWRA. FMG anticipates a lower design event (1 in 5 to 1 in 25 year) will be used/sufficient for construction phase. MECP re-iterates that water collection infrastructure should be designed to manage a 1 in 100-year storm event during all phases of construction and operation.	Water management infrastructure that will exist throughout the operations and closure phases will be designed to manage a 1 in 100-year event. This includes any major water management infrastructure, such as the Central Water Storage Pond (CWSP), which will be developed during the construction phase, and is expected to be present for the life of mine. However, during the construction phase (which is expected to extend for up to three years), the site layout will be fluid and changing rapidly as the site is developed. As a result, temporary water management infrastructure may be constructed to contain and manage contact water. This infrastructure (ex. ditches and sumps) will likely move throughout the construction phase, to capture runoff as new areas are cleared and developed. These will ultimately be replaced with the operations phase water management infrastructure, and therefore won't exist for longer than three years. The probability / likelihood of a 1 in 100-year event occurring within their lifespan (maximum three years) is lower than the probability of	Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		management ponds" proposed on the northern edge of the Ore Stockpile for which the design storm has not be defined. These ponds should also be designed to contain the 1 in 100-year 24-hour storm event. Adequately sized water management infrastructure may increase the footprint of certain project components which could impact the overall site layout; this is a key consideration given how condensed the project is on the site and proximity to large natural surface water features. Changes to the site infrastructure sizing will also impact the water balances for the mine site and the receiver which could include a greater amount of effluent to be managed and discharged. Impacts of this greater effluent volume must be considered at the EA stage.							it occurring within the 10 years of operations. Therefore, a lower return period (1 in 25-year) design event will be sufficient for these construction/temporary water management features. Furthermore, a lower risk design event is justified by the water quality risks associated with the construction phase when compared to the operations phase. The primary parameter of concern with construction water management is typically TSS. There is a lower risk to the environment related to the release of TSS when compared to the parameters of concern that will exist during the operations phase. Therefore, while a 1:100 year event is appropriate for infrastructure that will exist throughout the longer duration operations and closure phases, a 1:25 year event will be used/sufficient for infrastructure that will exist during the construction phase only.	
MECP-HYD-013	Section 6.8.1 Existing Conditions Page 6-173 Section 6.7.1 Existing Conditions Page 6-145 Appendix M-1 Figure B28	The proponent stated that eight water level monitoring stations were established in Springpole Lake in 2020. Water level monitoring is said to show a consistent trend throughout the three systems (i.e., north basin, southeast arm and outlet). This section indicates this level data is provided in Appendix M-1; however, this data is not included in Appendix M-1, so it is unclear where the data is located.	The proponent should include the baseline water level data in spreadsheet format within the hydrometric baseline summary and include a summary of the data collection interval (i.e., 15-minute, hourly, etc.) at each station for the entire time series so that the adequacy of the baseline data collected to date can be assessed. The proponent should also include a commitment to	Hydrometric baseline data has continued to be collected since release of the draft EIS/EA to appropriately characterize baseline flow and water level conditions in Springpole Lake. Sufficient data has been collected to determine natural variation in Springpole Lake levels. These include: • Measured levels throughout the north basin, southeast arm and outlet (May 2021 to Oct 2022) of Springpole Lake which	It is unclear if the proponent has collected enough baseline data to define the long-term natural variability of Springpole Lake or to corroborate the correlation between the on-site watersheds and the WSC station on the Sturgeon River. Proceeding without adequate baseline data is at the proponent's own risk. All baseline data should be	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and present over two years of monitoring data to support characterization of Springpole Lake water levels and the suitability of the selected WSC reference gauge.	Acknowledged. FMG indicates that the hydrology baseline report will be updated and provided in the final EIS/EA presenting two years of baseline monitoring data to support the characterization of baseline conditions and suitability of the selected WSC reference station.	Acknowledged	Appendix M-1, Section 4.8

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Upon review of Appendix M-1, there only appears to be a data summary (not considered to be sufficient) and graphical data from 2020 for station L5-FFC (not including 2021). The proponent has not adequately characterized the baseline water levels within Springpole Lake. Baseline water level data from Springpole Lake has been previously requested by the MECP to assess whether adequate baseline data has been collected. The proponent has not adequately identified the frequency of in-situ data collection for each of the stations in Springpole Lake. The data included within the documentation (less than 6 months data) is not sufficient to characterize the natural monthly, seasonal, or annual variation in water levels or to adequately predict project impacts to the water levels compared to baseline.	continue to collect sufficient baseline water level data prior to any project development and associated impacts. The proponent should assess how the project will impact the water level within Springpole Lake compared to the "natural variation" in the system, including a quantitative assessment of the predicted impacts (once adequate baseline has been collected). The impacts of the project on the water levels in Springpole Lake are not currently understood.	confirm that lake levels are consistent throughout the entire lake; • More than 2 years of flow measurements conducted during three monitoring programs (2011 to 2012, 2020, 2021 to 2022) which validate the selection of WSC Sturgeon River at McDougall Mills as an appropriate reference station; and • A robust rating curve for the outlet of Springpole Lake will allow us to determine natural variability in Springpole Lake levels. Water level data collected since the submission of the draft EIS/EA will be summarized in the final EIS/EA.	included within the final EIS/EA in a spreadsheet format.				
MECP -HYD-014	Section 6.9.2.4 Analytical Methodology Page 6-205	As part of the water quality and water balance assessment for waterbodies within the Project Development Area (PDA) and Regional Study Area (RSA), the proponent identified assessment nodes within areas where impacts to flow and water quality may be observed because of the effects of the project. The assessment node used in the model as a representative location for the local inland waterbodies is located in L-20. However, there is no corresponding surface water quantity monitoring station at	The proponent should establish a surface water quantity monitoring station (flow and water level) at L-20 in order to validate the predictions of the water balance assessment (outside of the DFO authorization). Adequate baseline data at this station should be collected prior to any potential project impacts. The proponent has not identified how they would continuously assess project impacts to water levels and flows in the inland waterbodies throughout the project life. Therefore, the proponent	The current hydrometric baseline monitoring program has established sufficient stations to characterize runoff from both small and larger sub-watersheds within the Springpole Lake watershed. To prepare for permitting and long-term monitoring, two additional lake level monitoring stations will be added to the 2023 monitoring program at L-20 and another reference local inland water body with a similar watershed size and characteristics. These will allow for monitoring of potential impacts from the open pit	It is acknowledged that two additional lake level monitoring stations will be added to the 2023 monitoring program at L-20 and another reference station will be added at a local inland waterbody. Data from these stations will allow the proponent to assess potential impacts at L-20. The Ministry continues to recommend that flow out of L-20 should be monitored to assess if the open pit dewatering is having an impact on the outflows of this small inland lake. Flow monitoring at a small watershed scale will also	As discussed on May 15, it has been agreed that monitoring of flows at L-20 (watershed area < 0.5 km2) would not provide enough accuracy to validate the estimated change in flows out of L-20. Water levels will be monitored, and characterization of the intermittent nature of flow conditions at the L-20 outlet will be documented throughout the 2023 monitoring program to support future permitting.	Acknowledged – based on discussions between FMG/MECP on May 15, 2023		EIS Section 6.9.1.2, Appendix M-1 Section 4.6.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		the inflow or outflow of waterbody L-20 within the hydrology monitoring program. It is unclear how the proponent has assessed the potential impacts to the flow on a small watershed scale without a flow station at this location to provide local flow data; it would not be accurate to prorate flows from a much larger watershed to this small watershed, and there are very few regional WSC stations that are of comparable watershed size. It is noted that there is a hydrology monitoring station on waterbody L-19, but this waterbody is proposed to be covered under a Fisheries Act Authorization due to the anticipated impacts to this feature. The proponent has not adequately designed the baseline monitoring program to characterize the baseline condition or to monitor the potential impacts of the project on surface water features that are not covered under the DFO authorization.	should establish a reference station for the local inland waterbodies to compare impacted and non-impacted surface water features. Adequate baseline data should be collected at the reference station to confirm the data is representative of project baseline conditions.	drawdown cone on L-20. Flows out of these local inland water bodies will not be monitored, as the level of accuracy required to validate water balance flow predictions would not be achievable with this size of watershed.	be helpful to assess impacts at other small inland lakes (such as those that are proposed to be covered under a FAA). The collection of this data will also support applications for future provincial permitting.				
MECP-HYD-015	Appendix M-3 Section 6.0 Summary Page 6-1	The receiver water balance model includes several model nodes that are based on actual locations within the PDA and the RSA environment. Model Node 5 is located at the outlet of the north basin of Springpole Lake. However, there are no corresponding monitoring locations for several of the modelling Nodes, including in some areas predicted by the	Due to the magnitude of the impacts predicted at Node 5 and the absence of a monitoring station, it is recommended that the proponent install a hydrometric (flow and level) monitoring station at this location. A station should be established at this location and the proponent should collect adequate baseline data at the outlet of the north basin prior to any project impacts to this location.	As identified in the response to Comment 1, the connection between the north basin of Springpole Lake and the remainder of the lake (node 5), have been observed to behave as a lake and not as a riverine lake outlet. This assessment node was put in place to support water quality estimates. The predicted flow losses are not expected to materialize into impacts to velocity or water level.	It is unclear if the proponent has collected enough baseline data to define the long-term natural variability of Springpole Lake or to corroborate the correlation between the on-site watersheds and the WSC station on the Sturgeon River. Proceeding without adequate baseline data is at the proponent's own risk. It is noted that a drogue study is planned for the 2023 field	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and present over two years of monitoring data to support characterization of Springpole Lake water levels and the suitability of the selected WSC reference gauge. As the 2023 drogue study is carried out, findings will be reviewed. If meaningful data is collected, extension of the	Acknowledged. FMG indicates that the hydrology baseline report will be updated and provided in the final EIS/EA presenting two years of baseline monitoring data to support the characterization of baseline conditions and suitability of the selected WSC reference station. A 2023 drogue study will be conducted and FMG states that depending on results, the study may continue into 2024	Acknowledged	EIS Section 6.7.1.2, Appendix M-3 Section 4.3.1, Attachment A.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		water balance model to be impacted. There is no baseline monitoring data for some areas predicted to be impacted by the project. Monitoring stations should be installed at these key modelling nodes to adequately characterize the baseline condition, validate the model predictions, and to monitor and assess the predicted impacts of the project on these areas.	Monitoring at this location during the project life will allow for validation of the modelled predictions and the assessment of the predicted impacts for the duration of the project life. Node 10 in the model is located at the outlet of Springpole Lake and it does have a corresponding hydrometric monitoring station (F8-HS7). This station will also be a crucial monitoring location as there are predicted impacts at this location for the duration of project life. Monitoring should continue at this location.	Due to the lake-like conditions, i.e., extremely low velocities and wide cross section (~150 m), it is not possible to establish a flow monitoring station at this location. Additionally, it would not provide any value to the Project, as it has been demonstrated that the levels of Springpole Lake are governed by the outlet of Springpole Lake (Node 10), for which there is a very robust hydrometric station with good quality monitoring data. Although the current baseline monitoring program and field observations sufficiently demonstrate this, a drogue study may provide more quantitative and concrete evidence of lake-like conditions at node 5. This study is planned for the 2023 field season. Lake levels in Springpole Lake and flow measurements at the outlet of Springpole Lake will continue throughout Project life and are expected to be sufficient to monitor potential impacts resulting from the pit filling period.	season to demonstrate the lake-like conditions at node 5. It is unclear if one season of data will be sufficient to characterize baseline velocities at node 5 or what requirements the MECP will have on the allowable reversal of flows through this lake section.	drogue study into 2024 may be considered.			

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-HYD-016	Section 6 Figure 6.6-2 Baseline Hydrometric Monitoring Station Page 6-138 Appendix M-1 Baseline Hydrometric Monitoring	Figure 6.6-2 summarizes the baseline Hydrometric Monitoring Program. The proponent has not adequately collected sufficient baseline data to characterize the baseline hydrometric condition within the PDA, LSA or RSA. In addition to the lack of adequate baseline data, a reference station should be added to the monitoring program to support the baseline data collection and to allow for the assessment of project effects for the life of the project. The Hydrometric Monitoring program does not appear to adequately cover the areas required to assess the cumulative project effects on surface water systems or to assess the basin specific impacts (i.e., north basin flow reductions).	It is recommended that the hydrometric monitoring program is revised in order to monitor the cumulative effects on surface water systems surrounding the PDA, local study area (LSA) and RSA. It is recommended that several surface water quantity reference stations be established within the un-affected portions of the RSA. These should be able to act as reference stations for the north basin of Springpole Lake, the local inland waterbodies, and the south-east basin of Springpole Lake. Cumulative impacts of the project on the surrounding environment should be adequately monitored to assess impacts. The assessment of cumulative impacts should include establishment of reference stations outside the area of project impacts. Adequate baseline data should be collected at the reference stations to confirm the data is representative of project baseline conditions.	An additional water level monitoring station will be established at a local inland water body during the 2023 hydrometric field program to support future permitting and monitoring needs. This will be used as a reference station for the local inland water bodies. Potential impacts to surface water quantity resulting from the Project (discussed in Sections 6.6 to 6.8 of the draft EIS/EA) would be captured by, and therefore observed by, the current monitoring stations. The most downstream monitoring location, at the outlet of Springpole Lake (Node 10), will capture the cumulative impacts of the Project. Cumulative effects are discussed in Section 7 of the Draft EIS/EA. The addition of monitoring stations within the un-affected portions of the regional study area are not necessary to identify or assess cumulative impacts. The WSC Sturgeon River station will be used as a reference station, as it has demonstrated a strong correlation to the several years of site data and is outside of the local and regional study areas. The additional of another surface water quantity reference station would not benefit the evaluation of impacts from the Project.	As previously stated, is it acknowledged that an additional water level monitoring station will be established during the 2023 hydrometric field season to be used as a reference station for local inland water bodies. It is noted that the WSC Sturgeon River station is proposed to be used as a reference station for the site. It is unclear if the proponent has any contingency plan related to lack of data availability for any reason (i.e., instrumentation problems, decommissioning). This should be included in the final EIS/EA. It is also unclear why the WSC Cat River below Wesleyan Lake is not utilized as a reference station or to monitor cumulative effects of the project. Springpole Lake and Birch Lake are both part of the Cat River drainage basin. The proponent should include discussion within the final EIS/EA on both the WSC Sturgeon River station contingencies and why the WSC Cat River station was not considered in the cumulative effects assessment.	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and will describe the comparison of baseline monitoring data to both WSC Sturgeon River and Cat River. A summary of the updated Baseline Report findings is provided below: – Generally, the spring freshet at Sturgeon River occurs prior to that at Cat River, and the collected Project baseline data falls in the middle, slightly closer to the timing of the Sturgeon River. In terms of total runoff, the collected Springpole Lake data aligns closer to that of Sturgeon River). – The WSC station at Cat River below Wesleyan Lake (04GA002) also showed many similar characteristics to the Project watershed, particularly in the timing and shape of the freshet period. However, the total runoff yield, both over the period of record, and on an annual basis for 2012 and 2022 is significantly lower. Furthermore, the percentage of the water cover at within the Cat River watershed is higher than the Project area at 39%, which likely indicates more lake attenuation of peak flows. This is likely why data from the Cat River shows a later spring freshet compared to Sturgeon River. – The WSC station at Sturgeon River at McDougall Mills (05QA004) was selected because of how its historical data aligned with all monitoring data sets (both monthly trends and total runoff), its period and	Acknowledged		Appendix M-1, Section 4

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
						completeness of record (1961-2022), and because of its comparable watershed land cover. If any data availability issues arise with Sturgeon River, the gauge on Cat River may be used instead. For reference, the calculated average annual runoff for the Sturgeon River at McDougall Mills watershed is approximately 280.1 mm, while the average annual runoff at Cat River is approximately 271 mm.			
MECP-HYD-017	Appendix M-1 Section 4.3 Springpole Lake Flow Data Page 21	The proponent has stated that additional flow measurements were conducted at the inlet of Springpole Lake (F7-HS1) during the 2020 field program. The flow records were summarized, however the rating curves used to convert the level logger data to flow data were not provided. Baseline data, including rating curves, must be provided to understand the seasonal variability in the system.	It is recommended that the rating curves be provided within the final EA/EIS. Review of the baseline rating curves is a crucial piece of information for the MECP to understand the baseline condition and on which to base recommendations for future monitoring efforts. It is also needed to understand the baseline seasonal variability in flows (i.e., winter flow measurements).	An updated hydrology baseline report, with 2021 to 2022 hydrometric monitoring data will be presented in the final EIS/EA. This will include the rating curves developed to date.	Acknowledged. It is recommended that all baseline data be included in the final EIS/EA. To clarify, the proponent should include the rating curves developed to date and the field data (including date of manual measurements) on which the rating curve is based.	Acknowledged the rating curves developed to date and the field data (including date of manual measurements) on which the rating curve is based will be included in the final EIS/EA.	Acknowledged		Appendix M-1, Section 4.8
MECP-HYD-018	Section 6.6.2.1 Identification of Potential Environmental Effects Page 6-107	The proponent has not evaluated or quantified the potential impacts on Birch Lake due to the open pit dewatering, the collection of surface water runoff from the site that would have otherwise flowed into the lake, and the proposed water taking from Birch Lake. It was stated within the report that these activities could result in changes to Birch Lake water levels, but these changes have not been assessed. The potential impacts to Birch Lake water levels due to the proposed project are not understood.	The EA must include an evaluation of the potential impacts to Birch Lake water levels and flows within nearby bays under the worst-case scenario to understand the potential effects of the project on this lake. Monitoring of the water level of Birch Lake should be committed to in the EA in order to capture adequate baseline prior to any impacts being realized, and monitoring should continue throughout the mine life to ensure that the site does not have unforeseen impacts on the lake.	Assessment nodes SW-03, SW-24 and SW-04 are located in Birch Lake. Potential impacts to flow are estimated at these nodes, as a result of changing groundwater conditions, the collection of surface water runoff from the site, and proposed water takings. This assessment is detailed in Appendix M-3 and residual impacts are discussed in Section 6.6.4 of the draft EIS/EA. Ongoing water level monitoring in Birch Lake takes place at hydrometric station L-10.	L-10 is located in Birch Lake in a bay beside the northern portion of the open pit. This station should be sufficient to assess impacts to Birch Lake depending on the amount of baseline data collected to confirm natural variability. The proponent should include all baseline data collected at station L-10 within the final EIS/EA and should explain the predicted impacts to Birch Lake.	Acknowledged, all baseline data collected at station L-10 will be included within the final EIS/EA and it will explain the predicted effects to Birch Lake.	Acknowledged		EIS Section 6.6.6, and Appendix M-3

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MECP-HYD-019	Section 4.4.1.2 Pre-development Dewatering Page 4-6	During the construction phase, the proponent has proposed to gradually dewater the open pit area (contained within cofferdams) over a 6-month period. This has the potential to impact the water levels in Springpole Lake, which has not been adequately quantified presumably due to lack of baseline data. The dewatering of the open pit area and development of the site also has the potential to impact the flows at the outlet of the north basin of Springpole Lake, which is discussed in greater detail in comment #1. Continuous water level monitoring on the remainder of Springpole Lake, as well as a water level reference site, should be established in order to confirm that natural variation in Springpole Lake water levels is not impacted by the dewatering activities. This monitoring program should include a reference station to continuously compare impacted to non-impacted stations. A commitment should be made in the EA for this impact monitoring and the development of mitigation plans to address impacts to lake water levels (and flows to the downstream riverine sections of the lake) so that mitigation can be enacted as quickly as possible if necessary.	Continuous data collection at impacted and reference (non-impacted) stations will inform the proponent if further engineering controls on the cofferdams are necessary. The hydrometric monitoring program must be updated to include a reference station and continuous comparison from impacted to non-impacted stations. Effective mitigation measures should be updated within the EA to ensure natural variation (once defined by baseline data) is maintained. It is recommended that the proponent discuss how they intend to maintain the natural variation of water levels in the remainder of Springpole Lake and how that natural variability was assessed. The downstream impacts to flow must also be predicted (discussed in comment #1). It is recommended that the proponent establish reference stations (both flow and water level) within the hydrometric monitoring program, that can be compared to the remainder of Springpole Lake during the construction phase and other mining phases when impacts to water levels are predicted to occur.	The final EIS/EA will include a description of the natural variation in water levels estimated for Springpole Lake based on the ongoing baseline program. Monitoring of lake levels in Springpole Lake during dewatering will be used to assess the changes to water levels or flow as a result of construction dewatering and other mining phases. Measured flows at the Springpole Lake outlet will be compared to the WSC reference station at Sturgeon River. The specific trigger flows out of Springpole Lake will be developed during the environmental approvals phase. In the event that dewatering exceeds natural variation, this would be mitigated by reducing the pumping rates accordingly.	It is unclear if the proponent has collected enough data to corroborate the correlation between the on-site watersheds and the WSC station on the Sturgeon River. Proceeding without adequate baseline data is at the proponent's own risk. The Ministry continues to recommend that a reference station be added or proposed based on surrounding WSC stations (with appropriate rationale). This is expected to be within the final EIS/EA. Reduced pumping rates may not be a sufficient mitigation measure to keep Springpole Lake water levels within natural variability. It is assumed that if pumping rates need to be maintained for safety reasons or prevention of flooding infrastructure then this will be prioritized. Additional mitigation measures should be proposed instead of just reduction of pumping rates.	Acknowledged. The Hydrology Baseline Report will be updated for the final EIS/EA and will present over two years of monitoring data to support the selection of the WSC reference gauge. Infrastructure will not be placed in the isolated basin until it has been sufficiently dewatered. As a result, a reduced pumping rate, as a mitigation measure, would not be hindered by the need for safety or infrastructure protection.	Acknowledged		EIS Sections 6.7.1.2, 5.7.1.2, 6.7.6.1, Appendix M-1 Section 4.3.1.
MECP-HYD-020	Section 8.4 Springpole Lake Natural Water Level	Water level monitoring of Springpole Lake is proposed to be carried out for both environmental and infrastructure related purposes.	It is recommended that the proponent identify and explain the trigger mechanism for deciding to raise the cofferdam height and include this	Appendix V of the draft EIS/EA includes the preliminary design of the dykes (cofferdams) . Section 3.4.2 of Appendix V notes that the freeboard	Acknowledged. Continuous water level data collection on Springpole Lake is expected to help inform detailed engineering.	Comment noted.	Acknowledged		EIS Section 5.7.1.1

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
	Fluctuation Page 8-4	The proponent has stated that if continuous lake level monitoring indicates an upward trend during operations, then the crest height of the cofferdams could be raised to provide additional contingency dam height and prevent overtopping. Currently the cofferdams are designed with 5m of freeboard above the average level of Springpole Lake. However, the proponent has not collected adequate baseline to calculate the long-term average water level of Springpole Lake, so the designed height of the cofferdams may not be appropriate. The proponent has not adequately described the trigger mechanism for raising the crest height of the dams. Design of infrastructure is a key component of the EA. Increasing the crest height of the cofferdams during the approvals phase could include significant timing delays between realizing the dam raise is required and implementing and having the increased height available. This could result in potential issues including overtopping the cofferdams. The cofferdam design height should be increased to an appropriate and conservative height based on the expected levels in Springpole Lake to ensure that they will not overtop during the life of mine.	explanation within the EA documentation. The proponent should also consider any timing delays in obtaining approval and completing construction of the dam raise before the increased height can be implemented and available. It is recommended that the cofferdam design include a height at which the dam will not overtop during the life of mine. This dam height should be based on the maximum water surface elevation recorded on Springpole Lake to date, rather than the average water level, to provide a conservative dam height; should the ongoing collection of baseline water level data show higher water levels than recorded previously, then the dam height should be adjusted accordingly.	allowance will need to provide flood protection during the Inflow Design Flood (IDF). The elevation change resulting from storage of a 72-hour IDF is expected to be less than 1 m, based on the 1 in 1,000-year precipitation and probable maximum precipitation (Ausenco 2020). Additional evaluation of the hydrologic behavior of Springpole Lake will be collected prior to detailed engineering to assess the lake level response to a design storm event and will be incorporated into the final design. Geotechnical and dam safety inspections will be conducted at regular intervals, meeting or exceeding all regulatory requirements.					
MECP-HYD-021	Section 5.19.2 Results Summary and	As part of the alternatives assessment for effluent discharge locations, three	The assimilative capacity study has been evaluated only considering a multi-port	The three alternative locations considered in Section 5.19 of the draft EIS/EA did not include	The alternatives assessment considers potential impacts based on the proposed location	Section 5.19 of the draft EIS/EA includes an assessment of the three alternative location only	FMG indicates the draft EIS/EA includes an assessment of the three alternative locations	To clarify, the three locations considered in the alternative section for the treated effluent	EIS Section 4.17.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
	Selected Alternative Page 5-55	locations were assessed, Birch Lake, Springpole Lake North Basin and Southeast Arm of Springpole Lake. Rationale for selecting the Southeast Arm of Springpole Lake as the preferred alternative included the consideration of the greatest 'natural' effluent mixing of the three options. This is due to discharge being directed into a riverine section of the lake instead of a lake basin, and of the three options, this is the greatest 'natural' assimilative capacity which should minimize impacts to the receiver. The proponent has stated that because of the mixing available within the Southeast Arm of Springpole Lake this location is preferred for their effluent discharge location since there is less reliance on additional measures such as a diffuser to minimize impacts to the receiver. However, the CORMIX modelling presented (within Appendix N-2) only considered using a multi-port diffuser. The draft EA does not include an assessment of the potential impacts of their proposed discharge at their preferred discharge location into Springpole Lake without a diffuser. Therefore, the EA only includes an assessment of the impacts from discharging with a diffuser. Alternatives without a diffuser would likely result in greater impacts than the alternative with the diffuser.	diffuser. Therefore, this discharge configuration is considered to be the only alternative assessed for this project component. The EA process requires that the proponent assess multiple alternatives for all project components including any site discharges considering greatest project impacts. It is agreed that the effluent discharge into the Southeast Arm of Springpole Lake will provide the best potential mixing however the proponent should evaluate all alternatives utilizing a diffuser for each location since this is the proposed design component.	additional design features such as a diffuser but was based only on the location. A diffuser is a design commitment and could be installed at any of the 3 locations, from an alternatives assessment perspective it would be considered non-differentiating in the assessment process. With the selection of the preferred location, the effluent discharge has been further described to include a diffuser and the CORMIX assimilative study was based on that design.	of infrastructure. An effluent discharge location would have different impacts at each proposed location depending on the installed infrastructure (e.g., multiport diffuser versus shoreline pipe discharge versus submerged pipe). Potential impacts predicted through an assimilative capacity assessment and mixing zone study would change depending on the installed diffuser structure. Therefore, the final EIS/EA should include an evaluation of the effluent discharge locations considering a multiport diffuser.	without the additional design features such as a diffuser. The selected location was further evaluated in Section 6.8 in consideration of a diffuser and the results of the CORMIX modelling.	without design features such as diffuser. Only the selected location was evaluated considering a diffuser and results of CORMIX modeling. Therefore, the MECP comment (April 3, 2023) that infrastructure could potentially impact the outcomes for location assessment is still valid.	discharge were based on location only, and did not consider further enhancements to potential mitigation such as diffusers. This provided for a comparable evaluation across the three locations. The potential effects of the discharge location include: – Terrestrial disturbance based on the length of the pipeline associated with the alternative being considered; – Aquatic disturbance depending on the site conditions for the alternative being considered; and, – Changes in surface water quality due to the discharge of effluent depending on the site conditions for the alternative being considered. Mitigation measures that would reduce these potential effects include: – Minimizing the footprint of the pipeline route and/or aligning with other Project infrastructure; – Implementation of best management practices such as sediment and erosion control measures and timing restrictions during construction of the pipeline and discharge; – Site the location of the discharge to maximize natural mixing and attenuation; and, – Treating the effluent prior to discharge. On the basis of the net effects, it was determined that preferred and selected alternative for water discharge is to discharge to the southeast	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
								arm of Springpole Lake, as this offers the greatest natural effluent mixing and attenuation, as well as the highest overall watershed / catchment area and resultant overall assimilative capacity. The primary disadvantage for the Birch Lake and the Springpole Lake north basin alternatives is that they would be expected to require more extensive engineering-enhanced mixing which would necessitate additional in water infrastructure and increase the effects on aquatic habitat. The selected alternative was carried forward into the effects assessment (Section 6) for further evaluation. To support this evaluation, a feasible description of a diffuser is required to support the CORMIX modelling.	
MECP-HYD-022	Section 4.13 Domestic Sewage Page 4-41 Appendix M-2 Open Pit Mining Phase Page 3-3	The proposed effluent discharge configuration includes mixing of the Effluent Treatment Plant (ETP) and the Sewage Treatment Plant (STP) effluent streams prior to discharge of this mixed effluent to the receiver. During the development of provincial approvals following the EA phase, this proposed discharge configuration may require separate compliance points on each of the effluent streams prior to the domestic sewage effluent mixing with the industrial site effluent. It should also be noted that CORMIX modelling must be completed considering the maximum concentration of each of the effluent streams prior to	CORMIX modelling must be completed on the final effluent discharge considering the maximum effluent concentration that could be discharged from both the domestic sewage effluent discharge (prior to effluent streams mixing) and the industrial effluent discharge concentration. This should be done in accordance with MECP Policy B-1-5 and MECP's Water Management policies, guidelines, and provincial water quality objectives.	As discussed in Section 4.10 of the draft EIS/EA, the discharge of treated effluent from the Project will be protective of the receiving environment and will occur in accordance with federal and provincial approval requirements. It is understood that the final effluent criteria for the Project will be determined in consultation with the Ministry of the Environment, Conservation and Parks (MECP) during the environmental approvals phase. As water management planning and associated engineering advances, it is understood that additional modelling will likely be required to support the provincial approvals process,	Although final effluent criteria for the project will be developed during the provincial approvals phase, the MECP wanted to notify the proponent about potential requirements the MECP may have with regard to the current details of the proposal. To reiterate, provincial requirements could include separate compliance points on each of the effluent streams and CORMIX modelling completed considering each of the effluent streams prior to mixing.	Acknowledged.	Acknowledged.		Not applicable

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		effluent stream mixing. This is needed to understand the full extent of the potential effects of the site discharges on the receiver in order to assess the acceptability of this project component.		and will include CORMIX and consideration of MECP Policy B-1-5. See the response to Comment #6 for further details.					
MECP-HYD-023	Section 3.3.5.4 Local Topography and Drainage Page 3-15	Existing conditions demonstrate there is a "narrow" natural watershed divide present between Springpole Lake and Birch Lake. This watershed divide should remain in place during the closure phase, specifically around the open pit area to ensure that contaminated runoff from the mine site is directed away from Birch Lake during the operations and closure phases. This is important to ensure the project impacts do not extend beyond the area predicted to be impacted and remain within the area that has been assessed. It is recommended that this should be addressed during the EA phase since the alternatives for the mining infrastructure placement and closure need to be considered as they may impact the extent of the mine's impacts as well as the grading of the closure phase of any infrastructure that maintains the natural watershed divide.	During the operations phase, infrastructure placement and grading of the site should be completed in such a way that directs all contaminated runoff and site water away from Birch Lake. During closure, the preferred alternative should include a plan to re-grade the site infrastructure to maintain the natural watershed divide, while maintaining separation between contaminated and clean runoff (with the exception of any runoff from the CDF). Follow up monitoring should include LIDAR topographic surveys completed regularly throughout the project life to ensure that topography of the infrastructure components during operations phase and closure do not impact the natural environment more than is currently predicted within the draft EA.	During all phases, an integrated water management system will be designed to collect and control contact water from the stockpiles, CDF and plant site areas, and water from the open pit to be recycled and used in processing. This will include runoff collection ditches around the perimeter of infrastructure including the CDF and stockpiles, where needed. Collected contact water not used in processing will be treated at the effluent treatment plant and discharged to the southeast arm of Springpole Lake as needed to maintain the site water balance. Non-contact water will be diverted away from Project components using ditches, diversion berms and other suitable measures. Mine decommissioning / closure must be completed to satisfy the Mine Reclamation Code under Ontario Regulation 240/00 of the Mining Act. The reclamation and decommissioning / closure objectives for the Project include re-establishing natural drainage, rehabilitating disturbed lands and ensuring site runoff meets regulatory criteria. A post-closure monitoring program will be	It is acknowledged that during all phases of the project the proponent will be collecting and treating contact water using on-site infrastructure. The post-closure monitoring program should also include appropriate monitoring programs to ensure that the site mimics pre-site watersheds (i.e., Birch Lake and Springpole Lake) as closely as possible.	Acknowledged.	Acknowledged.		Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				developed as part of the regulatory Closure Plan to ensure that the site remains physically, chemically and biologically stable.					
MECP-HYD-024	Appendix B-4 Page B-4-2	Previously the MECP recommended (within the EA Terms of Reference comments) that the proponent assess the change in residence time in the remaining portion of Springpole Lake considering the elimination of a portion of the north basin. Due to the reduced watershed size, it is expected that the residence time will increase, which would reduce the flushing rate of the lake, which could result in potential effects on water quality. The proponent has still not assessed the impact to the change in residence time of Springpole Lake. This assessment is needed to understand the full extent of the potential effects of the project on Springpole Lake, specifically to understand how the change in residence time in the lake may impact the available assimilative capacity of this receiver.	It is recommended that the proponent quantify the predicted change in residence time within the remaining portion of Springpole Lake (during the time which the upper portion of the north basin will be removed). It is recommended that the proponent include the predicted impacts that this change in residence time would have on the water quality of Springpole Lake. The assessment should consider how the change could affect the natural function of the system and how it might increase the potential effects of the effluent discharge into the receiver.	The estimated change in residence time in the north basin of Springpole Lake is 20 days resulting from Project-related effects. This is based on an average flow from the north basin of 12 cubic metres per second (or 1,036,800 cubic metres per day), using a lake volume of 192 million cubic metres prior to construction which is estimated to have an existing residence time of 185 days. After construction of the cofferdams (dikes), the lake volume will be 172 million cubic metres, and the residence time will be 165 days. The change in residence time will be considered in the assessment of changes in water quality in Springpole Lake in the final EIS/EA.	It is unclear if adequate baseline data has been collected to derive the average flow rate flowing from the north basin which is used to calculate the change in residence time in this basin. Proceeding without adequate baseline data is at the proponent's own risk. It is assumed that the residence time of Springpole Lake will change twice over the duration of this project. The first being when the portion of the north basin is originally eliminated for the duration of mining. The second being when the portion of the north basin is reconnected to the rest of Springpole Lake (since the volume will have again changed within the lake). These two changes in residence time should be considered in the assessment of changes to water quality in Springpole Lake in the final EIS/EA.	To clarify, the estimated change in residence time is for the entire Springpole Lake. Flow monitoring at the inflow of Springpole Lake via Cromarty Lake has taken place over more than two years, and baseline data is considered adequate to derive inflow rates applied to the residence time calculation. The changes in residence time will be considered in the assessment of changes to water quality in Springpole Lake in the final EIS/EA.	Acknowledged.		EIS Section 6.7.1.2, Appendix N-2 Section 3.
MECP-HYD-025	Appendix M-2, Table 5-15: Annual Runoff coefficients by Modelled Land Use for Open Pit Mining and Pit Filling Phases, Page 5-13	Within the mine site water balance there is a table summarizing the annual runoff coefficients inputted in the water balance model. Several of the runoff coefficients assigned to certain land use types have the comment "Assumed by Wood" within the 'notes' column. This is not considered to be sufficient; the proponent must explain how the runoff coefficients were selected and	It is recommended that the final EA explain how the runoff coefficients were selected, on what they are based, and why they are appropriate for the respective land use types. Water balance modelling should include an update to any revised runoff coefficients. Without this information, the MECP cannot assess if the water balance modelling is an	The runoff coefficients applied to the water balance modeling were selected based on experience and involvement in numerous mining-related water balance models in the northern Ontario (e.g. Goliath Gold Project, Côté Gold Project, Hemlo Mine, Sturgeon Lake Mine, etc.). Runoff coefficients were further informed by Project-specific groundwater modeling (infiltration rates) and	Appropriate rationale needs to be included in the final EIS/EA to support all chosen runoff coefficients. Appropriate rationale should include data, including but not limited to, calculated runoff rates and volumes using collected onsite data, proposed monitoring programs to validate these runoff coefficients that would be used within the site water balance.	Appropriate rationale needs to be included in the final EIS/EA to support all chosen runoff coefficients. Appropriate rationale should include data, including but not limited to, calculated runoff rates and volumes using collected onsite data, proposed monitoring programs to validate these runoff coefficients that would be used within the site water balance.	Acknowledged. The requested rationale will be provided in the Mine Site Water Balance report appended to the final EIS/EA.	Acknowledged.	Appendix M-2, Section 5.3

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		on what basis, and why they were considered to be representative of the land use type.	accurate representation of the site conditions, and whether the potential project impacts have been adequately predicted.	gauged flow records. Consideration of relevant information (such as more recent project work from other mining properties, groundwater modeling updates and ongoing measured flows from the natural Project watershed) will be clarified in the final EIS/EA water balance modeling work.					
MECP-IA-001	General Comment	The review undertaken does not consider or explore potential comments provided by the Technical Reviewer as it relates to Indigenous consultation gaps, nor whether or not Indigenous knowledge has referentially been incorporated into the baseline studies. This review specifically examines and explores whether the Record of Consultation provided in Appendix D-2 of the draft Environmental Impact Statement / Environmental Assessment (EIS/EA) (pages 135-742) demonstrates that FMG has fulfilled its commitments related to the duty to engage or consult as outlined in Section 9.1 of the approved amended ToR.	N/A	Comment noted.					Not applicable
MECP-IA-002	General Comment	Unable to locate any consultation plans in the draft EIS/EA submission. The proponent should have developed consultation plans which would have provided a road map for developing meaningful engagement opportunities throughout the EA process.	Provide additional information regarding consultation plans for the EA process, including how those consultation plans were designed to meet commitments in the approved amended ToR for consultation.	The approach for consultation, including methods used throughout the draft EIS/EA development are described in the consultation plans in the approved ToR as well as Section 2 of the draft EIS/EA. The consultation plans approved as part of the Terms of Reference (ToR) are being followed. In addition, and pursuant to the ToR, a community-specific					EIS Section 2.5

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				consultation plan for the Ojibway Nation of Saugeen has been developed. FMG has been working with the leadership of local Indigenous communities so that they can be engaged in the Project in a way that best suits their community, while meeting the commitments in the approved ToR. For example, in-person community meetings were held in Mishkeegogamang Ojibway First Nation in 2022; however the Métis Nation of Ontario preferred to meet virtually. Community meetings were also held on the region in Ear Falls and Sioux Lookout. FMG has reached out and shared information with communities on a regular and frequent basis through the draft EA process and will continue. The draft EA consultation process provides a key opportunity for consultation on the Project and EA, should communities be interested in participating. Additional information on engagement opportunities and how the commitments in the approved amended ToR for consultation have been met will be provided in the final EIS/EA.					
MECP-IA-003	General Comment	The actual role of the Springpole Environment Committee is not well defined in the draft EIS/EA. It is unclear whether the Springpole Environment Committee had the mandate or structure to represent each Indigenous community.	Provide additional information regarding the Springpole Environment Committee, including defining the objectives of the committee, its role in the EA process and how the committee's mandate and structure effectively represents each Indigenous community.	The Shared Territory Protocol Nations (STPN) Springpole Environment Committee is described in Section 2.1 of the draft EIS/EA. The environment committee includes members from Cat Lake First Nation, Slate Falls Nation and Lac Seul First Nation and was formed to facilitate discussions around the					Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Project and associated environmental studies. The Committee provides a forum for two-way distribution of information as well as to discuss community questions, comments and goals. The committee completed a review of the baseline studies which informed follow up studies in 2022. FMG is awaiting direction from the STPN on the function of the Environment Committee going forward.					
MECP-IA-004	General Comment	It is noted that Section 9.6.1.3 of the approved amended ToR includes information on how FMG consulted with communities in preparation of the ToR and potentially outstanding concerns / comments for the EA process. In this section, it is described that FMG met with the MNO in 2021 to discuss comments on the ToR (and concerns related to Valued Components). It is unclear from reading the draft EIS/EA whether this issue was resolved. The approved amended ToR notes that FMG met with Mishkeegogamang First Nation in 2021 to discuss comments on the ToR (and concerns with Traditional Knowledge / Traditional Land Use and environmental baseline studies). It is unclear from reading the draft EIS/EA whether this issue was resolved. The approved amended ToR notes that FMG met with the Ojibway Nation of Saugeen in 2021 to discuss their comments on the ToR and EA process. It is	Provide additional information regarding how these comments / concerns were considered in the EA process to address outstanding issues identified at the ToR review stage.	Section 2 of the draft EIS/EA describes consultation and engagement activities, including a summary of the input received and how it has been considered in the draft EIS/EA. In addition, Appendix C of the draft EIS/EA includes a copy of the comments received during the preparation of the draft EIS/EA as well as the responses and a reference to where in the draft EIS/EA the comment was addressed.					Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		unclear from reading the draft EIS/EA whether these issues were resolved. The approved amended ToR notes that FMG was working with the STPN to establish an environmental committee, develop a community-specific consultation plan and to provide resources to participate in the EA process and fund a specific Traditional Knowledge / Traditional Land Use study. Again, it is unclear from the draft EIS/EA whether this commitment was met. It is also unclear whether FMG was able to meet with Pikangikum First Nation and Wabauskang First Nation based on the records provided in the draft EIS/EA.								
MECP -IA-005	Appendix D2 – "Indigenous Consultation Materials"	Appendix D-2 provides a cursory appendix with presentations and FMG news as to the status or nature of the EA process. Absent from this appendix are any minutes and/or questions/concerns/summaries from any of the Indigenous communities relating to the actual presentations. More importantly, it is not known whether any membership of those Indigenous communities attended any community meetings, as no sign-sheet was provided. Also absent are any communication logs relevant to providing notices/information, whether it is receiving or sending notices to each Indigenous community. Further, no plain language documents were provided, nor any written	First Mining Gold should ensure that its Record of Consultation for the EA is complete and contains the materials noted in this comment.	The comment is understood and the Record of Consultation for the final EIS/EA will be complete and contain the materials noted in this comment. FMG has provided a comprehensive summary document for the draft EIS/EA in both English and Ojibway.						Appendix D-2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		material in Oji-Cree, Ojibway or Cree to any of the listed Indigenous communities.							
MECP-IA-006	Appendix D2 – "Indigenous Consultation Materials"	It is noted that there is limited information regarding what input the STPN provided during the EA process. It seems that some members may have acted as Environmental Monitors in the collection of data, but collecting data does not necessarily mean or translate to getting tangible feedback as it relates to any of the baseline studies. For example, integrating Traditional Knowledge or whether it was considered in the development of those baseline studies.	Additional information should be provided as to how Indigenous communities provided feedback to the EA process (including baseline studies), including how Traditional Knowledge was considered.	Section 2 of the draft EIS/EA describes how Indigenous communities provided feedback, including related to Traditional Knowledge/ Traditional Land Use (Section 2.6.1.1), baseline studies (Section 2.6.1.2), alternatives assessment (Section 2.6.1.3), valued components (Section 2.6.1.4). Information about the role of the Environmental Monitor opportunities is provided in Section 2.6.1.6. Available traditional knowledge is described in Section 6.21 of the draft EIS/EA and a summary of how the information from the community studies and documents has been considered in the draft EIS/EA is included in Table 6.21-1 to Table 6.21-4. FMG is continuing to work with Indigenous communities on additional TLRU information sharing where it is made available. The final EIS/EA will include non-confidential new information that may be provided.					EIS Sections 2.6.1, 6.26.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-IA-007	Appendix D – "Indigenous Consultation Materials"	While I appreciate that FMG provided presentations and news about the project to the listed communities, including an offer to meet with them individually, it seems there is a lack of consideration of Indigenous knowledge in the baseline studies for the EA process. Ideally, the use of Indigenous knowledge and Traditional Land Use studies during the EA process would have provided legitimacy into the development of baseline studies. What is also not clear is whether archaeological or heritage resources exist in the proposed development site. It is not known whether the listed communities had the opportunity to provide information. It is noted that, in many cases, Indigenous communities would not provide this type of information unless assurances are provided or confidential agreements have been made.	Provide additional information about how Indigenous knowledge and Traditional Land Use studies have informed the EA process. Provide an explanation for whether Indigenous communities were consulted and whether the communities had the opportunity to provide information with regards to archaeological and heritage resources that may exist in the area.	Available traditional knowledge is described in Section 6.21 of the draft EIS/EA and a summary of how the information from the community studies and documents has been considered in the draft EIS/EA is included in Table 6.21-1 to Table 6.21-4. FMG is continuing to work with Indigenous communities on additional TLRU information sharing where it is made available. The final EIS/EA will include non-confidential new information that may be provided. The Stage 1 Archaeological Assessment Report and Cultural Heritage Research Report were shared with the Indigenous communities for feedback in 2021. Prior to submission of the draft EIS/EA, FMG received comments from the Shared Territory Protocol Nations (STPN) of Cat Lake First Nation, Slate Falls Nation and Lac Seul First Nation, and Mishkeegogamang Ojibway First Nation. FMG considered the comments and feedback received to date, provided responses and incorporated the feedback into the field workplans accordingly. Where there is an interest, through review of the draft EIS/EA, there is another comprehensive opportunity for additional information and feedback to be received.					EIS Sections 2.6.1, 6.26, Appendix D-2.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-IA-008	General Comment	In Table 9.7.1 of the approved amended ToR, there are several comments and concerns from Indigenous communities that FMG summarized. For example, Cat Lake First Nation requested a translator during consultation events which FMG committed to for future events. Ideally, a translator should have been present from the onset, including a facilitator to hear all the community members' concerns. It must be noted that the EA process is a complex process, especially if scientific vernacular and technical knowledge is being presented. Presented in the right way, Indigenous knowledge holders are more likely to provide relevant information to the proponent. It is unclear whether FMG has met its commitment and whether it was able to effectively collect the Indigenous perspective, as required. It is critical to the EA process to understand Indigenous perspectives (for example, how fish sustain the community as whole). It is a process of transferring knowledge, including building the identity of the community. A similar issue was identified by Lac Seul First Nation.	First Mining Gold should ensure that it is meeting the commitments in the approved amended ToR to consultation with Indigenous communities, including commitments to how consultation with Indigenous communities will be undertaken and how Traditional Knowledge will be incorporated and considered in the EA process.	To confirm, translators are present at community meetings based on the need identified by community leadership with capacity support from FMG. FMG has been and will continue to provide all reasonable opportunities in accordance with the commitments in the ToR.					Not applicable
MECP-IA-009	General Comment	Table 9.7.1 in the approved amended ToR identifies concerns regarding consultation from a number of Indigenous communities. It is unclear how FMG's responses and how the draft EIS/EA address these concerns. It is unclear when FMG intends	Provide additional information about how concerns and comments from Indigenous communities are being considered in the EA process. Provide additional information regarding Indigenous community-specific consultation plans, as per the	Please refer to the responses to #2 and #4.					EIS Section 2.6.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		to develop consultation plans for each Indigenous community, as per the commitment in the approved amended ToR.	commitment in the approved amended ToR.						
MECP-IA-010	Appendix B	In the concordance tables provided with the draft EIS/EA submission (i.e., Table B-2-1), certain requirements have been flagged by FMG as "NC" or "not completed" and it is noted that information will be provided in the final EIS/EA submission. For example, FMG notes the following are not completed: – Documentation of context in which [Aboriginal or Treaty rights are] practiced or exercised (including information about which groups of an Indigenous group practice the right (women, elders, youth), how the right was practiced historically); – Documentation of how the Indigenous group's cultural traditions, laws and governance system inform the manner in which they exercise the rights; – Documentation of the Indigenous group's perspectives on the importance of the land on which the project is located and how it intersects with any land management uses and/or plans they may have; – Documentation of how often the right is practiced or exercised and timing or seasonality of the practice or exercise of the rights; – Providing maps and data sets; etc. Furthermore, for other commitments and requirements in FMG's concordance tables (i.e., in Appendices B-4, B-5),	The commitments and requirements identified in the concordance tables must be fulfilled through the EA process, and this should be documented to ensure that readers understand whether / how the commitments and requirements have been met.	Requirements noted as being not complete (or NC) in the concordance table for the approved Amended Terms of Reference (Table B-2-1) were in progress at the time of the submission of the draft EIS/EA. This concordance table will be updated in the final EIS/EA, as a result of ongoing engagement and feedback received from Indigenous communities, government agencies and stakeholders.					Appendices B-1, B-2, B-3, B-4, B-5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		only general references are given to sections in which the commitments / requirements have been met. It is not clear in all cases from reading those sections how the commitments / requirements have been met, which may be confusing to the reader.							
MECP-IW-001	4.4.1.2 Page 4-6	For construction dewatering, what is the discharge criteria for TSS concentration (what TSS concentration is considered unacceptable?)	Please provide information and action plan for TSS removal during dewatering.	The upper bounds of acceptable concentrations of total suspended solids (TSS) in discharge is prescribed by the Metal and Diamond Mining Effluent Regulations (MDMER), which specifies maximum monthly mean and maximum single grab sample concentrations of 15 mg/L and 30 mg/L respectively. Discharge criteria for construction dewatering will be determined in consultation with the MECP during the permitting phase. Based on recent experience for other mining projects recently approved, the criteria will most likely be set at the MDMER concentrations, or potentially at a maximum of 25 mg/. Contact water that requires discharge during construction will be protective of the receiving environment and will occur in accordance with provincial approval requirements. Mitigation measures for TSS during construction dewatering are discussed in Section 4.4 1, Section 6.6.3 and Section 6.7.3 of the draft EIS/EA, and are proposed to include use of turbidity curtains, sedimentation ponds, and flocculant to help settle	Comment addressed				Not applicable

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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				suspended sediments and minimize TSS concentrations.					
MECP-IW-002	4.4.3 Page 4-7	For blasting using emulsion-based explosives, will ammonium/nitrate be released to water and discharged to the environment through dewatering process.	Please confirm and provide explanation how to prevent environmental impact.	The potential for effects from explosive use will depend on the volume and type of explosives used and the efficiency of their management. During operations, potential environmental impacts associated with explosives nitrogen residues will be mitigated with measures such as: - Use of emulsion-type explosives where reasonable, as opposed to ammonium nitrate fuel oil (ANFO) explosives; - Fresh and contact water diversion systems to minimize the amount of contact water and thus potential for nitrogen loading to the aquatic environment (Section 4.10 of the draft EIS/EA, Water Management); - Contact water management further includes collection and direction of contact water to the water storage pond and subsequently the water treatment plant, as required; and, - pH adjustment to reduce concentrations of un-ionized ammonia, which is the toxic component of ammonia. A blasting plan will be developed for the Project, which is expected to include measures to minimize misfires, spillage control and clean-up, and transport and safe handling of explosives.	Comment addressed			Not applicable	"Not included in Section 6.6.1.2 (IoC). No commitment to update EIS/EA made, and not related to Southeast Arm directly."

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-IW-003	4.4.4.2 Page 4-9	Based on leachate results, the concentrations of some metals (especially arsenic) are greater than PWQO. What is the mitigation plan during construction and operation stages?	Please provide information and action plan for leachate control.	Section 4.4.4.2 of the draft EIS/EA summarizes geochemical test work results for mine rock at the time. Please note, results of geochemical test work, including leachate from Shake Flask Extractions or Humidity Cells, do not represent anticipated seepage / leachate chemistry for Project components, or expected parameter concentrations in receiving waters. Rather, results from testwork were incorporated into a conservative, quantitative mass-balance model (Appendix N-2) to determine the volume and flow of water, as well as the potential concentrations and transport of water quality parameters (metals) over the life of the Project using a conservative approach. Results of the water quality model relative to the Provincial Water Quality Objectives (PWQO) for the protection of aquatic life are presented in Appendix N-2. These results informed the effects assessment for surface water, presented in Section 6.7 through Section 6.9. Results indicate there are no predicted significant adverse effects on receiving water quality from the Project, and, in the presence of planned mitigation measures, no metals are projected to occur at concentrations greater than PWQO in the surface water environment as a result of Project activities. Mitigation measures for	Comment addressed				Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				seepage / leachate are summarized in Section 6.5.3 and Section 6.6.3 of the draft EIS/EA and include water collection and treatment, the use of liners, and perimeter ditching.					
MECP-IW-004	4.10.1 Page 4-33	It is indicated that the plant site pond and WSP are designed for a 100-year, 24-hour storm event. Will overflow channel designed for these facilities for extreme storm events (greater than 100-year storm event)? Where will the overflow be discharged to?	Please provide information.	It is anticipated that for extreme flow events, this flow will be directed and stored to the open pit if there is insufficient capacity remaining in the WSP. The water could be pumped out of the open pit in the days following a storm event as capacity becomes available in the WSP. Please note an event greater than a 100-year storm is not addressed directly in the surface water effects assessment (Section 6.6 though Section 6.9 of the draft EIS/EA) as it is a low likelihood, outside of normal operating conditions event. Such low-likelihood events are discussed in Section 9 of the draft EIS/EA (Malfunctions and Accidents). It is also important to note that during extreme storm events the assimilative capacity of the receiver is substantially increased as the rest of the watershed will also have received the storm event and will be in a flood condition, such that receiver water quality is not expected to be of concern.	Comment addressed				Not applicable
MECP-IW-005	4.10.1 Page 4-34	The WSP shall be constructed at the early stage of construction phase so that contact water and leachate can be collected and stored.	Please confirm the construction timeline of the WSP and ETP.	The timing of water treatment plant construction will be confirmed as Project engineering advances to support the provincial permitting process. If it is determined to be required, the plant will be constructed in	Comment addressed				Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				sufficient time to be operable in advance of need. Construction phase water management will include appropriate mitigation measures as required such that contact water that requires discharge during construction will be protective of the receiving environment and will occur in accordance with federal and provincial approval requirements.					
MECP-IW-006	4.10.2 Page 4-35	Except metal and TSS, pH might be another concern. Please consider neutralization treatment as part of ETP design.	Please confirm and provide explanation how pH will be controlled.	pH adjustment is a common water treatment strategy used in Ontario mines. Numerous options are available to support the Project and water treatment engineering is advancing in support of the permitting phase. Note that the pH of Project discharge is required to be equal to or greater than 6.0, but not greater than 9.5; as per the federal Metal and Diamond Mining Effluent Regulations (MDMER). Project discharge during construction and operations will be protective of the receiving environment and will occur in accordance with federal and provincial approval requirements.	Comment addressed				Not applicable
MECP-IW-007	4.11 Page 4-39	For chemical storage area, stormwater might be contaminated by spills or leakage. What is the plan for the discharge of this contaminated stormwater or contact storm water.	Please provide information and action plan.	There is a low likelihood of discharge of this contaminated stormwater or contact storm water, outside of normal operating conditions events, and this is discussed in Section 9 of the draft EIS/EA (Malfunctions and Accidents). An emergency response plan will be developed for the Project prior to construction and will address primary hazardous materials on site, including procedures for spill	Comment addressed				Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				response. Specific handling responses for a spill in the chemical storage area would depend on the type and quantity of the spill.					
MECP-IW-008	4.13 Page 4-41	If holding tanks are used at the outlying site facilities and the sewage is to be transferred to the onsite sewage treatment plant, licenced hauler shall be retained for the transportation of sewage. Discharge effluent criteria shall be established and approved by the Ministry.	Please confirm.	Comment noted. Details will be advanced during the permitting stage of the Project in discussion with MECP.	Response is sufficient with the assumption that the concern / issue will be addressed at the permitting stage.				Not applicable
MECP-IW-009	5.16 Page 5-48	For the assessment of process plant effluent treatment alternatives, the ability of the alternatives to meet MECP required discharge criteria and consistency in performance are also considering factors. The preferred approach need to be acceptable to MECP. The In-plant SO_2/Air approach is acceptable to the Ministry.	To add more criteria into Table 5.16.1.	Comment noted.	Response is sufficient with the assumption that more criteria will be added into the Table.				EIS Section 4.14 Table 4.141.
MECP-IW-010	9.8, 9.9 and 9.10 Page 9-11 to 9-14	To minimize failure of Passive Water Management System, Active Water Management System, and Water Management System Treatment, duty and standby arrangement shall be provided for major equipment (such as pumps and in-plant SO_2 / O2 treatment system).	Please confirm and provide action plan.	As noted in Section 4.16 of the draft EIS/EA, standby capacity will be available	Comment addressed				Not applicable
MECP-IW-011	10.4 Page 10-3	Benefit agreement with First nations shall be negotiated and agreement to be reached before the issuance of sewage approvals.	For information only.	Acknowledged	Comment addressed				Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-IW-012	11.2 Page 11-4	The holding tanks at the outlying site facilities might also need MECP approval.	Please confirm.	Comment noted	Response is sufficient with the assumption that the Consultant will look into this.				Not applicable
MECP-IW-013	12.3 Page 12-3	Domestic sewage shall also be monitored such as flow, influent and effluent quality etc.	Please confirm.	Comment noted. Monitoring will be undertaken in accordance with received permits / approvals.	Response is sufficient with the assumption that the concern / issue will be addressed at the permitting stage.				Not applicable
MECP-NS-001	Section 6.3	The noise impact of the off-site transport trucks associated with the project should be evaluated along the Wenesaga Forestry Road from the project location to the existing public road.	The most impacted point(s) of reception should be identified and assessed along that path.	The final EIS/EA will be updated to include a noise assessment of Project activities along the proposed mine access road using applicable points of reception. The potential noise effects of off-site transport trucks along the Wenesaga Forestry Road are assessed through the Forest Management Planning process and not part of the Springpole Gold Project.	As noted on the March 3, 2023 technical call with federal and provincial reviewers, the noise impact of trucks will need to be assessed from the project site to the public road. A quantitative evaluation should be provided in the final EIS/EA report.	The final EIS/EA will be updated to include a noise assessment of Project activities along the proposed mine access road to the connection with the existing public Wenesaga Forestry Road.	As noted on the March 3, 2023 technical call with federal and provincial reviewers, the noise impact of trucks will need to be assessed from the project site to the public road. A quantitative evaluation should be provided in the final EIS/EA report for the most impacted points of reception and/or communities along the access road. Any further discussion on the matter should be supported by a map clearly showing the location of the points of reception and/or communities which will be the most impacted by the influx of trucks from the project.	The final EIS/EA will include a quantitative evaluation of the construction and operation of the proposed mine access road (from the Project site to the public road [the northern terminus of the Wenesaga Forestry Road]) using representative points of reception.	EIS Section 6.3.1.2, Appendix H-3 Section 3.
MECP-NS-002	Table 6.3-1	Table 6.3-1, background sound levels.	The lowest hourly LAEQ sound levels recorded should be shown for each period of evaluation as per NPC- 300, and not the arithmetic average of all hourly LAEQ data points. The periods of evaluation under NPC-300 are daytime (0700-1900), evening (1900-2300) and nighttime (2300-0700).	The final EIS/EA will be updated to describe the existing conditions in accordance with NPC300, where applicable. This will include presenting hourly LAeqs calculated as an energy average and the lowest hourly LAeq.	As noted on the March 3, 2023 technical call with federal and provincial reviewers, a quantitative evaluation should be undertaken to determine the noise impacts from the transmission line component of the project.	A quantitative evaluation will be undertaken to determine the noise effects from the construction and operation of a representative section of the transmission line for the Project, and included in the final EIS/EA.	As noted on the March 3, 2023 technical call with federal and provincial reviewers, a quantitative evaluation should be undertaken to determine the noise impacts from the transmission line component of the project, using the nearest and most impacted point of reception along the proposed transmission line. Any further discussion on the matter should be supported by a map clearly	The final EIS/EA will include a quantitative evaluation of the construction and operation of the proposed transmission line for the Project.	EIS Section 6.3.1.2, Appendix H-1 Section 5.1, Appendix H-2, Appendix H-3 Section 3.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
							showing the location of the nearest and most impacted point of reception along the proposed transmission line.		
MECP-NS-003	Table 6.3-1	Table 6.3-1, background sound levels.	The lowest hourly LAEQ sound levels recorded should be shown for each period of evaluation as per NPC- 300, and not the arithmetic average of all hourly LAEQ data points. The periods of evaluation under NPC-300 are daytime (0700-1900), evening (1900-2300) and nighttime (2300-0700).	The final EIS/EA will be updated to describe the existing conditions in accordance with NPC300, where applicable. This will include presenting hourly LAeqs calculated as an energy average and the lowest hourly LAeq.	No further comments.	Acknowledged.			EIS Section 6.3.1.2, Appendix H-1 Section 5.1, Appendix H-2.
MECP-NS-004	Section 6.3	Section 6.3 indicates that "Noise and vibration emissions from the process plant will be minimal as most of the plant equipment is enclosed within the process plant building."	While it is understood that detailed information may not be available at this time, a preliminary noise assessment of the process plant's outdoor noise sources should be provided.	The final EIS/EA will be updated to include relevant process plant sources, based on applicable assumptions and experience with similar mining projects.	No further comments.	Acknowledged.			EIS Section 6.3.1.2, Appendix H-3 Section 3.
MECP-NS-005	General Comment	Aggregate supply locations.	Clarify operations at the aggregate supply locations including but not limited to the noise impact on the nearest/most impacted points of reception.	The final EIS/EA will be updated to include a noise assessment of the proposed aggregate locations for the Project, using the latest readily available project information regarding the supply of aggregate and applicable points of reception.	No further comments.	Acknowledged.			EIS Section 6.3.1.2, Appendix H-3 Section 3.
MECP-OP-001	3.1.1, Pg 3-1; Figure 3.1-1 Figure 6.18-4	There are no dedicated protected areas, conservation reserves or provincial parks within 20km of the proposed mine site. However, the following provincially regulated conservation reserves are located within the identified Regional Study Areas (RSAs) and are only reflected on one map (Figure 6.18-4) showing the Outdoor Recreation RSA. - Harth Lake Conservation Reserve, - Whitemud Conservation Reserve, - Bruce Lake Conservation Reserve,	Recommend reflecting protected areas on all maps to identify project vicinity to these areas. Provincial parks and conservation reserves are regulated under the Provincial Parks and Conservation Reserves Act, 2006, which affords the area enhanced level of protection for values. Because of the transient nature of many ecological values such as birds, large mammals, fish, bats, etc. effects on the broader landscape can have a significant impact on the values found within the protected area.	The following Conservation Reserves will be added to Figure 3.1-1 and other relevant figures in the final EIS/EA: • Harth Lake Conservation Reserve, • Whitemud Conservation Reserve, • Bruce Lake Conservation Reserve, • Lac Seul Islands Conservation Reserve, • Trout Lake Conservation Reserve, • Brokenmouth River Conservation Reserve, and • Gull-Christina Conservation Reserve.	Comment addressed				EIS Section 6.18 Figure 6.18-5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		- Lac Seul Islands Conservation Reserve, and Trout Lake Conservation Reserve-U82 - Caribou RSA Brokenmouth River Conservation Reserve- RSA noted above in addition to - Large Mammal RSA Gull-Christina Conservation Reserve- RSAs noted above in addition to: -Vegetation/Wetlands RSA, -Bats RSA, -SAR Birds RSA, -Wildlife Habitat RSA, -Land/Resource RSA, -Outdoor Recreation RSA, -Human and Ecological Health RSA, -Traditional land and Resource Use RSA, and - <900m away from the Air Quality RSA Cat Lake- Slate Falls Dedicated Protected Area is located <14km to the NE of the proposed mine location, and within several RSA's yet there is no mention of the protected area.	For all protected areas within the vicinity of the project, recommend including section that covers background/baseline information and impact analysis with cumulative effects that the project may have on these protected areas.	Section 6.18 of the draft EIS/EA includes a summary of the baseline information and effects assessment for conservation reserves. The Project is not predicted to have residual effects on these areas and has not been carried forward in the cumulative effects assessment (Section 7 of the draft EIS/EA).					
MECP -OP-002	2.2.3, Pg 2-5	Contact list does not include all potential stakeholders for consultation on the project	Ontario Parks to provide list of contacts for consultation purposes.	Comment noted, the contact list was based on the Terms of Reference for the Project and previous engagement events. Please provide as soon as possible and FMG will update the contact list appropriately.	A list of contacts is provided separately (see below).	As previously noted, the contact list was developed as part of the ToR process to include potentially affected stakeholders. FMG appreciates the list of contacts provided and will add these groups to the contact list if requested by them. In addition, information related to and considered in the environmental assessment process is made publicly available on the provincial and federal government websites which these groups can access if desired.			Not applicable

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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MECP -OP- 003	3.1.1.4 Pg 3-1	Water flows from Birch Lake into Springpole Lake, through the Birch River and ultimately into Lake St. Joseph. The Existing Water Diversion section is the only section that speaks to the water flow beyond Springpole Lake.	Suggest including Gull Lake and identify conservation reserve and other values between Springpole Lake and Lake St. Joseph.	Gull Lake will be added to the description of the existing water diversion. As noted in the response to Comment #1, additional conservation reserves will be added to Figure 3.1-1 and other relevant figures. It should be noted that Section 6.18.1.3 of the draft EIS/EA includes a summary of existing parks, conservation and other protected areas within the Regional Study Area of the Project. It notes two the two closest conservation reserves, including the Gull Christina Conservation Reserve (located 22.4 km to the southeast) and Brokenmouth River Conservation Reserve (located 41.8 km to the south).	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			EIS Section 6.18, ,Figure 6.15-5
MECP -OP- 004	3.3.3.1 Pg 3-11, Appendix J	No baseline measurements for ambient light- assumed that because of remote location, it could be characterized as intrinsically dark.	Recommend including baseline ambient light readings to inform increase and potential impacts of anthropogenic light sources from the project. Recommend adjusting receptor locations to areas that are intrinsically dark (no anthropogenic light sources) where a conservative analysis of impacts can be conducted- not outposts/cabins. Recommend analysis of anthropogenic light sources and potential impacts, in addition to consideration of mitigation options to address anthropogenic light sources from project.	As noted in Section 7.1.1 of the Ambient Light Baseline and Predictive Assessment (Appendix J of the draft EIS/EA), the average [sky glow] brightness was measured on August 8, 2021 within 400 m of the existing exploration camp, and determined to be 21.86 mag/arc-sec2 in the 0- to 30-degree zenith angle. Fine particulate matter from nearby wildfires may have had an effect on the measurements. This data was supplemented with predicted sky glow based on satellite surface brightness data (see Section 7.1.1). Measurements taken with a light meter measuring in units of lux were all below the limit of detection. Additional measurements have been taken since the submission of the draft EIS/EA that support these conclusions and will be included	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			EIS Section 3.4.12, Appendix J Sections 3, 4, 6.

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				in the final EIS/EA. Measurements could not be taken at receptor locations due to safety (accessing remote locations at night), however measurements were instead taken 400 m from the exploration camp in an area that was intrinsically dark. Appendix J, Section 7.2 includes a predictive assessment of light trespass from the Project. As noted in Section 9.0, light effects will be managed through the Project's lighting strategy (e.g., as part of routine monitoring each season, light sources will be visually assessed for damage and evidence of light spill). These measures are further outlined in Section 6.18.3 of the draft EIS/EA.					
MECP-OP-005	3.3.7.2 Pg 3-18, 4.4.1.2 Pg 4-6	Surface water in-flows/out-flows of Springpole Lake	Recommend providing explicit detail on: - The natural variation in water level of Springpole Lake and connected waterbodies. - How the proposed de-watering and re-filling of the pit will adjust the lake levels	Details on the natural variation of water levels are found in Section 6.7.1 of the draft EIS/EA for Springpole Lake. An assessment of the change in water levels in Springpole Lake as a result of dewatering and re-filling of the open pit is found in Section 6.7.	Comment addressed				Not applicable
MECP-OP-006	4.4.1.2 Pg 4-6	Suspended solids - Controlled dewatering of the mining area is expected to take approximately six months to complete, based on continuous (24-hour, 7-day per week) pumping. The dewatering process, including the transfer of water out of the isolated basin back into Springpole Lake and the removal of fish, will be designed to mitigate potential environmental effects, including to maintain lake levels within	Recommend identifying the acceptable limit of suspended solids that will be discharged into Springpole Lake. Recommend consideration of timing windows for discharge into Springpole Lake.- not reflected in EIS/EA	Discharge criteria for construction dewatering will be determined in consultation with the MECP during the environmental permitting phase. The quality of contact water that requires discharge during construction will be protective of the receiving environment and will occur in accordance with provincial and federal requirements. Note, the upper bounds of acceptable concentrations of total	Comment addressed				Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		natural variation. Clean water from the isolated basin will be pumped over the cofferdam(s) back into Springpole Lake, and monitored for suspended solids. As the water level decreases within the isolated basin and when the suspended solids content is no longer acceptable, the remaining water will be pumped to sumps / a sedimentation pond within the dewatered basin to manage suspended sediments, or to the water storage pond (WSP) which is part of the integrated site water management system. Flocculant or other means may be used in the WSP if needed to help settle suspended sediments.		suspended solids (TSS) in discharge is prescribed by the Federal Metal and Diamond Mining Effluent Regulations (MDMER), which is equivalent to a maximum authorized monthly mean concentration of 15 mg/L. Discharge of treated water will consider applicable timing windows and will be determined through the environmental approvals process.					
MECP -OP-007	4.8 Pg 4-31	What considerations have been given for fish and fish habitat other than compensation components?	Suggest exploring/analysing other options/alternatives that have the potential to mitigate fish and fish habitat impacts.	Efforts have been made to design the Project to minimize encroaching on fish habitat. Section 5 of the draft EIS/EA includes an assessment of alternatives for various components of the Project and includes consideration of fish and fish habitat. Further, Appendix E of the draft EIS/EA includes the Mine Waste Management Alternatives Assessment which evaluates alternate locations, methods and technologies for storing mine waste to minimize and/or avoid effects to fish habitat. As a result of the location of the ore body and the presence of numerous lakes and small waterbodies in the area, potential effects on fish and fish habitat from the preferred alternative are anticipated.	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			EIS Sections 4, 6.10.4.

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				These potential effects have been assessed in Section 6.10.3 of the draft EIS/EA, and considers mitigation measures to reduce the potential effects to fish and fish habitat, including fish habitat offsetting and compensation measures.					
MECP -OP- 008	4.9 Pg 4-33	An airstrip may be established to transport personnel to the site. Also a proposed helipad.	Suggest identifying the locations of these infrastructure and analysing the potential environmental/ecological impacts of increased aircraft presence?	An airstrip to support up to 2 flights per week during construction, operation and closure phases of the Project may be constructed on site for use by Dash-8 type aircraft. The location is proposed to be within the existing project development area and will be co-located along a section of the mine site access road. The location and the assessment of potential effects for the construction and operation of the airstrip will be included in the final EIS/EA.	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			EIS Sections 5.17.2, 6.3, 6.10, 6.13, 6.21.
MECP -OP- 009	4.10.4 Pg 4-36 Appendix M-2 Table 5-20 Pg 5-14	Effluent discharge and seepage	Suggest further assessment and identification of presence/absence of fish habitat at effluent discharge location. Suggest identification of the locations for 'other minor discharge locations'. Question- Does the volume of effluent discharge include all catchment areas (seepage/run-off of the CDF/ ore stockpiles, etc.), or is this just process and sewage effluent? Question- will all effluent/seepage/run-off/contact water be processed and discharged into Springpole Lake at the effluent discharge location, or will some be discharged into Birch Lake?	Baseline studies have been completed to assess fish habitat (Appendix O). Fish habitat is present at the proposed effluent discharge location. The southeast arm of Springpole Lake (Figure 4.1-2) was selected as the preferred discharge location for treated effluent. If additional minor discharge locations are required during construction, these would be determined during the environmental approvals process. Contact water from the mine site catchment areas will be collected with an integrated water management system (as described in Section 4.10.1.2 of the draft EIS/EA). Excess contact water that is not required for	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			Not applicable

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			What is expected total rate of discharge (m^3/day)? Question- How does the anticipated daily flow (m^3/day) of discharged effluent (all catchment areas) compare to the natural water flow rate at the effluent discharge location?	recycling to the process plant will be treated and discharged, as needed. There are no proposed effluent discharges to Birch Lake. The expected total rate of discharge from the combined effluent treatment plant / sewage treatment plant is 18,684 m^3/day. Section 6.8.4.1 of the draft EIS/EA predicts the changes in daily flow in the southeast arm of Springpole Lake due to the discharge of treated effluent. During an average year, the addition of treated effluent to the natural water flow rate is predicted to increase flows in the southeast arm of Springpole Lake by less than 1%.				
MECP -OP- 010	4.16 Pg 4-44 Table 5.25-1 Pg 5-72, 5-73	Power Supply and Infrastructure- 5000sq m switching station	Suggest identifying location of switching station at connection point to with the Wataynikaneyap transmission line. Suggest re-examining the power-supply options with emphasis on consideration of spatial alternatives for connection to electrical grid. Suggest further analysis of wind/solar impacts if consideration for supplemental power supply.	The location of the switching station at the connection point with the Wataynikaneyap line will be identified on the applicable figures in the final EIS/EA. Section 5.26 of the draft EIS/EA includes an assessment of four alternative routes for a 230 kV transmission line from the Wataynikaneyap line to the Project. These have been identified with full consideration of both the environmental and electrical engineering / power availability aspects. Section 5.25 of the draft EIS/EA includes an assessment of alternative sources of power for the Project. It was determined that wind and solar are not preferred. An assessment of wind turbine and solar panel farm is included in Appendix T (Table T10) of the draft EIS/EA.	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			EIS Sections 4.24, 4.25, 5.18, Figure 5.18-1,

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				This will be clarified in the final EIS/EA. While not part of the current Project proposal or closure concept, FMG is committed to studying long-term sustainable green energy opportunities that could be implemented, building on the key energy infrastructure put in place for the mine. This may present a unique and sustainable opportunity for generations to come and will be further explored during life of mine.					
MECP-OP-011	4.18.3.1 Pg 4-50 5.34 Pg 5-97	Waste management-construction, operations, and closure Non-hazardous demolition wastes that are not transported off site for re-use or sale will require permanent disposal. These materials will generally require disposal in an approved landfill either on site or off site, similar to solids wastes produced during the construction and operations phase. The approved offsite landfills are potentially available, but are located distant from the Project site (Section 5.29)	Recommend identification of potential locations for waste disposal facility and potential impacts for both existing landfills and development of new landfill facilities.	An onsite facility is not proposed. The potential impacts of both an existing and new landfill were assessed in Section 5.34 of the draft EIS/EA, with supplementary information on the assessment found in Appendix T-1 (Table T1-18). It was determined that an approved offsite landfill was preferred. There are two approved offsite landfills which have capacity and are potentially willing to accept waste from the Project; the Hidden Lake Landfill located approximately 400 km from the Project site that services the Town of Sioux Lookout and the surrounding area and a municipal landfill in Ear Falls (approximately 160 km from the Project site). FMG is in discussion with the local communities to determine the most appropriate location for the Projects waste disposal.	Comment addressed				Not applicable

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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MECP -OP- 012	5.21.2 Pg 5-60	Results summary and selected alternative- mine access road routing	Suggest re-examining the mine access road alternatives and developing mitigation options beyond the Overall Benefit Permit.	A detailed assessment of the mine access road alternatives with respect to Species at Risk is included in Appendix T-2 of the draft EIS/EA. As a result of the location of the ore body and the presence of numerous lakes and small waterbodies in the area, potential effects on species at risk are unavoidable and therefore an Overall Benefit Permit will be required. An assessment of these potential effects and the associated mitigation measures for the construction and operation of the preferred mine access road route are described in Section 6 of the draft EIS/EA. In addition to the measures that may be included under an Overall Benefit Permit, other mitigation measures for the preferred mine access road are further described in: – Air Quality (Section 6.2.3), – Noise (Section 6.3.3), – Surface Water (Section 6.9.3), – Fish and Fish Habitat (Section 6.10.3), – Vegetation Communities and Wetlands (Section 6.11.3), – Wildlife and Wildlife Habitat (Section 6.12.3), – Caribou (Section 6.13.3), – Wolverine (Section 6.14.3), – SAR bats (Section 6.15.3), – SAR birds (Section 6.16.3), and – Traditional Land and Resource Use (Section 6.21.3).	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			EIS Section 4.19.

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MECP-OP-013	5.21.2 Pg 5-60	Mine site access road alternatives	Question- Has consideration been given to align the transmission and road corridors to reduce the overall footprint/impacted area? If so, recommend providing analysis for evaluation.	Yes, this was fully considered and further detailed in Appendix T-2 of the draft EIS/EA. The preferred mine access road and transmission line routes are co-located where practical within a shared corridor. Roads and transmission lines have different subsurface and routing requirements. For example, the road has been preferentially located on higher lands to minimize direct effects to waterbodies and crossing wetlands where practical. Transmission lines cannot curve and turning points need to be minimized. However, this will be considered and as the design advances, opportunities for aligning the two corridors as much as possible will be explored.	Additional review will be completed when the final EIS/EA is submitted	Comment noted.				EIS Sections 4.18, 4.19, 4.24, 4.25, 5.2, 5.21, Appendix T Sections 1.2, 4.1.3.1, 4.1.5, 4.2.3.1, 4.2.5, 4.3.3.1, 4.4.3.1, 4.4.5.
MECP-OP-014	5.31 Pg 5-90	The primary intent of reclamation and closure of the open pit and the dewatered open pit basin is to achieve a physically safe and chemically stable environment.	Question- What is the assessment criteria/standards for achieving a 'physically safe and chemically stable environment'? Question- For which VCs and for what timeframe will long-term monitoring occur post closure (pit filling)?	The criteria is a requirement of rehabilitation under the Mining Act, and site-specific requirements of the Ministry of Mines (MINES). It will need to be defined in the Closure Plan to be filed with MINES prior to construction. The post closure monitoring program for the pit lake will be defined in the filed Closure Plan during the permitting process. Water quality monitoring is expected to occur on a regular basis, at least until the pit lake is reconnected to the natural system.	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			Not applicable

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MECP-OP-015	5.3 1 Pg 5-90	Filling of open pit from Springpole Lake and Birch Lake A limit would be placed on the quantity of water transferred from Springpole Lake into the dewatered basin in order to minimize potential environmental effects.	Suggest providing analysis of potential environmental impacts of transferring water from Springpole Lake and Birch Lake into the open pit. With the rapid refilling of the open pit, recommend explaining the potential effects increased flow into the pit will have on the development of the fresh water lens and the anticipated timeframe for stratification to occur.	Section 6.7.4.1 of the draft EIS/EA includes an assessment of the potential effects to surface water quantity as a result of refilling the open pit area at closure. The residual effects of the refilling are characterized as low magnitude as the change in lake water levels is within natural variation, with a moderate duration lasting from 3 to 5 years, having a low geographic extent that is constrained to the local study area and is reversible at closure. The effects on surface water quality due to the refilling of the open pit are assessed in Section 6.7.4.2. This is supported by the assessment in the Predictive Modelling of Open Pit Basin Water Quality found in Appendix N-3, which outlines the timeframe for stratification in the refilled open pit. It notes that the observed rate of dissolved oxygen (DO) depletion suggests that suboxic (<1 mg/L DO) conditions below the mixed layer will develop over a period of approximately 10 years. Observations of meromixis (not expected to fully turn over) indicate that the effects of wind-driven and convective mixing are not sufficient to mix the water column below a surface mixed layer depth of approximately 40 m. Results from pit modelling report indicates there will be no exceedances of Provincial Water Quality Objectives in the open pit basin by the last two years of pit filling.	Comment addressed				Not applicable

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MECP-OP-016	6.1.2 & 6.1.3 Pg 6-4	Spatial Boundaries- Separate study areas were defined for the biophysical and human environment VCs, as the areal extent of the potential effects to these components is different. Effects to the biophysical environment will generally occur closer to the Project; whereas human environment effects may occur more broadly. The study areas encompass the environment where effects are expected or likely to occur associated with the facilities and activities of the Project, and where effects were studied. The study areas therefore form the spatial boundaries for the assessment.	Recommend delineating spatial boundaries for the Regional Study Area (RSA) to the broadest extent identified for biophysical VC. This will allow for a more comprehensive landscape assessment of cumulative impacts the project may potentially have.	The spatial extent of the Regional Study Areas (RSA) is based on the applicable valued component and is sized to ensure there is sufficient area to understand the natural variation in the valued component around the Project. The spatial extent of the RSA takes into consideration the maximum geographical extent or zone of influence in which potential effects from the Project are assessed. Given this, the spatial extent of the RSA would support the assessment of cumulative effects for the applicable valued component. The results of the effects assessment are compared to the regional information and provide the necessary context to characterize the significance of residual effects.	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			Not applicable
MECP-OP-017	Table 6.1-1 Pg 6-9 & 6-10	Temporary construction camps and staging areas	Recommend identifying potential locations of temporary construction camps and staging areas that would be used to support construction of mine site and transmission line corridor.	The construction of temporary camps and staging areas will be conducted prior to the construction of the transmission line. These areas will be delineated, cleared of vegetation and graded, as required. Sediment and erosion control measures will be implemented, prior to and during construction. To the extent practical, these areas will be located within areas of the site and transmission line corridor that will otherwise be disturbed and has been assessed in Section 6 of the draft EIS/EA. The precise locations will depend on	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			EIS Section 5.4.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				detailed design, potential environmental values, known heritage and archaeological constraints, and contractor preference.					
MECP-OP-018	Table 6.1-1 Pg 6-10	Blasting- no mention of blasting requirements for aggregate sources/road alignments.	Question- Has analysis been conducted to assess the impacts of blasting on VCs other than fish? If not, recommend including analysis of blasting activities on additional VCs - LSA and RSA If blasting is anticipated for road construction and aggregate material, recommend analysis including placement of receptors for baseline information and ongoing monitoring of effects.	The potential effects of vibration from Project-related blasting are assessed in Section 6.3 of the draft EIS/EA. This section is supported by a detailed assessment of the impacts of blasting from the Project found in Appendix H-4. The results of the assessment in Section 6.3 are carried forward into the assessment of the following valued components: – Fish and Fish Habitat (Section 6.10), – Wildlife and Wildlife Habitat (Section 6.12), – Caribou (Section 6.13), – Wolverine (Section 6.14), – SAR bats (Section 6.15), – SAR birds (Section 6.16), – Commercial Land and Resource (Section 6.17), – Outdoor Recreation (Section 6.18) and – Traditional Land and Resource Use (Section 6.21). The construction of the mine access road includes consideration of the excavation of aggregate resource areas. If required, blasting for road construction or for the extraction of aggregate material would be conducted in accordance with regulatory requirements.	Comment addressed				Not applicable

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MECP-OP-019	Table 6.1-1 Pg 6-11	Filling of open pit basin with water- Refilling of basin is stated to have the greatest impact on taking water from Springpole system. The refilling would utilize more m^3 water daily than during mine operations. At one point in the presentation it was said that it may alter the water flow out of Springpole lake (reverse flow), however the extent of the regional study area ends at the outflow of Springpole. If the water flow is reversed during this period, the potential effects to adjacent watersheds should be analyzed and clearly stated.	Recommend analyzing potential impacts to adjacent watersheds, fish, and fish habitat due to the impact refilling will have.	Section 6.7.4.1 of the draft EIS/EA includes an assessment of the change in surface water quantity due to open pit refilling during closure. The predicted change in flow is estimated to result in a decrease of Springpole Lake water levels (<0.10 m) at the outlet of the north basin in Springpole Lake (Figure 6.6-7), which is within the natural variability of Springpole Lake levels. Water level monitoring will occur throughout the refilling process to ensure that lake levels are maintained within natural variation including during natural periods of low flow. Section 6.8.4.1 notes that the annual average flow rates are predicted to decrease by 10% during an average year at assessment node SW-22 (outlet of the Springpole Lake, Figure 6.6-7). These values are carried forward into the assessment of potential effects on fish and fish habitat, found in Section 6.10.	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			Not applicable
MECP-OP-020	6.1 Figure 7.2-4	Spatial boundary- RSA for Surface Water In some locations less than 1600m between LSA and RSA for surface water.	Due to the interconnected nature of Birch and Springpole Lakes to sensitive lakes in adjacent watersheds (lake trout and lake sturgeon present), recommend expanding RSA beyond include Gull Lake and ensuring analysis/monitoring is conducted throughout this tract.	The regional study area (RSA) is used to provide context for the assessment of potential Project effects, the assessment of cumulative effects and is the maximum geographical extent or zone of influence in which potential effects from the Project are assessed. As noted in Section 6.6.2.3, the RSA for the surface water systems is defined as including the contributing sources of water in the Birch Lake watershed. Catchment areas upstream of the Birch Lake watershed are not expected to influence water	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				quality, quantity or aquatic resources within the Birch Lake watershed. The downstream extent of the RSA has been identified the outlet of Birch River at Gull Lake. As Gull Lake is the confluence of the Birch and Cat Lake Rivers, it receives water from both similar-sized systems and represents the maximum geographic extent of where potential Project effects may extend to. Baseline data has been collected from the waterbodies surrounding the Project over a period of ten years, and adequately characterizes the water quality, quantity and aquatic resources for the purposes of the environmental assessment. The baseline water quality and quantity data is summarized in Sections 6.6.1 (Birch Lake), 6.7.1 (Springpole Lake, north basin), 6.8.1 (Springpole Lake, southeast arm) and 6.9.1 (local inland waterbodies), whereas the baseline aquatic resources is summarized in Section 6.10.1. Further details on the temporal and spatial extent of the baseline monitoring programs can be found in Appendix N-1 (Surface Water Quality Baseline Report, Cumulative (2011 to 2020)), Appendix M-1 (Baseline Hydrology Report), and Appendix O (Baseline Aquatic Resources).					

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MECP-OP-021	6.6.5	Significance of Residual Effects	For each VC, recommend description of impacts beyond Level I, II, and III categories to qualify and quantify the residual effects- both temporally and spatially.	Residual effects for each valued component are characterized using seven attributes defined in the Terms of Reference for the EA, including magnitude, duration and geographic extent. The duration attribute characterizes the temporal extent of the residual effects, whereas the geographic extent characterizes the spatial extent of the residual effect. The table in Section 6.5.5 includes a detailed description of the quantitative and/or qualitative measures used in the rating system for groundwater.	Comment addressed				Not applicable
MECP-OP-022	6.11.3 Pg 6-242	Dust management plan	Suggest providing additional information for dust management plan including type of suppression to be utilized- water vs. chemical	Section 6.2.3 of the draft EIS/EA includes further details on the dust management plan. It is noted that during all phases, dust emissions from roads and mineral stockpiles will be controlled through the application of water spray as needed, supplemented by approved dust suppressants particularly on roads, if required.	Comment addressed				Not applicable
MECP-OP-023	6.8 6.8.2.1 7.5	Surface Water Systems	Recommend preliminary screening in Table 6.8-4 point to additional supporting information beyond professional experience with other mining projects in Ontario. Question- During site preparation for construction, will grubbing and clearing extend to the shoreline or will a buffer be maintained as an erosion and sedimentation control measure?	In order to provide focus to the effects assessment, professional experience considers the assessment of similar projects to make reasonable predictions of whether the Project activities could interact with the applicable valued component. Where a reasonable prediction could not be screened out, it was conservatively assumed that the potential effect may occur and a detailed analysis of the potential effect on the valued component was conducted. Prior to grubbing and clearing, a detailed erosion and sediment	Additional review will be completed when the final EIS/EA is submitted	Comment noted.			Not applicable

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				control plan will be prepared to support the environmental approvals process. The plan will use various measures, including buffers, where applicable.					
MECP-SPO-001	General Comment – Provincial Ministry Names	Since the submission of the draft Environmental Impact Statement / Environmental Assessment (EIS/EA), some provincial ministry names have changed, including but not limited to: the Ministry of Mines, the Ministry of Natural Resources and Forestry, and the Ministry of Tourism, Culture and Sport.	Review the draft EIS/EA and update the names of provincial ministries, where necessary.	Comment noted.	N/A	Acknowledged	N/A		Not applicable
MECP-SPO-002	General Comment – Executive Summary	The draft EIS/EA does not include an executive summary. In accordance with Regulation 334 under Ontario's Environmental Assessment Act (EAA), an EA must contain a brief summary of the main points of the EA document. Section 4.3.1 of the Code of Practice for Preparing and Reviewing Environmental Assessments in Ontario (EA Code of Practice) states that the executive summary should be consistent with the way in which the EA is organized. Section headings that appear in the main document should appear in the executive summary followed by a summary of that section and the conclusions reached.	Include an executive summary with the formal EIS/EA submission that meets the requirements under Regulation 334.	A summary will be provided with the final EIS/EA.	No further comments at this time.	Acknowledged	N/A		EIS Summary

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MECP-SPO-003	General Comment - Consultation	The draft EIS/EA includes statements indicating that First Mining Gold is undertaking ongoing consultation and baseline work to support the preparation of a formal EIS/EA submission. MECP's EA Branch would like to understand how First Mining Gold intends to consult further on any additional information being collected, and on any changes that may be made to the draft EIS/EA as a result of ongoing work. In accordance with Section 4.3.7 of the EA Code of Practice, an EA should include a complete summary of consultation undertaken in preparation of the formal submission. This summary should: – describe consultation activities that took place, – identify all persons consulted during the preparation of the EA, – describe how interested Indigenous communities were identified and consulted, – clearly and accurately summarize comments and concerns raised during consultation activities and – during the preparation of the EA, – describe the proponent's response to comments and how concerns were considered in the preparation of the EA, – describe any outstanding concerns, – include minutes from any meetings, and – include copies of written comments received.	Include an executive summary with the formal EIS/EA submission that meets the requirements under Regulation 334.	Consultation will continue through the draft EIS/EA review process using the methods outlined in Section 2. The influence of consultation will be clearly documented in the final EIS/EA. FMG plans to present to local communities on what we have heard and any changes resulting from that prior to submission of a final EIS/EA. A consultation summary prepared in accordance with the EA Code of Practice and the Consultation Code of Practice will be included in the final EIS/EA.	Section 2 of the draft EIS/EA describes general consultation methods and provides high-level information about consultation prior to the draft EIS/EA submission. Please share additional information about specific activities / opportunities (including timelines, where possible) so we can better understand how FMG will consult with government agencies, Indigenous communities and interested persons with respect to any additional information that was not provided in the draft EIS/EA and/or changes to the draft EIS/EA as a result of ongoing 2022 / 2023 baseline collection, TK / TLU studies, and the planned Anishinaabe-Led Impact Assessment process being undertaken by the Shared Territory Protocol Nations. For example, does FMG intend to recirculate updated or redline studies, reports, and/or sections of the EIS/EA where new or additional information has been incorporated?	FMG provided a consultation summary that covered activities to the end of 2022 to MECP in April. This summary includes details on specific activities, and timelines, that occurred throughout 2022 and prior. FMG appreciates any feedback on that to consider for the final EIS/EA. The methods and opportunities for engagement as described in the summary, have and will continue throughout 2023. It is planned that comments and concerns will be discussed and addressed through the comment response process and associated meetings and discussions as needed. Additional information that has been collected or developed since the draft EIS/EA is being included as part of the responses to comments and presentations where available and relevant to the identified areas of interest. It is an iterative process between interested parties and FMG. FMG has allowed for two years between submission of the draft and final EIS/EA so that comments and concerns can be explored and discussed in depth.	MECP met with FMG on September 21, 2023, and provided feedback on the updated draft Record of Consultation (RoC) submitted in April 2023. This feedback is referenced in relevant comments below. Although MECP understands that FMG is continuing to address comments on the draft EIS/EA via the comment-response process and that technical presentations have been provided to government agency reviewers, the response does not clearly describe FMG's plans for consulting broadly with interested persons, the public and Indigenous communities (including those who have not yet participated in the draft EIS/EA review) about newly collected or updated information since the draft EIS/EA submission and any resulting changes. Please provide this information.	To clarify, the response provided in September applied to other interested persons, beyond government agency reviewers. Indigenous communities have been kept informed on advancements of the Project through ongoing dialogue, as well as the draft EIS/EA review. FMG has also included updated information in newsletters (distributed to contact list) and in person public meetings. FMG also initiated a monthly Community Bulletin that is sent to Indigenous communities monthly in order to provide ongoing updates on the Project and seek feedback. These bulletins have included information related advancements of the Project, including related to baseline studies and project design. Most recently, FMG held four separate webinars to present updates on the Project. All of this these activities include the request for questions, comments and input from interested parties. FMG has and will continue to invite engagement and participation in the Project with ongoing outreach to interested persons. This information will be included in the final EIS/EA.	EIS Section 2.0, Appendix D (all).

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		A comprehensive description of consultation activities is required, which should include a narrative description of the different activities. A table summarizing comments received and First Mining Gold's responses should be provided, including an indication of where in the EA the concern is addressed. It is recommended that comments from the public be organized by type (e.g., subject area), while Government Review Team and Indigenous community comments should be grouped by agency and community. If appropriate, the EA may also include a plan for ongoing consultation during construction, operations and decommissioning / closure, should approval under the EAA be given.							
MECP-SPO-004	General Comment – Consultation	First Mining Gold notes that the draft EIS/EA is a key consultation opportunity in the EA process. It is stated on p. 2-7 that the draft EIS/EA "aims to achieve the consultation requirements with local Indigenous communities, government agencies and stakeholders". In Section 9.1 of the approved amended ToR, First Mining Gold commits to providing flexible opportunities for consultation to Indigenous communities for the specific components of the EA process that are listed in that section (i.e., the development of criteria and indicators for the assessments of alternative methods and the preferred	The EIS/EA should clearly identify and describe the opportunities that were provided to government agencies, Indigenous communities and interested persons for consultation during the EA process. First Mining Gold should explain how consultation was undertaken on each of the components of the EA process listed in the ToR commitments, including how flexible opportunities for consultation were identified, the results of the consultation activities, and how comments informed each component of the EA process and First Mining Gold's decision-making. Any outstanding concerns should also be identified.	The approach for consultation, including methods used throughout the draft EIS/EA development are described in the consultation plans in the approved ToR as well as Section 2 of the draft EIS/EA. The consultation plans approved as part of the Terms of Reference (ToR) are being followed. In addition, and pursuant to the ToR, a community-specific consultation plan for the Ojibway Nation of Saugeen has been developed. FMG has been working with the leadership of local Indigenous communities so that they can be engaged in the Project in a	MECP looks forward to discussing with FMG in advance of the final EIS/EA submission. To clarify, additional information is needed to better understand how FMG has consulted on each specific component of the EA process listed in Section 9.1 of the approved amended ToR, and each key decision-making milestone identified in the ToR commitments. Please link discussions in the EIS/EA about consultation activities to the components of the EA process and decision-making milestones to provide a clear understanding of how the ToR commitments have been	Additional information on how FMG has consulted and engaged on each specific component of the EA process (listed in Section 9.1 of the approved amended ToR), and each key decision-making milestone identified in the ToR commitments will be included in the final EIS/EA. FMG has been engaging with communities on the draft EIS/EA through a variety of flexible methods, in addition to the technical review process, such as distributing Ojibway and English summary documents and videos, presenting findings through virtual webinars, hosting public meetings and community	MECP cannot confirm whether this comment has been addressed and whether FMG is meeting its ToR commitments until a review is undertaken of the additional information that FMG commits to provide in the final EIS/EA. As discussed on the September 21, 2023 call, the updated draft RoC submitted in April 2023 does not clearly describe how FMG consulted with Indigenous communities on each key component of the EA process and with the public and government agencies at key EA-decision making milestones, as identified in the ToR commitments. MECP recommends that FMG link	FMG provided an annotated Table of Contents for Section 2 (consultation) of the Final EIS/EA to MECP to demonstrate how the chapter will be presented, with each milestone being a separate header under each community. In order to continue to facilitate MECP's review in advance of the final EIS/EA submission, FMG will provide a working copy of one community section (Section 2.X), as well as the supporting appendices (communication log and copies of materials shared, meeting notes for key meetings / calls, presentations etc.) at the end of February 2024 for review.	EIS Sections 2.3.1, 2.5.1, 2.6.1, 2.8.1, 6.26, Appendices D-1.1, D-2.1.

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		undertaking, the development of methodologies and results of baseline studies, the development of evaluation methodologies for the assessments of alternative methods and the preferred undertaking, the conclusions of the assessments of alternatives and the preferred undertaking including identification of potential effects and mitigation, etc.). First Mining Gold commits in Section 9.1 and 9.8.1 of the approved amended ToR to developing community-specific Indigenous consultation plans and Nation-specific approaches to consultation with Indigenous communities, if requested. Sections 9.1, 9.8.2 and 9.8.3 also include commitments to engaging the public and government agencies at key EA-decision making milestones. Discussions about these commitments (including how consultation was undertaken on the specific identified components of the EA process, what comments were received and how feedback was considered in each component of the EA process) were not included in the draft EIS/EA. Without this information, it is difficult to determine how flexible consultation opportunities were provided and how government agencies, Indigenous communities and the public were engaged at key decision-making milestones. It is also difficult to determine how consultation was undertaken on the identified components of the EA process	Additional information is also requested regarding any community-specific consultation plans developed for the EA process to meet commitments in the approved amended ToR.	way that best suits their community, while meeting the commitments in the approved ToR. For example, in-person community meetings were held in Mishkeegogamang Ojibway First Nation in 2022; however the Métis Nation of Ontario preferred to meet virtually. Community meetings were also held on the region in Ear Falls and Sioux Lookout. FMG has reached out and shared information with communities on a regular and frequent basis through the draft EA process and will continue. The draft EA consultation process provides a key opportunity for consultation on the Project and EA, should communities be interested in participating. Additional information on engagement opportunities and how the commitments in the approved amended ToR for consultation have been met will be provided in the final EIS/EA. The comment is understood and FMG will work with MECP in advance of the final EIS/EA submission so that MECP expectations for the final EIS/EA are met.	met. Identify the objective or purpose of consultation activities, and describe how consultation informed each EA component and FMG's decision-making. FMG indicates that the draft EIS/ EA review is a key opportunity. MECP understands that some Indigenous communities have not provided comments to-date on the draft EIS/EA. How is FMG working with each Indigenous community identified for consultation to explore other flexible opportunities for participation in the EA process? Note, all consultation efforts (successful and unsuccessful) should be discussed in the EIS/EA and supporting records provided. FMG's response notes a community-specific consultation plan was developed for the Ojibway Nation of Saugeen. Have community-specific consultation plans been requested or discussed with other Indigenous communities?	meetings/ workshops where accepted, using social media, and continuing to relay information to community contacts through email and phone calls. The Ojibway Nation of Saugeen requested a community-specific consultation plan during the ToR review and no other requests have been received. FMG also has process agreements in place with Mishkeegogamang Ojibway First Nation and the Metis Nation of Ontario, and we have been working towards a process agreement with the STPN while offering consultation opportunities to all communities in the meantime.	discussions about consultation to the specific components / milestones or organize discussions under relevant headings. Complete records have also not been provided to demonstrate consultation on each component / milestone identified in the ToR commitments (i.e., the RoC lacks detailed correspondence log entries, records of document distributions, copies of materials shared and records of who received materials, complete meeting notes for all meetings / calls identified in the correspondence logs, emails, copies of written comments, etc.). The updated draft RoC also did not discuss FMG's commitments to developing community-specific consultation plans and how these commitments were met. Please include this information.		

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		and how feedback was considered. It is unclear how First Mining Gold has met the commitments in the approved amended ToR.							
MECP-SPO-005	General Comment – Consultation	In Section 1.4 of the approved amended ToR, First Mining Gold commits to tracking feedback provided on the ToR and the undertaking, and to considering all comments in the future EIS/EA and EA approval applications, should the provincial EA be approved. It is unclear how this commitment has been met, as corresponding records have not been provided in the draft EIS/EA submission.	Additional information is requested to understand how First Mining Gold has met this commitment from the approved amended ToR.	FMG has developed a process for tracking feedback provided and will provide the corresponding records in the final EIS/EA. A current Record of Consultation will be provided to the MECP that summarizes Indigenous consultation from the start of the process until December 31, 2022. The final EIS/EA will include an updated Record of Consultation, as a result of further ongoing engagement with government agencies, Indigenous communities and stakeholders.	No further comments at this time. MECP continues to review the updated Record of Consultation submitted by FMG in April 2023 and will provide feedback to FMG. MECP will review the Record of Consultation for the final EIS/EA submission when submitted.	Acknowledged	As discussed on the September 21, 2023 call, the updated draft RoC was missing records. The status of certain comments / concerns is also unclear, including how and where certain comments have been considered in the EA. MECP recommends page number references and/or better explanations and linkages. Identify and describe any outstanding concerns. Appendix F of the updated draft RoC submission includes questions / concerns raised during the ToR stage. The status for many issues appears to be "issue to be addressed in the EA" or "issue to be addressed in future consultation meetings". Provide information about FMG's approach to addressing these comments or how these comments have been addressed in the EA. The status of other comments received by FMG to-date (e.g., about baseline reports, alternative methods assessment summary tables, the draft EIS/EA) is also unclear. Provide information regarding whether / how FMG has confirmed that commenters are satisfied with FMG's responses and whether comments and concerns have been addressed. Please also explain how FMG will continue to track feedback	The final EIS/EA will include the updated Record of Consultation, as well as a summary of consultation between FMG and each entity and an appendix of supporting documents to the Record of Consultation for each entity. The combination of these three pieces will help explain the consultation narrative. The comments tables in the final EIS/EA consultation section will summarize comments received through EA engagement to date with responses provided by FMG, including any discrepancies between views. An appendix to the final EIS/EA will provide verbatim comments and responses from each entity based on review of the draft EIS/EA. The summary of consultation between FMG and each entity will speak to that status of comments/concerns generally, and specifically, if necessary. The comments tables will indicate how certain comments have been considered in the EA. The draft EIS/EA is a compilation of the baseline, alternative assessment and effects assessment work conducted for the Project and demonstrates how previously submitted comments were addressed. This will be explained in an Appendix to the	Appendix D (all).

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
							and consider it in further approvals per the commitment in the ToR.	final EIS/EA, similar to the Appendix C of the draft EIS/EA, in which each response to comments will include a reference to the relevant section of the EIS/EA. The feedback received on the draft EIS/EA from Indigenous communities, government agencies and the public represent the remaining outstanding comments. FMG has provided responses to comments submitted and followed up with opportunities to discuss the responses and for reviewers to provide follow-up comments and will do throughout the EA process. The final EIS/EA will include a subsection on the influence of consultation with government agencies, Indigenous communities and the public for each major section, i.e section 3 existing environment, section 4 alternatives, section 5 project description, section 6.1 to 6.25 VC effects assessments. Feedback on the Project will continue to be considered and tracked throughout the life of the Project. This will be used to prepare a record of consultation for the final EIS/EA, and subsequently permit application.	
MECP-SPO-006	General Comment – Traditional Knowledge and Traditional Land Use Information	The approved amended ToR includes commitments about collection and consideration of Traditional Knowledge (TK) and Traditional Land Use (TLU) information in the EA process. For example, in Section 9.1 of the approved amended ToR, First Mining Gold commits to providing flexible opportunities for the development of TK and	Additional information is needed to understand how TK and TLU information was / is being collected in consultation with Indigenous communities and how this information is considered in each key decision-making milestone of the EA process to fulfill the commitments in the approved amended ToR.	FMG offered to provide flexible opportunities to local Indigenous communities to collect TK and TLU throughout development of the draft EIS/EA and continues to do so to support the final EIS/EA. Mishkeegogamang Ojibway First Nation (MOFN) has been working on producing a TK/TLU	Please share more detailed information so we can better understand what flexible opportunities were provided to Indigenous communities for the development of TK and TLU studies. It would be helpful for FMG to identify specific opportunities provided to each Indigenous community identified, and to provide	FMG provided a consultation summary that covered activities to the end of 2022 to MECP in April. This summary includes details on opportunities provided to Indigenous communities for the development of TK and TLU studies and includes supporting records.	MECP cannot confirm whether this comment has been addressed and whether FMG is meeting its ToR commitments until a review is undertaken of the additional information and records that FMG commits to provide in the final EIS/EA submission.	Section 2 of the final EIS/EA will include a detailed discussion of the opportunities provided to Indigenous communities for the development of TK and TLU studies, and will be supported with the Record of Consultation and supporting documentation. Section 3 of the final EIS/EA provides a summary of the	EIS Sections 2.3.1, 2.5.1, 2.6.1, 2.8.1, 6.26, Appendicies D-1.1, D-2.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		TLU studies, and to considering and incorporating, where appropriate, TK and TLU information into each decision-making milestone for the EA process. Although Sections 2.6.1.1 and 6.2 of the draft EIS/EA include discussion of the financial support provided by First Mining Gold to Indigenous communities for TK and TLU work, existing TK studies and Land Use Plans that were reviewed by First Mining Gold, and potential effects to the "Traditional Land and Resource Use" valued component, the draft EIS/EA overall includes limited discussion about how TK and TLU information is being collected in consultation with Indigenous communities to inform the EA process. In Table 8.1.2 of the approved amended ToR, First Mining Gold commits to working with Indigenous communities and to clarifying an approach to collecting information in consideration of confidentiality in the EIS/EA. This approach is not discussed in the draft EIS/EA. Based on the information provided in the draft EIS/EA, it is unclear how these commitments in the approved amended ToR have been fulfilled.	Additional information should also be provided to explain how First Mining Gold has met its commitment to clarifying an approach to collecting information and feedback from Indigenous communities in consideration of confidentiality.	report for the Project since the fall of 2021 and it is expected to be shared with FMG soon. FMG will work with MOFN to ensure any confidential information is protected as needed. The Métis Nation of Ontario and Wabauskang First Nation provided a TKLU study for the Project which was considered throughout the draft EIS/EA, with details presented in Section 6.21. The STP Nations of Cat Lake, Slate Falls and Lac Seul have continue to work towards a joint process which FMG understands to include the sharing and protection of confidential Indigenous knowledge. FMG has and will continue to make all reasonable efforts to engage the Ojibway Nation of Saugeen and Pikangikum First Nation and support in the collection of TKLU information several times. FMG will continue this outreach for offering participation in the Project and to obtain TKLU information.	supporting records [e.g., correspondence logs, records of outreach attempts (both successful and unsuccessful), email and letter records, call and meeting notes, etc.]. Please include a detailed discussion in the EIS/EA of how FMG worked with each community to identify and carry out flexible opportunities to collect TK and TLU information to demonstrate how the ToR commitments were met. Additional explanation is needed in the EIS/EA to understand how and what TK and TLU information was collected and considered in the EA. Please include discussions of how TK / TLU informed each key decision-making milestone of the EA process to meet the ToR commitments. The referenced Wabauskang First Nation study appears to have been prepared for the "Springpole Gold Access Corridor Project". Was a TK / TLU study completed by Wabauskang First Nation for the Springpole Gold Project?	The final EIS/EA will include a detailed discussion of how FMG worked with each community to demonstrate how the ToR commitments were met, as well as what TK and TLU information was collected and considered in the EA. The referenced Wabauskang First Nation study was completed for the access corridor. FMG has offered the opportunity for Wabauskang First Nation to collect and share supplemental information.		baseline data collected for the Project and includes a description of non-confidential traditional knowledge and land use (TKLU) information that has been provided by Indigenous communities participating in the EA process. The information was combined with baseline investigations to better understand the existing conditions. Similarly, relevant baseline reports include a summary of TKLU information. Section 4 of the final EIS/EA includes several criteria related to TKLU in the assessment of alternative components of the Project. These criteria include: Potential effect on heritage resources including archaeology, built heritage and cultural heritage landscapes; Potential effect on First Nation reserves and communities; Potential effect on spiritual, ceremonial, and cultural heritage, and archaeological sites; Potential effect on traditional land use; and, Potential effect on Aboriginal and Treaty Rights. Section 6 of the final EIS/EA includes an assessment of effects on valued components and includes a summary of the existing conditions along with non-confidential TKLU information, where relevant to the valued component being assessed. For example, a list of plant species of interest to Indigenous people identified in TKLU studies is summarized in Section 6.11 (Vegetation community and wetland effects	

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								assessment). Based on the TKLU information, the potential effects to those plant species are assessed, and mitigated.	
MECP-SPO-007	General Comment – Level of Detail	Section 3.2.6 of the EA Code of Practice explains that a sufficient level of detail should be provided in an EA to fulfill the requirements of the EAA and to assure interested persons that the proposed undertaking is technically feasible and achieves environmental protection. Additional information is needed to support a better understanding of the proposed undertaking and the alternative methods considered in the EA process (e.g., more detailed information on project, alternative and site design components; specific locations of certain alternatives considered; specific activities over the life cycle of the undertaking; any assumptions made by First Mining Gold in the assessments; etc.). The EA should provide enough detail for a complete understanding of these components. It is noted that the EA must provide sufficient information and rationale so that the Minister can have a clear understanding of the undertaking about which a decision will be made. Additional information may also be required regarding potential effects, impact management measures, net effects, and advantages and disadvantages of the undertaking and the alternatives to better understand how First Mining	Please ensure that a sufficient level of detail is provided in the EIS/EA that will enable readers to understand the proposed undertaking and the alternatives considered in the EA process. Complete and sufficiently detailed information should also be provided regarding potential effects, impact management measures, net effects, advantages and disadvantages associated with the proposed undertaking and the alternatives considered. Additional comments are provided below.	The draft EIS/EA has been prepared in accordance with the approved Amended Terms of Reference, the EA Code of Practice and the federal Environmental Impact Statement guidelines for the Springpole Gold Project. A detailed description of the Project is provided in Section 4 of the draft EIS/EA. As a result of ongoing engineering and comments submitted by Indigenous communities, government agencies and other stakeholders, Section 4 may be updated in the final EIS/EA with additional information, as applicable. A detailed assessment of alternatives to the Project and alternative means of carrying out the Project have been provided in Section 5 of the draft EIS/EA. The methodology for the assessment of alternatives uses 30 criteria organized under six performance objectives to assess over 30 components of the Project in Section 5. This is supplemented with detailed assessment tables for 17 components of the Projects in Appendix T-1 of the draft EIS/EA. In addition, a detailed assessment of mine waste storage facilities is included in the Mine Waste Management Alternatives Assessment (Appendix E of the draft EIS/EA).	On a March 15, 2023, call between FMG and MECP's EA Branch, FMG asked for examples where additional detail is requested. Please see below. Note, this is not an exhaustive list. Please review the EIS/EA to ensure that it includes sufficiently detailed information about the proposed undertaking and the alternative methods considered in the EA. More detailed information is requested in the description of the preferred undertaking (i.e., Section 4). For example, information about: – construction and installation of cofferdams (including rock fill sources and excavation activities, dredging, isolation of in-water construction areas, installation of embankment shell, grout curtain and pile wall); – dewatering of the north basin of Springpole Lake (including rates, design features of the dewatering process which FMG notes will mitigate potential effects, etc.); – activities related to changes to or removal of existing facilities and infrastructure; – construction activities for all project facilities and components, including offsite components such as the access road and transmission line; – temporary construction	The final EIS/EA will include additional details of the Project components. Where required, assumptions will be clearly described and used to inform the assessment of potential effects, mitigation measures, net effects, advantages and disadvantages for Section 5 (alternatives assessment) and Section 6 (effects assessment). See the response to follow up comment #3 regarding consultation on updated reports.	MECP will review the additional details that FMG commits to provide in the final EIS/EA.	Acknowledged An example of the level of detail to be provided in the final EIS/EA is provided in Attachment MECP-SPO-7 for the construction and installation of the dikes.	EIS Section 4, 5 and 6

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Gold reached the decisions and conclusions in the EA. Although it is understood that more detailed information may be presented in the technical reports accompanying the EIS/EA, Section 4.3 of the EA Code of Practice explains that the main EIS/EA report should be sufficiently detailed to stand on its own. References to the specific appendices should be included for further justification to support claims in the EA, where necessary.		The existing environment is described in Section 3 and provides a summary of the components of the biophysical and human environment, along with a summary of the methodologies used to obtain baseline data. The baseline condition overview is supplemented with a detailed description in Section 6 for each valued component that was assessed to provide sufficient context for the assessment of potential effects. This approach is consistent with Impact Assessment Agency of Canada request. Detailed baseline studies are provided in appendices. Text summarizing the existing environmental conditions will be updated as needed by ongoing studies in the final EIS/EA. The effects assessment for each valued component in Section 6 includes a detailed summary of the assessment methodology, a detailed description of the analysis of the effects and detailed characterization of the residual effects to support a significant determination. This approach is consistent with a request by the Impact Assessment Agency of Canada that readers be able to readily follow a specific topic area without having to flip between different sections. As a result of feedback received through the consultation process on the draft EIS/EA and ongoing baseline and engineering studies, the assessment and conclusions will be re-evaluated, and updated where	camps and staging areas (locations, etc.); – aggregate activities, including needs to support access road construction and other project components, information about potential aggregate sources (e.g., locations, volumes, footprints, etc.), extraction, operation and decommissioning activities, etc.; – development and operation of the open pit (e.g., phasing, mining rates); – stockpile and storage areas (e.g., capacities if known); – ore processing (e.g., processing rates, potential phasing / sequencing, etc.); – how mine rock would be reused for construction and for what components; – locations and footprints of all buildings, facilities and site infrastructure, where known; – on-site trucking activities; – use of the access road for trucking activities, transport of waste, etc.; – waste management over the life cycle of the project, including information on waste streams, volumes, storage and transport; – construction, operation and decommissioning activities related to the on-site airstrip and helipad; – specific mitigation measures that contribute to the design of project components; Please update the assessment of the preferred undertaking (in Section 6) to describe any potential effects, impact management measures, net effects, advantages and				

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				necessary for the final EIS/EA. Where relevant, the information used in the main body of the draft EIS/EA was summarized from the applicable baseline, assessment and/or modelling reports which have been included as appendices to the draft EIS/EA. Additional reports may be issued or existing reports updated as appropriate for the final EIS/EA	disadvantages related to these activities and components. More detailed information is required for the assessment of alternative methods in Section 5 to describe potential effects, impact management measures, net effects, advantages and disadvantages of the alternatives. Throughout Sections 5 and 6, where there are references to "best management practices" or "standard", "appropriate" or "typical" mitigation measures, please identify the specific impact management measures. Discussion of efficiency of mitigation measures in addressing or mitigating potential effects should be supported with rationale / supporting information. Any assumptions made by FMG during the EA process should be clearly identified and described in the EIS/EA. FMG's response notes that additional reports may be issued, or existing reports updated. See Comment 3 regarding how FMG plans to consult on these new / updated reports prior to the final EIS/EA submission.				

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-008	General Comment – Rationales and Justifications for Conclusions and Decision-making	There are several statements made in the draft EIS/EA in reference to potential effects, effectiveness of proposed mitigation measures and the determination and characterization of residual effects (or "net effects" under the EAA) that do not appear to be substantiated by rationale or supporting information to explain how First Mining Gold arrived at its conclusions. For example, in many cases, First Mining Gold concludes that there may be no residual effects to valued components with the application of mitigation measures, or that residual effects are low in magnitude, reversible, unlikely, supported by the valued components, etc. Without adequate justification and rationale, in some cases, it is difficult to determine how First Mining Gold reached these conclusions presented in the draft EIS/EA. It is also unclear how First Mining Gold has determined the confidence level associated with its predictions in many cases, as limited rationale is provided. Section 3.1.5 of the EA Code of Practice explains that the EA planning and decision-making process followed must be clearly communicated in the EA document. Any interested person reading the EA document should be able to easily follow the rationales provided for making certain decisions. To ensure transparency, proponents should share complete information and sufficient detail	The EIS/EA should contain sufficiently detailed information and supporting rationale / justification for First Mining Gold's decision-making and conclusions for the EA process.	The EA planning and decision-making process is described in Section 1.9 of the draft EIS/EA, which provides a general overview of the methodology used for the environmental assessment to support decisions made for the Project. This is supplemented with detailed descriptions of the methodology used for the assessment of alternatives in Section 5.2 and the effects assessment in Section 6.1. The methodologies provide a clear, logical and traceable approach to the assessment of the Project and meet the needs of Section 3.1.5 and 4.2.4 of the EA Code of Practice. A detailed description of the Project is provided in Section 4 and is based upon the assessment of alternatives as detailed in Section 5. A detailed description of the methodology for the assessment of alternatives is provided in Section 5.2, including the decision-making process for the selection and justification of alternatives. The assessment of potential effects on valued components in Sections 6.2 to 6.24 follows the methodology described in Section 6.1 of the draft EIS/EA. The methodology provides systemic, transparent, and logical approach to the assessment of potential effects to valued components associated with the Project. Where mitigation measures are sufficient to fully address	Comment has not been addressed. MECP understands that Sections 1.9, 5.2 and 6.1 describe methodologies used for the EA. However, the original comment notes that, in several cases, the conclusions made in Sections 5 and 6 (i.e., the assessments of alternative methods and the preferred undertaking) may not be adequately substantiated by rationale or supporting information to explain how FMG arrived at its conclusions using the methodologies chosen. For example, in Section 5, there is limited information in the alternative methods assessment tables about potential effects, net effects and advantages and disadvantages of the alternatives considered. Conclusions are not presented based on criteria and indicators. As a result, it may be difficult to understand how FMG selected the preferred alternatives. Additional information is needed in the tables and accompanying discussions to clearly articulate the rationale for choosing the preferred alternatives. Please ensure that complete information is provided in the EIS/EA to support the conclusions, and that the process is documented with explanations of the rationale for choices made. Throughout Section 6, please provide additional rationale to support certain conclusions (e.g, regarding significance of	The conclusions on the selection of the preferred alternative in the alternatives assessment section for the final EIS/EA will be presented based on relevant evaluation criteria outlined in Section 5 of the draft EIS/EA. Additional information will be provided in the alternative assessment section of the final EIS/EA to support the conclusions on the net effects, advantages and disadvantages of the alternatives considered. A meeting with MECP – EAB will be held to review the approach to presenting the evaluation of alternatives. Conclusions on the significance of residual effects in Section 6 of the final EIS/EA will be based on the attributes outlined in the EA methodology described in Section 6.1. Additional rationale will be provided to support conclusions regarding the effectiveness of unconventional or atypical mitigation measures.	On a November 2, 2023, call MECP provided feedback on FMG's approach to presenting the alternative methods assessment. MECP advised that sufficient detail should be included in the assessment tables in the main EA Report to understand potential effects, mitigation, net effects, advantages and disadvantages of the alternatives considered. MECP understands that detailed assessment tables will be provided in the main EA Report. Per commitments in the ToR, the results of the alternative methods assessments should be recorded in a table with conclusions for each criterion. Overall, MECP cannot confirm whether this comment has been addressed until a review is undertaken of the additional information that FMG commits to provide in the final EIS/EA for the assessments of alternative methods and the preferred undertaking.	An example of the text for the assessment of alternatives for each Project component was previously provided to MECP on September 29, 2023 (and reviewed with MECP on November 2, 2023) and describes the level of detail regarding potential effects, mitigation, net effects and a discussion of the advantages and disadvantages for each alternative. This assessment will be updated with a detailed assessment table that evaluates all criteria and indicators in the main body of Section 4 of the final EIS/EA. An example of the updated detailed assessment table is provided in Attachment MECP-SPO-54. This approach will be used for the assessment of alternatives for other Project components.	EIS Section 4, 4.1.2, 4.2 through 4.31.

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		to support conclusions. In accordance with Section 4.2.4 of the EA Code of Practice, the assessment should be clear, logical and traceable. Anyone should be able to trace the results of the EA process and reach the same conclusions without any additional assumptions. It is noted that where it is determined that one or more components of the environment will not be affected by the undertaking and the alternatives considered, this conclusion and the way in which it was reached must be documented. As mentioned in the comment above, the main EIS/EA report should be sufficiently detailed to stand on its own and provide a complete picture of the planning process and the conclusions of the EA process.		potential effects on a valued component, residual effects are not predicted, and not further assessment is required. However, if residual effects are predicted for a valued component, the residual effects are characterized using the environmental assessment criteria as defined in Section 6.1, Table 6.1-2, along with rationale to support the rating. Similarly, the level of confidence in the prediction is substantiated for each valued component effects assessment.	residual effects, effectiveness of mitigation measures in mitigating potential effects, whether VCs are capable of supporting predicted residual effects, etc.). Where these types of statements are made, please clearly articulate how FMG reached these conclusions and identify any assumptions. As noted in the original comment, any interested person reading the EA document should be able to trace the results of the EA process and reach the same conclusions without any additional information or assumptions.				

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-009	General Comment – Commitments Commitments Tables for the Approved Terms of Reference and Consultation / Engagement Activities (Appendix B4) Draft EIS/EA Concordance with Approved Final Terms of Reference (Appendix B5)	In reviewing the draft EIS/EA, it is unclear to MECP's EA Branch whether or how several of the commitments made in the approved amended ToR have been fulfilled in preparation of the draft EIS/EA. It is understood that Appendices B4 and B5 are included to identify commitments / requirements, and in what sections of the draft EIS/EA they are addressed; however, in some cases the references are to large sections of the draft EIS/EA and, without further explanation, it is unclear from reviewing the referenced sections how the commitments are met. The following is a list of examples; however, this list is not exhaustive. Commitments related to specific information / assessments to be included in the EA process (e.g., commitments in Section 4.1 of the ToR to assessing alternatives for all major components of the proposed undertaking, to showing how backfilling of the open pit with mine waste would impact pit water quality and identifying associated mitigation measures, to determining and assessing changes in residence time in Springpole Lake, etc.); Commitments related to consultation (e.g., commitments in Section 9 of the ToR to providing flexible consultation opportunities on specific	In accordance with the approved amended ToR, First Mining Gold should ensure that all commitments and EA requirements have been fulfilled in the EA process and in preparation of the EIS/EA. Where possible, provide more specific references to sections of the EIS/EA where commitments have been fulfilled or additional information on how the commitments / requirements were fulfilled.	The final EIS/EA will include updated concordance tables in Appendix B4 and B5 based upon revisions to the draft EIS/EA, and include greater specificity, as applicable. Section 5 of the draft EIS/EA provides an assessment of alternatives for all major components. The methodology used in the assessment is outlined in Section 5.2, and an assessment for 17 project components follow. These are supplemented with comprehensive alternatives assessment tables in Appendix T-1. Appendix N-3 of the draft EIS/EA includes the pit water quality model and includes consideration of material used to recontour the basin to support optimization for fish habitat. The results of the modelling are considered in the assessment of water quality for the north basin of Springpole Lake during closure (Section 6.7) along with mitigation measures. The assessment of changes in residence time is described in Section 6.7.4.1 of the draft EIS/EA as part of the assessment of changes in surface water quantity in the north basin of Springpole Lake. Section 2.4.1 of the draft EIS/EA describes the various methods used to engage Indigenous communities during the EA process and illustrates the degree of flexibility utilized.	MECP will review the updated concordance tables in the final EIS/EA when submitted.	Acknowledged	N/A		EIS Appendices B-1 through B-5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		components of the EA process, to developing community-specific consultation plans, to refining components of the EA process in consultation with government agencies, Indigenous communities, and interested persons, etc.) Commitments to refining study areas, methodology, etc. Certain commitments made in response to specific comments from government agencies, Indigenous communities and interested persons (e.g., commitments to sharing certain information, considering specific interests, etc.) Given many commitments in the ToR originated through consultation with government agencies, Indigenous communities and interested persons who will also review the EIS/EA, it may be difficult for them to determine how their comments and concerns were addressed. Section 8.1 of the approved amended ToR states that the EIS/EA will include a comprehensive record of commitments, and where or how they have been dealt with during the EA process. In Section 2.1 of the approved amended ToR, First Mining Gold also commits to providing concordance tables to demonstrate how EA requirements are met.		Through ongoing communication with Indigenous communities, FMG has remained flexible in supporting alternate methods and approaches to engagement. This will be further described in the final EIS/EA. Similarly, Section 2.4.2 of the draft EIS/EA provides an overview of the approach to engage with government agencies. Ongoing communication with government agencies, in particular MECP and IAAC was used to refine the EA process given the circumstances of the Project, particularly during the COVID-19 pandemic. This will be further described in the final EIS/EA. The approved Amended Terms of Reference included a general study area for the Project along with a commitment to refine the study on the basis of the valued component in the EIS/EA. Section 6.2 to Section 6.24 of the draft EIS/EA include definitions and associated figures that describe the VC-specific study areas, which have been refined since the Terms of Reference stage. For example, Section 6.2.2.3 includes the description of the refined local and regional study areas for air quality and is accompanied by Figure 6.2-4. In addition, methodology used for the assessment of potential effects for each valued component has been refined and fully described in each section (Section 6.2 to 6.24). For example, Section				

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				6.2.2.4 includes a detailed description of the analytical methodology used to assess potential effects of the Project on air quality. Section 2.6 and 2.7 of the draft EIS/EA provides a detailed description of the information sharing that has occurred, and will continue, with Indigenous communities and government agencies, respectively, during the EA process. These sections describe how Project information related to methodology, baseline studies and alternatives were shared. Through the submission of the draft EIS/EA, information on the effects assessment, mitigation and monitoring for the Project is being shared, and FMG anticipates receiving input from Indigenous communities and government agencies on specific issues, whjch will be considered in the preparation of the final EIS/EA. A summary of the feedback received and how it was considered will be provided in the final EIS/EA. As a result of the engagement activities conducted during the EA process, a comprehensive record of commitments will be provided in the final EIS/EA.					
MECP-SPO-010	Purpose of the Project and Project Justification (Section 1.4)	Section 1.4 notes the purpose of the Springpole Gold Project is to extract ore by open pit mining for processing on site to meet global demands for gold and provide return on investment, while supporting local employment and the regional economy. Although it is understood that this is what	Provide additional information to clearly explain the problem or opportunity that prompted the planning process for the Springpole Gold Project and how it was determined that the proposed undertaking, as described, is viable, practical and feasible in addressing the problem or opportunity.	Prior to submission of the draft EIS/EA, a Pre-feasibility Study was completed in 2021 that considered the viability of the Project. Additional information will be added to the final EIS/EA to describe the opportunity presented by the resource at the Springpole Property that prompted the planning process	No further comments at this time. MECP will review additional information in the final EIS/EA when submitted.	Acknowledged	N/A		EIS Sections 1.3, 4.3.

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		First Mining Gold is proposing, the purpose statement in the draft EIS/EA does not provide information on the opportunity or problem that prompted the planning process for the Springpole Gold Project EA, nor does it provide information on how the proposed undertaking was determined to be viable, practical or feasible in addressing the opportunity or problem presented. Section 4.2.1 of the EA Code of Practice states that a preliminary description of the purpose statement is typically provided in the ToR; however, proponents are required, as part of the EA, to build on the purpose statement. At the end of the planning process, the proponent should provide a detailed definition of the purpose of the undertaking.		for the Springpole Gold Project environmental assessment.					

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-011	Provincial Environmental Assessment Requirements (Section 1.7.2)	Section 1.7.2 includes the following statement about the provincial EA requirements for the proposed Springpole Gold Project: "Ontario mining projects are required to meet the requirements of the Ontario Environmental Assessment Act, as well as other applicable regulatory requirements." Mines are not typically subject to requirements under the Environmental Assessment Act (EAA); however, there are requirements that may apply to components of mining projects (e.g., proposed transmission lines, dispositions of Crown resources, etc.). The draft EIS/EA does not describe the specific EAA requirements that apply to the proposed undertaking and its components. Without this information, it may be difficult to understand the context regarding provincial EA requirements for the proposed undertaking and why First Mining Gold is undertaking an individual EA for the proposed Springpole Gold Project. On April 18, 2018, a voluntary agreement was signed between the former Minister of the Environment and Climate Change and First Mining Gold to have the EAA apply to the proposed Springpole Gold Project. The draft EIS/EA does not provide an explanation of this process, nor does it explain First Mining Gold's rationale for entering into a voluntary agreement to conduct an individual EA for the proposed undertaking. MECP's EA Branch	Review the components of the undertaking and provide additional information to clearly identify the EAA requirements that apply to the proposed undertaking and its components. Please include a discussion of the Class EA and streamlined EA processes that apply to components of the undertaking, as well as context regarding First Mining Gold's request for a voluntary agreement and the rationale that supported this decision. The EIS/EA should clearly indicate that the provincial voluntary agreement signed by First Mining Gold (pursuant to section 3.0.1 of the EAA) makes the EAA apply to the undertaking as defined in the voluntary agreement (i.e., "the development, construction, operation, and closure of an open pit gold and silver mine and any associated facilities and ancillary activities").	Components of the Project that are anticipated to potentially require completion of provincial EA process(es), include: The Class EA for Resource Stewardship and Facility Development Projects, in particular disposition of Crown resources related to work on Crown lands, aggregate resources, forestry / tree cutting; The Class EA for activities of the Ministry of Northern Development and Mines under the Mining Act, potentially for the addition of lands to existing leases; The Class EA for Minor Transmission Facilities for the construction and operation of a 230 kV transmission line and associated substations; and, Class EA for Electricity Projects Regulation for diesel power between 1 and 5 MW. The decision to enter into a Voluntary Agreement to complete an individual EA for the Project was based on several factors, including: The evolution of planning and identification of additional infrastructure for the Project and increased certainty of carrying out one individual EA process that will encompass all the Class EA requirements for	No further comments at this time. MECP will review additional information in the final EIS/EA when submitted.	Acknowledged	N/A		EIS Section 1.7.2.

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		notes that the date of the signed voluntary agreement is also incorrect in the draft EIS/EA. In Section 2.1 of the approved amended ToR, First Mining Gold commits to reviewing the components of the undertaking, including the final project design and proposed alternatives methods, to determine whether additional EA requirements may apply. Based on the draft EIS/EA, it is unclear whether this commitment has been fulfilled.		all aspects of the Project. Improved transparency and clarity through the integration and coordination of provincial and federal EA requirements. Nature of the Undertaking, such that the potential provincial EA requirements and public interest warranted an individual EA. Feedback received during engagement activities with government agencies, Indigenous communities and stakeholders. Additional context on the voluntary agreement and clarification on the application of the Individual EA for the Project will be added to the final EIS/EA.					
MECP-SPO-012	Provincial Environmental Assessment Requirements (Section 1.7.2)	Section 1.7.2 briefly describes the provincial ToR process; however, the description provided may not accurately represent the ToR review process and is missing key milestones. On November 8, 2021, approval was issued for the amended ToR submitted by First Mining Gold on April 29, 2021. This approval was issued with further amendments considered necessary by the Minister of the Environment, Conservation and Parks, which are set out in the Notice of Approval for the ToR. This context should be provided.	Revise Section 1.7.2 of the draft EIS/EA to provide a brief and accurate discussion of the ToR submission and review process that was completed for the Springpole Gold Project EA. Please identify key milestones during the ToR review process.	The discussion of the provincial Terms of Reference process will be revised, as applicable, in the final EIS/EA.	No further comments at this time. MECP will review the revisions in the final EIS/EA when submitted.	Acknowledged	N/A		EIS Sections 1.7.2, 2.7.2, Appendices B-3, B-4.

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		Other important dates and milestones of the ToR review process should be briefly discussed, including but not limited to: the final and amended ToR submissions on August 21, 2020 and April 29, 2021, respectively; the "time-out" taken by First Mining Gold to amend its ToR; and comment periods and consultation opportunities provided on the final and amended ToR.							
MECP-SPO-013	Environmental Assessment Coordination (Section 1.7.3)	Section 1.7.3 states that First Mining Gold has been "working closely with the federal and provincial environmental approvals agencies to coordinate the federal and provincial EA processes." This section of the draft EIS/EA, however, does not discuss measures taken by First Mining Gold to coordinate activities (e.g., consultation, collection of information, distribution of documents for review, etc.), nor how First Mining Gold has (or intends to) satisfy the requirements of both the federal and provincial EA processes via a coordinated process. In Section 2.3 of the approved amended ToR, First Mining Gold commits to making reasonable attempts to coordinate consultation activities and to disseminating provincial and federal EA information simultaneously, as reasonable, to minimize duplication and delays. First Mining Gold also committed to working with both MECP and the Impact Assessment Agency of Canada (Agency) to refine, as	Additional information should be provided about the coordinated approach for the Springpole Gold Project EA to better understand how the commitments in the approved amended ToR have been fulfilled. An explanation should be included of how First Mining Gold's approach will address both provincial and federal EA requirements, which components and procedural aspects have been aligned (including consultations efforts), and how First Mining Gold has worked with both MECP and the Agency to develop an approach for a coordinated provincial-federal EA process. First Mining Gold should continue to ensure that it is meeting the commitments in the approved amended ToR to identifying and making reasonable attempts to coordinate consultation activities, and to working with MECP and the Agency to refine the path forward for aligning key aspects for the remainder of the EA process, where possible.	The draft EIS/EA was prepared as a single document to meet both the provincial and federal requirements and serves as the basis for review by the relevant federal and provincial agencies. FMG has worked with MECP and the Agency to make every reasonable attempt coordinate the timing of release of and review of baseline reports, preliminary alternatives assessment materials and the draft EIS/EA which has enabled all parties including FMG to understand the perspectives and comments from the various ministries and agencies. This is explained further in Section 2 of the draft EIS/EA. FMG has also worked with the MECP and the Agency to coordinate joint technical overview meetings on the draft EIS/EA. FMG will continue to work on meeting the commitments in the approved amended ToR and further information on the coordinated process is to be provided in the final EIS/EA.	No further comments at this time.	Acknowledged	N/A		EIS Sections 1.7.3, 2.2, 2.7.2.

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		appropriate, a path forward that aligns key aspects of the assessment process to satisfy the requirements of both federal and provincial EA processes. Section 2.3 of the approved amended ToR identifies procedural aspects that may be aligned in a coordinated process. Based on the information provided in the draft EIS/EA, it is unclear how these commitments in the approved amended ToR have been fulfilled. It is also unclear how First Mining Gold has worked with MECP and the Agency to develop a path forward for aligning activities while still meeting the requirements of the federal and provincial EA legislation. Without this information, it may be difficult to understand how each jurisdiction's requirements have been met and how input has been provided to the coordinated EA process.							
MECP-SPO-014	Government Agencies (Section 1.8.1, Section 2.2.2) Consultation Materials (Appendix D)	Sections 1.8.1 and 2.2.2 list provincial government agencies that are anticipated to have an interest in the EA process, including the Ministry of Infrastructure, Ministry of Indigenous Affairs, Ministry of Labour, Training and Skills Development, Ministry of Municipal Affairs and Housing, the Ontario Energy Board and the Independent Electricity System Operator. Based on the information provided in the draft EIS/EA, and the consultation records in Appendix D to the draft EIS/EA, it is unclear whether these	Additional information should be provided to explain whether the government agencies identified in the draft EIS/EA have been consulted to-date through the EA process. Note, based on emails from First Mining Gold dated July 12, 2022, MECP'S EA Branch understands that First Mining Gold has distributed links to the draft EIS/EA to the other ministries and government agencies identified as being potentially interested in the proposed undertaking.	FMG confirms that the ministries and agencies included in Sections 1.8.1 and 2.2.2 of the draft EIS/EA have been informed of the release of the draft EIS/EA and FMG has received responses from some of them. The City of Dryden is also included on the municipal contact list to receive communications from FMG, such as the Notice of the Draft EA, invitation to consultation events and our quarterly newsletters. FMG will continue to consult with interested government	No further comments at this time.	Acknowledged	N/A		EIS Sections 2.3.2, 2.6.2, 2.7, 2.9, Appendices D-1.2, D-1.3, D-2.2, D-2.3.

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		ministries and agencies have been consulted for the EA process to-date. If First Mining Gold has confirmed that these ministries and agencies are interested in the provincial EA process (or if it is anticipated that they would be interested), First Mining Gold should ensure that opportunities are provided for consultation, including the opportunity to review and comment on the draft EIS/EA. Consultation activities with these government agencies should be described in the consultation summary, in accordance with Section 4.3.7 of the EA Code of Practice. MECP's EA Branch also notes that under "Municipal Governments", the draft EIS/EA states that the City of Dryden may have an interest in the project. Based on the information provided in the draft EIS/EA, it is unclear whether the City of Dryden has been consulted to-date.	First Mining Gold should continue to consult with interested government agencies and document this consultation in the consultation summary that will accompany the formal EIS/EA submission, in accordance with Section 4.3.7 of the EA Code of Practice.	agencies and document this consultation in the final EIS/EA submission, in accordance with Section 4.3.7 of the EA Code of Practice.					
MECP-SPO-015	Consultation Requirements (Section 2.1)	Section 2.1 includes the following statement: "the federal and provincial government has delegated some procedural aspects of consultation to FMG." This section also includes a statement that First Mining Gold "remains open to engage in consultation when needed or requested by local Indigenous communities to ensure dialogue, comments and feedback are received and considered in the planning process".	Provide additional information to clearly and accurately describe the requirements for consultation and the process by which Ontario delegated the procedural aspects of consultation to First Mining Gold for the Springpole Gold Project EA. This should include information about First Mining Gold's responsibilities with respect to the procedural aspects of consultation for the provincial EA process. It is recommended that First	FMG acknowledges that the procedural aspects of consultation have been delegated by the Province. FMG's approach to consultation is described in Section 2.3 of the draft EIS/EA. FMG will respond to comments provided by the Agency on the draft EIS/EA, including regarding federal EA requirements and update this in the final EIS/EA as required.	Comment has not been addressed. Please adjust Section 2.3 of the EIS/EA to clarify and include additional information about Ontario's delegation of the procedural aspects of consultation to FMG for the provincial EA (per the original comment) to ensure that readers have a clear understanding of FMG's responsibilities.	Section 2.3 of the final EIS/EA will be revised to clarify and include additional information about Ontario's delegation of the procedural aspects of consultation to FMG for the provincial environmental assessment process using the wording provided in the original comment (or as otherwise provided by MECP).	No further comments at this time.	N/A	EIS Section 2.2.1.

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		These statements may not accurately characterize the respective consultation requirements for the provincial and federal EA processes, nor do they clearly describe the process by which the procedural aspects of consultation were delegated to First Mining Gold for the provincial EA process. Without this information it may not be clear what First Mining Gold's responsibilities are for consultation during the EA process. As noted in MECP's April 25, 2018 letter to First Mining Gold, the procedural aspects of consultation have been delegated to First Mining Gold for the provincial EA process. First Mining Gold's responsibilities for the procedural aspects of consultation include: providing identified communities with information about the proposed project (including anticipated impacts and information on timelines); following up with communities to ensure they receive project information and that they are aware of opportunities to express comments and concerns about the project; gathering information from the communities about how the project may adversely impact their Aboriginal and/or treaty rights or sites of cultural significance; considering comments and concerns provided by Indigenous communities and providing	Mining Gold confirm with the Agency whether statements made in the draft EIS/EA accurately represent federal EA consultation requirements. If the responsibilities differ between the provincial and federal EA processes, it is recommended that this be identified and described in the EIS/EA.						

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		responses; discussing potential mitigation strategies with communities; and bearing the reasonable costs associated with these procedural aspects of consultation. It is recommended that First Mining Gold's responsibilities for consultation during the EA process be clearly described in the EIS/EA.							
MECP-SPO-016	Provincial Requirements (Section 2.1.1)	Section 2.1.1 references the Consultation Plans for the Springpole Gold Project EA that were submitted with the approved amended ToR; however, there is limited information in the draft EIS/EA about these Consultation Plans and the commitments made by First Mining Gold regarding consultation. The approved amended ToR and the Consultation Plans submitted with the ToR include several commitments related to consultation with government agencies, Indigenous communities and interested persons. The description provided in Section 2.1.1 of the draft EIS/EA is not comprehensive in identifying these commitments and may not accurately and clearly reflect the consultation requirements for the provincial EA process. Without this information, it may be difficult for government agencies, Indigenous communities and interested persons reading the draft EIS/EA to understand how First Mining Gold is consulting in preparation of the formal EIS/EA submission and how First Mining Gold is meeting the	Provide additional information about First Mining Gold's Consultation Plans and the commitments made in the approved amended ToR regarding consultation in preparation of the EIS/EA. Please include a clear explanation of how First Mining Gold has prepared the EIS/EA in accordance with the Consultation Plans and commitments made in the approved amended ToR regarding consultation for the EA process.	The approach for consultation, including methods used throughout the draft EIS/EA development are described in Section 2 of the draft EIS/EA. The consultation plans approved as part of the Terms of Reference (ToR) are being followed. In addition, and pursuant to the ToR, a community-specific consultation plan for the Ojibway Nation of Saugeen has been developed. FMG has been working with the leadership of potentially affected local Indigenous communities so that they can be engaged in the Project in a way that best suits their community, while meeting the commitments in the approved amended ToR. For example, in-person community meetings were held in Mishkeegogamang Ojibway First Nation in 2022; however, the Métis Nation of Ontario preferred to meet virtually. The draft EIS/EA consultation process provides a key opportunity for consultation on the Project and EA, should communities be interested in	No further comments at this time. MECP will review additional information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 2.5, 2.6.

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		commitments described in the approved amended ToR and accompanying Consultation Plans for the EA.		participating. Additional information on engagement opportunities and how the commitments in the approved amended ToR for consultation have been met will be provided in the final EIS/EA.					
MECP-SPO-017	Overview of Key Consultation Milestones (Figure 2.1-1)	It is understood that Figure 2.1-1 presents an overview of the milestones for consultation during the coordinated provincial and federal EA processes; however, this figure may be missing key consultation milestones with regards to the EA phase of the provincial EA process. For example, Figure 2.1-1 does not identify formal comment periods on the EIS/EA submission and the Ministry Review, nor does it identify proponent-led consultation on key components of the EA process (as committed to in the approved amended ToR). Without this information it may be difficult for government agencies, Indigenous communities and interested persons to understand how and when they have / will be consulted in the EA process, and to which components of the EA process feedback may be provided.	Include an accurate description and/or revised figure that identifies the key consultation milestones in the provincial and federal EA processes.	Figure 2.1-1 will be updated with key consultation milestones.	No further comments at this time.	Acknowledged			EIS Section 2 Figure 2-1.
MECP-SPO-018	Overview of Key Consultation Milestones (Figure 2.1-1)	Figure 2.1-1 contains incorrect dates and missing information with respect to the provincial EA process. For example: The Notice of Submission of the ToR was first issued on August 21, 2020 (not in April 2021). An amended ToR was submitted by First Mining Gold	Revise Figure 2.1-1 to correct the dates and information for these provincial EA milestones.	This will be reviewed and updated as applicable in the final EIS/EA.	No further comments at this time.	Acknowledged			EIS Section 2, Figure 2-1

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		on April 29, 2021. An amended ToR was approved, with further amendments considered necessary by the Minister of the Environment, Conservation and Parks, on November 8, 2021. Submission of the draft EIS/EA document should reflect the date on which the complete draft EIS/EA was made available for review (e.g., June 17, 2022).							
MECP-SPO-019	Local Indigenous Communities and Stakeholder Identification (Section 2.2)	Section 2.2 notes that local Indigenous communities, government agencies and stakeholders were identified early in the project; however, there is limited discussion about how and why each government agency, Indigenous community and stakeholder listed was identified for consultation in the EA process and how it was determined that each has an interest in the proposed undertaking. For example, Section 2.2.1 states that MECP and IAAC identified lists of local Indigenous communities that may have an interest or may be potentially affected by the project; however, this section of the draft EIS/EA does not provide additional information about the rights, asserted rights and interests that may be potentially affected or impacted, directly or indirectly, by the proposed undertaking and the alternatives considered in the EA. Section 2.1 of the EA Code of Practice explains that	Provide additional information to explain how and why each government agency, Indigenous community and interested stakeholder was identified for consultation in the EA process. Include information on the legislative mandates that may be affected by the proposed undertaking, the permitting or approval requirements for the undertaking, and any Aboriginal rights or asserted rights and stakeholder interests that prompted initial engagement. An explanation should also be included of how First Mining Gold has confirmed, considered and addressed jurisdictional mandates, Aboriginal rights and interests and stakeholder interests during the EA process.	Section 1.8.2 of the draft EIS/EA describes how each Indigenous community was identified. Section 2.2.3 describes how interested stakeholders were identified. As noted in Section 2.2.2 of the draft EIS/EA, the various government agencies were identified early in the EA process in 2018. Through subsequent engagement, legislative mandates and permitting requirements have been clarified with government agencies as described in Section 11. An update on the engagement with Indigenous communities, government agencies and stakeholders and any changes to their role in the Project will be included in the final EIS/EA.	Comment has not been addressed. MECP will review updated information about consultation in the final EIS/EA when submitted. However, as noted in the original comment, additional information is being requested about how and why government agencies, interested persons, and in particular Indigenous communities were identified for consultation (e.g., information about stakeholder interests; legislative mandates; Aboriginal and treaty rights, asserted rights and interests that may be potentially affected or impacted, directly or indirectly, by the proposed undertaking and alternatives; locations of traditional territory, reserves and communities in relation to the undertaking and alternatives, etc.). Please adjust the EIS/EA to include this information.	Further information will be provided in the final EIS/EA to describe how and why government agencies, interested persons and Indigenous communities were identified for consultation and/or engagement.	MECP will review the additional information that FMG commits to provide in the final EIS/EA.	Further information is provided in Attachment MECP-SPO-19, that describes how and why government agencies, interested persons and Indigenous communities were identified for consultation and/or engagement. This information will be included in the final EIS/EA.	EIS Section 2.3.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		proponents are responsible for identifying government ministries and agencies, municipalities, members of the public, Indigenous communities and other persons who may have an interest in their proposal and engaging in meaningful consultation with all interested persons to identify and respond to needs and concerns. The purpose of this is to understand and confirm whether a particular jurisdictional mandate, Aboriginal right or stakeholder interest may be affected by the proposed undertaking and to seek feedback from interested persons on the proposal. Section 4.1.1 of the EA Code of Practice explains that proponents are responsible for confirming whether Aboriginal rights, asserted rights or interests may be affected by the proposed undertaking. Proponents should consider how to address impacts to rights, asserted rights and interests in the EA process. Without information about why a particular government agency, Indigenous community, stakeholder or interested member of the public has been engaged and consulted as part of an EA process and how they were determined to have an interest in the proposed undertaking, it may be difficult to understand whether respective jurisdictional mandates, rights and interests have been confirmed, considered and addressed in the EA process.							

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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MECP-SPO-020	Local Indigenous Communities and Stakeholder Identification (Section 2.2)	Section 2.2 states that local Indigenous communities, government agencies and stakeholders were identified early in the project; however, the draft EIS/EA does not discuss how the lists of identified Indigenous communities, government agencies and stakeholders may have evolved through continued consultation throughout the EA process. Section 4.0 of the Consultation Code of Practice explains that an EA consultation plan is a flexible tool that should be adapted to accommodate newly emerging issues and information and changes that may arise through the EA process. In the Consultation Plans submitted with the approved amended ToR, First Mining Gold commits to continuing to work with MECP and the federal government to adjust consultation activities with Indigenous communities, government agencies and interested persons going forward in the EA process. Additional commitments in the Consultation Plans require First Mining Gold to evaluate consultation activities and continually improve its plans based on feedback from participants in the EA process. The Consultation Plans discuss methods of evaluating First Mining Gold's approach to consultation on an ongoing basis, including targeted participant questionnaires and	Provide additional explanation to clarify that consultation is used to identify government agencies, Indigenous communities and interested persons that may be potentially affected by the proposed undertaking and the alternatives being considered in the EA. This explanation should include a discussion of how First Mining Gold has used consultation to inform the lists provided in Section 2.2 of the draft EIS/EA. Include a discussion of how refinements and improvements have been made to the consultation approaches, if applicable, based on feedback from participants of the EA process to fulfill the commitments in the approved amended ToR and accompanying Consultation Plans.	Engagement with government agencies, Indigenous communities and interested persons is ongoing throughout the EA process. The feedback received through these engagement activities will be considered in the design of the Project and fully considered in the approach to conducting the EA process to date. The contact lists provided in Section 2.2 of the draft EIS/EA are continuously updated based on engagement events such as public meetings and events. FMG has used various contact methods such as maildrops and social media to continue to engage the public and expand the contact list when requested. Additional information on how these engagement activities influenced the list of government agencies, Indigenous communities and interested persons will be provided in the final EIS/EA. Further, a description of how these activities were adjusted throughout the EA process will be summarized in the final EIS/EA. See the response to Comment 16 for further details.	No further comments at this time. MECP will review additional information in the final EIS/EA when submitted.	Acknowledged			EIS Section 2.3.

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		recording verbal feedback from participants and through the project website. Based on a review of the draft EIS/EA, it is unclear how these commitments have been fulfilled. Although Section 2.2 of the draft EIS/EA lists Indigenous communities, government agencies and stakeholders that have been consulted in the EA, this section does not discuss how continued consultation has informed these lists.								
MECP-SPO-021	Stakeholders (Section 2.2.3)	It is understood that Section 2.2.3 identifies a list of stakeholders that First Mining Gold has identified as potentially interested in the proposed Springpole Gold Project. MECP's EA Branch requests clarification on how this list was developed and whether it is intended to be an exhaustive list of non-government agency and non-Indigenous interested stakeholders / persons for the EA process. For example, given the information provided in the draft EIS/EA and the approved amended ToR, it is understood that First Mining Gold is working with Domtar in relation to the proposed mine access road connection to the Wenesaga Road. It is unclear why Domtar has not been included in the list of stakeholders presented in the draft EIS/EA and what consultation has taken place with Domtar to-date.	Provide additional information regarding how the list of potentially interested stakeholders was developed. Confirm whether additional interested persons / stakeholders should be included and whether / how they have been consulted.	The contact list was developed as described in Section 9 of the approved amended ToR and Section 2.2 of the draft EIS/EA. The contact list has been modified overtime as parties are added when they identify themselves as interested through email or at events, or removed if requested. FMG has conducted business conversations with Domtar that are considered outside of consultation on the EA process.	No further comments at this time	Acknowledged			Not applicable

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MECP-SPO-022	Stakeholders (Section 2.2.3)	Section 2.2.3 includes a list of interested stakeholders for the Springpole Gold Project EA, which includes Red Lake Trappers Association. MECP's EA Branch notes that the distribution list reviewed in advance of the draft EIS/EA submission does not include a contact from this association.	Confirm whether the Red Lake Trappers Association identified an interest in the EA process, and if so, if a copy of the draft EIS/EA was provided for review and comment	It has recently been confirmed that the Red Lake Trappers Association is no longer active and will be removed from the stakeholder list provided in the EIS/EA. The Northwestern Fur Trappers Association was included on distribution of the draft EIS/EA.	Comment addressed	Acknowledged			Not applicable
MECP-SPO-023	Local Indigenous Communities (Section 2.4.1)	Section 2.4.1 states that consultation with Indigenous communities is being conducted and is "based on a goal of continuous improvement, particularly as local Indigenous communities identify how they prefer to be involved and engaged throughout the project". In Sections 9.1 and 9.8.1 of the approved amended ToR, First Mining Gold commits to developing community-specific consultation plans with Indigenous communities, if requested; however, there is limited discussion in the draft EIS/EA about whether community-specific consultation plans have been developed. There is also limited discussion of how First Mining Gold has made efforts to refine their consultation approaches with Indigenous communities based on feedback from the communities on how they prefer to be engaged and consulted through the EA process.	Provide additional information to support the statement made in Section 2.4.1 about First Mining Gold continually improving its consultation with Indigenous communities based on the communities' feedback. Additional discussion should be included regarding community-specific consultation plans that have been developed (or are under development) to fulfill the commitments in the approved amended ToR, and how approaches to consultation with Indigenous communities have been refined based on input received.	Please refer to the response to Comment 16. Additional information on how approaches to consultation with Indigenous communities have been refined based on input received will be provided in the final EIS/EA.	No further comments at this time. MECP will review additional information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 2.5, 2.6.1.

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ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-024	Local Indigenous Communities (Section 2.4.1)	Section 2.4.1 states that First Mining Gold engages local Indigenous environmental monitors to supplement environmental baseline collection; however, there is limited information in the draft EIS/EA regarding which communities are participating as environment monitors, what involvement these monitors have in the EA process, how environmental monitors have been engaged to-date, etc. In Section 8.1 of the approved amended ToR, First Mining Gold commits to providing opportunities (including reasonable financial support) for community environmental monitors to participate in environmental field work and environmental monitoring programs. Based on the limited information in the draft EIS/EA, it is unclear how this commitment is being fulfilled.	Provide additional information about the environmental monitors mentioned in Section 2.4.1 of the draft EIS/EA and how the relevant commitments made in the approved amended ToR have been fulfilled.	FMG has provided opportunities and sought environmental monitors to participate in environmental field work since approval of the ToR. FMG has discussed and provided a job posting for this position to Cat Lake First Nation, Slate Falls Nation, Lac Seul First Nation and Mishkeegogamang First Nation. An environmental monitor from Slate Falls Nation participated in some programs in 2022 prior to stepping down due to an unrelated health concern. An environmental monitor from Lac Seul First Nation also participated throughout 2022 and will continue throughout 2023.	Have similar opportunities for environmental monitors been provided to other Indigenous communities not mentioned in FMG's response? Please include additional discussion (including the information outlined in FMG's response) in the EIS/EA to demonstrate how the ToR commitment is being met.	FMG has engaged all communities on the baseline studies and invited them to participate in environmental field work where intertest was raised; however FMG has focused full-time environmental monitor positions on the communities located closest to the site. The information outlined in the original response will be included in the final EIS/EA to demonstrate how the ToR commitment is being met.	Please include discussion (and records, where available) to demonstrate that FMG has met its ToR commitments.	FMG has provided opportunities for environmental monitors to participate in baseline studies has been provided to other Indigenous communities where interest was raised. The commitments on page 8-32 and E.1 -7 are related to the STPN communities. Opportunities for the local Indigenous communities closest to the Project to participate in environmental monitoring that is planned to occur throughout Project development will be provided. The final EIS/EA will include discussion (and records, where available) to demonstrate that FMG has met its ToR commitments.	EIS Section 2.7.1.
MECP-SPO-025	Consultation and Engagement (Section 2.0 Section 2.4.1 Section 2.4.2 Section 2.4.3 Section 2.5 Section 2.6 Section 2.7 Section 2.8)	Sections 2.4.1, 2.4.2, and 2.4.3 describe consultation methods and tools (e.g., newspaper notices, radio announcements, community meetings, general meetings and presentations, etc.) used by First Mining Gold for consulting government agencies, Indigenous communities and interested persons in preparation of the EIS/EA. Based on a review of Section 2.0 of the draft EIS/EA and Appendix D, it is noted that several aspects of First Mining Gold's consultation activities are unclear and additional information / supporting	Review the EA Code of Practice and Consultation Code of Practice, as well as the commitments made in the approved amended ToR and supporting Consultation Plans, to ensure that First Mining Gold is meeting requirements for consultation. The summary of consultation in the formal EIS/EA submission should be prepared in accordance with the EA Code of Practice and the Consultation Code of Practice.	The comment is understood and a consultation summary prepared in accordance with the EA Code of Practice and the Consultation Code of Practice will be included in the final EIS/EA.	FMG's response notes that the comment is understood; however, the response does not address whether / how FMG is meeting consultation requirements for the EA process. MECP will review the consultation summary and updated Record of Consultation when the final EIS/EA is submitted.	FMG provided a consultation summary that covered activities to the end of 2022 to MECP in April. This summary includes details on specific activities, and timelines, that occurred throughout 2022 and prior. FMG appreciates any feedback on that to consider for the final EIS/EA. The methods and opportunities for engagement as described this summary, have and will continue throughout 2023.	FMG's response still does not address the issues identified in the original comment. MECP reviewed the updated draft RoC, and notes that it did not describe in detail how public and stakeholder consultation has informed the EA. The updated draft RoC was missing records to support FMG's consultation (i.e., detailed correspondence log entries, emails, meeting minutes for some meetings and calls identified in the logs, document distribution and notification records, copies of written comments). No copies of public or stakeholder comments were	A summary of the approach, methods and results for consultation with the public and stakeholder is provided in Attachment MECP-SPO-25. The details of the activities will be provided in an updated Record of Consultation with the final EIS/EA.	EIS Section 2.6

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
	Consultation Materials (Appendix D)	records are required. For example: It appears that only one Public Information Session (in Sioux Lookout) was advertised via radio and in one newspaper, while another Public Information Session (in Ear Falls) may not have been advertised by the same means. It is unclear who participated in public information sessions and general meetings / presentations held by First Mining Gold, what feedback was received from these sessions and how it was considered in the EA process. It is unclear whether notices and documents were distributed directly to Indigenous communities and interested persons, who received the distributions and whether First Mining Gold confirmed receipt. It is unclear from the information provided what original feedback was collected on circulated documents and how comments informed the EA process. In accordance with Section 3.1.1 of the Consultation Code of Practice, notification of consultation events should be provided to all those who have expressed an interest in writing in the proposed undertaking, as well as local and adjacent municipalities (including municipal councillors). Information should be made available before the planned event, and notices (which					provided in Appendix C – have comments been received? It is unclear whether FMG is implementing certain commitments in its consultation plans from the approved amended ToR. For example, the consultation plans commit FMG to using questionnaires and surveys requesting feedback on specific issues; however, no records of these methods are provided. It is also unclear who was notified of consultation events. Were interested persons and Indigenous communities directly notified and how? Was sufficient notice of events given? In some cases, it appears only radio, newspaper and Facebook ads were used, and issued less than one week prior to the event. See the original comment and MECP's Codes of Practice for guidance. Complete discussions and records should be provided.		

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		should contain specific information outlined in Section 3.1.1 of the Consultation Code of Practice) should be published two weeks before the planned event in local newspapers. A complete consultation summary must be prepared in accordance with Section 4.3.7 of the EA Code of Practice. This summary must accurately describe consultation activities and should include sufficient records (e.g., meeting minutes, written comments received, communications logs, etc.) Based on a review of the draft EIS/EA, it appears that First Mining Gold may not be meeting the expectations described above and in MECP's Codes of Practice. First Mining Gold should ensure that it is consistent in its approaches and that it is following the guidance provided in the EA Code of Practice and Consultation Code of Practice with respect to consultation with government agencies, Indigenous communities and interested persons.							

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-026	Consultation with Local Indigenous Communities (Section 2.6) Consultation Materials (Appendix D)	Section 2.6 describes consultation undertaken by First Mining Gold with local Indigenous communities in preparation of the draft EIS/EA; however, the subheadings for this section do not align with the specific components of the EA process that are outlined in the consultation-related commitments in Section 9.1 of the approved amended ToR. Based on a review of Section 2.6 of the draft EIS/EA, it is noted that the description of consultation with Indigenous communities does not reflect the specific components of the EA process identified in the approved amended ToR. As a result, it is difficult to confirm whether Indigenous communities have been consulted on these components and how the commitments in the approved amended ToR have been fulfilled.	Provide an explanation of how First Mining Gold provided flexible consultation opportunities to Indigenous communities for the specific components of the EA process outlined in the commitments in Section 9.1 of the approved amended ToR. The objective of consultation on each EA component should be clarified and it should be explained in the EIS/EA how information was shared, feedback collected, and how comments were considered for each component of the EA process.	FMG has and will continue to provide flexible engagement and consultation opportunities as heard by the Indigenous communities. FMG has provided information using various forms of communication, such as virtual or in-person meetings, summary and workplan documents, social media, community meetings, videos and live webinars. FMG has worked with different communities to determine the preferred approaches and been flexible to modify the approach or logistics in order to address needs. For the final EIS/EA submission, an explanation will be provided on how information was shared, feedback collected, and how comments were considered for each component of the EA process.	FMG's response lists general methods used to consult with Indigenous communities; however, explanations of how those methods were used to consult on the specific components of the EA process outlined in the commitments in Section 9.1 of the approved amended ToR have not been provided. Please outline whether / how targeted consultation was undertaken with Indigenous communities on the identified components of the EA process. A comprehensive narrative description of consultation activities that took place during the preparation of the EA is required in the EIS/EA, rather than a list of methods. The objectives of consultation activities should be clear, and discussions should be linked to the components of the EA process identified in Section 9.1 of the approved amended ToR to describe how information was shared, what feedback was collected and how comments were considered for each component.	The final EIS/EA will include further information on how FMG consulted on specific components of the EA process outlined in the commitments in Section 9.1 of the approved amended ToR. As previously noted, FMG provided a consultation summary that covered activities to the end of 2022 to MECP in April. This summary includes details on specific activities, and timelines, that occurred throughout 2022 and prior. FMG appreciates any feedback on that to consider for the final EIS/EA however it is understood that a more comprehensive narrative is required for the final EIS/EA. It should also be noted that the draft EIS/EA was developed and published in order to provide a comprehensive consultation opportunity on all components of the EA process. Two years between release of the draft EIS/EA and final EIS/EA is more than adequate to allow for substantial engagement and consultation to occur. This objective will be clear in the final EIS/EA narrative.	MECP cannot confirm whether this comment has been addressed and whether FMG is meeting its ToR commitments until a review is undertaken of the additional information that FMG commits to provide in the final EIS/EA. As noted, MECP met with FMG on September 21, 2023, and provided feedback on the updated draft RoC (also reflected in relevant comments). MECP understands from FMG's response that the draft EIS/EA is intended as a comprehensive consultation opportunity on all components of the EA process. However, we also understand that several Indigenous communities have not participated in a review of the draft EIS/EA to-date. Given this, it is important to understand how FMG is providing other flexible opportunities for input about the specific components of the EA process (per the ToR commitments), as well.	The original response notes how FMG has provided flexible opportunities and this information will be included in the final EIS/EA.	EIS Section 2.5
MECP-SPO-027	Consultation with Local Indigenous Communities (Section 2.6)	Section 2.6 gives a high-level description of activities undertaken by First Mining Gold to consult Indigenous communities on TK and TLU Studies, Baseline Studies, the Assessment of Alternatives, and Valued Components; however, this section provides limited information about the opportunities provided to each Indigenous community	Provide additional information about the consultation opportunities offered to all eight Indigenous communities identified for consultation for the provincial EA process to fulfill the commitments in the approved amended ToR. The summary of consultation in the formal EIS/EA submission should be prepared in	The summary of consultation in the final EIS/EA will be organized by community so that the information about the opportunities provided to each Indigenous community is clear. Supporting records for the activities described will also be provided as part of the final EIS/EA submission.	No further comments at this time. MECP will review the additional information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 2.6.1, 2.7.1, 6.26, Appendices D-1.1, D-2.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		identified for consultation, including what information was shared, how information was distributed, and what feedback was collected from each community. Based on a review of Section 2.6 of the draft EIS/EA, it is unclear how the commitments to consultation outlined in the approved amended ToR were fulfilled. It is also unclear whether equal opportunities for consultation were provided to all communities, as some sections discuss consultation with only one or a subset of the eight Indigenous communities identified for consultation in the provincial EA process. Additional information is needed to understand the efforts made by First Mining Gold to consult Indigenous communities and how comments and concerns informed First Mining Gold's decision-making for the EA process. Supporting records are also needed for the activities described (e.g., distributions, meeting minutes, written comments, communications logs, etc.). In accordance with Section 4.2.7 of the EA Code of Practice, a complete consultation summary should be provided.	accordance with the EA Code of Practice and the Consultation Code of Practice.						

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-028	Consultation with Government Agencies (Section 2.7) Consultation with Stakeholders (Section 2.8) Consultation Materials (Appendix D)	Sections 2.7 and 2.8 provide high-level descriptions of activities undertaken by First Mining Gold to consult federal, provincial and municipal governments and interested persons in preparation of the draft EIS/EA; however, these sections provide limited information on how government agencies and interested persons were consulted at critical decision-making milestones in the EA process, what information was shared, how this information was distributed and to whom, and what comments and feedback were received. In Section 9.1 of the approved amended ToR, First Mining Gold commits to providing opportunities for government agencies and interested persons to be engaged at critical EA decision-making milestones, including but not limited to identification of criteria and indicators, the development of baseline studies and evaluation methodologies. Sections 9.8.2 and 9.8.3 of the approved amended ToR also include First Mining Gold's commitments to engaging the public and government agencies in decision-making for the alternatives assessment and identification of potential effects and mitigation measures. Based on the discussions in Section 2.7 and 2.8 of the draft EIS/EA, it is unclear how consultation opportunities provided by First Mining Gold	Provide additional information about the consultation opportunities offered to government agencies and interested persons (including the public) for the EA process to fulfill the commitments in the approved amended ToR. The summary of consultation in the formal EIS/EA submission should be prepared in accordance with the EA Code of Practice and the Consultation Code of Practice.	During preparation of the draft EIS/EA, FMG engaged with government agencies to receive feedback on the baseline studies completed and the preliminary alternatives assessment and project design. For a detailed list of comments and responses received during this period, please refer to Appendix D. A summary of comments received from local Indigenous communities, government agencies and stakeholders and an explanation of how the comment was considered in the draft EIS/EA is provided in Tables 2.9-1 to 2.9-6. A summary of the key changes / refinements made to the draft EIS/EA based on the results of consultation to date is provided in Table 2.9-7. FMG will continue to provide consultation opportunities that fulfill the commitments in the ToR throughout 2023 and will provide additional information and supporting records as part of the final EIS/EA.	Comment has not been addressed. It is unclear how the ToR commitments related to consultation with government agencies and interested persons are being met. To MECP's knowledge, preliminary alternatives assessment materials were not circulated broadly to government reviewers prior to the submission of the draft EIS/EA, nor were opportunities provided during the preparation of the EIS/EA for targeted consultation on decision-making milestones such as the identification of criteria / indicators, the development of evaluation methodologies, and the identification of potential effects and mitigation measures. From the draft EIS/EA and FMG's response, it is not clear what opportunities were provided to interested persons (e.g., tourism operators, other stakeholders and the public) for consultation on these decision-making milestones. A comprehensive narrative description of consultation activities is required in the EIS/EA. The objectives of consultation activities should be clear, and discussions should be linked to the decision-making milestones identified in the ToR commitments to describe how information was shared, what feedback was collected and how comments were	The final EIS/EA will include a comprehensive narrative description of consultation activities linked to the decision-making milestones identified in the ToR commitments. The final EIS/EA will describe how information was shared, what feedback was collected and how comments were considered in the EA. Considerable consultation and engagement was carried out prior to the release of the draft EIS/EA and the publication of the draft EIS/EA was intended to provide another meaningful opportunity for interested persons to provide feedback on all of the decision-making milestones considering the project holistically. FMG notified the contact list of the release of the draft EIS/EA, as well as invited attendance at open houses and webinars. FMG will continue information sharing related to the EA process with interested persons throughout 2023. It should be noted that the original response should have referred to Appendix C for the detailed list of comments and responses received during preparation of the draft EIS/EA.	MECP cannot confirm whether this comment has been addressed and whether FMG is meeting its ToR commitments until a review is undertaken of the additional information that FMG commits to provide in the final EIS/EA. Please ensure that complete records are provided in the RoC to support FMG's consultation activities (i.e., relevant emails, distribution records, copies of materials shared, updated detailed correspondence logs, copies of original written comments, complete meeting minutes, summaries of webinars, etc.).	Please see the response to #25.	EIS Section 2.5

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		to-date align with the key decision-making milestones identified in the ToR commitments and how these commitments have been fulfilled. Additional information is needed to understand the efforts made by First Mining Gold to consult government agencies and stakeholders and how comments and concerns informed First Mining Gold's decision-making in the EA process. Supporting records are also needed for the activities described (e.g., meeting minutes for the various government agency meetings listed, copies of written comments, feedback/ comments received in meetings and public information sessions, communications logs, etc.). In accordance with Section 4.2.7 of the EA Code of Practice, a complete consultation summary should be provided.			considered in the EA. MECP notes that Appendix D of the draft EIS/EA does not include original comments or responses, as stated in FMG's response; it provides only consultation materials (e.g., notices, slide decks, etc.). MECP will review additional information and supporting records that will be provided as part of the final EIS/EA submission.				
MECP-SPO-029	Summary of Influence of Consultation on draft EIS/EA (Section 2.9 Table 2.9-7)	Section 2.9 states that input was received and considered in the draft EIS/EA, and a summary of the key changes and refinements made to the draft EIS/EA is provided in Table 2.9-7. This section provides a high-level overview of early consultation during the preparation of the draft EIS/EA; however, as noted for other sections of the draft EIS/EA, Section 2.9 provides limited information about First Mining Gold's consultation activities, in particular with respect to the key components of the EA process and critical EA decision-making milestones identified in the approved amended ToR.	Provide additional information about the consultation opportunities offered by First Mining Gold to government agencies, Indigenous communities and interested persons regarding key components and decision-making milestones of the EA process, and how input was collected and considered to fulfill the commitments in the approved amended ToR. The summary of consultation in the formal EIS/EA submission should be prepared in accordance with the EA Code of Practice and the Consultation Code of Practice.	Table 2.9-7 describes the influence of consultation on the key components of the EA process and critical EA decision-making milestones (e.g., baseline, alternatives). This will be expanded upon as further feedback is received on the draft EIS/EA, including potential effects and mitigation measures. The summary of consultation in the final EIS/EA will provide additional information regarding this as well as supporting documentation where applicable.	No further comments at this time. MECP will review the additional information and summary of consultation in the final EIS/EA when submitted.	Acknowledged			EIS Section 2.7.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		In accordance with Section 4.2.7 of the EA Code of Practice, a complete consultation summary should be provided.							
MECP -SPO-030	Summary of Influence of Consultation on draft EIS/EA (Table 2.9-1 Table 2.9-2 Table 2.9-3 Table 2.9-4 Table 2.9-5 Table 2.9-6)	Several tables are included in Section 2.9 containing summaries of comments received to-date from government agencies, Indigenous communities and interested persons, and a discussion of how these comments were considered in the draft EIS/EA. As the consultation process is still ongoing, and because there is no information about whether government agencies, Indigenous communities and interested persons are satisfied about how their comments have been summarized and considered through the EA process, no comments are being provided at this time. A full review of section will be undertaken when the EIS/EA is formally submitted.	First Mining Gold should continue to update these tables as additional comments and feedback are received in preparation of the formal EIS/EA submission. MECP will review these tables upon submission of the final EIS/EA.	Comment noted. If there are any comments that MECP can offer to support development of the final EIS/EA, that is appreciated.	N/A	Acknowledged			EIS Section 2.6
MECP -SPO-031	Influence of Consultation on the draft EIS/EA (Table 2.9-7)	Table 2.9-7 provides a summary of changes and refinements made to the draft EIS/EA based on results of consultation undertaken by First Mining Gold to-date. As the consultation process is ongoing, and because there is no information about whether government agencies, Indigenous communities and interested persons are satisfied about how their comments have been summarized and considered as part of the EA process, no comments are being provided at this time. A full review of this table will be undertaken when the EIS/EA is formally submitted.	First Mining Gold should continue to update Table 2.9-7, as additional comments and feedback are received in preparation of the formal EIS/EA submission. MECP will review Table 2.9-7 upon submission of the final EIS/EA.	Comment noted. If there are any comments that MECP can offer to support development of the final EIS/EA, that is appreciated.	N/A	Acknowledged			EIS Section 2.6

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-032	Environmental Setting (Section 3.0)	Section 3.0 provides a general description of the existing environment, noting that the purpose of the description is "to familiarize the reader with the local setting in relation to the Springpole Gold Project". It is understood that the "Environmental Setting" represents a description of the environment within the EA study area; however, based on the statement above, this may not be clear. As the purpose of the "Environmental Setting" has not been clearly defined, it may be difficult for government agencies, Indigenous communities and interested persons to understand how and why the "Environmental Setting" has been characterized in Section 3.0 and how it will be considered in the EA process. Subsection 6.1(2)(c) of the EAA requires proponents to provide a description of the environment that will be affected or that might reasonably be expected to be affected, directly or indirectly, by a proposed undertaking and the alternatives considered in the EA process. The purpose is to provide a contextual understanding of the area within which the activities associated with the proposed undertaking and the alternatives may occur and where the potential effects of the proposed undertaking and the alternatives will be studied. It is suggested that First Mining Gold clarify this purpose in Section 3.0.	Consider clarifying the purpose of the "Environmental Setting" described in Section 3.0 of the draft EIS/EA.	The purpose of Section 3 is to provide regional context of the existing environment for the Project and is used to support the assessment of alternatives. This approach is in keeping with the request of the Impact Assessment Agency of Canada to provide more of an overview description to guide the readers in advance of the Project Description (Section 4) and Alternatives (Section 5) discussions. Further detailed baseline information on the existing conditions is included in each effects assessment subsection (within Section 6) to support the assessment of potential effects for each valued component, based on the description of the proposed Project in Section 4.	MECP recommends that the purpose described in FMG's response be included in the EIS/EA to provide context to readers. Please also clarify that the purpose of the section is to provide an understanding of the area within which the activities associated with the undertaking and the alternative methods may occur and where potential effects of the undertaking and the alternatives considered in the EA will be studied. MECP understands that the Impact Assessment Agency of Canada requested that detailed baseline information be provided in Section 6. As discussed on the March 15, 2023, call between MECP and FMG, while baseline information may also be provided in later sections, sufficiently detailed information should be presented in advance of the assessment of alternative methods to fully understand the existing environment that is expected to be affected (directly or indirectly) by the alternatives considered. The level of detail should enable readers to understand what potential effects are expected from each alternative and how these effects are considered when evaluating and comparing advantages and disadvantages of the alternatives. This will allow for a more logical and transparent assessment. Please review and revise Section 3 to ensure that a sufficient level of detail is provided.	The purpose of Section 3 will be provided in an introduction to the section in the final EIS/EA, including the provision of regional context for the existing environment and to support the assessment of alternatives. Additional baseline information will be included in Section 3 to support the alternatives assessment for the final EIS/EA, where relevant.	MECP will review the additional baseline information that FMG commits to provide in Section 3 of the final EIS/EA.	Acknowledged. The purpose of Section 3 will be included in the final EIS/EA, as follows: The description of the existing environment provided in this section aims to familiarize the reader with the local setting in relation to the Springpole Gold Project (Project). The section represents a contextual description of the geographic area as a whole, focusing on what potentially interacts with the Project and related alternatives considered for each Project component. This section provides a description of the existing conditions related to the natural, social, cultural, economic and built environment and based on extensive and robust environmental baseline studies that were conducted at the site and in the surrounding area between 2011 and 2023, as well as published information. The baseline data informs Project planning and design, including the assessment of alternatives and allows for a comparison to be made between pre-development and potential future post-development conditions.	EIS Section 3.0 (introductory paragraph).

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-033	Environmental Setting (Section 3.0)	The description of the existing environment in Section 3.0 is organized under various subsection headings; however, it is noted that the structure and sub-headings in Section 3.0 are not consistent with those identified in the approved amended ToR. For example, Section 3.0 of the draft EIS/EA does not organize the description of the existing environment based on the components of the environment as it is defined in the EAA (natural, social, economic, cultural and built environments). Section 3.0 also does not include dedicated subsections to describe features such as fish and fish habitat, benthic communities, species at risk, etc., whereas the approved amended ToR included subsections for these features. Subsection 6.1(2)(c) of the EAA requires proponents to provide a description of the environment that will be affected or that might reasonably be expected to be affected, directly or indirectly, by a proposed undertaking and the alternatives considered in the EA process. Section 4.2.3 of the EA Code of Practice explains that the detailed description of the environment must address all components of the environment (natural, social, economic, cultural and built). Based on the current structure and level of detail in Section 3.0, it may be unclear how the description of the environment in this section clearly and	Consider revising Section 3.0 of the draft EIS/EA to ensure consistency with the organization of the description of the existing environment in the approved amended ToR. The description of the existing environment in the EIS/EA should be more detailed than the description presented in the approved amended ToR. Please ensure that a clear and complete description of each component of the environment is provided. Reference should be made to the natural, social, economic, cultural and built environments to ensure that components of the environment that will be studied in the EA process align with the EAA.	The baseline information in Section 3 of the draft EIS/EA includes the sub-headings in the approved Amended Terms of Reference (ToR). The information provided in the draft EIS/EA is more detailed than the information provided in the ToR, and includes information collected since approval of the ToR. Further detail is provided in the comprehensive baseline documentation appended to the draft EIS/EA and referenced throughout Section 3. Note that a summary of geochemistry for the Project is provided in Sections 4.4.4 (mined materials) and 4.6.5 (tailings) as the geochemistry relates to Project mineral wastes and having the information close to the project components is helpful for reader understanding. A description of the baseline collection methodologies and summary information is included in Section 3, with detailed baseline information included in Section 6 to support the effects assessment for each valued components, as requested by the Impact Assessment Agency of Canada. Taken together, these provide a complete description of the environmental components. ..	MECP continues to recommend that the description of the existing environment in Section 3 be organized under similar subheadings as those in the ToR (i.e., natural environment, social environment, economic environment, cultural environment and built environment). This will allow readers to better understand the existing conditions for each component of the environment. Additional subheadings may be included, as needed, to further separate information under each component. See Comment #32 regarding the level of detail in Section 3 of the EIS/EA.	The Summary of Existing Conditions in Section 3 in the final EIS/EA will be broadly organized under subheadings similar to those in the approved Amended Terms of Reference.	No further comment at this time.	N/A	EIS Section 3 (all).

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		accurately reflects these components of the environment.							
MECP-SPO-034	Background and Information Sources (Section 3.2.1)	Subsections 2.(1)(b) and 2.(1)(c) of Regulation 334 state that an EA shall contain a list of studies and reports which are under the control of the proponent and which were done in connection with the undertaking or matters related to the undertaking; and a list of studies and reports done in connection with the undertaking or matters related to the undertaking of which the proponent is aware and that are not under the control of the proponent. Section 3.2.1 of the draft EIS/EA states that baseline data to support the draft EIS/EA was obtained from published sources, government databases, site-specific studies, community and Indigenous engagement, and ongoing TK studies; however, this section does not include a comprehensive list of studies and reports used to support the preparation of the draft EIS/EA.	In accordance with Regulation 334, include a complete list of studies and reports under First Mining Gold's control which were done in connection with the undertaking or matters related to the undertaking, and a complete list of studies done in connection with the undertaking or matters related to the undertaking of which First Mining Gold is aware and that are not under its control.	Relevant baseline studies and reports conducted by FMG or its consultants (i.e., under the control of FMG) in connection with the proposed Project are listed in Section 3.3.2 to 3.3.16 and summarized in Section 3.4. Further, additional studies and reports are listed in Section 6 to support the assessment of potential effects of the Project on the environment. Traditional knowledge studies have been / are being prepared and are not under the control of FMG. FMG will ensure this is clearly identified in the final EIS/EA.	Comment has not been addressed. MECP recommends that a complete list (or table) that lists and describes all studies and reports also be included in the EIS/EA, for ease of reference.	A complete list of studies and reports referenced in the environmental assessment will be included in the final EIS/EA.	No further comment at this time.	N/A	EIS Section 3.3.1, Table 3.3-1.
MECP-SPO-035	Baseline Study Areas (Section 3.2.2)	Section 3.2.2 states that baseline studies have been completed by First Mining Gold to document spatial and temporal variability and to enable the assessment of environmental effects of the project on each valued component. This section also states that the spatial areas used are based on "a conservative estimate of the overall project footprint, including buffers based on the valued components being studied".	First Mining Gold should ensure that the study area(s) defined for the EA are representative of the environment that will be affected or that might reasonably be expected to be affected, directly or indirectly, by the proposed undertaking and the alternatives considered in the EA process. This should include all components of the proposed undertaking and their alternatives. Provide additional information about the spatial and temporal	The overall EA study area used for the Project was described in Section 6.1 (Figure 6.1.1.) of the approved Amended Terms of Reference. This study area was refined based on particular components of the environment and used in the collection of baseline data to provide a regional characterization of the environment. Modifications to the study area were made to address changes in the Project, an examination of alternatives and to address comments received during the preparation	Comment has not been addressed. As discussed on the March 15, 2023, call between MECP and FMG, a refined overall EA study area should be presented in the EIS/EA that is representative of the geographical area that will be affected or might reasonably be expected to be affected, directly or indirectly, by the proposed undertaking and the alternatives considered. This includes alternatives for all on-site and off-site components of	The refined overall EA study area will be presented in the final EIS/EA, and the description of the existing environment within these geographic boundaries will be provided. The final EIS/EA will include an explanation of how the spatial and temporal boundaries of the overall EA study area were determined.	MECP will review the refined overall EA study area and additional information and explanation that FMG commits to provide in the final EIS/EA.	The explanation of how the spatial and temporal boundaries for the refined overall EA study area was determined includes: Baseline studies have been completed to accurately document spatial and temporal variability. The spatial areas used for the completion of the baseline investigations is based on a conservative estimate of the overall Project footprint and alternatives considered, including an appropriate buffer based on the VC being studied	EIS Section 3.3.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Subsection 6.1(2)(c) of the EAA requires proponents to provide a description of the environment that will be affected or that might reasonably be expected to be affected, directly or indirectly, by the proposed undertaking and the alternatives considered in the EA process. Section 4.2.3 of the EA Code of Practice explains that an EA document must define an initial geographic area (or study area) that accurately represents the area in which the effects of the undertaking and the alternatives are likely to occur. The geographic area should be large enough to incorporate all areas that may be potentially affected by the proposed undertaking and the alternatives. The study area for each alternative or for each component of the environment may vary from the overall EA study area depending on the alternatives and the geographic extent of the potential environmental effects; however, it is important to clearly describe in the EA how and why the boundaries of the overall study area and the study area for each alternative and/or effect were chosen. Based on a review of Section 3.2.2 of the draft EIS/EA, it is unclear whether First Mining Gold has identified an overall EA study area that is representative of the proposed undertaking and the	boundaries of the study area(s) used for the description of the existing environment in Section 3.0 of the draft EIS/EA, including a clear map of the EA study area(s). Provide an explanation of how the spatial and temporal boundaries described in Section 3.2.2 of the draft EIS/EA were developed to align with the requirements of the EAA.	of the draft EIS/EA. In some cases, the change in study area was specific to a particular valued component and comments received (for example, the study areas for the Species at Risk components were guided by MECP comments).	the undertaking. A description of the environment within these geographical boundaries should be provided. The EIS/EA should include explanation of how spatial and temporal boundaries of the overall EA study area were determined. If other study area(s) are defined for valued components, explanations of the spatial and temporal boundaries for these should also be included. Section 3 is being used to support the alternative methods assessment (per FMG's response to Comment #32). As noted in the original comment, MECP notes that it may not be appropriate to include references in Section 3 to further refined or modified study areas in Section 6 (based on selected VCs and assessment of the preferred undertaking), as the referenced study areas may not represent geographical areas that consider the undertaking and all the alternative methods considered in the EA. Please review and adjust Section 3, as needed.			to support the effects assessment. As Project consultation and optimization has progressed, the investigation area has been expanded as needed, to ensure sufficient spatial area coverage. A preliminary baseline investigation area was presented in the approved Amended Terms of Reference and since then has been refined by the Project team to account for advances in Project design as well asfeedback received from government agencies and Indigenous communities. I Temporal variability has been captured during the baseline investigations by the completion of multiple programs over the period between 2011 and 2023 in the pertinent investigation areas. The baseline investigation area used for the refined overall EA study area is presented in Attachment MECP-SPO-35.	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		alternatives assessed in the EA process and that enables the assessment of environmental effects of both the undertaking and the alternatives (e.g., including alternatives for off-site components such as the proposed transmission line corridor, the proposed mine access road, off-site aggregate supplies). A map of the EA study area(s) has not been provided in Section 3.2.2. It is noted that Section 3.2.2 of the draft EIS/EA references spatial boundaries and study areas presented in Section 6.0 of the document, which in some cases do not appear to represent a geographic area that includes all components of the undertaking and the alternatives. Without a clear description of the spatial and temporal boundaries of the EA study area(s), it may be difficult for government agencies, Indigenous communities and interested persons to provide meaningful input and comment on potential effects during the review of the EIS/EA.							
MECP-SPO-036	Baseline Study Areas (Section 3.2.2)	Section 3.2.2 references spatial areas used for the completion of baseline investigations; however, rationales for the spatial boundaries of the EA study area(s) are not clearly explained. Without clear rationales for the spatial boundaries of the EA study area(s), it may be difficult for government agencies, Indigenous communities and interested persons to provide meaningful input and comment	Provide an explanation / rationale for how the EA study area was determined. Include a description of how the study area was developed in consideration of the proposed undertaking and the alternatives considered in the EA process, as well as in consideration of jurisdictional mandates of government agencies, the rights and interests of Indigenous communities and the interests of members of the public.	As noted in the response to Comment 35, the overall EA study area for the Project is shown in Figure 6.1.1 of the approved Amended Terms of Reference. The study areas used for the collection of specific baseline data were based on the spatial area required to provide regional characterization of the environment component and was used to support an assessment of alternatives. Where feedback was provided	Comment has not been addressed. As noted in the original comment, explanation / rationale for how the EA study area was determined should be included in the EIS/EA, including a description of how the study area was developed in consideration of the proposed undertaking and the alternatives considered, as well as jurisdictional mandates of government agencies, the rights	The final EIS/EA will include an explanation of how the spatial and temporal boundaries of the overall EA study area were determined. A summary of the related feedback received from government agencies, Indigenous communities, stakeholders and the public, will be provided where relevant.	MECP will review the additional information that FMG commits to provide in the final EIS/EA.	The response to Comment #35 provides an explanation of how the spatial and temporal boundaries of the overall Project EA study area were determined. Only one comment has been received to date from government agencies, Indigenous communities, stakeholders and the public on the overall Project EA study area, summarized below:	EIS Sections 3.1, 3.3.2, Figure 3.3-1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		on potential effects during the review of the EIS/EA.		during the EA process, study areas were adjusted, e.g. study area for caribou. The baseline study areas are described in the appliable baseline report, and are dependent on the focus of the particular study. It should be noted that local and regional study areas for the purpose of effects assessment are defined specifically for each valued component to support the assessment of potential effects from the Project, as noted in Section 6.2 to 6.24.	and interests of Indigenous communities and the interests of stakeholders and members of the public. FMG's response refers to study areas in Section 6. Please see MECP's additional feedback to Comment #35 regarding use of these references.			Development of baseline investigation area and temporal boundaries, and related consultation input: MECP requested a refined overall EA study area to be presented in the final EIS/EA that is representative of the geographical area that will be affected or might reasonably be expected to be affected, directly or indirectly, by the proposed undertaking and the alternatives considered. Further, MECP requested that a description of the environment within these geographical boundaries be provided, and an explanation of how spatial and temporal boundaries of the overall EA study area were determined. In addition, MECP requested the identification of all alternatives on the relevant figures in Section 3, and not only the preferred undertaking, to allow for a better understanding of environmental conditions in relation to the alternative methods assessed. In consideration of this comment, the refined overall EA study area has been presented in MECP-SPO-35. and described in Section 3.3.1 of the final EIS/EA. Further, the description of the existing environment within these geographic boundaries has been provided. An explanation of how the spatial and temporal boundaries of the overall EA study area were determined is explained in Section 3.3.1 and Section 2. Relevant figures in Section 3	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
								have been updated to include the location Project alternatives that were considered in Section 4.	
MECP-SPO-037	Baseline Study Areas (Section 3.2.2)	In Section 6.1 of the approved amended ToR, First Mining Gold commits to refining the preliminary study areas that were presented in the ToR and to updating the study areas in the EIS/EA and providing a rationale for the study areas used for the EA. Based on the limited information provided in Section 3.2.2 of the draft EIS/EA and uncertainty regarding the spatial boundaries of the EA study area described in this section, it is unclear how these commitments have been fulfilled.	Provide an explanation of how First Mining Gold has refined the EA study area(s) and the rationales for the study area(s), in accordance with the commitments in the approved amended ToR. If revisions to the study area(s) were not required, an explanation should be provided to clarify why and how it was determined that Section 3.0 of the draft EIS/EA has been prepared in accordance with the approved amended ToR.	The overall EA study area used for the Project was described in Section 6.1 (Figure 6.1.1.) of the approved Amended Terms of Reference. To provide adequate regional characterization of each valued component, the spatial extent of the initial overall EA study area was refined for each baseline program, depending on the type of data to be collected. Further, modifications to the baseline study areas were made to address changes in the Project, to support an examination of alternatives and to address comments from government agencies and Indigenous communities received during the preparation of the draft EIS/EA. It should be noted that the local study area was refined in the effects assessment for each valued component in Section 6 and is based on the potential direct and indirect effects for that particular valued component due to the Project, as described in Section 4. The regional study areas in Section 6 was refined to provide appropriate regional context for the valued component in the assessment of effects, and to support the assessment of potential cumulative effects.	The overall study area presented in the approved amended ToR was characterized as “preliminary”, and FMG committed to refining and updating the study area(s) in the EA. MECP understands that refinements to the study area(s) have been made (per FMG’s responses to Comments #35, #36, #37). Please include a discussion of these refinements / updates in the EIS/EA. This should include a discussion of refinements made based on consultation with Indigenous communities, government agencies and interested persons.	The final EIS/EA will include a description of how feedback received from government agencies, Indigenous communities, stakeholders and the public informed the overall EA study area, where relevant.	No further comment at this time.	N/A	EIS Section 3.1

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-038	Summary of Existing Conditions (Section 3.3)	Throughout the descriptions of the existing environment provided in Section 3.3, references are included to further details on existing conditions presented later on in the draft EIS/EA to support the assessment of effects of the preferred undertaking on identified valued components (i.e., in Section 6.0, which follows the discussion and assessment of alternative methods in Section 5.0 of the draft EIS/EA). Based on a review of the sequencing of sections in the draft EIS/EA, it is unclear why all information about the existing environment and baseline conditions is not presented together in the draft EIS/EA, in advance of both the assessment of the alternative methods and the assessment of the preferred undertaking. It is unclear why the level of detail differs in Section 3.0 and Section 6.0. A sufficiently detailed description of the existing environment in the EA study area should be presented in advance of the assessment of alternative methods to provide sufficient context to enable the identification of potential effects, mitigation measures and net effects for the alternatives. The description should be sufficiently detailed for each component of the environment (natural, social, economic, cultural and built) to understand the potential effects of the alternatives considered in the EA process.	Consideration should be made for including a single section in the EIS/EA that describes the existing environment and that precedes both the assessment of alternative methods and the assessment of the preferred undertaking to provide sufficient context and detail for each assessment. First Mining Gold should ensure that the description of the environment is detailed enough to provide a complete description of the environment that may be affected or reasonably expected to be affected, directly or indirectly, by the alternatives and the undertaking, as required by Section 6.1(2)(c) of the EAA.	The summary description in Section 3 of the draft EIS/EA for each component of the environment includes applicable references to the appendices with detailed baseline reports. A more detailed baseline description is included in the same section as the effects assessment for each valued component, which was guided by a request from the Impact Assessment Agency of Canada. The information presented in Section 3 is considered regional baseline information to provide context for the Project focussing on what is reasonably expected to be affected by the Project and related alternatives considered for each Project component. The baseline information presented in Section 6 is specific to the proposed Project and considered relevant to the assessment of effects on the particular valued component. These sections will be updated in the final EIS/EA as needed to reflect the result of ongoing baseline studies.	As noted in MECP's feedback to Comment #32, if FMG is not consolidating all information about the existing environment in one section, please ensure that sufficiently detailed information about the existing environment is presented in advance of the assessment of alternative methods.	The section of the final EIS/EA that describes the existing environment will be sufficiently detailed and will precede the section describing the assessment of potential alternatives for the Project.	MECP will review the additional information that FMG commits to provide in the final EIS/EA.	Acknowledged	EIS Section 3 (all).

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-039	Section 3.0 Environmental Setting Figure 3.1-1 Figure 3.1-2 Figure 3.3-9 Figure 3,3-10 Figure 3.3-12 Figure 3.3-15 Figure 3.3-16 Figure 3.3-17 Figure 3.3-18 Figure 3.3-19 Figure 3.3-21	Section 3.0 includes several figures to support the description of the existing environment; however, it is noted that many of the figures provided include the identification of a "Project Development Area" or "Proposed Mine Features" that appear to represent only the preferred alternatives and preferred locations for components of the proposed undertaking. Given Section 3.0 precedes the evaluation of alternatives in the draft EIS/EA, it is unclear why preferred alternatives and preferred locations are identified on these figures. Subsection 6.1(2)(c) of the EAA requires proponents to provide a description of the environment that will be affected or that might reasonably be expected to be affected, directly or indirectly, by the undertaking and the alternatives considered in the EA process. Figures used to support this description of the environment should be reflective of the undertaking and the alternatives.	Revise the figures in Section 3.0 of the draft EIS/EA to ensure that they may be used to support the description of the existing environment that will be affected or that might reasonably be expected to be affected, directly or indirectly, by the undertaking and the alternatives considered in the EA process. Please ensure that the study areas, scales, and information presented in these figures consider the locations of the proposed undertaking and the alternatives. Remove the identification of preferred alternatives or preferred locations of components of the proposed undertaking.	The information presented in the figures in Section 3 of the draft EIS/EA supports an understanding of the regional environmental conditions. Section 5 of the draft EIS/EA includes appropriate figures for the assessment of Project alternatives. The identification of the "Project Development Areas" and/or "Proposed Mine Features" on the figures noted in this comment are provided to allow the reader to understand the environmental conditions in relation to the potential Project components. Where necessary, the figures will be reviewed and adjusted to provide clarity to the reader.	Comment has not been addressed. While MECP appreciates FMG's response, FMG indicates in its response to Comment #32 that Section 3 is intended to support the assessment of alternative methods. For this reason, it would be more appropriate to identify all of the alternatives on the figures in Section 3, and not only the preferred alternatives for project components. This would allow for a better understanding of environmental conditions in relation to the alternative methods assessed. Please adjust the figures accordingly.	The geographic boundaries for the alternatives considered will be included in relevant figures in the section describing the existing environment of the final EIS/EA.	No further comment at this time.	N/A	EIS Section 3 Figures 3.3-1, 3.4-10, 3.4-12, 3.4-13, 3.4-14, 3.4-15, 3.4-16, 3.4-17, 3.4-18, 3.4-19, 3.4-20, 3.4-21, 3.4-22.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-040	Traditional Knowledge / Traditional Land Use Studies (Section 3.3.13)	Section 3.3.13 states that activities practiced by Indigenous peoples, including hunting, fishing, harvesting, and cultural and ceremonial practices, were considered in baseline studies; however, there is limited discussion Section 3.0 of the draft EIS/EA of how TK and TLU information was considered in the description of the environment. The approved amended ToR includes several commitments relating to TK and TLU information. In Section 9.3.2 of the approved amended ToR, First Mining Gold commits to providing opportunities for Indigenous communities to be engaged throughout the EA process so that they may provide input on how the proposed undertaking and the alternatives considered in the EA process may have an impact on their rights and interests. In Section 9.1 of the approved amended ToR, First Mining Gold also commits to considering and incorporating TK into each component of the EA, where appropriate and available. Based on the description of the environment presented in Section 3.0 of the draft EIS/EA and the limited discussion of TK and TLU, it is unclear how these commitments have been fulfilled.	Provide an explanation of how consultation with Indigenous communities and TK / TLU information was considered in the description of the existing environment presented in Section 3.0 of the draft EIS/EA, including how TK and TLU information informed the boundaries of the EA study areas used.	Where TK/TLU information was available relative to a component of the environment, it was incorporated into the existing conditions for the valued component in Section 6 as identified in the draft EIS/EA text. As described in Section 2, opportunities to provide input were provided during ongoing engagement with Indigenous communities and included meetings to review baseline data and future workplans, community meetings to describe the EA process and present the Project alternatives, as well through the provision of TK/TLU information. During the review of the draft EIS/EA, feedback received from Indigenous communities, including the provision of relevant TK/TLU information, will be incorporated into the final EIS/EA.	Comment has not been addressed. As noted in the original comment, Section 9.1 of the approved amended ToR includes a commitment for FMG to consider and incorporate TK and TLU information into each EA decision-making milestone. Section 3 provides a description of the existing environment to support the assessment of alternative methods. This description of the existing environment (and the alternative methods assessment) should be informed by TK/TLU to meet the ToR commitments. Please describe in the EIS/EA how TK/TLU was considered in the description of the existing environment in Section 3, including how TK / TLU information informed the boundaries of the EA study area. See MECP's additional feedback to Comment #6 regarding consideration and incorporation of TK/TLU throughout the EA.	A summary of how TK / TLU was considered will be included in the description of the existing environment in Section 3 of the final EIS/EA. Further, a summary of how TK TLU information influenced the boundaries of the EA study area will be included in Section 3, where available and relevant.	MECP will review the additional information FMG commits to provide in the final EIS/EA to determine whether it has met its ToR commitments.	FMG has continued to support the collection of Traditional Knowledge (TK) and Traditional Land Use (TLU) by local Indigenous communities. This includes a Traditional Knowledge and Land Use Study for the Northwest Ontario Métis Community (NWOMC), supplemental TK/TLU report from NWOMC and a Traditional Knowledge and Use for Wabauskang First Nation, and Mishkeegogamang Ojibway First Nation. Studies are in progress by, Cat Lake First Nation, Lac Seul First Nation and Slate Falls Nation and are well advanced. FMG will continue to work with Indigenous communities through the life of mine to gather additional TK/TLU information and consider the data, as it is made available. Available, non-confidential TK/TLU information has been included in relevant baseline reports and in the applicable components of the EIS/EA, including Section 6.21 for the assessment of effects on traditional land and resource use. This explanation will be included in the final EIS/EA. TK/TLU information submitted by Indigenous communities outside preliminary study area proposed by FMG has been and will continue to be considered in the EA documentation, where relevant. See the response to Comment #6 for a description of how TK and TLU information was considered in each EA decision-making milestone.	EIS Section 2.6.1, page 2-26

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-041	Project Description (Section 4.0)	Section 4.0 provides a description of the preferred undertaking and its components (e.g., specific facilities, equipment, activities, locations of project components and a site plan). Based on a review of the sequencing of sections in the draft EIS/EA, it is unclear why Section 4.0 precedes Section 5.0, which includes the discussion and assessment of alternative methods for components of the proposed undertaking. As it is currently organized, the draft EIS/EA presents the preferred alternatives in advance of the assessment of alternative methods. Section 3.1.5 of the EA Code of Practice explains that the EA should clearly describe the environmental planning and decision-making process followed. Any interested person reading the EA document should be able to easily follow the process used by the proponent in determining the preferred undertaking, including the rationale for making certain choices. Based on the sequencing of the draft EIS/EA, it is unclear how First Mining Gold followed the environmental planning and decision-making process for the EA to arrive at the selection of a preferred undertaking.	Provide an explanation for the sequencing of these sections of the draft EIS/EA and consider revising the order of the EIS/EA to accurately reflect the order in which the EA decision-making was followed.	An explanation of the planning and decision-making process is provided in Section 4.1 in advance of the main Project Description text. It directs readers to Section 5 for the comprehensive assessment of feasible alternatives. The approach is further detailed in Sections 5.1 to 5.3. This comment will be fully considered during preparation of the final EIS/EA, and the order of these initial sections will be revised.	No further comments at this time. MECP will review the final EIS/EA when submitted.	Acknowledged			EIS Sections 4, 5.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-042	Project Description (Section 4.0)	Section 4.0 identifies and describes components of the preferred undertaking, including facilities, buildings, equipment and activities, for which approval under the EAA is being sought. Although overviews are provided for components and activities, there is a lack of detail about aspects of the conceptual design, the function of each component, the activities proposed and the undertaking overall. Subsection 6.1(2)(b)(i) of the EAA requires that a description of and statement of the rationale for the undertaking be provided in the EA. Section 4.2.5 of the EA Code of Practice explains that the description of the undertaking should be more detailed than the description of the alternatives. The description must cover the entire life cycle (construction, operation, and decommissioning) and must provide sufficient information so the Minister can have a clear understanding about the undertaking. The description of the undertaking should consider the conclusions of the assessment of alternative methods (e.g., how the potential effects and impact management measures for each of the preferred alternatives were considered.) Additional information may be needed about the components of the proposed undertaking and the proposed activities to fully understand the	Provide additional details about the components of the preferred undertaking and activities proposed, and a more detailed rationale for the preferred undertaking. Any potential effects from the components and activities over the life cycle of the undertaking should be fully described in the EA in accordance with the EAA. Proposed actions that may be necessary or may reasonably be expected to be necessary to prevent, change, mitigate or remedy the effects on the environment from the components and activities should also be described.	Section 4 will be updated with additional available information in the final EIS/EA. If there are specific Project components for which the function is unclear, or how they interact, please let us know. The facilities, buildings, equipment and activities are standard to Canadian mining operations,. Detailed design information will be provided during the environmental approvals process in support of Provincial and Federal permits, including from MECP. A description and statement of the rationale for the Project is provided in Section 1.4, intended to meet the needs of both the federal and provincial environmental assessment processes, without causing confusion to non-regulatory readers. The description of the undertaking provided in Section 4 of the draft EIS/EA is more detailed than the description of the alternatives provided in Section 5 of the draft EIS/EA, and does describe the entire life cycle (construction, operation, and decommissioning). Please refer to Sections 4.4 to 4.16, as well as Section 4.17 and 4.18 (life cycles). The Impact Assessment Agency has indicated that the description of mitigation measures is preferred to be associated with the text describing potential environmental effects. Accordingly, additional information regarding the	Please see MECP's additional feedback to Comment #7 for examples. Note that list is not exhaustive. Please review the EIS/EA to ensure that it includes sufficiently detailed information about the preferred undertaking. The level of detail should enable readers to understand what potential effects will be caused or might reasonably be expected to be caused to the environment by the undertaking, and what actions are necessary or may be necessary to prevent, change, mitigate or remedy the effects. With regards to mitigation measures, where mitigation measures are relevant to the design of the undertaking, these should be identified and described in the description of the undertaking for which FMG is seeking approval under the EAA.	Sufficiently detailed information about the preferred undertaking will be included in the final EIS/EA and will include in-design mitigation	MECP will review the additional detailed information that FMG commits to provide in the final EIS/EA.	Acknowledged. An example of the level of detail to be provided in the Project Description of the final EIS/EA is provided in Attachment MECP-SPO-7 for the construction and installation of the dikes.	EIS Section 5 (all).

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		undertaking for which approval under the EAA is being sought. For example, there is a lack of detailed information about the conceptual design of certain components and how they will function together as a whole. A more detailed rationale for the preferred undertaking should be provided in accordance with the EAA and the EA Code of Practice. Without sufficient information about the conceptual design and activities associated with the proposed undertaking, it may be difficult for government agencies, Indigenous communities and interested persons to provide input regarding potential effects, mitigation measures, etc.		proposed mitigation measures, including in relation to the Project design and activities, are provided in Section 6 (Effects Assessment and Mitigation).					
MECP-SPO-043	Main Project Components (Section 4.2)	Section 4.2 includes the following statement: "This section provides a description of the proposed Project based primarily on the Pre-feasibility Study (AGP 2021) but also as a result of ongoing optimization studies." Section 4.2.5 of the EA Code of Practice explains that the proposed undertaking is the preferred alternative selected by the proponent, after a systematic evaluation and in consultation with interested persons, as the solution to the problem or opportunity that was identified in the EA. Based on the statement quoted above, the context for how the proposed undertaking was determined may not be clear.	Revise Section 4.2 of the draft EIS/EA to clarify this context and to explain how the EA process was followed to arrive at the selection of the preferred undertaking for which approval under the EAA is being sought.	As described in Section 4.1 of the draft EIS/EA, "the proposed site layout and infrastructure routing,… has been developed by means of a comprehensive assessment of feasible alternatives as described in Section 5, guided in part from feedback received from consultation and engagement activities to date. Mine-related facilities have been placed near the open pit to the extent practical to minimize the overall footprint and associated environmental impacts. The Project has been designed to mitigate environmental effects, drawing from the extensive experience with other similar projects in Canada. As part of the mitigation measures, compensatory measures are expected to be required under the Fisheries Act and	No further comments at this time.	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Endangered Species Act. The site plan may be refined further as a result of ongoing consultation activities and engineering studies. The Project sets out to be designed in a manner compatible with regional land use planning, be respectful of the rights and interest of local Indigenous communities and land users in the area, and to facilitate the eventual reclamation of the site."					
MECP-SPO-044	Main Project Components (Section 4.2)	Section 4.2 states that the proposed undertaking is expected to be developed over a three-year period, and that a twelve-year mine life is anticipated based on work carried out to define the Springpole ore body. Additional information may be required to understand how these timeframes were determined and to support the estimated timelines presented for construction, operations and decommissioning / closure of the proposed undertaking.	Provide additional information, where possible, to clarify how the estimated mine life was determined. Include an explanation of how the estimated duration of each phase of the proposed undertaking was determined (e.g., construction, operations, decommissioning, etc.).	An NI 43-101 Technical Report and Pre-Feasibility Study (PFS) was published for the Project in early 2021 which provides key information necessary to the decision-making process of a mining project. As part of the development of the PFS, engineering and technical studies are completed to investigate a range of options and determine the most appropriate for the Project. In order to determine the proposed timelines, a number of factors are considered such as but not limited to mining rates, mill processing rates, material availability and economics.	Comment has not been fully addressed. Please include information in the EIS/EA, where possible, to describe how the estimated timelines were determined (e.g., information about mining rates and mill processing rates over the life of the mine, etc.). Based on April 2023 media releases, MECP understands that FMG may have identified additional deposit continuity at the Springpole site. In speaking with FMG, MECP understands that no changes are currently proposed to the Springpole Gold Project; however, please inform MECP of any potential changes in the future as they relate to the undertaking for which approval is being sought under the EAA.	The final EIS/EA will include information, where possible, to describe how the estimated Project timelines were determined. FMG will inform MECP of any potential changes in the future as they relate to the undertaking for which approval is being sought under the EAA.	No further comment at this time.	· Section 1 of the final EIS/EA will include additional information on the estimated Project timelines, as described below: The overall Project development schedule consists of the following main phases: Construction Phase: Years -3 to -1 including the installation of infrastructure and preparation for open pit mining; Operations Phase: Years 1 to 10 with the first year potentially representing a partial year as the Project transitions from construction into operations; and Decommissioning and Closure Phase: Years 11 to 15 corresponding to the period when primary decommissioning and reclamation activities are carried out, to be followed by a period of post-closure environmental monitoring (Year 16+). Construction will begin once the	EIS Section 1.4.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
								EA process is complete / approved, the necessary initial environmental approvals are received and a corporate decision is made to proceed. The timeframe to complete the required site preparation and construction of the surface infrastructure to start open pit mining activities is two to three years. The primary construction phase activities will include: Mine access road and airstrip construction; Site preparation activities including clearing, grubbing and bulk earthworks; Aggregate resource development and operation; Onsite haul road construction; Initiation of compensatory fish habitat measures; Dike construction; Open pit preparation including, controlled dewatering of the open pit basin, and stripping of lake bed sediments and overburden and excavation of mine rock at the open pit; Construction of buildings and onsite infrastructure; Construction of a transmission line connecting the site to the regional electrical grid; Preparation of the CDF;	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
								Establishment and operation of water and waste, management and treatment facilities; and Environmental protection and monitoring activities. The operations phase is anticipated to last approximately 10 years based on a 30,000 tonnes per day mining and milling rate, and will include the following primary activities along with other related activities: Development and ongoing mining in the open pit; Processing of ore in the process plant; Management of mine rock, ore, overburden and tailings in designated engineered facilities; Operation of water and waste management and treatment facilities; Environmental monitoring to ensure regulatory requirements are met; Follow-up environmental studies; and Progressive reclamation activities. The decommissioning and closure phase will require that the open pit be allowed to fill with water after mining ceases, with enhanced filling. Based on the proposed active filling rate, it would require 3 to 5 years to fill the combined dewatered open pit basin and fish habitat	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
								development area to the average natural elevation of Springpole Lake. In addition, the following activities if not completed progressively during operations as appropriate would also occur during this phase: Removal of assets that can be reasonably salvaged for re-sale or re-use; Demolition and recycling and/or disposal of remaining materials; Removal and disposal of demolition-related wastes in approved facilities; Reclamation of affected areas, such as by re-grading, placement of an appropriate cover to facilitate revegetation if needed, and revegetation (active or passive); and, After all regulatory requirements are met including as demonstrated through monitoring results, reconnect the reclaimed basin and fish habitat development area to Springpole Lake.	
MECP-SPO-045	Aggregate Sources (Section 4.14) Aggregate Supply (Section 5.28)	Section 4.14 describes two preferred locations for aggregate supply; however, there is limited discussion about this proposed component of the undertaking, the aggregate sources identified, and the activities associated with the extraction of the aggregate supply over the life cycle of the proposed undertaking.	Provide additional information about the proposed aggregate sources and supplies, including but not limited to a more detailed explanation of aggregate requirements for the proposed undertaking, the feasibility of the alternatives assessed, the activities associated with aggregate extraction over the life cycle of the proposed undertaking, and	Additional field investigations are proposed for 2023, which will be used as appropriate to inform the final EIS/EA. Updated information regarding aggregate sources and potential environmental effects will be provided in the final EIS/EA.	Noctiver comments at this time. MECP will review updated information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 5.16, 4.27.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Section 5.28 describes an assessment of alternatives for aggregate supply and includes the assumption that the quality of aggregate required is present in the volumes needed at all identified locations. This section states that resources will be investigated further in support of the final EIS/EA, and that a third potential location would likely only be developed if specialty aggregate were found to be present. Additional information may be required to better understand this component / activity and the feasibility of the alternatives considered. In Sections 5.2.11 and 5.2.13 of the approved amended ToR, First Mining Gold commits to considering potential effects associated with proposed aggregate extraction and transportation (including mitigation measures) in the EA. Without a sufficient level of detail and understanding of this component and any associated activities, it may be difficult for government agencies, Indigenous communities and interested persons to provide input regarding potential effects and mitigation measures.	any anticipated permits/approvals. First Mining Gold should ensure that potential effects from this component of the proposed undertaking have been fully considered in the EA in accordance with the commitments in the approved amended ToR. If there is uncertainty regarding this component, please describe that uncertainty and how that has been considered in the EA process.						

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-046	Site Access (Section 4.15)	Section 4.15 includes a brief discussion of access to the mine site and a proposed two-lane, all-season gravel access road that would be constructed from the site to the end of the existing Wenesaga Road; however, there is limited discussion about this component and the activities associated with the proposed access road over the life cycle of the proposed undertaking (construction, operations, and decommissioning / closure). Based on a review of Section 4.15, it is unclear what specific physical activities may be undertaken with respect to construction, operations and potential decommissioning of the proposed mine access road. There is also no discussion of frequency of use of the proposed access road (e.g., trucking to and from the site, maintenance activities, traffic, etc.), despite the commitment in Section 5.2.13 of the approved amended ToR to considering duration and frequency of use of access alternatives. It is unclear whether First Mining Gold has considered these activities and all potential effects associated with the proposed mine access road over the life cycle of the proposed undertaking. It is understood from information provided in the draft EIS/EA and the approved amended ToR that First Mining Gold proposes to construct the proposed mine access road from the mine site to the	Provide additional information about the proposed mine access road component of the proposed undertaking, including but not limited to more detailed descriptions of the activities associated with the mine access road over the life cycle of the proposed undertaking (including construction, operations and decommissioning). Provide a description of the duration and frequency of use of the proposed access road and access alternatives, and how this was considered in the EA. This should include an explanation of whether and how First Mining Gold has considered truck volumes, traffic, etc. and how these considerations have informed the assessment of potential effects and the alternatives. First Mining Gold should ensure that potential effects from this component of the proposed undertaking have been fully considered in the EA.	Updated information regarding the mine access road will be provided in the final EIS/EA, including any revisions to the mine access road routing alternatives based on comments received, as applicable.	No further comments at this time. MECP will review updated information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 5.4, 5.17.1, 5.19.3.9.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		existing Wenesaga Road at the Birch River crossing. First Mining Gold has committed to working with Domtar to develop appropriate agreements for any shared infrastructure; however, there is limited information provided in this section of the draft EIS/EA about the potential shared infrastructure, potential required upgrades to the existing Wenesaga Road and any agreements with Domtar. Additional information may be needed to better understand this component of the proposed undertaking. Without a sufficient level of detail and understanding of the proposed mine access road and associated activities, it may be difficult for government agencies, Indigenous communities and interested persons to provide input regarding potential effects and mitigation measures.							
MECP -SPO-047	Project Description (Section 4.0)	Section 4.0 includes several statements that imply uncertainty regarding components of the proposed undertaking (e.g., a potential airstrip may be established, a helipad will be maintained however no location is discussed, another potential aggregate supply location may be developed, an open burn area may be requested on the project site, explosives may be needed for onsite construction work, etc.). Section 4.2.5 of the EA Code of Practice explains that it may be appropriate for proponents to	Include explanations to clarify what, if any, aspects of the conceptual design of the preferred undertaking may require a minor potential change and/or where there is uncertainty with respect to components of the proposed undertaking. Where necessary, clearly describe the rationale for why a potential minor change may be required and how this has been considered and assessed as part of the EA process.	The Project Description text will be revised as needed to reflect the progression of the Project design since the draft EIS/EA was prepared. A conservative approach has been taking to defining / describing the undertaking to allow for the reasonable level of refinement to the conceptual design, that typically arises for Ontario mining projects post EIS/EA. These optimizations normally arise as a result of ongoing consultation and engagement, detailed engineering design and the environmental permitting /	MECP will review the revisions to the EIS/EA when it is submitted. Please provide an explanation in the final EIS/EA of the approach taken by FMG to account for project refinements, and how any uncertainty and potential for minor changes have been considered and assessed in the EA process. As noted in the original comment, please identify and describe the rationales for any potential minor changes.	An explanation of the approach taken to account for Project refinements due to uncertainty and minor changes will be included in the final EIS/EA.	MECP will review FMG's explanation in the final EIS/EA.	The explanation of the refinements that have been made to the Project since the draft EIS/EA as a result of feedback received from Indigenous communities, government agencies and the public, and further engineering optimization includes: The continuing maturing of the Project design has resulted in the potential refinements and improvements to the preliminary Project design. The refinements that have occurred during the intervening period and included in the draft EIS/EA are typical of mining projects as	EIS Section 5.21.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		include flexibility in the EA with respect to how it proceeds with the undertaking, considering that further technical approvals may be required and the proposed undertaking may be subject to minor changes; however, limits on the flexibility must be included in the description of the undertaking. First Mining Gold may indicate where potential minor changes may be contemplated to the conceptual design, but it must be clearly identified where the change may be required. Rationales should be provided to support why the change may be considered necessary and how the potential need for a minor change has been considered and assessed in the EA process. Please be advised that any change to an undertaking described in an approved EA document that has not been contemplated as part of the EA process may be considered a new undertaking subject to the requirements of the EAA.		approvals processes. A conservative approach has also been taken to the assessment of potential environmental effects, as described in the individual sections for each valued component in Section 6. With this conservative approach (i.e., there is considered to be an over-estimation of effects of the undertaking in the draft EIS/EA), the effects assessment will be able to accommodate a reasonable level of Project refinement while maintaining the validity of the assessment.				designs progress. A list of the refinements will be included in Section 5 (Project Description) of the final EIS/EA.	
MECP-SPO-048	Project Description (Section 4.0)	Section 4.0 does not provide detailed information to understand the potential effects and proposed impact management measures associated with the components and activities required for the proposed undertaking for which approval is being sought under the EAA. Additional information may be needed about potential effects and proposed impact management measures to better understand certain aspects of the conceptual design, the function of each	Provide additional information about the potential effects and proposed impact management measures that will be applied to each component and activity for the proposed undertaking to provide a better understanding of the proposed undertaking for which approval is being sought under the EAA.	The potential effects and proposed mitigation measures associated with the Project are provided in Section 6 of the draft EIS/EA. It is not practical or reasonable to complete an effects assessment in Section 4 for individual project components in isolation, as the effects are interrelated.	Comment has not been addressed. MECP is not asking for a complete effects assessment to be presented in this section of the EIS/EA. As certain aspects of the preferred undertaking are described across different sections of the draft EIS/EA (i.e., Section 4; more detailed mitigation measures in Section 6), MECP is recommending that a complete description of the	An updated description of the preferred undertaking will be provided in the Project Description section of the final EIS/EA. This will include information on in-design mitigation.	MECP will review the updated description of the preferred undertaking that FMG commits to provide in the final EIS/EA.	Acknowledged. An example of the in-design mitigation is provided in Attachment MECP-SPO-48, and a summary table will be included in Section 5 of the final EIS/EA.	EIS Section 5 (all).

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		component of the undertaking, and the activities proposed. In Section 7.4 of the approved amended ToR, First Mining Gold commits to describing potential effects and mitigation measures in the EIS/EA and to refining the description of the actions necessary to prevent or mitigate the effects on the environment. It is unclear from the descriptions provided in Section 4.0 of the draft EIS/EA how this commitment has been fulfilled.			preferred undertaking be provided in a standalone section that describes in detail the undertaking for which approval is being sought. As discussed on the March 15, 2023 call between MECP and FMG, please include in the description of the preferred undertaking information about mitigation measures where relevant to the design and function of project components and proposed activities.				
MECP-SPO-049	Project Description (Section 4.0)	Section 4.0 provides an overview of the key components, facilities and activities associated with the proposed undertaking; however, this section does not identify which components and/or activities may require post EAA approvals. Sections 3.2.4 and 4.3.6 of the EA Code of Practice explain that the EA should identify and include an outline of what other approvals will be required for the undertaking and for what component of the undertaking. Although a list is provided in Section 11.0 of the draft EIS/EA, First Mining Gold should consider also identifying permitting and approval requirements in the description of the proposed undertaking in Section 4.0, as each component and activity is described. This would help clarify which components require post EAA approval. Section 4.3.6 of the EA Code of Practice explains that if approval is required under several pieces	Include additional information about the components and activities of the proposed undertaking that may require post EAA approvals. First Mining Gold is encouraged to discuss the level of detail that should be provided in the EIS/EA with MECP.	A list of anticipated environmental approval requirements is provided in Section 11 of the draft EIS/EA, based on guidance provided during the ToR approvals process from the various regulatory reviewers at the time, as well as experience of the Project team on other mining projects in Ontario. Pre-consultation with MECP and other Provincial Ministries on environmental approval requirements for construction and operation is proposed in parallel, with the environmental assessment process but it is understood that detailed environmental approval applications cannot be submitted until the environmental assessment process is complete.	No further comments at this time.	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		of legislation administered by MECP, proponents are encouraged to submit documentation that would, as much as possible, fulfil the requirements of all the applicable legislation (e.g., requirements under the EAA, Environmental Protection Act and Ontario Water Resources Act). Proponents should discuss with MECP the benefits of doing this, such as potential reduction in time needed to acquire other approvals.							
MECP -SPO-050	Existing Facilities and Infrastructure (Section 4.3)	Section 4.3 includes a brief discussion of existing facilities and infrastructure components present on the site including a small exploration camp, office, storage facilities and yard areas. It is unclear from the information provided what changes (if any) may be made to the identified existing infrastructure and facilities as a result of construction, operation and decommissioning of the proposed undertaking.	Provide additional information about the existing infrastructure identified at the mine exploration site, including but not limited to any potential changes to existing buildings and facilities, associated activities, etc. proposed as part of the undertaking. Please ensure that potential effects have been considered in the EA.	Changes to the minor facilities and infrastructure present on the site will be clarified in the final EIS/EA. Generally, these facilities will be removed during Project construction.	No further comments at this time. MECP will review the updated information in the final EIS/EA when submitted.	Acknowledged			EIS Section 5.5.
MECP -SPO-051	Project Phases and Schedule (Section 4.17)	Section 4.17 provides a high-level list of activities expected during each phase of the undertaking (e.g., construction phase, operations phase, decommissioning and closure phase). Additional information may be needed to better understand the physical activities associated with these more general activities (e.g., “construction”, “development” or “operation” of components of the undertaking). Section 4.2.5 of the EA Code of Practice states that the EA must provide sufficient information so that the Minister of the	Provide additional information about the activities described in Section 4.17 of the draft EIS/EA.	Activities associated with the Project are described throughout Section 4 as applicable. Section 4.17 will be updated in the final EIS/EA to provide additional detail regarding the activities associate with each phase, as available, including with linkages to the earlier descriptions of Project components, where additional detail is available.	No further comments at this time. MECP will review the updated information in the final EIS/EA when submitted.	Acknowledged			EIS Section 5.4.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Environment, Conservation and Parks can have a clear understanding about the undertaking for which approval under the EAA is being sought. Without a full understanding of what activities will be undertaken, it may be difficult to provide input regarding potential effects and impact management measures.							
MECP -SPO-052	Project Phases and Schedule (Section 4.17)	In Section 4.2 of the approved amended ToR, First Mining Gold commits to developing a mine plan that will include sequencing of construction activities and that will be presented in the EIS/EA. Although Section 4.17 identifies, at a high-level, the anticipated activities expected to occur during each phase of the proposed undertaking (construction, operations, decommissioning / closure), a mine plan that clearly describes the sequencing of activities has not been provided. It is unclear how the commitment above has been fulfilled.	Include a mine plan that clearly describes the sequencing of activities, in accordance with the commitment in the approved amended ToR.	Section 4.17 will be updated in the final EIS/EA to provide sequencing of activities as available. It is expected that this sequencing will continue to be optimized through the environmental approvals phase.	No further comments at this time. MECP will review the updated information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 5.4, 5.19.
MECP -SPO-053	Preliminary Project Development and Production Schedule (Table 4.17-1)	In Section 4.2 of the approved amended ToR, First Mining Gold commits to refining the production schedule in the EIS/EA. Based on a comparison of the preliminary project development and production schedule presented in the approved amended ToR and Table 4.17-1 – "Preliminary Project Development and Production Schedule" in the draft EIS/EA, it appears that changes have been made;	Provide an explanation of how the production schedule was refined in the EIS/EA to fulfill the commitment in the approved amended ToR, including rationales for any changes.	Changes to the production schedule since the ToR, will be described in the final EIS/EA and rationale for any optimizations will be provided. The production schedule originally presented in the ToR was refined during preparation of the draft EIS/EA as a result of greater engineering information, including regarding the time required for basin dewatering and filling (construction / closure phases increased by one year) while protecting the environment.	No further comments at this time. MECP will review the updated information in the final EIS/EA when submitted.	Acknowledged			EIS Section 5.4

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		however, no discussion is provided about how the schedule was refined during the EA process.		Table 4.17-1 of the draft EIS/EA will be updated if needed in the final EIS/EA to reflect the current information including an explanation of how the production schedule was refined over time.					
MECP-SPO-054	Alternatives to the Project (Section 5.1.1) Project Alternatives (Section 5.4)	Sections 5.1.1 and 5.4 describe an assessment of alternatives to the Springpole Gold Project, including consideration of the following alternatives: Proceed with the project as planned Delay the project until circumstances are more favourable; or Abandon the project (i.e., "do nothing") The purpose of this assessment is unclear and appears to be inconsistent with the approved amended ToR. Section 2.0 of the approved amended ToR explains that First Mining Gold will be preparing its EA in accordance with subsections 6.1(3) and 6(2)(c) of the EAA. It is stated that development of an "open pit" mine is the only viable alternative to the proposed undertaking, and therefore "alternatives to the undertaking" will not be considered in the EA. Section 4.2.2 of the EA Code of Practice explains that proponents should consider the 'do nothing' alternative in relation to the preferred undertaking, as this can highlight the advantages and	Revise the draft EIS/EA to clarify that First Mining Gold is preparing its EA in accordance with 6.1(3) and 6(2)(c) of the EAA and that alternatives to the undertaking are not considered, as per the approved amended ToR. Include a clear and sufficiently detailed assessment of the preferred undertaking against the 'do nothing' alternative to assess the advantages and disadvantages of proceeding with the preferred undertaking.	As a standard practice, the 'do nothing' alternative to the Project was considered in the context of a benchmark against which potential effects of the Project and alternatives to it were measured to highlight the advantages and disadvantages of proceeding with the Project. The 'do nothing' alternative was not considered explicitly as an alternative to the Project, but it is represented as the existing environmental conditions that will experience change through the implementation of the Project.	Comment has not been addressed. Section 5.2.1 of the approved amended ToR includes a commitment to compare the "do nothing" alternative against the project to assess the overall advantages and disadvantages of proceeding with the preferred undertaking. As discussed on the March 15, 2023, call between MECP and FMG, please revise the EIS/EA to include an assessment of the preferred undertaking against the "do nothing" alternative.	As noted in Section 5.1.1 of the draft EIS/EA, the do nothing alternative relative to the undertaking does not meet the purpose of the Project but has been included for transparency and as required by the Ontario Code of Practice (MOE 2014). The do nothing alternative represents the existing, baseline environmental conditions, that could be affected if the Project proceeds either as planned, or with a delay. A detailed assessment of each criteria and indicator has been provided for the do nothing alternative in Appendix T-1, Table T1-1. Similarly, the 'do nothing' alternative was not identified for evaluation in the assessment of alternative methods, since each Project component is needed to support Project construction, operation or closure, and the Project could not be feasibly implemented without the inclusion of the identified Project components. The do nothing alternative for each Project component would not satisfy the questions listed in Section 5.1, and would likely result in unacceptable impacts to the environment, i.e. not including a cofferdam to isolate a portion of the north basin for dewatering, or not identifying a location for the disposal of	On the November 2, 2023 call with FMG, MECP's EA Branch recommended that FMG revise the EIS/EA to include a more detailed assessment comparing the "do nothing" alternative against the preferred undertaking in the main EA report (i.e., in Section 5.1.1), in order to assess overall advantages and disadvantages of proceeding with the undertaking. Consider updating and including the table from Appendix T in the main EA report. MECP noted that Table T1-1 in Appendix T includes a column for the "do nothing" alternative; however, that column notes "no effects identified" for most criteria. To allow for a better comparison, it is recommended that the "do nothing" column clearly describe the "do nothing" or existing baseline condition for each criteria / indicator chosen. This will allow a clearer comparison of potential effects, advantages and disadvantages. With regards to consideration of the "do nothing" alternative in the assessment of alternative methods, please see Comment 64 below.	The individual detailed tables in Appendix T-1 of the draft EIS/EA will be moved to the relevant individual subsections in the renumbered Section 4 Alternatives Assessment, and the summary assessment table in the draft EIS/EA subsections will be removed. An updated version of a detailed assessment table example has been included in Attachment MECP-SPO-54, showing the updated assessment including a description of the existing baseline condition for comparison. This approach will be taken for the detailed alternative tables for other Project components.	EIS Section 4.3

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		disadvantages of proceeding with the preferred undertaking. Based on a review of the draft EIS/EA, clarification is needed to understand whether the assessment described above is intended to meet the requirement for assessing the 'do nothing' alternative. First Mining Gold should clearly assess the 'do nothing' alternative in relation to the preferred undertaking. This assessment of the 'do nothing' alternative should be detailed enough to identify and understand the advantages and disadvantages of proceeding with the proposed undertaking and weigh these advantages and disadvantages to arrive at a conclusion.				tailings. The rational for not evaluating the no nothing alternative for each component will be included in the final EIS/EA. This approach is consistent with other mining environmental assessments in Ontario.			
MECP -SPO-055	Identification of Alternatives (Section 5.1)	Section 5.1 includes a statement that alternatives were only considered in the EIS/EA if they are likely to satisfy a set of questions (which are outlined in MECP's EA Code of Practice). No additional information is provided about how the questions were considered to identify a reasonable range of viable alternative methods for each component of the proposed undertaking. Based on this statement, it is unclear whether First Mining Gold may have used these questions to limit or screen alternatives to be considered in the EA. The Notice of Approval for the ToR was issued with amendments, including amendment 2.1, which clarifies text regarding the use of these questions to identify	Revise the text in Section 5.1 of the draft EIS/EA to clarify that, in accordance with MECP's Codes of Practice, a reasonable range of alternatives should be identified in the draft EIS/EA based on consideration of the questions presented in Section 4.2.2 of the EA Code of Practice. Provide additional information about how these questions were considered and how First Mining Gold identified a reasonable range of alternatives for the EA process. An explanation or rationale should be provided if First Mining Gold limited the examination of alternatives for the draft EIS/EA.	The process of identification of a reasonable range of alternatives is provided in the introduction of Section 5.1. The alternatives assessed in the draft EIS/EA were identified for assessment, either as per the EIS Guidelines, the provincially-approved amended ToR, and/or resulting from comments received through consultation and engagement activities to date. The text of the final EIS/EA will be revised to clarify how a reasonable range of alternatives have been identified and assessed, consistent with the EA Code of Practice. The text will also clarify how the questions were considered to identify a reasonable range of alternatives.	No further comments at this time. MECP will review the revised information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 4.0 (introductory paragraph), 4.1.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		alternatives that will be assessed in the EA process. Based on MECP's review of Section 5.1 of the draft EIS/EA, it appears that the approach described is not consistent with the amendments made to the ToR. In Section 5.1.1 of the approved amended ToR, First Mining Gold commits to identifying and conducting an evaluation of a reasonable range of alternative methods. Additional information may be needed to better understand how certain factors (such as the questions listed) were considered in identifying alternatives for the assessment of alternative methods in the draft EIS/EA to determine whether a reasonable range of alternatives have been assessed. Without this context, it may be difficult for government agencies, Indigenous communities and members of the public to understand why the alternative methods have been proposed and whether a reasonable range of alternatives have been assessed in accordance with the commitments in the approved amended ToR. As noted in Sections 3.1.2 and 4.2.2 of the EA Code of Practice, a clear rationale for limiting the examination of alternatives must be provided in the EA, if that approach is taken.							

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-056	Alternatives Assessment (Section 5.0)	Throughout Section 5.0 alternative methods are identified and described for components of the proposed undertaking; however, based on a review of the information provided, additional information and context may be required to better understand the descriptions, feasibility and rationales for certain alternatives. Subsection 6.1(2)(b)(ii) of the EAA requires proponents to describe and provide rationales for the alternative methods considered in the EA process. The descriptions provided should be detailed enough to enable the identification of potential effects, advantages and disadvantages from each alternative.	Provide additional information to support the descriptions of the alternative methods in Section 5.0. Rationales for the alternative methods selected for assessment in the EA process should also be provided.	The text of the final EIS/EA will be revised to clarify that a reasonable range of alternative methods have been identified and assessed, consistent with the EA Code of Practice. The text will also clarify how the reasonable range of alternative methods was identified.	Comment has not been addressed. As noted in the original comment, rationales for the alternative methods selected for assessment in the EA process should be provided in the EIS/EA. This includes rationales for why the alternatives were originally selected for consideration and why they were carried forward for assessment. The descriptions of the alternative methods should be detailed enough to enable identification of potential effects, advantages and disadvantages of each alternative.	The rationale for the selection of candidate alternatives for Project components will be included in the final EIS/EA. Further, the rationale for why alternatives were carried forward for further assessment will be included in the final EIS/EA and include sufficient detail to enable identification of potential effects, advantages and disadvantages of each alternative.	MECP will review the additional rationales and information that FMG commits to provide in the final EIS/EA.	Acknowledged.	EIS Sections 4.1, 4.2, 4.3.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-057	Alternatives Assessment and Evaluation Methodology (Section 5.2, Section 5.2.1)	Section 5.2 includes various subsections that identify performance objectives, criteria and indicators used for the assessment of alternative methods for components of the proposed undertaking. Section 5.2.1 states that, for each performance objective identified for the alternatives assessment, a series of evaluation criteria and indicators were selected. As explained in past comments provided to First Mining Gold, criteria and indicators should be developed in a way that enables the identification of both positive and negative impacts to the environment and should be linked to components of the environment as it is defined in the EAA (natural, social, economic, cultural and built environments). Indicators should be identified for each criterion and should be measurable to be able to ascertain a change (positive or negative) to the particular environmental criterion under consideration. This guidance is also outlined in Section 4.2.4 of the EA Code of Practice. By grouping criteria and indicators by the performance objectives chosen by First Mining Gold, it may be unclear how the potential effects, mitigation measures, net effects, advantages and disadvantages of the alternatives have been identified and considered in relation to each component of the environment. First Mining	Review past comments and applicable guidance to ensure that the criteria and indicators used for the alternatives assessment in the EIS/EA are developed in accordance with Section 4.2.4 of the EA Code of Practice. Further discussion is recommended between First Mining Gold and MECP to ensure that appropriate criteria and indicators are being used to effectively assess the alternative methods considered in the EA process.	The evaluation criteria and indicators utilized in the draft EIS/EA are consistent with those developed through consultation activities including with MECP, other Ministries and Indigenous communities, that culminated in the approval of the Amended ToR. A summary table will be provided in the final EIS/EA providing the rationale for the indicators. A description of the positive and negative impacts to the environment is described in the assessment of each alternative (Sections 5.4 to 5.36), in support of the comparative analysis. The tables in Appendix T-1 will be revised to include an assessment by each criteria, as well as the existing assessment by performance objective.	Comment has not been addressed. The approved amended ToR includes commitments for FMG to refine the list of preliminary criteria and indicators through the EA process in consultation with government agencies, stakeholders and Indigenous communities. Please continue to consider feedback and comments received on the draft EIS/EA in order to refine the list of criteria and indicators. Please see the original comment for feedback. MECP will review the summary table with rationales for each criteria and indicator when the final EIS/EA is submitted. As discussed on the March 15, 2023, call between MECP and FMG, it is recommended that criteria, indicators and performance objectives be clearly linked to the components of the environment. See Comment #66 regarding the alternatives assessment tables in Section 5 and Appendix T-1.	Feedback and comments received on the list of criteria and indicators used in the draft EIS/EA from government agencies, stakeholders and Indigenous communities will be considered during refinement of the list of criteria and indicators for the final EIS/EA. The final list of criteria, indicators and performance objectives will be clearly linked to the components of the environment.	· The response does not address how MECP feedback provided to-date on criteria / indicators will be considered. MECP's original comments restate previous guidance provided to FMG. These comments were also discussed on the November 2, 2023 call between FMG and MECP's EA Branch. Please consider and address the following: Criteria / indicators should be linked to components of the environment. Several criteria chosen by FMG (e.g., "available technology", "service", "accessibility", "Springpole Gold Project financing", etc.) are not clearly linked to the components of the environment, which include the natural, social, economic, cultural and built environments. Criteria and indicators should be developed in a way that enables identification of both positive and negative impacts. Indicators should be measurable. Many indicators chosen by FMG are not measurable. In some cases where FMG has identified measurable or quantifiable indicators, FMG does not discuss measured or quantified effects. For example, FMG chose "area, type and quality of SAR territories or habitat that would be displaced" as an indicator; however, the discussions of potential effects from the	The updated criteria and indicators used for the assessment of alternatives are demonstrated in Attachment MECP-SPO-57. The criteria and indicators have been organized by environmental component (natural, social, economic, cultural and built environments). Note that the alternatives assessment was prepared to satisfy both provincial and federal requirements. To address federal requirements, the guidance document Addressing Purpose of and Alternative Means under the Canadian Environmental Assessment Act, 2012[1] was considered. As noted in the federal guidance document, there is a need to evaluate the technical and economically feasibility of the methods and mitigation. Accordingly, technical and reclamation objectives will continue to be assessed. The indicators have been revised, taking into account comments received on the draft EIS/EA including from MECP, and allow identification of both positive and negative impacts for the comparative assessment. The revised criteria and indicators will be used in the comprehensive alternative assessment tables provided for the more complex topics. A summary table providing the rationale for the revised criteria and indicators, and data sources	EIS Section 4 tables 4.12, 4.13, 4.14.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Gold has focused several performance objectives on technical feasibility, ability to service the site, amenability to reclamation and cost effectiveness. It is unclear how these proposed performance objectives (and the criteria and indicators identified for each) relate to the components of the environment as it is defined in the EAA. It is recommended that First Mining Gold consider identifying each component of the environment, and subsequently the criteria and indicators that will be used to assess the potential effects to the components of the environment. Section 4.2.4 of the EA Code of Practice and past comments provided to First Mining Gold regarding its preliminary list of criteria and indicators should be reviewed and considered in refining and finalizing the criteria and indicators used for the assessment of alternatives in the EA.					alternatives do not provide the area of habitat that would be displaced for each alternative. Where qualitative indicators are used instead of quantitative indicators, FMG should provide a rationale for why quantifiable measures are not being considered. Data sources should be identified for each indicator so that it is clear what information FMG is using to assess potential effects and base its conclusions.	utilized will be included in the final EIS/EA.	
MECP-SPO-058	Alternatives Assessment and Evaluation Methodology (Section 5.2)	Section 5.2 includes subsections identifying criteria and indicators used for the assessment of alternative methods for components of the proposed undertaking. This section provides limited information about how criteria and indicators were developed and how they were used to evaluate the alternatives. Section 4.2.4 of the EA Code of Practice states that the reasons for selecting the criteria and indicators should be clearly	Provide an explanation of how criteria and indicators were developed, including a discussion of the reasons for selecting each criterion and indicator. The factors that were considered in the identification and selection of the criteria and indicators should be discussed, as well as the objective of each criterion and indicator in assessing the alternatives. A description of how the criteria and indicators will be used to measure and compare	The evaluation criteria and indicators utilized in the draft EIS/EA are consistent with those developed through consultation activities including with MECP, other Ministries and Indigenous communities, that culminated in the approval of the Amended ToR. A summary table will be provided in the final EIS/EA providing the rationale for the indicators. The methodology of how the criteria and indicators are used to measure and compare	No further comments at this time. MECP will review the summary tables and additional information in the final EIS/EA when submitted. FMG may wish to consult Section 4.2.4 of the EA Code of Practice for an example of how criteria, indicators and potential data sources may be presented.	Acknowledged			EIS Section 4.1.2 and 4.2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		explained. This will help all interested persons understand the judgments that were made and allow them to participate more effectively in the EA process. An outline of the data sources for the criteria and indicators is also required in the EA.	advantages and disadvantages of each alternative method should be provided. An outline of data sources should also be included.	advantages and disadvantages is described in Section 5.2 of the draft EIS/EA and demonstrated in the associated text throughout the section, in brief summary tables included to assist reader understanding and the detailed tables provided in Appendix O. References / data sources have been provided where applicable. A summary of data sourced will be added to the section.					

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-059	Performance Objectives (Section 5.2.1)	Section 5.2.1 explains that the criteria and indicators used for the assessment of alternative methods were consulted on and refined as practical based on comments received; however, the draft EIS/EA does not provide additional information on how First Mining Gold consulted on the preliminary list of criteria and indicators in preparation of the draft EIS/EA, what input was received and how feedback was considered in refining the list of criteria and indicators. In Section 5.1.2 of the approved amended ToR, First Mining Gold commits to refining and modifying the preliminary list of criteria and indicators to incorporate input from government agencies (including MECP), various stakeholders and Indigenous communities. Section 9.1 of the approved amended ToR also includes commitments to consulting government agencies, Indigenous communities and interested persons in the development of criteria and indicators for the assessment of alternatives. Based on the limited discussion in the draft EIS/EA, it is unclear how these commitments have been fulfilled. In Section 5.1.2 of the approved amended ToR, First Mining Gold also commits to identifying further data sources during the development of the EA with justification, if it is determined in consultation with government agencies that they	Provide additional information about how consultation was undertaken on the preliminary list of criteria and indicators to fulfill the commitments in the approved amended ToR. Provide an explanation of how further data sources were identified in consultation with government agencies. Further discussion is recommended between First Mining Gold and MECP to ensure that appropriate criteria and indicators are being used to effectively assess the alternative methods considered in the EA process.	The evaluation criteria and indicators utilized in the draft EIS/EA are consistent and generally the same as those identified in the approved Amended ToR, which incorporated feedback from the MECP, other Ministries and Indigenous communities prior to approval, including through revisions to the ToR prior to amendment and final approval by the MECP. A preliminary list of criteria and indicators were provided in the draft ToR, which were based in part on previous Individual Environmental Assessments successfully completed for other Ontario mining projects. The draft ToR inclusive of the preliminary criteria / indicators and alternatives assessment methodology, was issued for comment. Input received from regulatory agencies, Indigenous communities and stakeholders during consultation on the draft ToR was fully considered in the selection of criteria and indicators for the draft EIS/EA. In addition, a factsheet and short video was developed for consultation activities during 2021, which included a preliminary list of criteria and indicators. The factsheet and short video was circulated to Indigenous communities and made available on the environmental assessment portal for the Springpole Gold Project on the First Mining Gold website. Information on the alternatives assessment methodology, and preliminary	Comment has not been addressed. While MECP understands that the preliminary lists of criteria, indicators and data sources were developed through the ToR process, the original comment refers to commitments in the approved amended ToR for FMG to further consult and refine these lists in preparation of the EA. It is unclear from the draft EIS/EA and FMG's response, how FMG has met these commitments, and it appears that FMG is relying mainly on consultation undertaken at the ToR stage for preliminary criteria, indicators and data sources, which is not consistent with the commitments. Please provide additional information to outline how FMG is meeting these ToR commitments. In its response, FMG indicates that factsheets, videos and community meetings were used to provide information to Indigenous communities about criteria, indicators and the alternatives assessment. Please provide a detailed description of these activities in the consultation summary for the EIS/EA (including discussion of the objectives of the consultation activities, how / what information was shared, how / what feedback was collected, and how comments were considered in refining the lists of criteria and indicators. Records (emails, correspondence logs,	The preliminary lists of criteria, indicators and data sources were developed throughout the environmental assessment process starting with the development of the provincial Terms of Reference and continuing through the review of the draft EIS/EA. Feedback received on the criteria, indicators and data sources during the draft EIS/EA review will be summarized in the final EIS/EA. A detailed description of engagement and consultation activities will be included in the consultation summary for the final EIS/EA. Records will be included in the Record of Consultation.	MECP cannot confirm whether this comment has been addressed and whether FMG is meeting its ToR commitments until a review is undertaken of the additional information and records that FMG commits to provide in the final EIS/EA.	The preliminary criteria and indicators developed and consulted on during the Terms of Reference process in 2020 and 2021 were used in the draft EIS/EA. Prior to the draft EIS/EA, public and community information sessions included poster boards and handouts on the preliminary alternatives assessment. Where interested, communities were provided capacity to review these preliminary assessments. The draft EIS/EA document was circulated to government agencies, Indigenous communities and the public in June 2022 in order to obtain feedback including on these aspects. In addition to the comments received in this table, other comments received from reviewers during the environmental assessment process include: The Ministry of the Environment, Conservation and Parks (MECP) requested clarification for how groundwater quality and quantity, surface water quality and quantity and long-term impacts to surface water were evaluated in the assessment of alternatives. The assessment of alternatives for the EIS/EA includes surface and groundwater indicators under the potential effect on fish and aquatic habitat criteria, and the potential effect on public health and safety criteria. The Northwest Ontario Métis	EIS Section 4.1.2 and 4.2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		are required to adequately assess the alternative methods. Based on the limited discussion in the draft EIS/EA, it is unclear whether this commitment has been fulfilled.		assessment results were also presented at community meetings in the fall of 2021, including through a presentation, poster boards and handouts. Comments received through these processes were considered in the final selection of the list of criteria and indicators for the draft EIS/EA. The indicators and criteria detailed in Section 5.2 of the draft EIS/EA are the culmination of comments received on the both the draft and final ToR from regulators, Indigenous communities and stakeholders, as well as through other means. The alternatives assessment methodology is described in Section 5.2 and demonstrated in the associated text throughout the section, in brief summary tables included to assist reader understanding and the detailed tables provided in Appendix O. Note that MECP technical staff suggested an extensive list of additional criteria and indicators for the assessment and evaluation of alternatives for linear corridors for one species (Caribou Boreal). Appendix T-2 of the draft EIS/EA provides an assessment of the transmission line and mine access road alternatives according to these additional criteria and indicators to satisfy this species-specific request. References / data sources are consistent with the preliminary listing provided in the approved Amended ToR and have been	distribution lists, meeting minutes, original comments, etc.) should be included in the Record of Consultation.			Community requested clarification on how potential effects to Métis rights were considered. This is evaluated in the assessment of alternatives in the EIS/EA with an indicator under the potential effect on Aboriginal and Treaty Rights in the alternatives assessment. The Ministry of Natural Resources and Forestry (MNRF) requested clarification on how the removal of terrestrial habitat, mortality, invasive species, and habitat for bat prey were evaluated in the assessment of alternatives. noted an interest in evaluating negative effects from removing habitat sooner, where there are marked differences. Further, MNRF requested clarification on the analysis of changes in wildlife movement and the attraction of nuisance wildlife resulting in mortality. These items are addressed with indicators in the assessment of alternatives in the EIS/EA under the potential effect on terrestrial species and habitat criteria. Where these specific items are material to the evaluation of these indicators, additional explanation is provided in the assessment of the specific alternative. The Ministry of Citizenship and Multiculturism requested clarification on the description of indicators used for maintenance or provision of local access, maintenance or improvement of tourism and recreational opportunities, financial risk and land use	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				referenced where applicable in the draft EIS/EA text. A summary of data sources utilized will be added to the section in the final EIS/EA.				conflicts. Where material difference amongst the assessment of alternatives in the EIS/EA is noted, additional explanation will be provided in the final EIS/EA. Meetings with these reviewers have been offered and held during 2022 and 2023 to discuss and gain clarification on the comments, and where appropriate, determine a path forward for resolution. In addition, targeted consultation and engagement events have occurred throughout the EA process to date, including a public webinar session in November 2023, which specifically presented the criteria and indicators for feedback. The feedback described in this response will be summarized in Section 5 of the final EIS/EA. Details will be provided in the Record of Consultation appendix, that will include documentation and records relevant to the activities.	

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-060	Identification of the Preferred Alternative(s) and Selected Alternative (Section 5.2.2) Comprehensive Alternatives Assessment Tables (Appendix T-1)	Section 5.2.2 and Appendix T-1 both include the following statement: "An alternative is rejected if it attains a not preferred rating for any single performance objective, with the knowledge that all of the performance objectives are essential." Based on this statement, it is noted that First Mining Gold may be following methodology for its EA process that is inconsistent with the approved amended ToR, amendments made to the ToR by the Minister of the Environment, Conservation and Parks, and the EAA. It appears that this methodology would allow for rejection of alternatives based solely on one performance objective (e.g., cost effectiveness). Section 4.2.4 of the EA Code of Practice explains that a systematic evaluation of alternatives must be undertaken, which should be based on criteria and indicators. Advantages and disadvantages of the alternatives should be identified, and the evaluation process followed should be a trade-off process in which these advantages and disadvantages to the environment are weighed in terms of their effects, both positive and negative, on the environment following the determination of net effects. A consistent basis for trade-offs is important so that a solid case is made for the selection of the preferred alternative. Generally, the alternative that has the preferred balance of advantages and disadvantages	Revise this section, as required, to ensure that the methodology followed for the assessment of alternative methods is aligned with the approved amended ToR and the EA Code of Practice.	Section 5.1.3 of the approved Amended ToR, states that: The alternative which receives the greatest number of preferred ratings is not necessarily the best, or most preferred, overall alternative. The relative importance of the individual performance objectives needs to be considered as well. It may be that one or two performance objectives are more important and override all other objectives, so long as a minimum rating of acceptable is attained for the less important objectives and the relative importance assigned to performance objectives is supported by Provincial and Federal regulatory agencies. This will be clarified in the final EIS/EA. The final evaluation of alternatives is therefore a reasoned process, in which the basis for the final selection of alternatives is easily understood at all levels. The alternatives assessment in the draft EIS/EA followed that approach as well as the EA Code of Practice (systematic evaluation of alternatives undertaken, based on criteria and indicators with advantages and disadvantages of the alternatives identified) and revisions to the methodology are not proposed for the final EIS/EA.	As discussed on the March 15, 2023 call between MECP and FMG, MECP understands that the EIS/EA will be revised to remove the statement quoted in the original comment.	The final EIS/EA will be revised to address the original comment.	No further comment at this time.	Acknowledged	Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		becomes the undertaking – therefore, alternatives should not be disregarded based solely on a disadvantage for one performance objective. The rationale for choosing the preferred alternative must be clearly articulated, considering relative advantages and disadvantages of the alternatives. Additional information may be needed to better understand the methodology used by First Mining Gold for assessing alternative methods in the draft EIS/EA and for the decisions made. Section 3.2.3 of the EA Code of Practice provides guidance with respect to openness and transparency in the EA process. To achieve this, proponents should: use appropriate, well-established and easily understood evaluation methods; ensure that the process is clear and logical; share complete information with interested persons to support conclusions and decisions; and document the process with explanations of the rationale for making certain choices.							

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-061	Influence of Consultation and Consideration of Indigenous, Government and Public Information and Concern (Section 5.3)	Section 5.3 states that initial information on alternatives was shared during preparation of the draft EIS/EA and the ToR. This section states that criteria and indicators detailed in Section 5.2 are "the culmination of comments received on both the draft and final ToR from Indigenous communities and stakeholders, as well as through other means". Although the draft EIS/EA states that preliminary findings and alternatives assessment summary tables were distributed and presented during consultation efforts in Fall 2021, there is limited information provided about how consultation with government agencies, Indigenous communities and interested persons contributed to the identification of alternative methods and the development of the alternatives assessment methodology presented in the draft EIS/EA. As noted in a letter to First Mining Gold from MECP's EA Branch dated December 23, 2021, the preliminary alternatives assessment summary tables distributed in Fall 2021 did not include descriptions of the alternatives assessed or criteria and indicators for the assessment of alternative methods. It is, therefore, unclear how these components of the EA process were consulted on. It is also unclear who was consulted, what comments were	Provide additional information on how First Mining Gold consulted on these components of the EA process. Review past comments (including those provided by MECP's EA Branch) and provide an explanation of how feedback was considered. First Mining Gold should ensure that it is consulting on components of the EA process and key decision-making milestones in accordance with the commitments in the approved amended ToR, and that its consultation summary is complete.	Additional information on how the assessment of alternatives were consulted on is included in Sections 2.6.1.3, 2.7.1.1, and 2.8.1 of the draft EIS/EA. Table 2.9-7 outlines the influence of consultation on the alternatives assessment. There is also a summary of comments received and how they were considered included in Tables 2.9-1 through 2.9-6. Appendix C includes a copy of comments received from Mishkeegogamang Ojibway First Nation and the Impact Assessment Agency of Canada, as well as a reference to the section where it is addressed in the draft EIS/EA. The draft EIS/EA review process is intended to provide another opportunity for meaningful consultation on the overall Project concept, including alternatives, so that optimizations may be made where feasible and incorporated in the final EIS/EA.	No further comments at this time. MECP will review updated information in the final EIS/EA about further consultation on this component of the EA process (e.g., through review of draft EIS/EA). A complete summary of consultation activities, feedback received and how it was addressed / considered in the EA should be included in the final EIS/EA.	Acknowledged			EIS Sections 4.2, 2.7.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		received and how feedback was considered in the draft EIS/EA regarding the identification of alternatives, the alternatives assessment methodology and the results of the alternatives assessment. MECP's EA Branch notes that its December 23, 2021 comments on the preliminary alternatives assessment summary tables were not addressed in the draft EIS/EA. These comments (and all other feedback received by First Mining Gold on alternatives, alternatives assessment methodology and results) should be described in the EIS/EA, including how these comments were considered in refining the alternatives, methodology and assessment results. In accordance with commitments in Section 9.1 of the approved amended ToR, First Mining Gold should consult with government agencies, Indigenous communities and interested persons on components and decision-making milestones in the EA process, including but not limited to the evaluation methodology and results of the assessment of alternative methods.							

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-062	Alternatives Assessment (Section 5.0) Comprehensive Alternatives Assessment Tables (Appendix T-1)	In Section 5.0 and Appendix T-1, First Mining Gold describes the results of its assessment of alternative methods for components of the proposed undertaking. Based on a review of the draft EIS/EA and Appendix T-1, however, it appears that alternatives have not been fully assessed for the components listed below. – Ore processing (including location of processing plant) – Stockpile Locations (ore, overburden, surficial soil, lakebed sediment, etc.) – Overburden management – Site water management – Site access – Workforce accommodations – Fish and fish habitat offsetting – Hazardous waste management – On-site explosive handling and storage siting The approved amended ToR includes commitments to assessing a reasonable range of viable alternatives for the key components of the proposed undertaking, including many of those listed above. By not including an assessment of alternatives of these project components, First Mining Gold has not fulfilled the commitments in its approved amended ToR regarding the assessment of a reasonable range of alternatives. If First Mining Gold identifies that there are no viable	In accordance with the commitments in the approved amended ToR, First Mining Gold must consider a reasonable range of alternative methods during the EA process for the key components of the proposed undertaking. If First Mining Gold chooses to limit the alternatives assessed in the EA, additional rationale should be provided to support its decision-making process.	A reasonable range of alternatives were assessed in the draft EIS/EA. The alternatives reviewed in detail are consistent with the approved Amended ToR and the Federal Environmental Impact Statement Guidelines. The range of alternatives to be assessed were revised based on the consultation and engagement efforts prior to and during the preparation of the draft EIS/EA and include: – Potential use of renewable power sources; – Cofferdam (dyke) locations; – Treated effluent discharge locations; – Additional routing alternatives for the mine access road; and – Additional routing alternatives for the transmission line. The process of identification of a reasonable range of alternatives is provided in the introduction of Section 5.1. With respect to the alternatives noted: – Ore processing (including location of processing plant) - see Section 5.6; – Stockpile Locations (ore, overburden, surficial soil, lakebed sediment, etc.) - see Section 5.13 and 5.14; – Overburden management - see Section 5.13; – Site water management - see Sections 5.16, 5.18 and 5.19; – Site access - see Section 5.20; – Workforce accommodations - see Section 5.22;	Comment has not been addressed. Section 5 of the approved amended ToR states that "a reasonable range of alternatives will be identified […] and a comparative evaluation will be completed per the methodology described [in the ToR] to assess each of the alternative methods". Section 5.1 of the ToR proceeds to describe an evaluation based on criteria and indicators "to identify and evaluate potential environmental effects, advantages and disadvantages of each alternative method of carrying out the Project, including measures to mitigate potential adverse effects and net effects". This section commits to recording results in a summary table(s) with conclusions for each criterion. Section 5.2 of the ToR includes a commitment to identify and assess alternatives for major components of the project in the EIS/EA, and identifies project components for which alternatives will be assessed using the methodology described in the ToR. As noted in the original comment, it appears that this methodology has not been followed for the assessment of alternatives for certain project components (i.e., alternative methods were not assessed using criteria and indicators, alternatives assessment tables are not provided). Please review and revise the EIS/EA to ensure	The alternatives assessed in Section 5 of the draft EIS/EA included an evaluation against the criteria and indicators. Where the evaluation of the criteria/indicator was neutral across the alternatives, this has been noted in the summary tables for each Project component in Section 5. Detailed tables for the assessment of alternatives have been provided in Appendix T-1. A meeting with MECP – EAB will be held to review the approach to presenting the evaluation of alternatives. The final EIS/EA will be revised, where appropriate, to address the methodology and commitments identified in the approved Amended Terms of Reference. The applicable consultation and relevant changes will be summarized in the final EIS/EA. Alternatives assessment tables with sufficiently detailed information will be included in the main text final EIS/EA.	The response notes that the alternative methods assessment in Section 5 of the draft EIS/EA included an evaluation of the alternative methods against criteria and indicators; however, the high-level summary tables in Section 5 do not present an evaluation based on the list of criteria and indicators identified by FMG – instead, only performance objectives are presented. This is inconsistent with methods and commitments described in the approved amended ToR. As discussed on the November 2, 2023 call, FMG should present detailed assessment tables using criteria and indicators in the main EA report. As noted in previous comments, alternative methods assessment tables were not provided for several project components (as listed in the original comment) which is inconsistent with the ToR. FMG should assess alternatives for the project components identified in the ToR (per the ToR commitments) and follow the ToR methodology and commitments.	As described in draft EIS/EA, a limited number of components do not have other feasible alternatives but have been included because they have been raised as topics of interest in the past. A description is provided in the text, to provide clarity for the reader. Further assessment including detailed assessment tables will not be completed for the final EIS/EA. The rationale for limiting the range of alternatives for these select components will be clarified further in the final EIS/EA.	EIS Section 4.1.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		alternative methods for the above components, then sufficient and clear rationale should be provided for limiting the alternative methods, including complete information to support and document the conclusions made. It should be clear why other potential alternatives may not be viable and what restrictions / limiting factors may exist. Section 4.2.2 of the EA Code of Practice states that if proponents choose to rely on previous planning work to limit the discussion of alternatives, then the rationale for doing so must be evaluated for appropriateness, relevance and accuracy.		– Fish and fish habitat offsetting - see Section 5.30; – Hazardous waste management - see Section 5.29; and – On-site explosive handling and storage siting - see Section 5.27. Comprehensive alternatives assessment tables are provided in Appendix T-1 only for more complex topics, where helpful to the understanding of the determination of the preferred alternatives.	that the methodology and commitments identified in the approved amended ToR are being followed. FMG's response references revisions to the range of alternatives based on consultation. Describe any changes and consultation in the EIS/EA. FMG's response references Appendix T-1. As noted, the EA Report should be sufficiently detailed to stand on its own and provide a complete picture of the planning process and its conclusions. Alternatives assessment tables with sufficiently detailed information should be included in Section 5 of the EIS/EA, not only in Appendix T-1.				
MECP-SPO-063	Mine Rock and Tailings Alternatives (Section 5.7 Section 5.8 Section 5.9 Section 5.10 Section 5.11) Comprehensive Alternatives Assessment Tables (Appendix T-1)	Sections 5.7, 5.8, 5.9, 5.10 and 5.11 describe the assessments of alternatives related to mine rock and mineral waste storage for the proposed undertaking, including information on MDMER requirements. Although it is understood that an assessment has been provided in Appendix E pursuant to the requirements of the MDMER, it is unclear how the methodology presented for the assessment of alternatives in the EA has been applied to these components of the proposed undertaking, as there are no detailed assessment tables provided in Appendix T-1 for mine rock and mineral waste / tailings storage. There are only high-level alternatives assessment summary tables	Provide additional information about how the alternative methods for these components of the project were assessed using the methodology described for the EA process and in accordance with the approved amended ToR. Include in the EIS/EA an assessment of alternatives for these components based on the EA methodology described.	The mineral waste alternatives assessment provided with the draft EIS/EA (Appendix E) was completed in accordance with the Metal and Diamond Mining Effluent Regulations separate from the results of the comparative analysis for other Project components. The completed process is a systematic evaluation of the potential environmental effects of alternatives, including consideration of advantages and disadvantages, consistent with the general requirements of the EA Code of Practice.	Comment has not been fully addressed. Please include additional detailed information and discussion (summarized from Appendix E) in Section 5 of the EIS/EA to describe the assessment of alternative methods for these components of the undertaking.	Information from the mineral waste alternatives assessment will be clarified in the alternatives assessment section of the final EIS/EA, where relevant to the applicable criteria and indicators used.	MECP will review the additional details that FMG commits to provide in the final EIS/EA.	Acknowledged.	EIS Sections 4.5, 4.6, 4.7, 4.8, 4.9, 4.10, 4.11.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		provided in Section 5.0 that do not describe in detail potential effects, mitigation measures, net effects, advantages and disadvantages of the alternatives to the components of the environment. In the approved amended ToR, First Mining Gold commits to assessing alternative methods for the management of overburden, mine rock and tailings (including alternative locations for mine rock storage areas and the tailings management facility). First Mining Gold should ensure that it is consistently applying the alternatives assessment methodology described in the draft EIS/EA to these components of the proposed undertaking (i.e., assessing the alternatives using criteria and indicators; identifying potential effects, impact management measures and net effects of each alternative; and completing a comparative analysis of the advantages and disadvantages of the alternatives to arrive at a preferred alternative).							
MECP-SPO-064	Alternatives Assessment (Section 5.0) Comprehensive Alternatives Assessment Tables (Appendix T-1)	In Section 5.2.1 of the approved amended ToR, First Mining Gold commits to considering the 'do nothing' alternative in the context of a benchmark against which the potential effects of the alternative methods will be evaluated and compared to determine the advantages and disadvantages of the alternatives. Based on a review of the draft EIS/EA, it is unclear how this commitment has been met.	Include the 'do nothing' alternative in the alternatives assessment tables presented in Section 5.0 and Appendix T-1 of the EIS/EA to clearly provide the benchmark against which alternatives may be assessed.	As a standard practice, the 'do nothing' alternative to the Project was considered in the context of a benchmark against which potential effects of the Project and alternatives to it were measured to highlight the advantages and disadvantages of proceeding with the Project. The 'do nothing' alternative was not considered explicitly as an alternative to the Project, but it is represented as the existing environmental conditions that	Comment has not been addressed. As discussed on the March 15, 2023 call between MECP and FMG, the "do nothing" should be more clearly represented in the assessment of alternative methods. MECP understands that FMG is considering this comment further (i.e., options for adding a "do nothing" column in	See the response to comment #54.	MECP reviewed the updated example alternative assessment tables submitted by FMG and the revised example text regarding consideration of the "do nothing" alternative in the assessment of alternative methods. As discussed on the November 2, 2023 call, the examples do not meet the commitments in the approved amended ToR with regards to considering the	A column will be added to the detailed assessment tables to represent the baseline condition to allow for comparison by the readers. An example of a detailed assessment table with baseline conditions included is provided in Attachment MECP-SPO-54. The detailed assessment tables will be moved into the main section of the EIS/EA (Section 4).	EIS Section 4 Tables 4.3-1, 4.4-1, 4.4-2, 4.5-1, 4.6-1, 4.7-1, 4.8-1, 4.9-1, 4.11-1, 4.14-1, 4.17-1, 4.15-1, 4.19-2, 4.21-1, 4.24-1, 4.25-1, 4.26-1, 4.23-1, 4.28-1, 4.29-1, 4.29-2, 4.30-1, 4.16-1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		In accordance with Section 4.2.2 of the EA Code of Practice, the 'do nothing' alternative should always be considered and should be carried through to the assessment of alternative methods in the EA. In a letter from MECP's EA Branch dated December 23, 2021 regarding the preliminary review of First Mining Gold's Alternatives Assessment Summary Tables for the Springpole Gold Project EA, the ministry explained that a 'do nothing' alternative should be included in the alternatives assessment tables to provide information about baseline conditions and to show impacts and make advantages and disadvantages between the alternatives more evident. Based on a review of Section 5.0 of the draft EIS/EA and Appendix T-1, MECP's EA Branch notes that this comment has not been addressed. MECP's EA Branch continues to recommend that a column be added to each alternatives assessment table that describes the 'do nothing' alternative (i.e., baseline conditions).		will experience change through the implementation of the Project.	summary tables or providing a table upfront with "do nothing" or baseline conditions) and will be revising the EIS/EA.		"do nothing" alternative. FMG should clearly demonstrate how the "do nothing" alternative was considered in the context of the benchmark against which the potential effects of alternative methods will be evaluated and compared to determine the advantages and disadvantages of the alternatives. As mentioned on the call, consider adding a column to the alternative methods assessment tables to represent the "do nothing" alternative or baseline condition.	See also response 54 and 57.	
MECP-SPO-065	Alternatives Assessment (Section 5.0)	Subsection 6.1(2) of the EAA states that an EA must include descriptions of potential effects, impact management measures, and advantages and disadvantages of the undertaking and the alternatives considered in the EA process. All phases of the proposed undertaking (construction, operations and	Please ensure that the methodology used for the assessment of alternative methods is consistent with the EAA, the EA Code of Practice and the approved amended ToR. A sufficient level of detail should be provided regarding the potential effects, impact	Section 5 provides a description in sufficient detail on these aspects to allow for comparison of the alternatives. The detailed assessment tables in Appendix T-1 of the draft EIS/EA, will be updated for the final EIS/EA to more clearly demonstrate the advantages and disadvantages of each	Comment has not been addressed. As noted in the original comment, more detailed information is required in Section 5 of the EIS/EA with regards to the identification and descriptions of potential effects (both positive and negative, and direct and indirect), impact	The assessment of alternatives in Section 5 and the detailed tables in Appendix T-1 includes consideration of all phases for each alternative against each criteria and indicator. This will be clarified in the final EIS/EA. Additional information will be included in the section of the final EIS/EA regarding the	MECP reviewed the updated example alternative assessment tables submitted by FMG. As discussed on the November 2, 2023, call, the example summary table provided (which is intended to be included in Section 5 of the EIS/EA) is not sufficiently detailed in the description of effects,	The level of detail describing the potential effects, mitigation, net effects and a discussion of the advantages and disadvantages for each alternative in the main section of the EIS/EA will be similar to the example provided to MECP on November 2, 2023. The detailed assessment tables will be moved into the main section	EIS Section 4 (all), Tables 4.3-1, 4.4-1, 4.4-2, 4.5-1, 4.6-1, 4.7-1, 4.8-1, 4.9-1, 4.11-1, 4.14-1, 4.17-1, 4.15-1, 4.19-2, 4.21-1, 4.24-1, 4.25-1, 4.26-1, 4.23-1,

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		decommissioning) and each component of the environment, as defined under the EAA (natural, social, economic, cultural and built environments) should be considered. As per Section 4.2.4 of the EA Code of Practice, all potential positive and negative, and direct and indirect effects should be identified in the EA to provide a balanced picture of the potential environmental effects. The EA should also examine the interrelationships between components of the environment and the undertaking and its alternatives. Section 5.1.1 of the approved amended ToR states that the assessment of alternative methods for the Springpole Gold Project will be carried out to identify and evaluate potential environmental effects, advantages, and disadvantages of each alternative method of carrying out the Project, including measures to mitigate potential adverse effects and net effects in accordance with the EAA. Based on a review of Section 5.0, it is unclear whether the alternatives assessment described in the draft EIS/EA was prepared in accordance with the EAA and the methodology described in the approved amended ToR. Section 5.0 includes limited information about potential effects, impact management measures and net effects of the alternatives assessed, as well as	management measures, net effects, advantages and disadvantages of each alternative method assessed in the EA process. All phases of the proposed undertaking and all components of the environment should be represented.	alternative methods, where applicable, showing for discrete phases of the Project.	management measures, net effects, advantages and disadvantages of the alternatives considered. Include consideration of potential effects to each component of the environment and for each phase of the proposed undertaking. As discussed on the March 15, 2023 call between MECP and FMG, a sufficient level of detail should be included in the body of the EA Report such that it can stand on its own and provide a complete picture of the planning process and its conclusions. MECP understands that FMG is considering this comment further.	identification and descriptions of potential effects to relevant components of the environment, mitigation measures, net effects, and the advantages and disadvantages of the alternatives considered.	mitigation, net effects, advantages and disadvantages of each alternative. Include detailed alternative methods assessment tables in the main EA report that assess the alternative methods using criteria and indicators.	of the EIS/EA (Section 4). An example of the updated detailed assessment table with typical assessments for each indicator is provided in Attachment MECP-SPO-54. See also response to 54 and 57.	4.28-1, 4.29-1, 4.29-2, 4.30-1, 4.16-1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		how the advantages and disadvantages of each alternative were assessed and compared. Instead, only certain effects are identified in the summary tables provided. By not discussing all the potential effects both direct and indirect, that may result from the construction, operation, and decommissioning of each alternative being considered as part of the EA process, it may be difficult to understand how advantages and disadvantages of each alternative were determined and compared. Without a full description of the advantages and disadvantages of each alternative (following the identification of potential effects, mitigation measures and net effects), it may be difficult to understand the trade-off process that was evaluated for the alternatives and how First Mining Gold made its decisions regarding the selection of preferred alternatives. Additional information is needed in Section 5.0 to ensure that the assessment of alternatives presented in the draft EIS/EA is clear, transparent and traceable. As per Section 4.3 of the EA Code of Practice, although some of this information may be provided in appendices to the draft EIS/EA, the main document should be sufficiently detailed to stand on its own and provide a complete picture of the planning process and its conclusions.							

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-066	Alternatives Assessment (Section 5.0) Comprehensive Alternatives Assessment Tables (Appendix T-1)	In Section 5.1.3 of the approved amended ToR, First Mining Gold commits to recording the results of its assessment of alternative methods in a summary table that identifies conclusions for each criterion selected for the assessment (based on the advantages and disadvantages of the alternative) and provides clear rationales for the conclusions and decisions made. Based on a review of Section 5.0 of the draft EIS/EA and Appendix T-1, it appears that these commitments have not been fulfilled. The assessment summary tables in Section 5.0 do not identify specific criteria and indicators for the assessment of alternative methods. Instead, conclusions are presented based solely on performance objectives (which are incorrectly labelled as "criteria") with focused discussion of only certain advantages and disadvantages of the alternatives. It is noted that, in Appendix T-1, conclusions have also not been presented for each criterion identified for the assessment. In the absence of more detailed and complete information about potential effects, impact management measures, net effects, advantages and disadvantages of the alternatives, and without conclusions for each criterion, rationales for the selection of the preferred alternatives may not be clearly understood.	Please ensure that the alternatives assessment for the EA process is conducted in accordance with the commitments in the approved amended ToR and the EA Code of Practice. The summary tables in Section 5.0 and Appendix T-1 should include conclusions for each criterion identified for the assessment of the alternatives, and sufficiently detailed information should be provided to ensure that the rationales and decisions are clearly understood.	The assessment of alternatives in the draft EIS/EA has been completed in accordance with the approved Amended ToR and the EA Code of Practice. The descriptive text in Section 5, supplemented by the comprehensive tables included in Appendix T, provide an overall assessment. The tables in Appendix T-1 will be revised to include an assessment by each criteria, as well as the existing assessment by performance objective. If there are specific pieces of information being requested, please let us know.	Comment has not been addressed. As discussed on the March 15, 2023, call between MECP and FMG, the alternative methods assessment tables in Section 5 of the EIS/EA should be updated to include an assessment of the alternative methods (in sufficient detail to stand on their own from the Appendices) based on criteria and indicators. Per the commitments in the approved amended ToR, conclusions should be identified for each criterion selected for the assessment. Please revise Section 5 of the EIS/EA.	The tables in the alternative assessment section of the final EIS/EA will include a sufficiently detailed assessment based on relevant criteria and indicators. Conclusions for each criterion have been included in the detailed tables (Appendix T-1) of the draft EIS/EA. Conclusions for each criterion will be summarized in the main text of alternatives assessment of the final EIS/EA.	MECP reviewed the updated example alternative assessment tables submitted by FMG. As discussed on the November 2, 2023, call, the example summary table provided (which is intended to be included in Section 5 of the EIS/EA) is not sufficiently detailed and does not include conclusions for each criterion, nor does it present an assessment based on criteria and indicators. Include detailed alternative methods assessment tables in the main EA report which assess the alternative methods using criteria and indicators and include conclusions for each criterion identified for the assessment of alternative methods.	An example of the updated detailed assessment table with typical assessments for each indicator is provided in Attachment MECP-SPO-54. The detailed assessment tables will be moved into the main section of the EIS/EA (Section 4). See also response to 54 and 57.	EIS Section 4 Tables 4.3-1, 4.4-1, 4.4-2, 4.5-1, 4.6-1, 4.7-1, 4.8-1, 4.9-1, 4.11-1, 4.14-1, 4.17-1, 4.15-1, 4.19-2, 4.21-1, 4.24-1, 4.25-1, 4.26-1, 4.23-1, 4.28-1, 4.29-1, 4.29-2, 4.30-1, 4.16-1.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-067	Effects Assessment and Mitigation (Section 6.0) Project Interactions (Table 6.1.1)	It is understood that Section 6.0 of the draft EIS/EA describes potential effects, mitigation and net effects related to each valued component identified in the EA, resulting from the anticipated project interactions identified in Table 6.1-1. Subsection 6.1(2)(c) of the EAA requires proponents to describe in their EA the effects that will be caused or that might reasonably be expected to be caused to the environment from the proposed undertaking. As per Section 4.2.4 of the EA Code of Practice, proponents must determine all potential positive and negative, and direct and indirect effects of the undertaking on the environment and identify those in the EA. This provides a balanced picture of the potential environmental effects. Based on a review of Table 6.1-1 and Section 6.0 of the draft EIS/EA, it is unclear whether the assessment of potential effects from the preferred undertaking considered all potential effects that may be expected or may reasonably be expected to the environment from the proposed undertaking over its entire life cycle phase (construction, operation, decommissioning / closure). It is unclear whether Table 6.1-1 is a comprehensive list of all potential project interactions and whether it enables an assessment of all potential effects, positive and negative and direct and indirect, from the proposed undertaking.	Please ensure that the approach taken to assessing the effects from the preferred undertaking is done in accordance with the requirements of the EAA and the EA Code of Practice. Provide additional information, at a sufficient level of detail, regarding the potential effects that may be expected or may reasonably be expected to the environment from the proposed undertaking. This should include any positive and negative effects and indirect and direct effects over the full life cycle of the proposed undertaking.	As described in Section 7.1.1 of the approved Amended Terms of Reference, "The EA will focus on the assessment of potential adverse environmental effects of the Undertaking on the identified [Valued Components]. [Valued Components] are components of the environment associated with the Undertaking that are of special value or interest to Indigenous communities, regulatory agencies, the Proponent, stakeholders, and/or the public." Section 6.1.1 of the draft EIS/EA describes how the valued components were identified. Table 6.1-1 provides a list of Project activities during each phase of the Project. The assessment of each valued component considered the potential effect of each interaction included in Table 6.1-1. Where an interaction was expected to have a potential effect on the valued component, a more detailed assessment was conducted for the valued component, and considered both relevant positive and negative effects, as well as direct and indirect effects. Where an interaction was unlikely, the potential effect is not considered to be likely or feasible, and rationale is provided in the section.	Comment has not been addressed. As noted in the original comment, it is unclear whether Table 6.1-1 is a comprehensive list of all project interactions and whether it enables a clear assessment of all potential effects to the environment from the proposed undertaking. For example, it is unclear whether the following were considered: – Waste storage and transport activities – Trucking along the proposed mine access road – Operation of the proposed transmission line – Aggregate activities (extraction, operation, etc. of potential aggregate sources) The EAA requires proponents to describe in their EA the effects that will be caused or that might reasonably be expected to be caused to the environment from the proposed undertaking. Please review and revise the EIS/EA accordingly.	Table 6.1-1 in Section 6.1 of the draft EIS/EA describes the potential interactions of the Project with the environment. It includes the construction of the mine access road which considers the extraction and operation of the aggregate resource areas; the operation of the accommodations complex which includes the management of domestic waste; and the operation and maintenance of mine site infrastructure which includes the operation of the haul and access roads and other mine infrastructure such as the transmission line. This table will be reviewed, and updated as appropriate, to include a comprehensive list of activities and components identified by MECP.	MECP will review the updated table that FMG commits to provide in the final EIS/EA.	The updated table is included in Attachment MECP-SPO-67. Note that waste storage and transport activities is included as the management of domestic waste under the accommodations complex operations Project activity. The trucking along the proposed mine access road and the operation of the transmission line is considered under the operation and maintenance of mine site infrastructure Project activity. Aggregate activities including extraction and operation of potential aggregate sources is considered under the construction of the mine access road Project activity.	EIS Section 6.1, Tables 6.12, 6.13.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-068	Methodology (Section 6.1)	Section 6.1 presents the methodology used to identify and assess the potential effects of the proposed undertaking. This section notes that "the baseline characterization provides information on the features of the biophysical and human environment and their associated interrelationships …". It is noted that Section 4.2.3 of the EA Code of Practice explains that the description of the existing environment in the EA must address all components of the environment as it is defined in the EAA (natural, social, economic, cultural and built). The baseline characterization provided in Section 6.0 of the draft EIS/EA should consider each of these components of the environment. Consideration should be made to linking the descriptions of baseline characterization to each component of the environment, where possible.	Please ensure that the description of the existing environment addresses all components of the environment, as defined in the EAA. Consider linking the descriptions to the components of the environment, where possible.	The baseline characterization of the natural environment is described in: Section 6.2.1, Air Quality; Section 6.3.1, Noise and Vibration; Section 6.5.1, Groundwater; Section 6.6.1, 6.7.1, 6.8.1 and 6.9.1, Surface Water Systems (including hydrology and surface water quality); Section 6.10.1, Fish and Fish Habitat; Section 6.11.1, Vegetation Communities and Wetlands; Section 6.12.1, Wildlife and Wildlife Habitat; Section 6.13.1, SAR: Caribou; Section 6.14.1, SAR: Wolverine; Section 6.15.1, SAR: Bats; and, Section 6.16.1, SAR: Birds. The baseline characterization of the social environment is described in: Section 6.17.1, Commercial Land and Resource Use; Section 6.18.1, Outdoor Recreation; Section 6.20.1, Local and Regional Infrastructure and Services; and, Section 6.24,.1 Human and Ecological Health. The baseline characterization economic environment is described in Section 6.18.1, Local and Regional Economy. The baseline characterization of the cultural environment is described in:	No further comments at this time; however, it is recommended that FMG consider linking the descriptions in the EIS/EA to each component of the environment, where possible (similar to how FMG has done in its response).	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Section 6.21.1, Traditional Land and Resource Use; and, Section 6.23.1, Cultural Heritage. The baseline characterization of the built environment is described in Section 6.22.1, Archaeology.					
MECP-SPO-069	Valued Components (Section 6.1.1)	Section 6.1.1 describes the valued components identified for the EA process. This section states that valued components are included to "provide focus to the assessment of potential effects on the biophysical and human environment". Subsections identify biophysical and human valued components for the assessment of the preferred undertaking. The different components of the environment, as it is defined in the EAA (natural, social, economic, cultural and built) should be clearly reflected in these valued components to align with the EAA.	Please ensure that the valued components selected for the EA process accurately represent the components of the environment as described in the EAA.	As described in Section 7.1.1 of the approved Amended Terms of Reference, "The EA will focus on the assessment of potential adverse environmental effects of the Undertaking on the identified [Valued Components]. [Valued Components] are components of the environment associated with the Undertaking that are of special value or interest to Indigenous communities, regulatory agencies, the Proponent, stakeholders, and/or the public." Section 6.1.1 of the draft EIS/EA describes how the valued components were identified. Valued components representing the natural environment include: Air Quality (Section 6.2); Noise and Vibration (Section 6.3); Groundwater (Section 6.5); Surface Water Systems including hydrology and surface water quality (Section 6.6 to 6.9); Fish and Fish Habitat (Section 6.10); Vegetation Communities and Wetlands (Section 6.11); Wildlife and Wildlife Habitat	No further comments at this time; however, it is recommended that FMG consider linking the valued components identified in the EIS/EA to each component of the environment, where possible (similar to how FMG has done in its response).	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				(Section 6.12); SAR: Caribou (Section 6.13); SAR: Wolverine (Section 6.14); SAR: Bats (Section 6.15); and, SAR: Birds (Section 6.16). Valued components representing the social environment include: Commercial Land and Resource Use (Section 6.17); Outdoor Recreation (Section 6.18); Local and Regional Infrastructure and Services (Section 6.20); and, Human and Ecological Health (Section 6.24). Valued components representing the economic environment include Local and Regional Economy (Section 6.18). The baseline characterization cultural environment include: Traditional Land and Resource Use (Section 6.21); and, Cultural Heritage (Section 6.23). Valued components representing the built environment include Archaeology (Section 6.22).					
MECP-SPO-070	Valued Components (Section 6.1.1)	Section 6.1.1 states that valued components were identified based on data collected and input received through consultation; however, based on a review of the information provided, it is unclear how consultation with government agencies, Indigenous	Provide an explanation of how consultation with government agencies, Indigenous communities and interested persons informed the selection of valued components in accordance with the commitments in the approved amended ToR.	During the preparation of the provincial Terms of Reference, a preliminary list of valued components was included the draft versions of the Terms of Reference. As a result of the subsequent engagement during the EA process, two additional valued components were added	No further comments at this time. MECP will review additional information provided in the final EIS/EA when submitted.	Acknowledged			EIS Sections 6.1.1, 6.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		communities and interested persons informed the selection of these valued components. In Section 7.1.1 of the approved amended ToR, First Mining Gold commits to gathering additional input from Indigenous communities and non-Indigenous stakeholders and interested parties to refine its preliminary list of valued components in preparation of the EIS/EA. It is unclear how this commitment has been fulfilled, including how information was collected and from whom, what feedback was received to the list of valued components, and how comments were considered in finalizing the list of valued components presented in the draft EIS/EA.		including: Noise and Vibration, and Commercial Land and Resource Use. Through ongoing engagement on the draft EIS/EA, feedback provided by Indigenous communities, government agencies and other stakeholders will be considered in the refinement of the valued component list, as applicable. The feedback and the results of this feedback will be summarized in the final EIS/EA.					
MECP-SPO-071	Effects Assessment and Mitigation (Section 6.0) Effects Analysis Methodology (Section 6.1.4)	Section 6.1.4 explains that project-related environmental effects were identified for the valued components identified in the draft EIS/EA based on interactions between the valued components and the project. Based on a review of Section 6.0, it appears that the methodology applied for the assessment of the proposed undertaking includes a step during which "professional experience with other mining projects in Ontario" is used to conduct a preliminary screening of project interactions that will be assessed for each valued component. The draft EIS/EA includes statements that "those interactions with the potential to cause adverse residual effects, or that are of particular interest to government,	Please ensure that the assessments of the proposed undertaking and the alternatives considered in the EA process are completed in accordance with the EAA and EA Code of Practice.	The assessment of potential effects is conducted in a stepwise fashion, consistent the methodology described in Section 6.1 of the draft EIS/EA and the EAA (and as introduced in the approved Amended Terms of Reference). As noted in the response to Comment 8, the detailed descriptions of the methodology used for the effects assessment provides a clear, logical and traceable approach to the assessment of the Project and meet the needs of Section 3.1.5 and 4.2.4 of the EA Code of Practice. To provide focus to the assessment of potential effects, the professional judgement of technical experts with experience with other mine environmental assessments was used to identify and screen	Comment has not been addressed. MECP notes that the approach of screening potential effects and project interactions was not discussed in the approved amended ToR. As noted in the original comment, the evaluation methods used for the EA should be clear, logical and traceable and allow anyone with the same information to reach the same conclusions without any additional assumptions. To screen out project interactions or effects based on "professional experience" may not allow for a transparent assessment of the preferred undertaking. Section 4.2.4 of MECP's EA	Additional rationale will be provided in the final EIS/EA to support the screening out of Project interactions that have no or negligible potential effects on the environment, where relevant. Further discussion will be added to Section 6.1 to explain the screening of interactions with no potential effects on the environment.	MECP will review the additional rationale and information that FMG commits to provide in the final EIS/EA.	The rationale is as follows, and will be included in the final EIS/EA: As not all Project facilities and activities materially interact with each VC, the input received from government agencies, Indigenous communities the public and technical experts from the Project team were used to identify and screen potential effects that will be caused or that might reasonably be expected to be caused to the environment from Project activities. The rationale for why certain Project activities will not interact with a VC is explained for each VC. The potential effects that will be caused or that might reasonably be expected to be caused are further analyzed in the effects assessment for each VC.	EIS Section 6.1.5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Indigenous communities or the public were further assessed and described in the draft EIS/EA." However, no discussions are provided to support the screening of project interactions, nor to explain how it was determined that an interaction would be of particular interest to government, Indigenous communities or the public. This approach to screening out the assessment of certain "interactions" (or components / activities) may not be consistent with the EAA. The EAA requires proponents to describe in their EA the effects that will be caused or that might reasonably be expected to be caused to the environment from the undertaking and the alternatives considered in the EA process, and the actions necessary or that may reasonably be expected to be necessary to prevent, change, mitigate or remedy the effects to the environment. Section 4.2.4 of the EA Code of Practice explains that proponents must determine all potential positive and negative, and direct and indirect effects of each alternative and the undertaking on the environment and identify those in the EA. This provides a balanced picture of the potential environmental effects. A description of impact management measures is required, and the effects remaining after the application of impact management measures (e.g., "net effects")		potential effects that will be caused or that might reasonably be expected to be caused to the environment from Project activities. The potential effects that are further analyzed in Section 6 of the draft EIS/EA are considered to be direct and indirect, as well as negative and positive, where applicable. Feedback received through engagement activities during the Terms of Reference process and the preparation of the draft EIS/EA with Indigenous communities, government agencies and stakeholders was also considered in the identification of potential interactions and screening process. Feedback received through the review of the draft EIS/EA will be considered in the final EIS/EA. As described in Section 6.2 to 6.24 of the draft EIS/EA, mitigation measures are described that are reasonably expected to prevent, change, mitigate or remedy effects. An assessment of the net effects (referred to as residual effects) is also described for the assessment of effects on each valued component.	Code of Practice indicates that where environmental effects are uncertain, proponents should explain why and how this has been addressed in the evaluation. Where it has been determined that one or more components of the environment will not be affected, this conclusion as well as the way in which it was reached, must be documented. Please include additional rationale and discussion in the EIS/EA. Please review the methodology and ensure that the EA process is completed in accordance with the EAA and EA Code of Practice. Please ensure that complete information is shared in the EIS/EA and that the process is documented with explanations of the rationale for making decisions / choices.			In addition, the input received from government agencies, Indigenous communities and the public that resulted in changes to the screening of Project activities against the VC will be summarized in the influence of consultation portion of the effects assessment for each VC for the final EIS/EA.	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		must be described in the EA. Section 4.2.4 of the EA Code of Practice explains that evaluation methods for the EA must be able to produce a clear, logical and traceable assessment – one in which anyone with the same information could reach the same conclusion without any additional assumptions.							
MECP -SPO-072	Effects Analysis Methodology (Section 6.1.4)	Section 6.1.4 states that "the effects assessment presented in Section 6.0 addresses the maximum effects expected to occur during any phase of the Project life." It is unclear what is meant by this statement. The EAA requires proponents to describe in their EA the effects that will be caused or that might reasonably be expected to be caused to the environment from the proposed undertaking and the alternatives considered in the EA process. As per Section 4.2.4 and Section 3.3 of the EA Code of Practice, proponents must determine all potential positive and negative, and direct and indirect effects of the undertaking and the alternatives on the environment and identify those in the EA. This provides a balanced picture of the potential environmental effects. Proponents should conduct appropriate scoping in their EAs to ensure that all elements of the undertaking's life cycle (commissioning, construction, operations and decommissioning / closure) are assessed.	Please ensure that the assessments of the proposed undertaking and the alternatives considered in the EA process are completed in accordance with the EAA and EA Code of Practice.	As noted in the response to Comment 8, the detailed descriptions of the methodology used for the effects assessment provides a clear, logical and traceable approach to the assessment of the Project and meet the needs of Section 3.1.5 and 4.2.4 of the EA Code of Practice. The maximum effect refers to the greatest potential effect that may occur to the valued component due to the Project and is based upon the assumptions used and the use of a conservative approach. By using this approach, effects may be overestimated. but will support flexibility to accommodate minor refinements in the design during detailed engineering. This is a common practice used during the environmental assessment phase of a project.	Comment has not been fully addressed. While MECP appreciates FMG's response, it is unclear (based on the statement in Section 6.1.4 of the draft EIS/EA) whether FMG has assessed the potential effects from each phase of the preferred undertaking (construction, operation, decommissioning / closure) or if FMG is choosing a maximum effect scenario that is representative of only one phase of the project. For example: Section 6.2.2.5 of the draft EIS/EA explains that the Air Quality assessment includes a prediction of effects that encompasses the sources of air emissions associated with the maximum operating scenario in the operations phase of the Project. It is unclear whether an air quality assessment was completed for construction and/or decommissioning phases. Section 6.3.2.4 of the draft EIS/EA indicates that worst-case scenarios for the noise assessment were used including	The draft EIS/EA includes consideration of potential effects at each phase for all valued component as described in Section 6.X.2. Where the potential effect on a valued component is anticipated to be materially different for each phase, an assessment of the residual effects has been included in Section 6.X.4. As noted in Section 6.2.2.5 and 6.3.2.4, the assessment of effects on air quality and noise focused on the phase with the maximum effect, which has been consistent with similar mining EAs. However, the final EIS/EA will include an assessment of the construction phase for air quality and noise. The potential effects on air quality and noise are expected to be similar to the construction phase. This will be clarified in the final EIS/EA.	MECP will review the additional information that FMG commits to provide in the final EIS/EA.	Acknowledged	EIS Sections 6.1.1, 6.1.5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
					construction, pre-production and two operations years. It is unclear whether a noise assessment was completed for the decommissioning /closure phase. Please clarify FMG's approach, and ensure that the EA considers potential effects from all phases of the preferred undertaking.				
MECP -SPO-073	Environmental Assessment Criteria (Table 6.1-2)	Table 6.1-2 is entitled "Environmental Assessment Criteria"; however, it presents factors that will assist First Mining Gold in characterizing residual environmental effects (i.e., context, magnitude, extent, duration, frequency, reversibility, timing, likelihood). This title may be confusing, as the term "criteria" typically refers to the set of criteria used to assess the effects of the alternatives and the undertaking on the environment. It is recommended that the title of this table be revised to ensure clarity.	Revise the title of Table 6.1-2.	This will be updated to "Environmental Assessment Attributes" in the final EIS/EA. Note however, that the term 'Environmental Assessment Criteria' is consistent with the approved Amended Terms of Reference and was used for continuity.	Comment addressed. However, MECP notes that the approved amended ToR refers to criteria and indicators, which are different from the factors listed in Table 6.1-2 of the draft EIS/EA. Section 7.1.3 of the ToR refers to these factors as "attributes", which is consistent with FMG's proposed revision to the EIS /EA.	Acknowledged			EIS Section 6 Table 6.14.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-074	Effects Assessment and Mitigation (Section 6.0)	Section 6.0 provides a description of the methodology and results of First Mining Gold's effects assessment for the preferred undertaking. Based on a review of this section, the methodology used may be inconsistent with the approved amended ToR and EA Code of Practice. Section 7.1.3 of the approved amended ToR includes a table of proposed criteria and preliminary indicators for the assessment of the preferred undertaking, and a commitment to refining the criteria, indicators and data sources in the EA. The approved amended ToR also includes commitments related to consultation with government agencies, Indigenous communities and interested persons on criteria and indicators. Section 6.0 of the draft EIS/EA, however, does not present a final list of criteria and indicators linked to each component of the environment (natural, social, economic, cultural and built). It is unclear how criteria and indicators have been used in the assessment and how the preliminary list was refined in accordance with the approved amended ToR. Section 4.2.4 of the EA Code of Practice explains that the EA must present a final list of criteria and indicators. The reasons for selecting the criteria and indicators should be clearly explained to help all interested persons understand the judgments made, and an outline of data sources for each	The methodology for the assessment of the proposed undertaking should be consistent with the EAA, the approved amended ToR and the EA Code of Practice, using criteria and indicators in the assessment. Provide an explanation of how the preliminary list of criteria, indicators and data sources in the approved amended ToR were refined in the EA, and how each criterion and indicator has been considered in the assessment of the preferred undertaking. A final list of the criteria, indicators and data sources should be presented in the EIS/EA. Please refer to Section 4.2.4 of the EA Code of Practice for examples. Reasons for selecting the criteria and indicators should also be explained.	The methodology used in the draft EIS/EA is consistent with the EAA, the approved Amended Terms of Reference and the EA Code of Practice. Note that the approved Amended Terms of Reference indicated that the methodology was subject to revision and clarification in the EIS/EA as needed. Valued components (VCs) have been established for the various components of the environment, as outlined in the response to Comment 68. The VCs presented in the approved Amended Terms of Reference have been included in the draft EIS/EA, and where necessary further refined, including where appropriate, based on feedback received during the EA process. Similarly, the preliminary criteria identified in the approved Amended Terms of Reference that would be used to assess the potential effects on the VCs has been refined and presented in the draft EIS/EA. To avoid confusion with the term used for environmental assessment criteria, criteria have been referred to as indicators in the draft EIS/EA. These indicators are used to assess the effects of the undertaking on the VCs. The approved Amended Terms of Reference included preliminary indicators (referred to as measurable parameters in the draft EIS/EA), which have been refined in the draft EIS/EA for the assessment of effects for each VC, based on the particular	MECP recommends that FMG use consistent terminology (i.e., "criteria" and "indicators") to align with the provincial EA process and the approved amended ToR. MECP will review additional information about consultation on the preliminary list of criteria and indicators, as well as the final list and rationales, in the final EIS/EA when submitted. It is recommended that a complete list of final criteria, indicators and data sources be provided in one location in the EIS/EA with accompanying rationales, preceding the assessment of effects from the preferred undertaking.	Terminology consistent with the approved Amended Terms of Reference will be used in the final EIS/EA. A complete list of final criteria, indicators and data sources be provided in the final EIS/EA, along with applicable rationale for their selection.	No further comment at this time.	Acknowledged.	EIS Sections 6.1.1, 6.1.2, Table 6.12.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		criterion and indicator is required. It should be clear how the criteria and indicators have been considered in the assessment.		indicator used. Measurable parameters are those elements of the particular VC that could be quantitatively predicted and evaluated as a result of the Project. During the Terms of Reference process and the preparation of the draft EIS/EA, feedback received through engagement activities with Indigenous communities, government agencies and stakeholders was considered in the development of the list of criteria and indicators used for the draft EIS/EA. Should additional feedback be received through the review of the draft EIS/EA, it will be considered in the preparation of the final EIS/EA. A summary of the feedback considered will be provided in the final EIS/EA, to support the final list of indicators and measurable parameters used. In general, data sources included the baseline reports for the VCs that have been prepared for the Project, which in turn relied on a combination of field studies, traditional knowledge, various government sources and other relevant sources related to the VC, consistent with the potential sources identified in the approved Amended Terms of Reference. The final list of indicators and measurable parameters will include rationale for their selection in the final EIS/EA.				

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ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-075	Valued Components (Section 6.1.1)	Section 6.1.1 explains that valued components have been selected to provide focus to the assessment of potential effects from the proposed undertaking on the biophysical and human environment, and that they were identified based on the federal EIS Guidelines and the provincial ToR, comments raised during consultation on the project, and the potential for interactions between the project and the biophysical and human environment. Although MECP'S EA Branch understands that the valued components selected are intended to align with aspects of the natural and human environment, as mentioned above it is unclear as to how the methodology presented in the draft EIS/EA aligns with the requirements of the EAA, the approved amended ToR and Section 4.2.4 of the EA Code of Practice. The relationship between valued components, criteria and indicators should be clearly explained including how criteria and indicators have been linked to each component of the environment.	Provide additional information to clearly identify the relationship between the valued components, criteria, indicators and data sources used in the assessment of the proposed undertaking. Provide an explanation of how the methodology chosen meets the requirements of the EAA.	The Provincial Environmental Assessment Act requires a description of the environment that may be directly or indirectly affected, the effects that may be caused to the environment and the actions that may be necessary to mitigate the effects. This is supplemented with the requirements of the Provincial EA Code of Practice which requires a systematic evaluation of the undertaking using evaluation criteria linked to the components of the environment to describe the effects of the undertaking. Further, each criterion indicators will be used to identify how potential environmental effects will be measured. An outline of the data sources used for the assessment is also required. Consistent with Section 7.1 of the approved Amended Terms of Reference, Section 6.1 of the draft EIS/EA provides a general description of the methodology used for the assessment of potential effects of the undertaking, that is further refined in Sections 6.2 to 6.24 for individual valued components. The undertaking was determined through a detailed assessment of alternatives, using the methodology described briefly in Section 4.1 and detailed in the individual subsections of Section 5. The components of the environment include the natural, social, economic, cultural and built environment have been further refined into	No further comments at this time. However, it is recommended that the information in FMG's response be clearly described in the EIS/EA.	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				valued components to focus the assessment of the potential effects on the environment. The assessment of each valued component in Sections 6.2 to 6.24 includes a description of the existing conditions that may be directly or indirectly affected by the undertaking. The specific methodology used for each valued component includes a description of the criteria and measurable parameters to evaluate the potential effects that may be caused to the valued component of the environment. Data sources used in the assessment are primarily based on the baseline reports prepared for the draft EIS/EA, which relies on Project-specific fieldwork, government records and other relevant sources. The criteria and measurable parameters are selected based on professional experience and input received from Indigenous communities, governmental agencies and stakeholders during the EA process. The methodology is followed by a description of the actions that may be necessary to mitigate potential effects on the valued component. Where feedback is provided during the review of the draft EIS/EA, it will be considered in the preparation of the final EIS/EA.					
MECP-SPO-076	Effects Assessment and Mitigation (Section 6.0)	Throughout Section 6.0, discussions of the existing environment in relation to each valued component are provided in advance of discussions of spatial and temporal boundaries (i.e., study areas for	Revise the draft EIS/EA to present the study areas for each assessment in advance of the discussions of the existing environment and potential effects.	Study areas described in Section 6 are used to support the assessment of Project effects. However, these will be presented prior to the description of the existing	No further comments at this time.	Acknowledged			EIS Sections 6.2 through 6.26.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		the assessments). In accordance with Section 4.2.3 of the EA Code of Practice, the study area should be finalized before describing the environment; therefore, sequentially, discussions of the study areas should be provided before the description of the environment and the identification of potential effects to provide context for the assessment.		conditions for each valued component in the final EIS/EA					
MECP-SPO-077	Effects Assessment and Mitigation (Section 6.0)	Several figures are presented throughout Section 6.0 to identify the study areas used for the assessment of effects to each selected valued component. Many of the study areas do not fully encompass all components of the proposed undertaking and the alternatives considered in the EA process. For example, it appears that certain components and their alternatives (e.g., transmission line and access road alternatives, tailings storage location alternatives, off-site aggregate supply alternatives, etc.) fall outside of the local and regional study areas for certain valued components assessed in the EA process. The EAA requires proponents to provide a description of the environment that may be affected or reasonably expected to be affected, directly or indirectly, by the undertaking and the alternatives considered in the EA process. Proponents should clearly describe how and why the boundaries of the study	Please ensure that the study areas used for the EA consider the proposed undertaking and the alternatives considered for each component of the undertaking. Provide rationales for the study areas chosen for the EA process.	The definition and rationale for study areas used for the effects assessment of the proposed Project for each valued component are included in Section 6.X.2.3, and not intended to be used for the assessment of alternatives. Section 3 includes study areas used in the collection of regional baseline data, which supported the assessment of alternatives for the Project.	Comment has not been addressed. As mentioned for Comment #35, Section 3 of the draft EIS/EA (which includes a description of the existing environment to support the assessment of alternative methods) often refers to more detailed baseline information presented in Section 6. Therefore, it seems that the information (and study areas) in Section 6 are being used to support the descriptions of the existing environment for both the assessment of alternative methods and the preferred undertaking. Please adjust the EIS/EA to clarify the study areas used for the descriptions of the existing environment in Sections 3 and 6. Provide rationales / descriptions for how and why the study areas were chosen. MECP notes that some study areas in Section 6 of the draft EIS/EA do not encompass all components of the preferred undertaking. For example, the	The final EIS/EA will include an explanation of how the spatial and temporal boundaries of the overall EA study area were determined. It will include a summary of the feedback received from government agencies, Indigenous communities, stakeholders and the public, where relevant.	MECP will review the additional information that FMG commits to provide in the final EIS/EA.	Acknowledged	EIS Sections 6.1.3, 6.1.4, 6.2 through 6.26.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		areas for each alternative and/or effect were chosen.			proposed transmission line and aggregate operations are not fully included on Figure 6.3-2. It is unclear whether potential effects from these components have been fully assessed. Please revise the study areas in Section 6, as needed, to include all components of the preferred undertaking. Provide rationales / descriptions for how and why the study areas were chosen.				
MECP-SPO-078	Environmental Effects and Mitigation (Section 6.0 and accompanying figures)	Throughout Section 6.0, descriptions are provided for the existing conditions and potential effects of the proposed undertaking, in relation to the valued components selected for the EA process. Several of these descriptions include discussion of the existing environment and potential effects in relation to the "project development area", which is described to include the footprint of the preferred undertaking and associated buffers around the mine site area, corridor for the transmission line and mine access road. These descriptions often refer to supporting figures also provided in Section 6.0. MECP's EA Branch notes that several of the supporting figures do not identify the project development area, and instead identify only the footprint of certain components of the proposed undertaking. It is recommended that the "project development area" be identified in these figures to support the discussions in Section 6.0.	Consider revising the applicable figures in Section 6.0, to include identification of the project development area.	The project development area will be included in appliable figures in Section 6 or the final EIS/EA.	No further comments at this time.	Acknowledged			EIS Section 6,

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

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MECP-SPO-079	Existing Conditions – Vegetation Communities and Wetlands (Section 6.11.1) Wetland Communities (Section 6.11.1.2)	Section 6.11.1 makes reference to Figure 6.11-1, Figure 6.11-2 and Figure 6.11-3 to support discussions of vegetation communities in the study areas. Similarly, Section 6.11.1.2 makes reference to Figure 6.11-4, Figure 6.11-5 and Figure 6.11-6 to support discussions of the extent of wetlands in the project development area. These figures appear to be referenced incorrectly as there are no corresponding figures with those titles. MECP's EA Branch understands that First Mining Gold is likely referring to other figures labelled under different titles (e.g., Figure 6.11-1a, Figure 6.11-1b and Figure 6.11-1c; and Figure 6.11-4a, Figure 6.11-4b and Figure 6.11-4c). Please review all figure references throughout the draft EIS/EA to ensure that the correct references are provided and figure titles are correct.	Review and revise figures accordingly.	This will be reviewed and revised in the final EIS/EA, as necessary.	No further comments at this time.	Acknowledged			EIS Section 6.11
MECP-SPO-080	Municipalities (Section 6.19.1.1)	Section 6.19.1.1 states that the information provided about municipalities in the local study area is based on the 2011 National Household Survey and the 2016 Census, and that the 2021 Census data will be released in 2022. It is noted that the most recent available data should be used in the preparation of the formal EIS/EA submission.	Please ensure that information is updated accordingly prior to the formal EIS/EA submission.	Updated information from the 2021 Census data will be appended to the baseline socioeconomic report (Appendix Q of the draft EIS/EA) and included in the applicable valued component effects assessment in Section 6 of the final EIS/EA.	No further comments at this time.	Acknowledged			EIS Sections 6.19.1.2, 6.19.2.
MECP-SPO-081	Municipalities (Section 6.19.1.1)	Section 6.19.1.1 provides a summary of the education and labour force for municipalities in the local study area, including percentages for workforce sectors with supporting figures (Figure 6.19-1, Figure 6.19-2 and Figure 6.19-3). It is unclear	Provide additional information about how the information presented in Section 6.19.1.1 regarding education and labour forces was determined.	Figure 6.19-1, Figure 6.19-2 and Figure 6.19-3 show percentages of the workforce by industry in each of the three municipalities. Workforce industry categories are not grouped beyond the original data shown in the figures. However, percentages	No further comments at this time.	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		how the percentages quoted in Section 6.19.1.1 were derived from the data presented in the supporting figures as it seems workforce sector categories have been grouped with no explanations.		of the workforce by occupation, which are not shown in Figure 6.19-1, Figure 6.19-2 and Figure 6.19-3, are also discussed in the paragraph in question. These may have been misunderstood as grouped workforce sector categories. Percentages of the workforce by occupation are shown in Figure 4-16, Figure 4-18 and Figure 4-20 in Appendix Q-1.					
MECP-SPO-082	Indigenous Communities (Section 6.19.1.2 Section 6.20.1.2)	Section 6.19.1.2 and Section 6.20.1.2 describe existing conditions for the Local and Regional Economy Valued Component and the Local and Regional Infrastructure and Services Valued Component, respectively, with respect to Indigenous communities. Based on the information provided, it is unclear how consultation with Indigenous communities has informed these sections of the draft EIS/EA. Similarly, it may also be unclear how consultation with Indigenous communities has informed other discussions in the draft EIS/EA regarding existing conditions (e.g., in Section 6.23 regarding the Cultural Heritage Valued Component, Section 6.24 regarding the Human and Ecological Health Valued Component, and more). In addition, information about Indigenous communities is sometimes grouped together in the descriptions provided in the draft EIS/EA. It is recommended that information on existing conditions and potential effects be described for each	Provide an explanation of how consultation with Indigenous communities informed the descriptions of existing conditions in Sections 6.19.1.2 and 6.20.1.2, as well as all other applicable sections of the draft EIS/EA that discuss existing conditions and potential impacts to Indigenous communities. It is recommended that discussions be specific to each Indigenous community, where possible, to ensure that the potential impacts to each community can be determined.	Information received from Indigenous communities through traditional knowledge / traditional land use (TK/TLU) studies and other engagement activities during the Terms of Reference process and the preparation of the draft EIS/EA was considered in the existing conditions described in these sections of the draft EIS/EA. This included research activities conducted to prepare the baseline socioeconomic report (Appendix S), engagement opportunities such as in-person community meetings, and the provision of TK/TLU studies. Additional feedback received from Indigenous communities including through the review of the draft EIS/EA issued in part to obtain this information, will be considered for the effects assessment during the preparation of the final EIS/EA. A summary of the feedback received during the review of the draft EIS/EA will be considered and the influence of consultation will be documented in the final EIS/EA. Where appropriate, information on the existing conditions and	No further comments at this time. MECP will review additional information in the final EIS/EA when submitted.	Acknowledged			EIS Section 6.20.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		community separately, where possible, to provide a better understanding of how the proposed undertaking and alternatives considered in the EA process may impact the specific communities.		potential effects will be described for each community separately.					
MECP-SPO-083	Municipalities (Section 6.20.1.1) Consultation Materials (Appendix D)	Based on a review of Appendix D to the draft EIS/EA, it appears that First Mining Gold advertised one public information session (in Sioux Lookout) and issued its Notice of Commencement, both via the Sioux Lookout Bulletin newspaper. It is noted that another public information session was held in Ear Falls; however, it is unclear how this event was advertised. No other records were provided with respect to advertising open house and public information events, formal notices, etc. in other local newspapers. Under the "Municipal Services" heading in Section 6.20.1.1, First Mining Gold describes newspapers that service Ear Falls, Red Lake, and Sioux Lookout. From the description provided, it appears that the Sioux Lookout Bulletin does not service Ear Falls or Red Lake. It is, therefore, unclear how interested persons in these surrounding communities have been (and continue to be) notified of consultation opportunities and how they are being meaningfully consulted in the EA process. MECP's EA Branch would like to better understand how First Mining Gold is consulting with interested persons and the	Provide additional information about how First Mining Gold is engaging and consulting with interested persons and the public in the EA process in accordance with the EA Code of Practice and Consultation Code of Practice. Please ensure that consultation activities meet the requirements of the EA process.	FMG has endeavoured to provide notifications for consultation opportunities in a manner that would reach the applicable audiences and has used methods such as mail, radio, newspaper and social media. In some cases, not all forms of notification are available in certain areas. In addition to consultation and engagement on the Project and EIS/EA, FMG has also participated in local community events to raise awareness of the Project, such as the Sioux Lookout Blueberry Festival and Ear Falls Safety Night. As part of the final EIS/EA, FMG will provide additional information how First Mining Gold is engaging and consulting with interested persons and the public, including supporting documentation where applicable.	No further comments at this time. MECP will review the additional information in the final EIS/EA when submitted.	Acknowledged			EIS Sections 2.4, 2.5.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		public for the EA process, including how the locations of consultation events have been chosen, how consistent notification is being provided, and how feedback is being collected and considered in the EA process. Consultation for the EA process should be undertaken in accordance with the EA Code of Practice and Consultation Code of Practice.							
MECP -SPO-084	Assessment of Residual Effects – Local and Regional Infrastructure and Services (Section 6.20.4) Significance of Residual Effects (Section 6.20.5)	Sections 6.20.4 and 6.20.5 describe potential and residual effects (or net effects) from the proposed undertaking with respect to increases in demands on education services, emergency services and municipal services (e.g., municipal landfills) and transportation. Based on a review of these sections, it appears that First Mining Gold anticipates that many current services will have the capacity to accommodate increased demands resulting from the proposed undertaking; however, it is unclear how this was determined. It is also unclear how municipalities have been consulted and how they have provided input to these sections of the draft EIS/EA and the conclusions therein. Additional information may be required to understand the demands that the undertaking will put on the local and regional infrastructure and services (e.g., additional information about waste streams and projections, traffic volumes, demands for emergency and community services, etc.). Additional	Provide additional information to support the assessment of effects from the proposed undertaking on local and regional infrastructure, including a description of how municipalities were consulted, what feedback was provided and how comments were considered in the assessment of effects on local and regional infrastructure.	Information collected during the preparation of the draft EIS/EA was utilized to conduct the assessment of potential effects and develop appliable mitigation measures. FMG plans to continue discussions with the local municipalities to obtain further feedback in 2023. Feedback received from municipalities during engagement activities including during the review period for the draft EIS/EA will be considered and the effects assessment will be updated, as necessary. A summary of the feedback received during the draft EIS/EA review process will be provided in the final EIS/EA.	Comment has not been fully addressed. As noted in the original comment, please include additional information in the EIS/EA to support the assessment of effects from the proposed undertaking on local and regional infrastructure (e.g., additional information about waste streams and volumes, traffic volumes, demands for emergency and community services, etc.). MECP will review the feedback provided to FMG from municipalities in the final EIS/EA when submitted.	Information to support the assessment of effects from the proposed undertaking on local and regional infrastructure will be included in the final EIS/EA, where relevant and available.	MECP will review the additional information that FMG commits to provide in the final EIS/EA.	FMG has been in engaging and consulting on the Project in the local municipalities including holding in-person meetings with mayor and/or council in the Sioux Lookout, Ear Falls, Red Lake and Dryden in 2023 to provide an update on the Project and receive any feedback. To date, most feedback is related to the potential effect on local housing and power capacity; which is being considered in the Project design and mitigation. Public open houses were also held in these four municipalities in 2023 with questions and responses provided are documented in meeting notes. FMG will continue to work with the local municipalities to keep them informed of the Project progress and receive any input and/or questions.	EIS Section 6.20.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		rationale may also be required regarding First Mining Gold's conclusions, including information on how municipalities were consulted and how their input was considered. Without this information it may be difficult to determine potential effects from the proposed undertaking and whether any mitigation measures proposed are sufficient, as well as whether the existing capacities may support the proposed undertaking.							
MECP -SPO-085	Significance of Residual Effects – Traditional Land and Resource Use (Section 6.21.5)	Section 6.21.5 states that consultation and engagement with local Indigenous communities on the draft EIS/EA will inform the residual effects (or net effects) and the discussion of significance of the residual effects with respect to traditional land and resource use. It is unclear from this section and the statement above whether and how Indigenous communities have been consulted to-date regarding potential effects to the Traditional Land and Resource Use valued component, and in accordance with the commitments in the approved amended ToR. Additional information may be needed to better understand the potential impacts of the proposed undertaking to this component, and how consultation with Indigenous communities has informed this section of the draft EIS/EA. It is understood that First Mining Gold is continuing to	Provide additional information about how consultation with Indigenous communities has informed the effects assessment for the Traditional Land and Resource Use valued component to-date. The summary of consultation in the formal EIS/EA submission should be prepared in accordance with the EA Code of Practice and the Consultation Code of Practice.	To support meaningful consultation, available traditional knowledge and land use information from Indigenous communities was considered during the preparation of the draft EIS/EA for the assessment of potential effects on traditional land and resource use. FMG is seeking feedback from Indigenous communities including during the review period for the draft EIS/EA that will be considered in the discussion of significance of the residual effects regarding traditional land and resource use and will be updated in the final EIS/EA. A summary of the feedback considered during the EA process will be provided in the final EIS/EA.	No further comments at this time. MECP will review additional information in the final EIS/EA when submitted.	Acknowledged			EIS Section 6.21.1.2, Appendicies D-1.1, D-2.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		consult with Indigenous communities. First Mining Gold should ensure that ongoing consultation is being undertaken in accordance with the requirements of the EAA, the commitments in the approved amended ToR and MECP's Codes of Practice. A complete summary of consultation should be provided with the formal EIS/EA submission.							
MECP -SPO-086	Greenhouse Gas Emissions (Section 6.4) Effects of the Environment on the Project (Section 8.0)	Sections 6.4 and 8.0 both discuss climate change; however, the MECP guide Considering Climate Change in the Environmental Assessment Process is not referenced. In Section 7.3 of the approved amended ToR, First Mining Gold commits to considering this guide in the EA process and in preparation of the EIS/EA. It is unclear how this commitment has been fulfilled.	Provide additional information explaining how First Mining Gold has considered MECP's guide Considering Climate Change in the EA process, and reference this document in relevant sections of the EIS/EA.	The draft EIS/EA includes information related to climate change in various sections, including the existing environmental conditions in Section 3.3.1 (Meteorology and Climate), the environmental effects of the Project on climate change in Section 6.4 (Greenhouse Gas Emissions) and the effects of climate change on the Project in Section 8.7 (Climate Change). The potential effects of climate change on the Project during the construction, operation and closure phases have been considered and incorporated in the planning and design of project infrastructure, as noted in Section 8.7.1 and 8.7.2. In addition, monitoring will be ongoing throughout the Project, and modifications will be made to infrastructure or operations through an adaptive management approach, if required. These sections will be updated, as necessary, in the final EIS/EA and make reference to the MECP guidance document, where applicable.	No further comments at this time.	Acknowledged			EIS Sections 6.4.1.4, 8.

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-087	Scoping for Cumulative Effects (Section 7.2)	Section 7.2 describes the approach taken by First Mining Gold to identify the location and nature of present and known future projects and physical activities that could interact with residual effects (or net effects) of the proposed undertaking, resulting in cumulative effects. Table 7.2-3 and Figure 7.2-1 in the draft EIS/EA identify present and planned future projects and physical activities within the study area for the cumulative effects assessment. It is noted, however, that past activities are not clearly identified and discussed. In accordance with Section 3.3 of the EA Code of Practice, proponents are encouraged to provide information about potential cumulative effects of the project in combination with past, present and reasonably foreseeable future activities. Proponents are advised to consult with government agencies to identify projects and to consider potential cumulative effects to the extent possible. The Impact Assessment Agency of Canada's Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 includes guidance for setting temporal boundaries for cumulative effects assessments, which includes setting past temporal boundaries to demonstrate how conditions have evolved over time and provide a more meaningful picture of valued components.	Review the EA Code of Practice and the federal guidance for Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 to ensure that the cumulative effects assessment for the EA process is prepared in accordance with the guidance therein.	The cumulative effects assessment has been prepared in accordance with the EA Code of Practice and the federal guidance for Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012. As noted in Section 7.2 of the draft EIS/EA, the present-day conditions reflect the cumulative effects from past and most present activities as set out in the operational policy statement and the technical guidance from Impact Assessment Agency of Canada. Existing (i.e., baseline) conditions fully represent the cumulative effects associated with past physical disturbances of developments, such as mining, forestry and hydroelectric projects, and infrastructure, including communities. As noted in Section 7.2, numerous government agency registries were reviewed to identify past, present and known future activities and projects. Should additional projects or activities be identified by Indigenous communities, governmental agencies or stakeholders, these will be considered for inclusion in the list of projects identified for the cumulative effects assessment in the final EIS/EA.	Based on the March 15, 2023, call between MECP's EA Branch and FMG, MECP understands that FMG will be revising the EIS/EA to provide further explanation and rationale for how its cumulative effects assessment approach meets the requirements of the EA Code of Practice, the commitments made in the approved amended ToR and the federal guidance for assessing cumulative effects. MECP will review the additional information when submitted.	Section 7 of the draft EIS/EA provides information about potential cumulative effects of the Project in combination with past, present and reasonably foreseeable future activities as required by the approved Amended Terms of Reference (ToR) and the Code of Practice for Preparing and Reviewing environmental assessment in Ontario. A qualitative assessment of potential cumulative effects has been provided, where quantitative information about these projects was not available. The framework for the assessment of cumulative effects in Section 7 was based on the requirements of the federal government guidance (Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012), as recommended by the Code of Practice, and meets the requirements of the approved Amended ToR. Through the review of the draft EIS/EA by government agencies and Indigenous communities, feedback provided will be considered in the update of this section for the final EIS/EA, as necessary.	No further comment at this time.		EIS Sections 7.1, 7.2, 7.3.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		In Section 7.2 of the approved amended ToR, First Mining Gold commits to identifying past, present and future foreseeable projects and to using the Agency's technical guidance (Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012) for its cumulative effects assessment in the EA. Given the limited discussion of past projects and activities in the draft EIS/EA, it is unclear how these commitments have been fulfilled.							
MECP-SPO-088	Scoping for Cumulative Effects (Section 7.2)	In Section 7.2 of the approved amended ToR, First Mining Gold commits to identifying past and present projects, using historical records of activities, spatial information identifying existing disturbance features, TK, and knowledge of ongoing activities. Although Section 7.2 of the draft EIS/EA provides a list of sources used to identify locations of present and known future projects and activities, it appears that the sources may differ from those identified in the approved amended ToR. It is, therefore, unclear how this commitment has been fulfilled, including how First Mining Gold identified past and present projects using the means described in the approved amended ToR.	Provide an explanation of whether and how the sources identified in the approved amended ToR (including historical records, spatial information, TK and knowledge of ongoing activities) were used to identify past and present projects for consideration in the cumulative effects assessment.	The approved Amended Terms of Reference states that past and present projects will be identified from sources such as those listed in Section 7.2 of the draft EIS/EA. Historical records of activities were identified in the sources identified in Section 7.2 of the draft EIS/EA, including the IAAC and Environmental Approval Registries. Spatial sources used to identify existing disturbance features included the Impact Assessment Agency of Canada Registry, Ontario Mining Association website, Environmental Approval Registry, Aggregate Pit and Quarry Registry, and the Ontario Highways Program. Where Traditional Knowledge was provided by Indigenous communities, relevant information on past and present projects in the area was considered in the list of projects in Section 7.2.	No further comments at this time.	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				Knowledge of ongoing activities was obtained through research associated with the socio-economic baseline study, a review of available published information and registries maintained from the Independent Electricity System Operator (IESO), Ontario Highway Programs, Forestry Management Plans and Ontario Mining Association. Should other sources be identified during the review of the draft EIS/EA, these will be considered in the updates to the cumulative effects section of the final EIS/EA.						
MECP-SPO-089	Scoping of Cumulative Effects (Section 7.2)	Section 7.2 states that the evaluation of cumulative effects uses the same temporal boundaries as were used for the effects assessment for the project. It is noted that the approach taken by First Mining Gold is to screen the list of present and known future projects and physical activities against the spatial overlap of the specific valued component and the temporal overlap of the project (i.e., construction, operations and closure). It is noted that "activities associated with the residual effects are restricted to the site preparation and construction, operations, decommissioning and closure phases [and] there would be no residual effects during the post-closure phase". First Mining Gold notes in its draft EIS/EA that it prepared its cumulative effects assessment based on the federal Technical Guidance for Assessing	It is recommended that First Mining Gold review the federal guidance documents referenced for the cumulative effects assessment to ensure that its approach is consistent. Provide an explanation of how the approach taken by First Mining Gold aligns with the referenced guidance documents.	The cumulative effects section of the draft EIS/EA was completed in accordance with the guidelines issued by the Impact Assessment Agency of Canada for the Project. The majority of valued components will not have residual effects that would extend into the post-closure phase of the Project, as activities would cease at the end of operations or during the closure phase. However, for some valued components, the conservative approach used in the effects assessment may have resulted in a residual effect being predicted that may extend beyond the closure phase. In those instances, the temporal boundary could be extended depending on the context of the valued components. This will be re-evaluated and updated if necessary, in the final EIS/EA, concurrent with the updates to	No further comments at this time. MECP will review any updates to the final EIS/EA when submitted.	Acknowledged			EIS Section 7.3.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 and the policy statement, Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012; however, it is unclear whether the approach described above is consistent with these documents. Guidance provided in Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 explains that practitioners should consider temporal dynamics of valued components in response to environmental effects when setting a future temporal boundary for their assessment (e.g., there may be delays or lag times in observing environmental effects and in a valued component's response or recovery from an effect beyond the phases of the project).		the effects assessment of each valued component, including based upon the ongoing engineering work and input received from Indigenous communities and stakeholders.					
MECP-SPO-090	Cumulative Effects Assessment (Section 7.0)	In Section 7.2 of the approved amended ToR, First Mining Gold commits to considering input received from Indigenous communities in the cumulative effects assessment. Based on a review of Section 7.0 of the draft EIS/EA, it is unclear how this commitment has been met, including how Indigenous communities have been consulted in preparation of the cumulative effects assessment, what comments were received, and how input was considered.	Provide an explanation of how Indigenous communities have been consulted in preparation of the cumulative effects assessment presented in the draft EIS/EA to fulfill the commitment in the approved amended ToR.	Ongoing feedback received through the review of the draft EIS/EA including from Indigenous communities will be considered in the preparation of the final EIS/EA.	No further comments at this time. MECP will review additional information in the final EIS/EA and Record of Consultation when submitted.	Acknowledged			EIS Section 7.2 and Section 2.5.1

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SPO-091	Cumulative Effects Assessment (Section 7.0)	The cumulative effects assessment in Section 7.0 the draft EIS/EA is scoped based on valued components for which residual effects (or net effects) associated with the project were predicted. As a result, it is noted that any potential changes to the assessment of effects to the valued components resulting from ongoing baseline work, consultation and TK and TLU information collection should be reflected, as appropriate, in the cumulative effects assessment as well.	Review and revise the cumulative effects assessment, as needed.	Where necessary, the cumulative effects assessment will be revised based on the updated residual effects from Section 6 in the final EIS/EA.	No further comments at this time. MECP will review any revisions to the final EIS/EA when submitted.	Acknowledged			Not applicable
MECP-SPO-092	Introduction and Scope – Effects of the Environment on the Project (Section 8.1)	Section 8.1 notes that the assessment of effects of the environment on the project was based on guidance provided from regulatory agencies, project-specific information and experience with other mine EAs; however, no additional information is provided about what guidance or direction was received from regulators, what project-specific information was considered and other considerations for the assessment. Section 4.2 of the EA Code of Practice describes Project Management Principles for the EA process, noting that the EA process should be open and transparent. Anyone should be able to trace the results of the EA planning process using the evaluation approaches set out therein. Additional information is needed to understand how First Mining Gold assessed the effects of the environment on the proposed undertaking.	Provide additional information regarding what guidance was provided by regulators to First Mining Gold, what project-specific information was considered and what other considerations were made for the assessment of effects of the environment on the proposed undertaking.	Feedback received through engagement activities during the preparation and review of the draft EIS/EA with government agencies will be considered in the assessment of effects on the environment for the final EIS/EA. A summary of the feedback considered on this aspect will be provided in the final EIS/EA.	Comment has not been addressed. While MECP will review updated information about feedback received through consultation on the draft EIS/EA when the final EIS/EA is submitted, the original comment requests additional information on how FMG undertook its assessment of effects of the environment on the project presented in Section 8.1 of the draft EIS/EA. Please refer to the original comment and provide additional information on the guidance, project-specific information, and experience that FMG refers to when describing how it undertook the assessment of the effects of the environment on the project. Any assumptions should be clearly stated in the EIS/EA.	· The assessment of effects of the environment on the Project, as described in Section 8.1 of the draft EIS/EA has now been reviewed by governmental agencies and Indigenous communities. Feedback received during the review of the draft EIS/EA will be summarized in the final EIS/EA. Additional information to explain how the effects of the environment on the proposed undertaking were assessed, including any assumptions made, will be included in the final EIS/EA. Regulatory guidance provided in this section includes: Section 8.3: dams and berms have been designed in accordance with both Canadian Dam Safety Guidelines (CDA 2019) and Ministry of Natural Resources (MNR 2011a) guidelines, as applicable. Section 8.5: all applicable facilities have been designed in accordance with the Canadian	MECP will review the additional information that FMG commits to provide in the final EIS/EA.	Acknowledged	EIS Sections 8.2, 8.2.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
						Dam Safety Guidelines (CDA 2019) and the provincial regulatory requirements under the Lakes and Rivers Improvement Act (MNR 2011a) and used the maximum credible earthquake criteria estimates from the Natural Resources Canada (NRCan) seismic hazard calculator (NRCan 2019).			
MECP-SPO-093	Follow-Up and Monitoring (Section 12.0)	Section 12.0 notes that First Mining Gold will develop a detailed monitoring program following the EA process and that a follow-up and monitoring framework will be developed into more detailed stand-alone plans as the project design progresses; however, this approach may be inconsistent with the approved amended ToR and EA Code of Practice. Section 4.3.5 of the EA Code of Practice explains that, as part of a compliance strategy, the EA is required to include a monitoring framework that will be carried out if the undertaking is approved. An EA must include a monitoring framework that considers all phases of the proposed undertaking (planning, detailed design, tendering, construction, operation, closure and decommissioning). Compliance monitoring, and where appropriate, effects monitoring must be included. An EA must provide a plan that sets out how and when all commitments, including impact management measures, made in the EA and any conditions of approval will be fulfilled and	Include a monitoring framework and monitoring plans in accordance with the commitments in the approved amended ToR and the EA Code of Practice. A table of commitments made in the EA process should be provided, including impact management measures identified, that meets the criteria set out in the EA Code of Practice.	Section 12 includes a preliminary follow-up and monitoring framework that will be used to manage the environmental effects and enhance the benefits of the Project during all phases. This may be updated for the final EIS/EA, in consideration of comments received Indigenous communities and government agencies during the EA process. During the permitting phase, stand-alone monitoring plans will be developed following this monitoring framework. The purpose of the plans will be to verify the accuracy of the predicted effects assessment, assess the efficacy of the mitigation measures and to address monitoring and reporting requirements under various regulatory approvals. Additional environmental monitoring data may be identified as needed during the EA process to supplement the existing dataset to ensure there is a meaningful and appropriate background conditions available to compare monitoring results against. FMG will use the results of the monitoring plans to adaptively	Comment has not been addressed. Additional information and detail are required in the EIS/EA with regards to the monitoring framework that will be carried out by FMG if the undertaking is approved. It is unclear how FMG has met the commitments in the approved amended ToR related to this component of the EA (for example, developing a follow up program as part of the EA process with potential measures to be implemented if effects are different than predicted, etc.). Please review the ToR commitments and the EA Code of Practice and revise the EIS/EA, as necessary. MECP notes FMG's commitment to providing a table of commitments in the final EIS/EA. MECP will review this table when submitted.	The ToR commitments and feedback received during the review of the draft EIS/EA will be summarized and used to update the follow-up and monitoring section of the final EIS/EA.	Comment has not been addressed. The draft EIS/EA only listed valued components for which monitoring and follow-up programs would be undertaken and listed proposed environmental management plans. Details about these programs and plans were not provided. As noted in previous comments, additional information and detail are needed about FMG's proposed monitoring framework and follow-up programs. Please see the previous comments and EA Code of Practice for guidance. MECP acknowledges FMG's commitment to providing a table of commitments in the final EIS/EA.	As described in the EA Code of Practice, the framework in the final EIS/EA will outline the proposed approach for confirming that the undertaking was constructed, operated and closed in accordance with conditions of applicable approvals and commitments made during the EA process. The compliance monitoring framework consists of: A description of the potential effects and requirement for mitigation for relevant valued components and phases of the Project; A summary of the commitments made in the final EIS/EA and conditions of applicable approvals; A description of the requirements for monitoring of the applicable valued component and a summary of the supporting baseline conditions in and near the Project; A description of how the performance of the valued component will be tracked and monitored, including	EIS Section 12.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		how the proponent will report to the ministry. This information should be summarized in a single table, with columns for a brief description of commitments, where in the document the commitment is mentioned and when each commitment will be fulfilled. In Section 8.2 of the approved amended ToR, First Mining Gold commits to developing a monitoring framework with consideration of comments raised by stakeholders and Indigenous communities to address the post-EA phase of the proposed undertaking. Monitoring programs are to be identified in the EIS/EA. Table 8.1.2 of the approved amended ToR includes further commitments to developing a follow up program as part of the EA process with potential measures to be implemented if effects are different than predicted, which will be presented in the EIS/EA. Based on a review of the draft EIS/EA, it appears that these commitments have not been fulfilled.		manage particular aspects of the Project, where necessary. A table of commitments will be included in the final EIS/EA, based upon the consultation during the EA process and in consideration of review comments on the draft EIS/EA submitted by Indigenous communities, government agencies and stakeholders. The table will include a description of the commitment, timing for implementation and linkage to the section of the final EIS/EA.				preliminary methods, sampling locations and frequency; A description of how feedback from the monitoring program will be provided to Project personnel and the corrective actions that may be implemented if warranted; and, A description of the requirements for provincial and federal reporting. The follow-up monitoring framework describes how the accuracy of effects predictions will be verified and / or the how the effectiveness of the measures to mitigate the adverse effects on the valued component will be verified, during applicable phases of the Project. The follow-up monitoring framework will apply to relevant valued component, as determined by the effects assessment and will consist of: An outline of the relevant effects predictions and/or mitigation measures to be monitored; Description of the preliminary monitoring methodology, potential parameters to be monitored, preliminary locations for sampling, the anticipated frequency of sampling and the applicable regulatory standards;	

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
								A summary of the analysis used for monitoring data in comparison to baseline conditions and relevant regulatory standards; An outline of the potential corrective actions that may be implemented; and A description of the reporting requirements. A preliminary description of the compliance and follow-up monitoring framework will be provided for relevant valued components in the final EIS/EA, using this approach.	
MECP-SPO-094	Preliminary Follow-Up and Monitoring Programs (Table 12.3-1)	Table 12.3-1 provides an overview of monitoring plans by valued component; however, it appears that plans have not been identified for each valued component assessed in the draft EIS/EA despite the relevant sections of the draft EIS/EA (in Section 6.0) committing to monitoring. For example, Section 6.17.3 notes that monitoring programs will be implemented to verify the accuracy of predicted effects, assess the effectiveness of implemented mitigation measures and further optimize mitigation for the Commercial Land and Resource Use valued component; the same is noted in Section 6.18.3 for the Outdoor Recreation valued component, in Section 6.19.3 for the Local and Regional Economy valued component, in Section 6.20.3 for the Local and Regional Infrastructure and Services valued component; and	Provide additional information on how monitoring for each identified valued component will be conducted.	The preliminary follow-up and monitoring programs outlined in Table 12.3-1 will be updated for relevant valued components with additional information in the final EIS/EA, as necessary, based on input received during the review of the draft EIS/EA. Follow-up and monitoring programs developed for environmental media (e.g. air, water, fish, plants) will be the basis for programs developed for the socioeconomic and human health valued components, with additional programs developed for other valued components as needed.	No further comments at this time.	Acknowledged			EIS Section 12 Table 12-1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		in Section 6.21.3 for the Traditional Land and Resource Use valued component.							
MECP-SPO-095	Conclusions (Section 13.0)	Section 13.0 states that future unknown project refinements have been addressed using a conservative approach in the EA; however, should any material refinements / optimizations occur, they will be discussed with the Impact Assessment Agency of Canada and MECP. Section 4.2.5 of the EA Code of Practice explains that, although it may be appropriate for proponents to include flexibility in the EA with respect to minor changes, limits on the flexibility must be included in the description of the undertaking. In Section 10 of the approved amended ToR, First Mining Gold commits to developing short-term contingency plans as appropriate to provide flexibility for minor design changes; however, it is unclear how this commitment has been fulfilled in the draft EIS/EA. Please be advised that any change to an undertaking described in an approved EA document that has not been contemplated as part of the EA process may be considered a new undertaking and subject to the requirements of the EAA.	In accordance with the commitment in the approved amended ToR, include additional information about any short-term contingency plans developed by First Mining Gold. Provide an explanation of how limits on flexibility have been included in the description of the undertaking, and ensure that potential minor changes have been considered as part of the EA process, where possible.	There are currently no short-term contingency plans for the Project, however, minor design optimizations identified through the environmental assessment process will be presented in the final EIS/EA. The draft EIS/EA has taken a conservative approach and/or used assumptions in the assessment of potential effects. By doing so, the effects have been overestimated which provides flexibility that may be required as the Project is optimized during detailed engineering. The limits of this flexibility are described in the applicable subsection of the effects assessment sections. In the event that a material change outside these limits is considered beneficial for the Project or the environment, it would be discussed with Impact Assessment Agency of Canada and MECP before implementing the change.	No further comments at this time.	Acknowledged			EIS Section 5.21
MECP-SPO-096	Draft EIS/EA Concordance with Responses to Comments Received During Preparation	Appendix C includes comment-response tables for comments provided by certain government agencies and Indigenous communities during the preparation of the draft EIS/EA.	Include the December 23, 2021 letter from MECP's EA Branch and describe how these comments were considered in preparation of the draft EIS/EA. Confirm whether other input,	As noted in FMG's response to MECP on January 17, 2022, the preliminary alternatives assessment summary tables were intended as high-level summaries to facilitate early consultation to support the	MECP understood, based on discussions with FMG, that the preliminary alternatives assessment summary tables were not circulated broadly to government agencies. It is also unclear from FMG's Record of	Please see the response to Follow-up Comment # 4.	See follow up comment #4. MECP cannot confirm whether this comment has been addressed and whether FMG is meeting its ToR commitments until a review is undertaken of	Additional information on how FMG has consulted and engaged on each specific component of the EA process (listed in Section 9.1 of the approved amended ToR), and each key decision-making	EIS Section 2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
	(Appendix C) Consultation Materials (Appendix D)	MECP's EA Branch notes that Appendix C does not include a record of the comments provided by MECP's EA Branch on December 23, 2021, regarding the preliminary alternative assessment summary tables submitted by First Mining Gold. Furthermore, no records of these comments have been provided in Appendix D to the draft EIS/EA. Based on a review of the draft EIS/EA, it appears that many of the comments in this December 23, 2021 have not been considered in preparation of the draft EIS/EA. Based on the high-level descriptions of consultation and other statements made in the draft EIS/EA, MECP's EA Branch notes that it is unclear whether other comments / input may be missing from the records provided with the draft EIS/EA as well.	written comments, verbal feedback, etc. may be missing from the records provided in the draft EIS/EA. In accordance with Section 4.2.7 of the EA Code of Practice, a complete consultation summary should be provided	preparation of the draft EIS/EA. The draft EIS/EA document intended to be prepared in accordance with the Environmental Assessment Act and the approved Amended Terms of Reference, however it is acknowledged that the final EIS/EA must meet all of those requirements. The circulation of the preliminary alternatives assessment summary tables concurrently with the preparation of the effects assessment facilitated a better understanding at an earlier stage to support the selection of the preferred alternatives. By taking this approach, it ensured that feedback from Indigenous communities and government agencies could be considered in drafting the EIS/EA, so that outcome of the alternatives assessments could further consulted on in a draft EIS/EA, which would include a better assessment of the potential effects. Further, this approach provided increased transparency while still maintaining flexibility to incorporate feedback during EA process. The attached Table 1 includes detailed responses to the comments submitted on December 23, 2021. A copy of these responses will be included in the final EIS/EA.	Consultation whether / how these documents were circulated to Indigenous communities and other interested persons for review and comment. It remains unclear who was consulted, what feedback was received and how comments/concerns were considered for certain components of the EA process. Please clarify and provide additional information on how FMG consulted on each component of the EA process (including the alternative methods assessment). A complete summary of consultation and supporting records should be provided in the final EIS/EA.		the additional information that FMG commits to provide in the final EIS/EA.	milestone identified in the ToR commitments will be included in the final EIS/EA. An example of how this was undertaken will be provided as a working copy of one community section (Section 2.X), as well as the supporting appendices (communication log and copies of materials shared, meeting notes for key meetings / calls, presentations etc.) at the end of February 2024 for review.	

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP -SPO-097	Alternatives Assessment Tables (Appendix T-1 & T-2)	Appendix T-2 includes supplemental information regarding the assessment of alternatives with respect to Species at Risk. It is unclear how the detailed information presented in Appendix T-2 has been considered and reflected in the other sections of the draft EIS/EA that discuss the evaluation of alternative methods for the components of the proposed undertaking (e.g., in Section 5.0 of the draft EIS/EA and in Appendix T-1). For example, it appears that the tables presented in Section 5.0 and Appendix T-1 do not discuss several potential effects on Species at Risk that are identified in Appendix T-2. It is noted that the criteria and indicators (parameters) used in Appendix T-2 also differ from those presented in Section 5.0 and Appendix T-1.	Provide an explanation of how the assessment of alternative methods presented in the various sections/ appendices of the draft EIS/EA have adequately considered Species at Risk. The assessments of alternative methods in Section 5.0 and Appendix T-1 should be sufficiently detailed to understand the full extent of potential impacts to Species at Risk, including consideration of any potential effects that have been identified in the supplemental assessment presented in Appendix T-2.	A large number of additional criteria were suggested related to Caribou (Boreal population) for application to the assessment of alternative for linear corridors. These criteria were clearly not applicable for all Species of Risk or for all Project alternatives. Accordingly, a dedicated appendix was prepared to provide the information requested by MECP while not adding to the complexity and potential confusion for other readers. As indicated in Section 5.2.1.1 of the draft EIS/EA, the information provided in Appendix T-2 was used as a source of information to inform the assessments of alternatives related to the Species at Risk Criteria in Section 5 and Appendix T-1. This will be further clarified in the final EIS/EA.	Comment has not been addressed. Please include additional detailed information and discussion (summarized from Appendix T-2) in Section 5 of the EIS/EA. The main body of the EIS/EA should include sufficiently detailed information to stand on its own and provide a complete picture of the planning process and its conclusions (including with regards to the assessment of alternative methods and how potential effects to species at risk were considered).	Additional information and discussion will be included in the assessment of alternatives section of the final EIS/EA, as required by approved Amended ToR. A meeting with MECP – EAB will be held to review the level of detail to be included in the main body of the final EIS/EA.	As discussed on the November 2, 2023, call, FMG should include detailed alternative methods assessment tables in the main EA report which assess the alternative methods using criteria and indicators and include conclusions for each criterion identified for the assessment of alternative methods.	The detailed assessment tables will be moved into the main section of the EIS/EA (Section 4). See also response to 54 and 57.	EIS Section 4
MECP -SW-001	6.7.2.1 and 6.7.2.2 The section Decommissioning and Closure Phase (6.7.2.1)	The EA identifies that the reconnection of the mine area and open pit may affect Springpole Lake water quality. However, the document also states that the open pit/exposed mine area will not be reconnected to Springpole Lake until the open pit water quality is "suitable" based on measurable parameters identified in section 6.7.2.2. The potential for impact to Springpole Lake and the downstream environment is not fully evaluated nor is the target water quality for reconnection provided. The EA does not identify by which criteria	The impacts of reconnecting the open pit after closure to the remaining parts of the lake have not been adequately defined. This information is needed as part of the EA to understand the short- and long-term impacts of the project on sensitive lake trout habitat.	The refilled basin will not be reconnected to Springpole Lake until all regulatory requirements are met, including with respect to water quality. Section 4.18.3.1 of the draft EIS/EA describes the reconnection of the open pit basin to Springpole Lake during closure. Section 6.7.4.2 of the draft EIS/EA includes the effects assessment based on the predicted water quality conditions at the time the open pit basin will be re-connected to Springpole Lake. The predicted water quality of the filled pit basin was compared against Provincial Water Quality Objectives	FMG has provided an adequate response(s) to this MECP comment with the assumption that the modelling and predictions describe therein are accurate. The response indicates that additional information will be included and discussed in EIS/EA. FMG indicates that a detailed monitoring plan will be developed during the environmental approvals phase. No further comment required at this time.	Acknowledged			EIS Sections 6.7.1.2, 6.7.6.2, Appendicies N-2, N-3.

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		(background and/or PWQO/CWQG) water quality "suitability" will be assessed.		(PWQO) for the protection of aquatic life. The results of the model indicate there will be no exceedances of PWQO at completion of pit filling. Further details regarding the modelling approach and the water quality results are provided in Appendices N-2 and N-3. After reconnection of the filled pit basin to Springpole Lake during final closure, no water quality parameters are predicted to exceed applicable water quality guidelines in the north basin of Springpole Lake (nodes SW-02 and 5; Section 6.7.4). A detailed monitoring plan will be developed during the environmental approvals phase and will be implemented during re-filling of the open pit basin. The time for refilling will provide considerable time to validate the model predictions, and identify and implement additional mitigation measures, if warranted.					
MECP-SW-002	6.7.2.1	There has been no assessment of impacts should the water quality in the re-filled pit/previously dewatered area does not meet the proposed target. Water quality and/or quantity constraints may increase the time required to fill the pit and associated dewatered area.	Based on the provided information, MECP is unable to fully understand the impact of reconnecting the open pit mine with Springpole Lake. In addition, MECP is not fully informed of the duration of pit filling and what water quality decision points will be used to join these two features. These will have significant impacts on the recovery of the lake and suitability of the fish compensation provided. The company needs to evaluate and provide contingencies that	As noted in the response to Comment 1, the effects on surface water as a result of re-connection of the refilled open pit to the north basin of Springpole Lake are assessed in Section 6.7.2 and 6.7.4 of the draft EIS/EA. Section 4.18.3.1 describes the refilling of the open pit basin and fish habitat development area. It is predicted to require 3 to 5 years to fill the open pit basin to the average natural elevation of Springpole Lake (elevation 391 m, above mean	FMG has provided an adequate response(s) to this MECP comment with the assumption that the modelling and predictions describe therein are accurate. No further comment required at this time	Acknowledged			EIS Sections 6.7.1.2, 6.7.6.2, Appendicies N-2, N-3.

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			will be followed if these criteria are not met.	sea level), assuming average flows conditions. This rate of filling is unlikely to have detectable ecological effects on downstream habitats. Water quality will be regularly monitored as the water rises in the open pit basin to confirm predictions. The effluent treatment plant will continue to be used during the initial decommissioning / closure phase, if needed, and will remain onsite as a contingency measure during the closure phase.					
MECP-SW-003	6.7.4.1	Open pit filling after closure is predicted to range between 3 and 5 years. Depending on the degree of flow supplementation from Springpole Lake pit filling may take considerably longer than predicted. Water taken from Springpole Lake to supplement pit filling at a proposed rate of 1.15 m^3/s will account for approximately 10% of the average monthly flow of the inlet to Springpole Lake (outlet of Cromarty Lake) and is predicted to take 3-5 years to fill the dewatered area back to the natural Springpole Lake elevation. However, this water taking rate almost matches the 7Q20 flow at the outlet (Node 5) of the north basin (1.2 m^3/s) (Table 6.7-2). OWRA Section 34-34.11 states that water taking cannot cause unacceptable environmental impact or interference. During the open pit refilling phase, inflow to the pit area will exceed the natural outflow from the north basin of Springpole	The proponent needs to better assess the magnitude of the taking of water to supplement the filling of the open pit area. Given the likely reduction in the rate of taking, the consultant should revise the estimated time to infill the open pit. This extended period should be assessed as part of the DFO's habitat compensation strategy. The proponent must provide a contingency plan in the event that the water quality in the re-filled pit/previously dewatered area does not meet the proposed target.	The active filling rate discussed in the draft EIS/EA (1.15 cubic metres per second) is based on average annual flows. It is understood that a threshold flow will be established during the environmental approvals phase. This threshold flow will limit water takings when the receiver is in a low flow condition and may be based on near instantaneous / real-time flows. As such, during low flow conditions, overall water takings may be less than the 10% previously assumed. However, for the purposes of the environmental assessment, it is a conservative approach to evaluate potential impacts on a monthly basis under average, 1:100 wet, and 1:100 dry year conditions. This assessment has been captured in Appendix M-3 of the draft EIS/EA. Should flow conditions during the pit filling period be below average, the closure phase may be extended. For context, if the average annual water taking is	FMG has provided an adequate response(s) to this MECP comment with the assumption that the modelling and predictions describe therein are accurate. No further comment required at this time	Acknowledged			EIS Sections 6.7.1.2, 6.7.6.2, Appendicies N-2, N-3.

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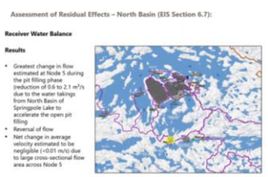
		Lake by a factor of 4 under average flow conditions, which corresponds to an estimated 400% reduction in annual inflows to node 5 (Table 6.7-6), This will result in a temporary flow reversal between the south and north basins of the lake with a predicted decrease in water level in Springpole Lake of <0.10 m. The report states that this is within the natural seasonal variability of the lake.		reduced by half to 5%, the pit filling period would remain under 10 years (see Section 4.18.3.1 of the draft EIS/EA). This would not impact the significance of the duration of residual effects, as defined as Level II (more than 3 years, but less than 20 years) as described in Section 6.7.5 of the draft EIS/EA.					
MECP-SW-004	Section 6.7, 6.10 6.7.4.1	During the open pit refilling phase, inflow to the pit area will exceed the natural outflow from the north basin of Springpole Lake by a factor of 4 under average flow conditions, which corresponds to an estimated 400% reduction in annual inflows to node 5 (Table 6.7-6), This will result in a temporary flow reversal between the south and north basins of the lake with a predicted decrease in water level in Springpole Lake of <0.10 m. The report states that this is within the natural seasonal variability of the lake.  The reversing of flow in a major lake system is precedent setting and not consistent with MECP water taking policies (OWRA Section 34-34.11). Based on the information provided, MECP does not clearly understand the magnitude and duration of potential impacts of refilling the	To ensure a clear understanding of the details of the proposal and potential risks, as part of the EA process, the company needs to provide information as outlined below: Magnitude of dewatering • The company needs to clarify the extent and duration of the water level reductions in Springpole Lake. It is unclear if the reduction in water levels is a yearly average or will the lake be approximately 10 cm lower for 3-5 years and/or potentially longer depending on water quality/quantity limitations that may be encountered. • The company needs to clarify whether this flow reversal is continuous for the duration of the filling, (i.e., 3-5 years inclusive and during the ice-cover period(s)). • Seasonal variability is by its nature, "seasonal", with maximum and minimum flows and water levels existing at specific times of the year and for a finite short duration. The system could be exposed to	The receiver water balance (Appendix M-3 of the draft EIS/EA) identifies that the change in flow resulting from the open pit filling period during average climate conditions, as well as during the more extreme 1:100 year dry year and 1:100 wet year. At most nodes, change in flow is less then 11%, with the exception of nodes 1, 2 and 4 which are influenced by the effect of mine site infrastructure and not related to the water taking for pit refilling. An assessment of the change in downstream flows during the pit filling phase estimated that there will be a decrease in flow at the southeast arm of Springpole Lake (node 9) of 10% and at the outlet of Springpole Lake (node 10) of 11% during the pit filling phase. The changes in flows at each node during the 1:100 wet and dry years was similar to the predicted changes during an average year, as the proposed water taking rate would be adjusted to the anticipated monthly average flow. Based on the DFO guidance	FMG has provided responses to the MECP comments with the assumption that the modelling and predictions describe therein are accurate. It is important to note that predicted changes and the assertion that there is unlikely to be an ecological impact on aquatic habitat is based solely on the DFO's (2013) Ecological Flow Requirements to Support Fisheries in Canada and Locke and Paul 2013, both of which provide guidance regarding riverine ecosystems and were developed to address impacts associated with hydropower development and operation. The response from FMG specifically states that Springpole Lake (at node 5) functions as a "continuous body of water" and "…behaves as a lake, not as a riverine lake outlet". Thus, my previous comments are still valid as there are considerable unknowns with the predictions and modelling related to the re-filling of the open-pit and de-watered area behind the coffer dams. The FMG response indicates	Acknowledged. To address comments related to the predicted impacts at Node 5 resulting from the pit filling phase, a dynamic wave routing model has been prepared to characterize the average monthly velocities across Node 5 under existing and the proposed pit filling phase. This analysis confirms that during the majority of the year, water drains out of the North Basin into the Southeast Arm. However, during the spring freshet in an average year, there is reversal of flow, and water does in fact flow north into the North Basin across Node 5. The model is currently being refined, however preliminary results indicate that the velocities observed during the pit filling phase are in fact of the same order of magnitude as what is observed under average spring freshet conditions and therefore the estimated change in velocity is not predicted to have an effect on local fish populations. A summary of the model and its findings is attached (Memo – Springpole			EIS Sections 5.19.3.1, 6.1, 6.7.1.2, 6.7.6.1, 6.10.

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		open pit and how this part of the lake will be returned to baseline conditions (i.e., both aquatic communities and hydrology).	extreme ranges for prolonged and/or continuous periods during pit filling. The company needs to clearly define what those impacts would be during these prolonged periods. • The report does not provide any linkage to the fisheries offset plan as a result of the reversal of flow at node 5 during pit filling. The report needs to detail an evaluation of the impacts of this flow reversal and water level reductions in Springpole Lake to fish and aquatic life and how this is being evaluated in the fisheries compensation plan. • The assessment does not consider how this flow reduction will impact downstream water levels. The report should include an evaluation of the impact this reduction will have on dewatered areas, such as riffle sections of streams, lake trout and/or whitefish spawning shoals, walleye/pike spawning areas, and shallow back bays, downstream of the lake. The company needs to provide this information as part of the EA so that the Ministry has a full understanding of potential impacts of supplementing flows to fill the open pit more rapidly.	(DFO 2013) and Locke and Paul (2011), the predicted change of less than 11% is unlikely to have an ecological effect on aquatic habitat. The temporary change in flow direction is predicted to occur over 3 to 5 years, depending on the time required to refill the open pit. This temporary effect would be continuous for the duration of the pit filling phase. At final closure, the change in flow within Springpole Lake would be reduced to less than 10% at node 5 and return to near existing conditions (less than 0.1%) at downstream nodes 9 and 10. In response to specific comments related to the estimated change in flow at node 5, as described in Section 6.7.1, water level monitoring in 2020 indicated that the Springpole Lake system (north basin, southeast arm, and the outlet of Springpole Lake) all function as one continuous body of water. More recent baseline hydrometric studies conducted over the 2021 and 2022 monitoring period also demonstrate this. This means that the connection between the north basin of Springpole Lake and the remainder of Springpole Lake (Node 5) behaves as a lake, not as a riverine lake outlet. Section 6.7.2.2 of the EIS/EA will be refined for clarity, to establish water level and velocity as the attributes to assess significance of impacts to the north basin. As noted in Section 6.7.4.1,	that the final EIS/EA will include a more detailed description of impacts to average seasonal water levels resulting from an average monthly ~10% water taking and the rationale for the geographic extent and duration will be provided in greater detail. The FMG response has also deferred further discussion on the change in flow direction as it relates to effects on fish and fish habitat to the final EIS/EA. Since my comments have not yet been addressed, these concerns remain outstanding until they are adequately addressed in the final EIS/EA.	Lake Hydrologic Routing Assessment, dated June 23, 2023). .			

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				– Velocity: The temporary change to lake flow direction at the outlet of the north basin of Springpole Lake (node 5) is based upon a water taking rate which was predicted to have a net change in average velocities of less than 0.01 cubic metres / second. – Water Levels: The change in flow rate is estimated to decrease water levels in Springpole Lake by less then 0.1 metres, which is within natural variation. Further, given the size of the cross section at node 5, it is unlikely there will be detectable ecological effects on downstream habitats. The assessment of potential effects to water levels in the north basin of Springpole Lake will be updated in the final EIS/EA to expand upon the changes resulting from the open pit refilling phase. The geographic extent of the effect of water level reduction is confined to Springpole Lake within the local study area as defined in Section 6.6. The duration of the impact on water levels is predicted to be 3 to 5 years, based on the time to refill the open pit to the average natural elevation of Springpole Lake. Water quality at the end of pit refilling phase is predicted to meet water quality guidelines, as discussed in the Predictive modelling of the pit lake water quality (Appendix N-3). The final EIS/EA will include a more detailed description of impacts to average seasonal				

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				water levels resulting from an average monthly 10% water taking. Additionally, the rationale for the geographic extent and duration will be provided in greater detail. The final EIS/EA will also include further discussion on the change in flow direction as it relates to effects on fish and fish habitat.					
MECP-SW-005	6.7.4.1	Modelling indicates that water quality will be below PWQO (or equivalent) in the open pit as it fills and that any contaminants will be isolated in the bottom layers of the resulting pit lake. Pit water will then mix with water in the surrounding area confined by coffer dams and once water chemistry stabilizes, the coffer dams will be partially removed to allow for full mixing with Springpole Lake. Water quality modelling indicates that sulphate, arsenic, cobalt, copper and phosphorus concentrations are greater than guidelines (PWQO/CWQG) during operations at SW-25 (outlet of Lake 16) (conservative model assumption). The information provided does not clearly evaluate water quality once all these sources are mixed. The EA states that the north basin of Springpole Lake is expected to experience a flow reversal at the outlet of the basin (node 5) for (at least) 3-5 years during the pit re-filling period. Presumably, all water originating from the site (runoff, CDF seepage, etc.) will be confined to the north basin	The draft EIS does not include the impact of hydraulically isolating the north basin during open pit refilling and the potential negative impact that site drainage and seepage could have on water quality at the outlet of the basin. This information is needed during the EA to better understand the impacts of pit refilling.	The potential effects on surface hydrology in the north basin of Springpole Lake and on downstream watercourses (i.e., the southeast arm of Springpole Lake) during the refilling of the open pit basin are presented in Sections 6.7.4.1 and 6.8.4.1 of the draft EIS/EA. As a result of the determination that there could be potential changes in surface water hydrology in the north basin of Springpole Lake, surface water quality modelling (Appendix N-2) was completed for SW-02 and node 5 and included water quality estimates for all these sources mixed, including the outlet of Lake 16 flows, overland runoff / flow from the catchment reporting to the north basin of Springpole Lake, and in final closure also water from the refilled pit basin once it is reconnected to Springpole Lake (see Tables 6.7.7, 6.7-8, 6.7-10 and 6.7-11 of the draft EIS/EA). This will be further clarified in the final EIS/EA. Water quality model results for SW-02 and node 5 indicate that all water quality parameters are less than the applicable water quality	FMG has provided responses to the MECP comments with the assumption that the modelling and predictions describe therein are accurate. The FMG response indicates that potential effects on surface hydrology in the north basin of Springpole Lake and on downstream watercourses will be further clarified in the final EIS/EA Since my comments have not yet been addressed, these concerns remain outstanding until they are adequately addressed in the final EIS/EA.	There is high confidence in the results of the effects assessment as presented in the draft EIS/EA. Input data used in predictive modelling are of high quality, and the range of existing and projected variability in both the existing regime and the mine influenced regime are well constrained by model sensitivity cases applied, including water balance modelling (Appendix M-2), surface water quality modelling (Appendix N-2), and hydrogeological numerical modelling (Section 6.5 and Appendix L-2). Importantly, the conservative approach of the assessment demonstrates that predicted effects on surface water are not underestimated, and with the application of mitigation measures, there will be reliable environmental protection of surface water. As is standard practice, follow-up monitoring programs for surface water will be ongoing in the construction, operations and closure phases and will support the validation of the predictions. As discussed, this will be further clarified in the final EIS/EA.			EIS Sections 6.7.1.2, 6.7.6.1, 6.7.6.2.

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		during the refilling phase (minimum of 3-5 years) of the open pit and dewatered area. This is not discussed in the EA. This scenario must be accounted for relative to water quality modeling parameter concentrations. Table 6.7-12 indicates that the final closure water quality will not exceed applicable guidelines. Confirmation is needed as to when the final closure phase starts, i.e., whether that is following pit filling or at the cessation of mining.		guidelines during operations and in final closure (when the pit basin is connected to the north basin of Springpole Lake). Water quality at SW-25 (Table 6.7-12 of Section 6.7 of the draft EIS/EA) is not affected by hydraulic reconnection of the refilled pit basin to Springpole Lake. Table 4.17-1 of the draft EIS/EA provides a schedule of the mine phases, and notes that the final closure phase would occur after pit filling ceases.					
MECP-SW-006	6.7.4.2	During operation, the report indicates that the primary pathway for surface water quality effects on the north basin of Springpole Lake is seepage from the CDF. Modeling shows that uncontrolled seepage from the CDF comprises approximately 67% of the total flow reporting to SW-25 and up to 17% of monthly average flows to SW-02 during operation (north basin). This infers that water quality at this location is greatly influenced by dam seepage. The company has not proposed any measures to capture or treat this contaminated seepage. Ministry policies state that a mixing zone cannot be a replacement for good treatment.	The company needs to propose a plan (supported in good science) to collect and treat CDF seepage using best efforts. Should collection and treatment not be feasible at this location, then an alternative location for the CDF needs to be proposed/assessed. This should be an integral part of the alternatives assessment.	To support the effects assessment on groundwater quality in Section 6.5 of the draft EIS/EA, a conservative approach was taken in the predictive modelling and used the assumptions outlined in Section 6.5.2.5. This included the assumption that no groundwater recharge originating from the co-disposal facility, or other stockpiles, would be captured by the runoff water collection system. As a result, the loading to surface water from groundwater interactions and seepage is overestimated. However, as noted in Section 6.5.3 of the draft EIS/EA, runoff water collection ditches will be constructed around the perimeter of key infrastructure, including the co-disposal facility and stockpiles, to collect overland flow and seepage and direct it to the water storage pond during operations. The	FMG has provided an adequate response to the MECP comment with the assumption that the modelling and predictions describe therein are accurate.	Acknowledged			EIS Sections 6.5.1.2, 6.5.4, 6.5.6.2, 6.6.1.2, 5.12, 12, Appendix L-2 Sections 3.2, 6, Appendix L-1 Section 5, Appendix A.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				collected contact water not re-used in processing will be treated at the effluent treatment plant and discharged to the southeast arm of Springpole Lake as needed to maintain the site water balance. Similar water management will continue after operations cease until regulatory requirements for passive discharge from the reclaimed site are met.					
MECP-SW-007	6.7.4.2	Baseline monitoring locations (2011-2021) in Springpole Lake (North Basin) include: • SW-01 located approximately 1.3 km south of the currently developed project location (site) and adjacent the proposed CDF. SW-01 will be overprinted by the coffer dam/pit development. • SW-02 is located approximately 2.4 km SE of the proposed CDF and 3.5 km south of the site. • SW-06 is centrally located in the main north basin approximately 1.4km SE of the proposed CDF and 2.5 km south of the site. • SW-15 is located nearshore in the large bay approximately 6 km SE of the site. • SW-25 is located approximately 400m south of the proposed CDF. In agreement with previous surface water review(s) from this	Due to the large scale of the proposed undertaking, additional baseline sampling locations (sediment, water quality and benthic invertebrate monitoring) are required to thoroughly characterize baseline conditions and better understand the heterogeneity of the watershed (spatially and over time) The new sampling locations need to be complementary to existing stations. Existing stations could be used for monitoring during operation and closure to compare pre- and post-development. These additional sampling locations are required during the EA.	The map included in the reviewer's comment is from the 2021 surface water quality baseline report and does not show the full extent of the combined aquatics and water quality program for the north basin or reflect sampling efforts from 2021 through 2022. A map of the current sampling program is in the workplan provided in Appendix W of the draft EIS/EA. An updated surface water quality baseline report, inclusive of data collected through 2022 will be included in the final EIS/EA. The surface water quality and aquatics baseline program within the north basin has been conducted over multiple years, generating more than 200 datapoints. This meets / exceeds the requirements to produce accurate predictive modelling. Of note, monitoring results indicate that there is little to no variation in water quality amongst the eight discrete baseline stations within the north basin of Springpole Lake, indicating that baseline conditions are fairly homogenous. Adding new	The FMG response states that the baseline conditions are fairly homogenous across the study area and that there is sufficient baseline data to meet and/or exceed the requirements to produce accurate predictive modelling and that "…baseline conditions of the north basin have been thoroughly characterized, and the temporal and spatial extent of surface water and aquatic baseline monitoring is sufficient to support the draft EIS/EA". The Ministry does not agree that the baseline data is sufficient for these purposes. I still maintain that the surface water baseline monitoring stations are too few and too far from the potential sources of contaminants and need to be reproducible over the entire lifespan of the mine (i.e., construction, operation and closure).	As discussed with MECP on May 15, 2023, there has been extensive investigation of baseline surface water quality in the area and the dataset is sufficient to support the effects assessment. Technical studies were progressed in parallel during preparation of the draft EIS/EA and the submitted baseline report was a standalone document available at the time of publication (2020). Monitoring has since continued and water quality data collected after 2020 was used to inform the draft EIS/EA, however it was included in the modeling report (Appendix N-2). Baseline reporting will be consolidated in the final EIS/EA and information on sampling locations, frequencies, and exact numbers will be provided. It was acknowledged at the May 15, 2023 meeting that additional monitoring locations, particularly west of the proposed CDF, may be required to support follow-up monitoring as part of the provincial approvals process.			EIS Sections 6.7.1.2, 6.7.2, Appendix N-1 Section 3.

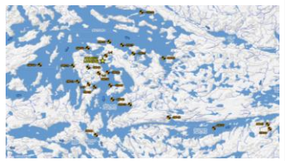
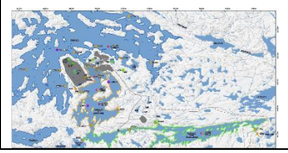
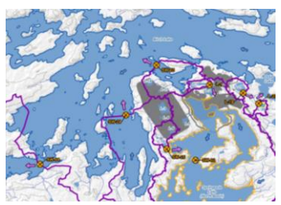
ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		ministry, the stations are too few, too far from the sources of contaminants and need to be reproducible over the entire lifespan of the mine (i.e., construction, operation and closure). The number of samples collected to date for each of these existing stations is limited and needs to be augmented in order to statistically define baseline conditions. 		monitoring stations to the north basin would not affect the overall characterization of baseline conditions, nor the conclusions of the effects assessment as presented in the draft EIS/EA. The baseline conditions of the north basin have been thoroughly characterized, and the temporal and spatial extent of surface water and aquatic baseline monitoring is sufficient to support the draft EIS/EA. It is understood that the monitoring program may need to be refined to support provincial environmental approvals process including to support the Closure Plan related to closure and post-closure conditions. As applicable, these stations will be established during the provincial environmental approvals process, prior to the construction phase of the Project. 					

Table C-2.4: First Mining Gold Response to the Ministry of the Environment, Conservation and Parks Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SW-008	6.7.4.1 and 6.7.5.1	The EA uses a value of 15% change beyond seasonal "normal" variation for assessing the significance or magnitude of residual effects. This methodology appears to be based on DFO guidance (DFO 2013) and Locke and Paul 2011 (10-15% reduction in instantaneous flows are unlikely to have a detectable (measurable?) ecological effect on downstream habitats). The EA states that a water taking of 10% of available monthly (rather than instantaneous) flow at the inlet to Springpole Lake (Cromarty Lake outlet – Birch River) was used to support the effects assessment. The preliminary rating curve for the Springpole outlet (SE arm into Birch River) is estimated to result in a (<0.10 m) decrease in Springpole Lake level. There is insufficient hydrological data to have confidence in the stage/discharge relationship so there is little confidence that water level reduction will be minimal and/or have no ecological effect. It is not clear if these predicted water level reductions also include the northern basin of Springpole Lake. It is not clear how this general flow rate reduction has been applied; for example, was this "seasonal" value modelled over extended time periods. See comment #4 The consultant has not provided support for the use of this	It is not clear how the 15% of monthly flows can be used to determine lake level reductions with confidence or if this protocol applies to lake systems. The consultant needs to substantiate their predictions with more data and consider those water level reductions with habitat mapping. The proponent needs to provide evidence that this proposed reduction will not adversely impact critical fish habitats such as spawning and nursery areas.	The estimated flows into Springpole Lake were used to determine the rate of water taking for the purpose of refilling the open pit basin in the north basin of Springpole Lake. The rate proposed is 10%, however a range between 5 and 15% was also considered, including under extreme wet and dry conditions. It was determined that a water taking rate of 1.15 cubic metres per second over a three to five year period would not likely have detectable ecological effects on downstream aquatic habitat, as described by DFO guidance (DFO 2013) and Locke and Paul (2011). Further, as described in Section 6.7.4.1, water levels throughout Springpole Lake are predicted to change less than 0.1 m as a result of these water takings (based on a preliminary rating curve developed for the draft EIS/EA). Based on Springpole Lake flow estimates and the preliminary rating curve, 0.1 m is within the natural variation of Springpole Lake. The potential residual effects on surface water is localized, low magnitude and reversible. As a result, the change in water flows and levels is not predicted to have a residual effect on critical fish habitat in Springpole Lake. Hydrometric data has continued to be collected in 2021 and 2022, and will be evaluated and summarized in the final EIS/EA. This will include a more robust rating curve for the Springpole Lake outlet, as well as water level monitoring data throughout the lake (including	The statement that the predicted change of "less than 0.1 m" is within the natural variation of Springpole Lake water levels is unclear. Is the ~0.1 m decrease in water level continuous and thus cumulative to any natural variation the system experiences? For example, if the water level of Springpole Lake is ~0.3 m lower during August than in May, is the ~0.1 m decrease in addition to the 0.3 m decrease? The FMG response indicates that the Hydrometric data will continue to be collected and will be further evaluated and summarized in the final EIS/EA. The ministry will assess the adequacy of this data once it is provided in the EIS/EA.	It was estimated that the average annual water level would be reduced by approximately 0.1 m when comparing an average annual water level under existing conditions to the average annual water level under the proposed pit filling scenario however this is within the natural seasonal variation of the lake. With a new robust rating curve for the outflow of Springpole Lake, the estimated change to water level will be refined and evaluated on a monthly basis in the final EIS/EA. A seasonal water level analysis will also be further detailed in the updated Hydrology Baseline Report.			EIS Sections 5.19.3.1, 6.1, 6.7.1.2, 6.7.6.1, 6.10.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		protocol as it applies to lake systems. It is understood that the guidance provided in Locke and Paul (2011) was primarily developed for use in riverine systems. Locke and Paul (2011) states that the timing and predictability of flow events is critical ecologically for many species that either avoid or utilize variable flows throughout the year and a threshold of 10-15% reduction may only be appropriate over shorter time periods or when the reduction is not constant (such as with waterpower facilities). Also, the 10-15% threshold may not be appropriate during periods of lower flow.		the north basin). A preliminary review of the 2021/2022 field data suggests that the relationship between flow and water level through Springpole Lake align with the estimates made in the draft EIS/EA for the average monthly flow conditions. This analysis will be expanded upon and presented in the final EIS/EA more fully, to substantiate the estimated seasonal water level and estimated change in water levels resulting from the proposed pit filling rate.					
MECP-SW-009	Throughout, Fig. 6.10-2	The Local Study Area (LSA) does not include the total area of Birch Lake that would be potentially exposed to mine discharges (direct or diffuse). The assessment only includes a station at the outlet of Birch Lake which is several kilometers downstream (west) of the LSA boundary shown in Figure 6.10-2.  Given the absence of this data, the ministry does not clearly understand the potential for site activities to impact Birch Lake water quality and if there are contingency measures that could be implemented to mitigate those impacts.	The EIS needs to include multiple stations (reference and exposure) within the basins of Birch Lake to quantify baseline conditions and assess the potential of the development to impact lake conditions over time.	The surface water quality and aquatics baseline program within Birch Lake has been conducted over multiple years, collection more than 120 water quality samples. A summary of water quality of Birch Lake is presented in Table 6.6-4; water quality results by monitoring station (SW-28, SW-20, SW-19b, SW-03, BIRCH-B2, SW-18, SW-24 and SW-04) are also presented in Appendix N-1 of the draft EIS/EA. Station SW-28, located upstream of the Project at the edge of the LSA boundary provides an appropriate reference station. The assessment of potential effects on surface water quality for Birch Lake is provided in Section 6.6.4.2 and includes three assessment nodes: • Assessment node SW-03 (directly north of the mine site in Birch Lake);	The FMG response states that the geographic coverage and number of stations to characterize baseline conditions in Birch Lake is considered sufficient for the purposes of the environmental assessment and that the number and location of assessment nodes is also sufficient to evaluate and predict changes in water quality in Birch Lake due the Project. Birch Lake is an extremely large, deep, cold-water lake. The proposed co-disposal facility is approximately 3 km x 1.5 km in size and will be coincident with approximately 5.5 km of Birch Lake's shoreline. Based on maps provided by FMG, it appears that the co-disposal facility will be within 300-400 metres of the Birch Lake shoreline. During mine operations, predictive modelling results provided in the Draft EIS/EA, indicate that the primary pathway for surface	As discussed with MECP on May 15, 2023, there has been extensive investigation of baseline surface water quality in the area and the dataset is sufficient to support the effects assessment. Contrary to the comment, there are 10 baseline monitoring locations within Birch Lake. Additional mapping will be provided in the final EIS/EA to provide further clarity regarding geographic extent of baseline monitoring locations. Technical studies were progressed in parallel during preparation of the draft EIS/EA and the submitted baseline report was a standalone document available at the time of publication (2020). Monitoring has since continued and water quality data collected after 2020 was used to inform the draft EIS/EA, however it was included in the modeling report (Appendix N-2). Baseline			Appendix N-1, Section 3

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				• Assessment node SW-24 (west of the CDF in Birch Lake); and • Assessment node SW-04 (far-field node in Birch Lake). The geographic coverage and number of stations to characterize baseline conditions is considered sufficient for the purposes of the environmental assessment, Similarly, the number and location of assessment nodes is sufficient to evaluate and predict changes in water quality in Birch Lake due the Project.	water quality effects on Birch Lake is fugitive seepage from the CDF. Birch Lake is approximately 28 km long and 12,000 ha in area, with a watershed area of 1050 km^2. The current surface water baseline sampling locations on Birch Lake consist of two near-field locations, a background location several kilometres to the northeast of the proposed mine and a single far-field station approximately 4.75 km southwest of the proposed co-disposal facility. As previously stated, it is my opinion that there are not enough baseline monitoring locations on Birch Lake relative to the scope and size of the proposed project and co-disposal facility, and the potential impacts of the project. Proceeding with a lack of baseline data on which the EIS/EA is based is at the proponent's risk	reporting will be consolidated in the final EIS/EA and information on sampling locations, frequencies, and exact numbers will be provided. It was acknowledged at the May 15, 2023 meeting that additional monitoring locations, particularly west of the proposed CDF, may be required to support follow-up monitoring as part of the provincial approvals process.			
MECP-SW-010	6.7	Although it is reported that 150+ water quality samples were collected between 2011-2021; most monitoring locations were sampled sporadically and are not a continuous sample record over the time span (2011-2021). Previous Ministry surface water review(s) have indicated that additional baseline sampling locations (sediment, water quality and benthic invertebrate monitoring) are required to thoroughly characterize the heterogeneity of the watershed	The baseline data is not adequate to clearly or statistically characterize baseline conditions. Understanding and quantifying baseline conditions is an essential first step to assessing the potential impact of the project. In the absence of this data the company and the Ministry are unable to adequately understand or assess the impact of the project. The company needs to assess the dataset and consult with the Ministry to identify data gaps and augment existing data	As noted in the response to Comment #7, baseline studies are ongoing since submission of the draft EIS/EA. Monitoring has continued through 2023 to supplement the existing baseline dataset, however, these additional data do not affect the overall conclusions of the effects assessment as presented in the draft EIS/EA. Updated surface water quality and aquatics baseline reports, inclusive of data collected through 2022 will be provided in the final EIS/EA.	As previously stated, it is my opinion that there are not enough baseline monitoring locations on Birch Lake and Springpole Lake relative to the scope and size of the proposed project. FMG states that 150+ water quality samples were collected between 2011-2021; however, most monitoring locations were sampled sporadically over that time period and do not provide a continuous sample record. Additional monitoring may be	As discussed with MECP on May 15, 2023, there has been extensive investigation of baseline surface water quality in the area and the dataset is sufficient to support the effects assessment. Technical studies were progressed in parallel during preparation of the draft EIS/EA and the submitted baseline report was a standalone document available at the time of publication (2020). Monitoring has since continued and water quality data collected			EIS Sections 6.7.1.2, 6.7.2, Appendix N-1 Section 3.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		due to the large scale of the proposed undertaking. For a project of this scope and size, sampling locations should include both nearshore (littoral) and offshore (benthic) locations and should also include nearfield and far-field sites that will be potentially impacted by the undertaking. In addition, several background locations that will not be impacted by the undertaking must also be included in the baseline sampling. The number of sampling locations, timing of sample collection and the number of samples needed for statistical rigor, do not adequately define baseline conditions.	where needed as approved by MECP.		required for the EIS/EA and/or may be a requirement during the provincial permitting and approvals process. Proceeding with a lack of baseline data on which the EIS/EA is based is at the proponent's risk	after 2020 was used to inform the draft EIS/EA, however it was included in the modeling report (Appendix N-2). Baseline reporting will be consolidated in the final EIS/EA and information on sampling locations, frequencies, and exact numbers will be provided. It was acknowledged at the May 15, 2023 meeting that additional monitoring locations, particularly west of the proposed CDF, may be required to support follow-up monitoring.			
MECP -SW-011	4.1 6.6	Site water management is not adequately discussed regarding stormwater control (ex. one in 100-year storm events) during the construction phase. Drainage pathways and collection ditching must be constructed and sized to contain storm events. Water storage capacity must not exceed the water treatment potential. More detail is required regarding site water balance during construction.	The proponent must provide evidence that there is sufficient space on site for larger ditches and water storage facilities on site (in particular, around the CDF). Due to the relatively compact footprint of the site and CDF, this may have implications for the sizing and location of required infrastructure and may limit future development. Due to the more frequent occurrence of larger storms, the standard storm event used to design water management infrastructure requiring MECP OWRA S. 35 approvals is the 1 in 100-year, 24-hour event. The water management infrastructure required for the project should be designed to contain storm events up to and	Seepage collection, perimeter ditching and associated ponds will be designed during the detailed engineering phase prior to construction in support of and detailed in the environmental approval applications. It is anticipated that a lower design event (between 1 in 5 and 1 in 25 year) will be used for these features during construction, based on experience with other mining projects in northern Ontario.	The standard storm event used to design water management infrastructure requiring MECP OWRA S. 35 approvals is the 1 in 100-year, 24-hour event. The water management infrastructure required for the project should be designed to contain storm events up to and including the 1 in 100-year 24-hour event (100-year event) from the outset of site development which includes the initial construction phase of the project. The final EIS/EA needs to incorporate this larger storm event in the design of water management infrastructure for all project phases.	Water management infrastructure for the Springpole Project will comply with the Ontario Water Resources Act.			EIS Section 5.10.1.2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
			including the 1 in 100-year 24-hour event (100-year event).						
MECP-SW-012	6.6	Erosion and sediment controls are not adequately discussed in the EA with regard to water balance during the development of the site and construction of the facilities. More detail is required. See comment 11.	More detail is required regarding erosion and sediment controls during development.	A detailed erosion and sediment control plan will be developed prior to construction in support of the environmental approvals process and will be submitted with the application(s) as appropriate. Typical measures may include: physical sediment barriers, sedimentation ponds, ditches and other measures, as required.	FMG has provided an adequate response to this MECP comment and has committed to a "detailed erosion and sediment control plan" to be developed prior to construction in support of the environmental approvals process. The Ministry will assess the adequacy of this plan once it is submitted. No further comment required at this time	Acknowledged			Not applicable
MECP-SW-013	6.1	There is limited baseline data (fish collection data) for areas within the greater LSA/RSA. Specifically, Birch Lake adjacent the proposed CDF and area downstream. Available data may not be statistically robust enough to determine any effects.	Statistically robust baseline data is the foundation of the assessment. Without good baseline data the assessment cannot adequately quantify potential effects. For the ministry to understand potential effects, the proponent needs to collect more data from additional sample locations.	There have been three cycles of Broadscale Monitoring (BsM) on Birch Lake (2009, 2014, 2019) conducted by the Province (MNRF) as reference in Section 3.7.2.2 of Appendix O3 of the draft EIS/EA. Additional fish community and habitat sampling was completed in the areas of Birch Lake adjacent to the Project during 2022. An eDNA program using metabarcoding analysis was completed in 2022 and included samples from Birch Lake adjacent to the Project and Springpole Lake. Data collected during 2022 also included a comprehensive lake wide BsM program in Springpole Lake as suggested by reviewers; which extended approximately 17 km downstream of the north basin of Springpole Lake through to the southeast arm of Springpole Lake. Three (3) additional regional water quality stations were established downstream of the Project in 2022 in response (Appendix W of the draft EIS/EA) to comments from	FMG has provided an adequate response to this MECP comment. No further comment required at this time	Acknowledged			EIS Section 6.10.1.2, 6.10.2, Appendix O-1.

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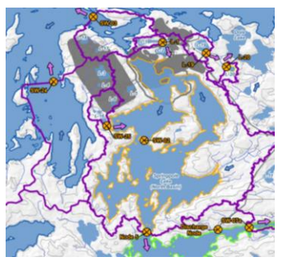
				Indigenous communities. In addition to the quarterly water sampling, a set of eDNA samples were collected from each station and metabarcoding analysis used to define the fish communities present. The 2022 data will be provided in the final EIS/EA.					
MECP-SW-014	6.10.4.1	The north basin of Springpole Lake is a headwater system situated at a height of land with a relatively small contributing catchment area. The EA states that the lake surface area that will be temporarily isolated by the construction of coffer dams is approximately 6% of the north basin total surface area. However, the total volume of water is proportionally greater due to the overprinting of the largest deep basin of the north basin (>10%). This deep-water zone is critical lake trout habitat (i.e., juvenile summer thermal refugia). To understand the impact of the proposal and the loss of critical cold-water habitat, the proponent needs to clearly define loss by both surface area and volume. The ministry also needs to understand the magnitude of the impacts of the project as defined by habitat loss and what role the pit area (de-watered area) plays in the fisheries resource of Springpole Lake, such as the seasonal habitat usage of lake trout and whitefish. The report does not clearly define the magnitude, duration and implications of removing this area (for a minimum of 13+ years) on the fish population in the north	The proponent needs to provide additional information on the magnitude of impacts related to the elimination of this critical coldwater habitat. Consultation with DFO and MNRF is needed to ensure that impacts are acceptable and can be adequately compensated for.	Additional investigations were completed in 2022 to confirm the understanding of how fish are using the other deeper water basins and lake areas, as well as the one deep water basin that will be isolated by the Project. These studies included a lake wide Broadscale Monitoring program following provincial protocol, a hydroacoustic study to estimate abundance and distribution and the continuation of the lower trophic and physicochemical sampling. The data is showing that, although 6% of the lake area (representing 9% of the volume) and the deep-water basin that will be temporarily isolated by the Project is important fish habitat, the remaining adjacent deep water areas outside of the isolated basin also provides comparable seasonal habitat and refugia for fish, including Lake Trout, Walleye and Whitefish (Coregonids spp) species. The 2022 data confirms that, although the temporarily isolated basin will impact fish and fish habitat, all of the resident species of fish will be retained in the Springpole Lake. We look forward to additional consultation with DFO, MNRF	FMG has provided an adequate response to this MECP comment. No further comment required at this time	Acknowledged			EIS Sections 6.10.1.2, 6.10.2, 6.10.3, 6.10.4, 6.10.6, 6.10.7, Appendices O-1, F.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		basin (and Springpole Lake in general) with respect to seasonality (cold water refugia, spawning and rearing habitat, potential year-class reductions or losses etc.).		and other parties to further discuss these findings. The temporary isolation of this basin is included as a loss of fish habitat that requires offsetting measures in the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA). As a result, there are no predicted residual effects to fish habitat from the isolated basin and therefore significance attributes (outlined in Section 6.1 of the draft EIS/EA) have not been applied.					
MECP-SW-015	Section 6.10.4.1 Appendix F	Section 6.10.4.1 Changes in Fish Habitat page 6 Appendix F: At the end of mining, the final surface area of the open pit is expected to be 104 ha, consisting of the 77 ha of existing Springpole Lake area and an additional 27 ha of former terrestrial area. This area of pit development will have steep side slopes to a depth of approximately 350 m. At this depth, the column of water in the former pit is expected to be meromictic (not expected to fully turn over). The surface waters will mix part way (approximately 40 m) through the column (zone referred to as mixolimnion) to a depth comparable to and exceeding the adjacent natural lake basins (30 to 35 m), providing pelagic habitat for species such as Lake Trout, Lake Whitefish and Walleye, similar to conditions currently provided by deep water basins. During pit filling, the northern basin of Springpole Lake will be isolated from the downstream	More detail is required regarding the concept of re-establishing lake habitat over the pit lake. The proponent must provide evidence whether the pit, once refilled, is expected to act as a "sink" for contaminants originating from the Mine (runoff, LDF seepage) and whether this scenario has been evaluated.	Section 4.18.3.1 of the draft EIS/EA provides a summary of the water quality in the filled open pit basin at closure. The predicted water quality is based on model simulations using PitMod to predict the physical and chemical evolution of the water column during and after filling (Appendix N-3). PitMod is a numerical hydrodynamic model used for predicting the spatial and temporal distribution of temperature, density, dissolved oxygen and water quality parameters in lakes (Dunbar 2013; Martin et al. 2017). The model considers anticipated inputs to the basin, including: actively pumped water from Springpole Lake, groundwater seepage, local runoff and precipitation. Water quality results of the model were compared against the Provincial Water Quality Objectives (PWQO) for protection of aquatic life. The results indicated that there would be no exceedances of PWQO at completion of pit	FMG has provided an adequate response to this MECP comments. No further comment required at this time.	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		environment due to the predicted reversal of flow at node 5. This will also isolate contaminant concentrations from the site and contain the seepage discharging from the CDF during pit filling.		filling. Water quality parameters from pit wall runoff and co-disposal facility seepage decrease as the basin fills in response to a decrease in subaerial pit wall exposure area and a decrease in groundwater flux as hydraulic gradients lessen. Further details regarding the modelling approach and the water quality predictions are provided in Appendix N-3 of the draft EIS/EA. The Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) and Section 6.10 provide a detailed description of the habitat to be established in the refilled basin.					
MECP-SW-016	6.6-9	During mine operations, predictive modelling results indicate that the primary pathway for surface water quality effects on Birch Lake is fugitive seepage from the CDF as well as contact water that is conservatively assumed to not be intercepted by the CDF perimeter collection ditching. Under these model assumptions, contact runoff and fugitive seepage represents up to 66% and 18% of the total flows reporting to nodes SW-03 (north) and SW-24 (west), respectively. Based on the contact runoff and seepage estimates, it appears that control and/or management of this runoff/seepage from the CDF is inadequate. The uncontrolled discharge of contaminated water from the CDF to the lake(s) is not consistent with Ministry policies. The location of the proposed	The company needs to take all reasonable efforts to collect and manage seepage from the CDF. A commitment from the proponent is needed to ensure that these measures are addressed during provincial permitting. Baseline conditions within Birch Lake and the downstream watershed have not been clearly defined and this prevents the Ministry from fully understanding the potential impacts from this runoff/seepage. The proponent must collect additional baseline data from Birch Lake (including from additional background sample locations) before an assessment on the potential impact on Birch Lake water quality can be made. This information is required in the EA.	Section 6.6.3 and Section 6.7.3 of the draft EIS/EA include mitigation measures to address potential effects to water quality. It includes an integrated water management system that will be designed to collect and control contact water during the construction and operation phases of the Project from the stockpiles, CDF and plant site areas, and water from the open pit to be recycled and used in processing. The collected contact water not re-used in processing will be treated at the ETP and discharged to the southeast arm of Springpole Lake as needed to maintain the site water balance. Similar water management will continue after operations cease until regulatory requirements for passive discharge from the reclaimed site are met. Additional monitoring has continued through 2023 to	As previously stated, it is my opinion that there are not enough baseline monitoring locations on Birch Lake relative to the scope and size of the proposed project and co-disposal facility. Previous ministry surface water review(s) have indicated that additional baseline sampling locations (sediment, water quality, fish and benthic invertebrate monitoring) are necessary to thoroughly characterize the heterogeneity of the watershed, in particular Birch Lake due to its size and proximity to the proposed CDF. Additional monitoring may be required for the EIS/EA and/or may be a requirement during the provincial permitting and approvals process. Proceeding with a lack of baseline data on which the	As discussed with MECP on May 15, 2023, there has been extensive investigation of baseline surface water quality in the area and the dataset is sufficient to support the effects assessment. Contrary to the comment, there are 10 baseline monitoring locations within Birch Lake. Additional mapping will be provided in the final EIS/EA to provide further clarity regarding geographic extent of baseline monitoring locations. Technical studies were progressed in parallel during preparation of the draft EIS/EA and the submitted baseline report was a standalone document available at the time of publication (2020). Monitoring has since continued and water quality data collected after 2020 was used to inform the draft EIS/EA, however it was included in the modeling report (Appendix N-2). Baseline			EIS Sections 5.10.1, 6.6.1.2, 6.6.4, 6.7.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		CDF is a risk to Birch Lake water quality as a result of impacts from runoff and seepage. Baseline monitoring locations (2011-2021) in Birch Lake include: • SW-03 is located approximately 1.8 km northwest of the currently developed project location (site) and adjacent to the northern portion of the proposed CDF. • SW-19b and SW-23 are located approximately 2 and 2.5 km northeast of the site. • SW-28 is located approximately 6 km northeast of the site. • SW-18 is located within a few hundred metres from shore in the large bay immediately to the west of the site and adjacent to the proposed CDF. • SW-24 is located to the west of the proposed CDF, near the outlet of a small creek which will be overprinted during CDF development. Additional sampling locations have been added to Birch Lake (SW-20) and Birch-B2 in Appendix N2 (Figure 2-3, Baseline Surface Water Quality and Aquatic Resources Monitoring Stations) dated April 2022. These sample locations appear adequate; however, due to the size of Birch Lake and scope of the project, additional sample locations are required. Previous ministry surface water review(s) have indicated that additional baseline sampling locations (sediment, water		supplement the existing baseline dataset. However, these additional data do not affect the overall conclusions of the effects assessment as presented in the draft EIS/EA. Updated surface water quality and aquatics baseline reports, inclusive of data collected through 2022 will be included in the final EIS/EA.	EIS/EA is based is at the proponent's risk	reporting will be consolidated in the final EIS/EA and information on sampling locations, frequencies, and exact numbers will be provided. It was acknowledged at the May 15, 2023 meeting that additional monitoring locations, particularly west of the proposed CDF, may be required to support follow-up monitoring.			

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		quality, fish and benthic invertebrate monitoring) are required to thoroughly characterize the heterogeneity of the watershed. The approximate distances of the sampling locations (listed above) clearly show the large distances between locations. These locations should also be used as monitoring locations during operation and closure to compare pre- and post-development.							
MECP-SW-017	6.7.4.2	During operation, section 6.7.4.2 of the report indicates that the primary pathway for surface water quality effects on the north basin is seepage from the CDF. Modeling shows that seepage from the CDF comprises approximately 67% of the total flow reporting to SW-25 and up to 17% of monthly average flows to SW-02 during operation. 	The volume of "seepage" water relative to total flow at assessment nodes appears to be exceptionally high. The company needs to take all reasonable efforts to collect and manage seepage from the CDF. A commitment from the proponent is needed to ensure that these measures are addressed during provincial permitting. Baseline conditions within the north basin of Springpole Lake and the downstream watershed have not been clearly defined and this prevents the Ministry from fully understanding the potential impacts from this runoff/seepage.	Section 6.6.3 and Section 6.7.3 of the draft EIS/EA includes mitigation measures to address potential effects to water quality. It includes an integrated water management system will be designed to collect and control contact water during the construction and operation phases of the Project from the stockpiles, CDF and plant site areas, and water from the open pit to be recycled and used in processing. The collected contact water not used in processing will be treated at the ETP and discharged to the southeast arm of Springpole Lake as needed to maintain the site water balance. Similar water management will continue after operations cease until regulatory requirements for passive discharge from the reclaimed site are met. Seepage collection, perimeter ditching and the associated ponds will be designed during the detailed engineering phase in support of environmental approvals. The response to Comment #7 describes the characterization of baseline conditions of the	The Ministry continues to assert that additional baseline sampling locations (sediment, water quality, fish and benthic invertebrate monitoring) are necessary to thoroughly characterize the heterogeneity of the watershed relative to the size and scope of the project. Proceeding with a lack of baseline data on which the EIS/EA is based is at the proponent's risk. The FMG response indicates that "Seepage collection, perimeter ditching and the associated ponds will be designed during the detailed engineering phase in support of environmental approvals". As previously stated, the water management infrastructure required for the project should be designed to contain storm events up to and including the 1 in 100-year 24-hour event (100-year event) from the outset of site development, which includes the initial construction phase of the project.	As discussed with MECP on May 15, 2023, there has been extensive investigation of baseline surface water quality in the area and the dataset is sufficient to support the effects assessment. Technical studies were progressed in parallel during preparation of the draft EIS/EA and the submitted baseline report was a standalone document available at the time of publication (2020). Monitoring has since continued and water quality data collected after 2020 was used to inform the draft EIS/EA, however it was included in the modeling report (Appendix N-2). Baseline reporting will be consolidated in the final EIS/EA and information on sampling locations, frequencies, and exact numbers will be provided. It was acknowledged at the May 15, 2023 meeting that additional monitoring locations, particularly west of the proposed CDF, may be required to support follow-up monitoring.			EIS Sections 6.7.1.2, 6.7.6.1, 6.6.4, 6.7.4, 6.7.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				north basin of Springpole Lake. The baseline surface water quality and aquatics program has been implemented over the last 10 years and as it meets / exceeds best industry standards for a Project at this stage. Adding new monitoring stations in the north basin would not affect the characterization of baseline conditions, nor the conclusions of the effects assessment as presented in the draft EIS/EA.	The EIS/EA should address the proper sizing of water management infrastructure.	A lower design event (between 1 in 5 and 1 in 25 year) will be used for water management infrastructure features during construction, based on experience with other mining projects in northern Ontario.			
MECP-SW-018	6.6.3 Table 6.6-9 6.8.2.2	Ammonia is not a parameter in Table 6.6-9. Nor is ammonia a parameter considered in the predicted SW quality during operations in Birch or Springpole Lake. Cyanide and ammonia are not included as indicators and measurable parameters for the assessment of SW effects. The staged development of the tailings facility will limit the water storage relative to potential ammonia treatment requirements.	To understand the impact of the effluent and site drainage during construction and operations, ammonia needs to be included as a contaminant of concern and included in the assimilation capacity assessment.	Ammonia will be included in the water quality modeling and the assessment of potential effects on the water quality of southeast arm of Springpole Lake in the final EIS/EA.	Acknowledged. No further comment required.	Acknowledged			Appendix N-2, Section 3.3and and EIS Section, Table 6.6-5
MECP-SW-019	6.6.3 Appendix N-2	Section 6.6.3 indicates that during operation, in-plant destruction of cyanide in tailings will be undertaken using SO_2/O2 treatment to minimize residual cyanide in the CDF. Cyanide is not a parameter in Table 6.6-9: Predicted CDF Seepage water quality (during operations). Nor is cyanide a parameter considered in the predicted surface water quality during operations in Birch or Springpole Lakes. Appendix N-2.	Modeling of residual cyanide concentrations in tailings seepage and effluent discharge during operations is required in the EA. Cyanide must also be added to the parameters to be monitored during operation.	Cyanide will be added as a parameter in the water quality modeling and the assessment of potential effects in the final EIS/EA. Operational monitoring requirements for water quality parameters will be established as part of the provincial environmental approvals process, and are expected to be required to include cyanide based on other mining projects in Ontario.	Acknowledged. No further comment required.	Acknowledged			Appendix N-2, Table 3.2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
MECP-SW-020	4.10.2	Treatment options are not described except that BATEA will be considered for the ETP to meet requirements and that the ETP will be refined with ongoing project planning and engineering design and as discharge criteria are finalized. At this stage of the project, more detail is required regarding potential effluent treatment options.	The degree of treatment and the size and chemical characteristics within the mixing zone are critical components of understanding operational impacts. The company needs to provide this information for the ministry to understand the impact of the project.	Section 6.8.4.2 provides a description of the mixing zone and was based on CORMIX modelling (Appendix N-2) to support the effects assessment. The modelling indicates that the maximum mixing of treated effluent discharge is achieved approximately 1.3 metres downstream of the discharge point (effectively at the discharge point) in a worst case flow condition (7Q20), assuming use of a 10-port unidirectional diffusor. Model results indicate there are no exceedances of surface water quality guidelines for the protection of aquatic life in the southeast arm of Springpole Lake in any Project phase as a result of the Project. Characterization of the mixing zone within the southeast arm of Springpole Lake will be expanded upon and detailed further as part of the provincial approvals process. As noted in Section 6.8.3 of the draft EIS/EA, the effluent treatment plant (ETP) will be designed and operated to produce an effluent quality appropriate for discharge to the environment in accordance with applicable regulatory requirements, including the Metal and Diamond Mining Effluent Regulations (MDMER), and the effluent concentrations required by the Ministry of the Environment, Conservation and Parks to protect the receiving water and aquatic resources. The best available technologies that are economical achievable will be considered for the ETP to meet protection requirements.	Acknowledged. No further comment required at this time.	Acknowledged				Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
				The design of the ETP will be refined with ongoing Project planning and engineering design, and as discharge criteria are finalized during the approvals process.					
MECP-SW-021	6.7.4.2 Table(s) 6.6-7 – 6.6-12	Section 6.7.4.2 indicates that there will be ditching around the perimeter of the CDF to collect seepage. The timeframe for constructing this ditching is not provided. Presumably it will be constructed during the staged development of the CDF; however, timing of development is not included in the EA. Geochemical characterization of the project indicates that CDF seepage will be circumneutral to slightly alkaline (pH 7-9) (Table 6.6-7 – 6.7-12). CDF seepage during operations is predicted to have elevated concentrations of copper, cadmium and lead relative to guidelines (PWQO/CWQG) (Table 6.6-9). The report indicates that no parameters are predicted to exceed applicable guidelines at SW-25 during closure and the improvement in water quality is due to the decrease in seepage flow from the CDF.	The proponent must identify where the ditching will be directed and how and where runoff water and seepage will be treated (i.e., pumped back to the CDF for treatment). The draft EA indicates that there will be significant seepage volumes discharging from the CDF. The proponent must provide a contingency plan in the event that CDF seepage does not meet applicable guidelines and/or predicted water quality.	Section 6.5.3 and Section 6.6.3 describe measures to be implemented to mitigate potential effects to water quality. During construction and operation phases, an integrated water management system will be operated to collect and control contact water from the stockpiles, CDF and plant site areas, and recycle water in processing. Runoff water collection ditches will be constructed around the perimeter of the CDF to collect seepage and direct it to the water storage pond during operations. The collected contact water that is not re-used in processing will be treated at the effluent treatment plant and discharged to the southeast arm of Springpole Lake as needed to maintain the site water balance. Similar water management will continue after operations cease until regulatory requirements for passive discharge from the reclaimed site are met.	Acknowledged. No further comment required at this time.	Acknowledged			EIS Sections 5.10.1.2, 6.6.1.2.
MECP-SW-022	6.7.4.2	The seepage collection and perimeter ditching are proposed to be designed for a one in ten-year storm event. The perimeter ditching requires at least a one in 100-year 24-hr retention storm event design.	It is recommended that all site water management infrastructure be designed for at least a one in 100-year 24-hour retention storm event volume to minimize the potential impacts of storm events.	Seepage collection, perimeter ditching and the associated ponds will be designed during the detailed engineering phase in support of environmental approvals. It is anticipated that a 1 in 25 year event for the construction phase will be the design basis for these features, based on experience with other mining projects in northern Ontario.	The standard storm event used to design water management infrastructure requiring MECP OWRA Sec. 35 approvals is the 1 in 100-year, 24-hour event. The water management infrastructure required for the project should be designed to contain storm events up to and including the 1 in 100-year 24-hour event (100-year event)	Acknowledged			EIS Sections 5.12.1

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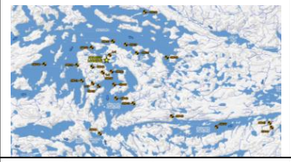
					from the outset of site development and includes seepage collection and perimeter ditching.				
MECP-SW-023	Appendix N-2	The report utilizes "receiving environment assessment nodes" to support the effects assessment in Birch and Springpole Lakes. These nodes are located in areas where impacts to flow, water quality, etc. may be observed. Most nodes appear to be coincident with baseline monitoring locations. Note – the Appendix N (N-2) Water Quality Technical Support Documents, Surface Water Quality Modelling Report Figure 2-2 shows water quality assessment node locations that do not correspond with sampling locations identified in the 2021 workplan (Figure 1.1). This is confusing since these nodes/sample locations use the same sample location names. SW-24 is described as being offshore in a "large lake basin" whereas the 2021 workplan shows SW-24 nearshore coincident with a small creek that will be overprinted by the proposed CDF. The location of SW-04 in Appendix N-2 is approximately 2.8 km southwest	This is confusing since these nodes/sample locations use the same sample location names. The proponent should provide clarity as to naming and location of sites/nodes.	Surface water quality model nodes in the receiving environment are described in text and their locations are presented in Appendix N-2. To support the surface water quality effects assessment in Section 6.6 to Section 6.9, water quality model nodes were named according to the closest baseline monitoring location or that which informed their initial surface water quality condition. It is understood that the hydrology models used a different naming convention, which may have resulted in some confusion. Naming conventions of surface water quality nodes will be reviewed and as appropriate aligned with the hydrology nodes in the final EIS/EA, or otherwise clearly described.	Acknowledged. No further comment required at this time.	Acknowledged			" Appendix M-3 and Appendix N-2

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		of its location in the 2021 workplan. 							
MECP-SW-024	Appendix N-2, Section 2.3.2 Table 6.8-7	ETP influent quality estimates based on Base Case and Sensitivity 3. Assimilation Capacity Study Table 6.8-7 states that at the maximum predicted effluent concentration from the ETP at the lowest (7Q20) flow in the receiver, the mixing zone has been predicted to be only 1.3m from the diffuser, However, several parameters do not achieve applicable criteria at 1.3m in the receiver, including: sulphate (1300 m), Al (2.3m), Boron (2.1m), Fe (10 m).	Provide clarity as to why the mixing zone distance was set to 1.3 m when some parameters do not meet their applicable criteria for a greater distance.	The reviewer is referencing assimilation study results, which are presented in Table 2.4 in Appendix N-2, as well as Table 6.8-7 in Section 6.8 of the draft EIS/EA. The parameter values (e.g., for sulphate, aluminum, boron and iron) are estimates for the maximum allowable concentration in effluent. For a 7Q20 low flow condition, these are sulphate (1300 mg /L), aluminum (2.3 mg/L), boron (2.1 mg/L), and iron (10 mg/L). The CORMIX model indicates that these effluent concentrations will meet appropriate benchmarks by the end of (the regulatory) mixing zone, which is estimated as 1.3 m from the diffuser in the draft EIS/EA. Final effluent criteria for the Project will be determined in consultation with the MECP during the environmental approvals phase. The Project discharge will be protective of the receiving environment and will occur in accordance with federal and provincial approval requirements. The interpretation of these values in these tables will be clarified in the final EIS/EA.	The proponent indicates that "Final effluent criteria for the Project will be determined in consultation with the MECP during the environmental approvals phase". As details are currently lacking, additional baseline data and assessments may be needed for deriving acceptable effluent criteria for the project during the EA phase, and also during provincial permitting and approvals. No further comment necessary at this time.	Acknowledged			"Comment included in Section 6.8.1.2 (IoC). Comment addressed in the Treated Effluent Discharge Mixing Study (CORMIX; Appendix N-2, Attachment 1)"

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MECP-SW-025	General comment Section 6.7	Predicted flow scenarios in Springpole Lake northern basin (node 5 etc.) relative to pit refilling are not consistent with MECP Permit to Take Water policies (OWRA Section 34-34.11). The volume of water taking and flow reversal at node 5 are magnitudes greater than approvable limits (if this was a direct taking requiring a PTTW).	Detail what other alternatives have been considered, for example has Birch Lake been considered as a source for supplemental water?	The volume and rate of water taking necessary to refill the open pit basin is described in Section 4.18.3.1 of the draft EIS/EA. Section 6.7.4.1 includes an assessment of the potential effects on water quantity in Springpole Lake due to the water taking required to refill the open pit basin. It was determined that a water taking a rate of 1.15 cubic metres per second over a three to five year period would not likely have detectable ecological effects on downstream aquatic habitat. Using the draft EIS/EA methodology, this was determined to have a localized, low magnitude and reversible effect. As noted in the response to Comment #3, the temporary reversal of lake movement / flow direction at the outlet of the north basin of Springpole Lake (node 5) will result in a net change in average velocities less than 0.01 cubic metres per second. This is predicted to occur over a three to five year period. Baseline hydrometric studies conducted over the 2021 and 2022 monitoring period suggest that the connection between the north basin of Springpole Lake and the remainder of Springpole Lake (node 5) did not identify a consistent directional flow, and that this section behaves as a lake, not as a riverine lake outlet. Section 5.17 of the draft EIS/EA includes an assessment of alternative water supplies for	No further comment necessary at this time. Please refer to comment #4 MECP follow-up response. (see below): FMG has provided responses to the MECP comments with the assumption that the modelling and predictions describe therein are accurate. It is important to note that predicted changes and the assertion that there is unlikely to be an ecological impact on aquatic habitat is based solely on the DFO's (2013) Ecological Flow Requirements to Support Fisheries in Canada and Locke and Paul 2013, both of which provide guidance regarding riverine ecosystems and were developed to address impacts associated with hydropower development and operation. The response from FMG specifically states that Springpole Lake (at node 5) functions as a "continuous body of water" and "…behaves as a lake, not as a riverine lake outlet". Thus, my previous comments are still valid as there are considerable unknowns with the predictions and modelling related to the re-filling of the open-pit and de-watered area behind the coffer dams. The FMG response indicates that the final EIS/EA will include a more detailed description of impacts to average seasonal water levels resulting from an average monthly ~10% water taking and the rationale for the geographic extent and duration will be provided in greater	Acknowledged			EIS Sections 5.19.3.1, 6.1, 6.7.1.2, 6.7.6, 6.10.

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				the operation of the Project, and determined that Birch Lake was the preferred location although Springpole Lake was also suitable.	detail. The FMG response has also deferred further discussion on the change in flow direction as it relates to effects on fish and fish habitat to the final EIS/EA. Since my comments have not yet been addressed, these concerns remain outstanding until they are adequately addressed in the final EIS/EA.				
MECP-SW-026	General	Due to the overprinting of the site area and associated waterbodies, the predicted decrease in upstream contributing area is not consistent with ministry policy (OWRA Section 34-34.11).		The Project has been assessed on the basis of subwatersheds which collectively are part of the Birch River watershed. The residual effect on the surface water systems due to a seasonal decrease in catchment flows from the development of Project infrastructure have been characterized as low magnitude (less than 15%), with a low geographic extent (constrained to the local study area) and is reversible at closure. The design of the water management infrastructure will meet the requirements of the provincial environmental approvals process.	No further comment necessary at this time.	Acknowledged			Not applicable
MECP-SW-027	5.8	The Draft Alternative's Assessment does not provide any consideration to potential impact to surface water regarding the location of the proposed CDF. The CDF location is located less than approximately 100 metres from surface water (Birch and Springpole Lakes) along various portions of the facility's perimeter. The CDF is bordered on all sides by Birch and Springpole Lakes. The report indicates that seepage from the CDF will be a significant contaminant load to the lake	A more thorough alternatives assessment for locating the CDF is recommended that considers potential long-term impacts to surface water. Mitigation measures must be evaluated during the EA process.	Section 4 of the draft mine waste management alternatives assessment provided in Appendix E of the draft EIS/EA, includes a subaccount for water resources and an indicator for water treatment and recycling. These were selected to consider the water quality and quantity of the alternatives during the evaluation. The preferred alternative method for the management of mine waste has been fully assessed in the draft EIS/EA, in particular for water quality and	No further comment necessary at this time.	Acknowledged			Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		basin and the lake is at high risk if there is catastrophic failure of the dams. An assessment of alternatives has not been adequately provided that considers potential short and/or long-term impacts to surface water.		quantity in Section 6.6 to Section 6.9. These sections included a summary of the mitigation measures to be implemented during the construction, operation and closure of the Project, and were considered in the assessment of potential effects.					
MECP-SW-028	4.4.1.1	Section 4.4.1.1 states that the cofferdams will be constructed to a height (freeboard) above lake level that provides protection during storm events. This is described as 5m above "average lake level" of 391 MASL.	This raises several questions that need to be addressed by the proponent, specifically: Is this proposed dam height based on long-term in-situ monitoring or modelled? Why is dam height elevation not based on maximum lake level as opposed to average lake level? What is the contingency in the event water levels downstream of the coffer dams rise beyond proposed development safety levels?	In-situ monitoring of water levels in Springpole Lake have occurred over the last 10 years. This information was used to predict the average lake level and determine the cofferdam (dyke) freeboard height, in accordance with the Canadian Dam Association and regulatory requirements. Ongoing monitoring of water levels in Springpole Lake will continue prior to construction and operation. The information will be used to verify the required dyke height and determine if a raise is required.	The FMG response indicates that the Canadian Dam Association and regulatory requirements use average lake level as opposed to maximum lake level to determine dam height safety parameters. Please provide the regulatory requirements referenced in the response to support these statements. It is strongly recommended that the proponent compare average and maximum lake levels in the EIS/EA to consider dam design requirements and to evaluate the risk of designing this critical infrastructure based on average lake levels. It is recommended that the proponent consider maximum lake levels in the coffer dam design.	To clarify, the design of the dikes will be in accordance with the Canadian Dam Association and regulatory requirements.			EIS Section 5.7.1.1.
MECP-SW-029	6.1	Section 6.10, Fish and Fish Habitat does not provide sufficient information regarding seasonal variability relative to proposed water volume/flow variation and takings with regard to pit re-filling.	More information is required regarding seasonal variability with regard to pit refilling volumes and timing.	Pit refilling volumes are based on the data collected for the Project to date, as summarized in Section 6.6.1 (Birch Lake), Section 6.7.1 (Springpole Lake, north basin) and Section 6.8.1 (Springpole Lake, southeast arm) of the draft EIS/EA. The results of the hydrometric monitoring program from 2021 to 2022 will be included in the final EIS/EA to further support the known seasonal variability in water levels in Springpole	No further comment necessary at this time.	Acknowledged			EIS Section 6.7.1, page 6.7-9

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				Lake. The information will be considered in any refinements to the available water volumes used to determine water taking rates for pit refilling. If necessary although not expected, the assessment of potential effects on surface water systems and fish habitat due to water taking will be revised in the final EIS/EA.					
MECP-SW-030	7.5.1	Section 7.5.1 indicates that a residual effect of the Project will be "a minor and seasonal decrease in catchment flows as a result of Project development and a short-term water taking during initial closure to expedite open pit filling". It further states that both are predicted to be reversible at closure. Although the proposed water taking for pit filling is reversible, this "short-term" water taking is described as a continuous taking for a 3 to 5-year period. This time frame may be substantially longer depending on climate conditions and available flow.	The proponent must consider that the pit filling stage could be limited by several factors and could result in a longer "initial closure" phase than is currently evaluated within the EA. The proponent has not evaluated the "worst-case" pit filling scenario including lack of available flow, taking only during the ice-free season (or water taking only allowable during a fish timing window), and a lower percent taking. It is recommended that the proponent predict the potential duration of the closure phase based on longer pit filling time within the EA and explain the implications of this on the extent and duration of project impacts.	Section 4.18.3.1 of the draft EIS/EA includes a summary of the controlled filling of the open pit basin. The section includes a table that provides the predicted time, using various water taking rates, to fill the basin. The water taking is considered under several scenarios, including average flow conditions as well as the 5th and 95th percentiles to represent very dry and very wet flow years.	No further comment necessary at this time.	Acknowledged			EIS Sections 6.7.1.2, 5.19.3.1, 6.10.6.1.
MECP-WS-001	1.5, page 1- 7; 6.20.1.1, Page 6-449 and 6-650; 6.20.4.3, Page 6-466; 6.20.5, Page 6-468; 4.12, Page 4-41	In the Draft EIS/EA it was stated that: – Non-hazardous wastes will be transported to existing facilities such as in Ear Falls or Sioux Lookout for disposal. – Hazardous waste will be transferred to licensed storage and disposal facilities off site. At no point in the Draft EIS/EA was there an estimation on the amount of waste that would be	In order to be able to determine that proper waste management for this project, the proponent should calculate the quantities of waste that will be created and needed to be transported to other existing facilities and have agreements in principle with these facilities/local communities to accept these wastes. Without these agreements then alternative waste disposal activities will be required to be determined and assessed as part of the EA.	It is expected that the Project will produce approximately 45,000 – 65,000 m^3 total through construction to closure. This information will be incorporated into the final EIS/EA. FMG will work with local waste facilities to determine an agreement for waste disposal.	Comment addressed What is the status of the agreement with the local communities to accept the waste from the Springpole Gold Project? These agreements need to be in place, at least in principle, as part of the consultation process within the EA. A FMG response in February 2023 states that the project will produce approximately 45,000	FMG has received confirmation from the Municipality of Ear Falls that their municipal landfill has capacity and is able to accept waste from the Project; please see attached letter. A formal Waste Disposal Agreement is expected to be put in place following a construction decision for the mine, in order to address tipping fees, which is typical for this type of Project. The amount does include the			EIS Section 6.20.1.2.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Commenter Response 2	FMG Response 3	Where Addressed
		produced over the length of the project. This was a comment provided in the Terms of Reference by Craig Fowler on September 25, 2020. There was also no agreement with either local community that they were willing to take the waste from the project.			to 65,000 m3 of waste. Does that amount include all the demolition and construction material generated during the closure phase? Does the agreement with the local communities to accept waste include demolition and construction material generated during the closure phase? Similar to the comment above, what is the status of the agreement with the local communities to accept this waste from the Springpole Gold Project?	estimated material generated during closure and the agreement with the landfill will include acceptance of this waste.			
MECP-WS-002	1.5, page 1- 8; Table 6.20- 1; 4.18.3.5, Page 4-53; 4.18.3.7, Page 4-53	In the Draft EIS/EA it is unclear during the decommissioning and closure phase whether all the demolition waste and construction material will be transported off-site.	If materials are remaining on-site then these materials will require to be disposal in an approved landfill that is issued under an Environmental Compliance Approval by the MECP.	Waste will be transported on a regular schedule, expected to be once or twice weekly during operations. Mitigation measures for the interim storage facilities were identified in the draft EIS/EA, where required for wildlife. For example, domestic solid waste products and similar materials will be properly secured and stored, particularly anything that is an attractant for scavenging wildlife. Domestic solid waste products will be transported to a landfill off site and therefore mitigating the habitat sink effect of increased predator densities that can be created due to access to landfill sites.	Comment not addressed. It is still unclear what will happen to the demolition waste and construction material during the closure phase of the Site. This is not domestic waste. It is waste such as concrete, steel, timber, etc from the demolition of the on-site buildings on operations. Very often at mining sites on-site landfills are created for these types of wastes however they need approval from the Ministry.	Waste management during closure is described in Section 4.18.3.7 of the draft EIS/EA. There is no construction and demolition landfill proposed for the Project. Therefore, the demolition and construction material generated during the closure phase will be transported off-site to an approved landfill.			EIS Section 6.20.1.2.

Table C-2.5: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
MNRF-000	Throughout	Please provide a master list of all acronyms in the EA document, which reviewers can easily reference.	A master list of acronyms in the main document will be provided in the preface to the final EIS/EA.	Not applicable
MNRF-001	Throughout	All ministry documents should cite ministry name at time of publication as cited at front of the publication. Many documents cited bear incorrect Ministry name. For instance, the MNRF did not come into use until mid-2014. The caribou Range Management Policy should be cited as "MNRF 2014" while the GHD for caribou should be cited as "OMNR 2013". Please refer to each document to know Ministry name at time of publication. Please revise in your documents and reference lists.	References will be checked for this aspect during preparation of the final EIS/EA and revision of associated document. For some older documents in appendices, this may not be practical There are a large number of references and the majority were presented in this manner.	Not applicable
MNRF-002	Throughout	Recommend the addition of line numbers to documents to enable easier commenting and revisions, and page numbers to those documents (incl appendices) that do not have them. Also, a Table of Contents is needed for each appendix, and a master Table of Contents of all files in needed at front end, to make navigation and orientation easier. It is difficult to figure out where some files/details are.	These comments will be fully considered in preparation of the final EIS/EA. Table of Contents and page numbers will be added to documents in appendices where practical. For some older documents in appendices, re-formatting is not practical. Line numbers will not be added.	Not applicable
MNRF-003	Throughout	Please provide an invasive species assessment detailing the non-native and invasive species (plant, animal & fish) present as well as an evaluation of risk and mitigation measures to prevent further introductions	The final EIS/EA will include an assessment of the potential effects from the Project introducing non-native and invasive plant and wildlife species, and used as the basis for applicable mitigation measures.	EIS Sections 6.11.1.2, 6.11.4, 6.11.5, 6.11.6, 6.12.4, 6.12.6.
MNRF-004	Throughout	The inset images of the PDA in many of the wildlife observation figures should be expanded to the east and south to show Wenesaga Road and aggregate pits since many species' observations are just immediately north of the existing road or near the end of the existing road. This project will result in increasered traffic volumes on the existing portion of the road hence it should be present in the inset images. Many of these figures are present in Sec 3.3.10 & 11, Sec 6.11 to 16, Appendix P and Appendix T, and likely in other chapters too. This is conspicuous in fig 6.14-1 where it appears the wolverine observations in the lower right corner are near no disturbance yet, they are ~1km from Wenesaga Road and the proposed aggregate pits. The aggregate pits are difficult to see on the larger scale images of animal observations.	Figures will be adjusted in the final EIS/EA to better show wildlife observations, where warranted.	EIS Section 6.14.1.2, Figure 6.14.2.
MNRF-005	Throughout	Is the preferred road route going to create a loop road? Some of the mapping appears to show connections to Slate Falls First Nation from the preferred route. Loop roads encourage further human disturbance and place pressures upon previously isolated fisheries and sensitive wildlife species. Increase traffic/access also brings in more invasive species.	No. The preferred mine access road is a single road (Figure 4.15-1). Further details regarding the mine access road are provided in Section 4.15 of the draft EIS/EA.	EIS Section 5.17.1.
MNRF-006	Throughout	Evaluations and assessments should include decommissioning new roads as part of the EA. There are numerous environmental benefits to decommissioning the main road including reducing further human pressures to fisheries and wildlife, rehabilitation of lost caribou habitat, wetlands, Provincially Significant Wetlands and other Significant Wildlife Habitat (SWH), as well as maintaining remoteness for tourism. Please undertake an assessment to the same scale as other assessments in this EA.	As discussed in Section 4.18.3.9 site roads and the mine access road will be decommissioned when no longer needed to support final reclamation, long-term management and environmental monitoring in accordance with a filed Closure Plan, or unless otherwise approved at the time of closure to be retained to support other needs. The reclamation of impacted areas within the mine site area is included in the assessment of potential effects.	EIS Section 5.19.3.9.
MNRF-007	Throughout	Terminology used to define study areas is not consistent. Chapter 3, Sec 1.1 and App P-1 (pg 1) do an excellent job of defining terrestrial study areas (PAI, LAI & RAI) yet new terms are used in App P-3 (pg 1-2; PDA, LSA, RSA) and terms inconsistent in rest of documentation and not consistent in presentations. Table 1-1 in App 3 is handy & should appear in Sec 3 once terminology reconciled. Fig 1-2 in App 3 does not even use "PDA", "LSA", "RSA" in it despite text citation on pg 1-2 saying it does. Please revise documents to be consistent and provide a glossary of study areas as well as better mapping.	Documents provided in the appendices were correct at the time of finalization and the Project has continued to evolve since that time. The methodology for defining the spatial study areas is outlined in Section 6.1 of the draft EIS/EA and VC-specific local and regional study areas are described in the relevant sub-section of Section 6.	EIS Sections 6.12.1.2, 6.1.3, 6.14.1.3.
MNRF-008	Throughout	Please use updated Enhanced Forest Resource Inventory data for the vegetation assessments. This is available periodically as the 2011 inventory is much too old and there should be more recent ones. Please use inventories from all Forest Management Units' that overlap RAI study area, and please update inventories with Annual Report depletions. The inventory data you are using appears very dated and does not provide the current context since the trees in the 2011 Forest Resource Inventory would be at least 5 years older than dated, making stand ages in this inventory +15 years out of date.	FRI is not available for approximately a third of the study area. Forestry companies have been contacted for updated disturbance information. The final EIS/EA will include a discussion of the best available information for each area used as inputs into habitat assessments. Available FRI data has been used to inform vegetation assessments at the stand scale. Far North Land Cover data has been used in some instances as it covers the entire vegetation community and wetland regional study area. Ground truthing vegetation surveys have been extensively undertaken across the approximately 30 ecosites present in the vegetation community and wetland regional study area since 2012 including 23 plots in 2012, 90 plots in 2019, 111 vegetation plots in 2021 and an additional 254 plots in 2022. This information has been used to further refine local levels of detail per ecosite.	EIS Sections 6.11.1.2, 6.11.2, 6.13.5.10, Appendix P-1.

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
			The enhanced Forest Resource Inventory (FRI) data has been used for the majority of the assessments. The only exception was the initial refuge habitat model for Boreal Caribou in 2021, which did not use the enhanced FRI data. However, the model has now been re-run using the Ontario Landscape Tool (OLT), which uses the enhanced FRI. The FRI data only exists in Project study areas within certain Forest Management Unit (FMU) boundaries, and portions of many of the regional study area fall outside the FMU boundaries. Digital FRI data is not available for areas east of Slate Falls. However, digital enhanced FRI for Trout Lake Forest, Lac Seul Forest (these are the two main ones), Caribou Forest, Whiskey Jack Forest, Wabigoon Forest and English River Forest have been extracted from the Provincial Online data (Land information Ontario). This data is being updated through ongoing discussions with forestry companies operating in the area that are able to share their data. The spatial disturbance layers are being updated for the spatial extent of the entire Churchill Range for Caribou with recent fire and forestry related disturbance data (from forestry companies willing to share it). Where feasible, annual report depletions will be incorporated into this update. This will be updated in the final EIS/EA.	
MNRF-009	Throughout	Rationale on the size of study areas/buffers for each vegetation, Provincially Significant Wetland and wildlife survey is needed. Distances appear to be arbitrary and not reflect research on zones of impact or home range sizes. The result is that the areas surveyed are questionable with regards to presumption of impacts.	Baseline study areas have evolved over the course of the period during which field programs have occurred, based on specific valued components being studied, the examination of alternatives, comments received during the preparation of the EIS/EA, and optimizations made to the Project. These are defined in the relevant baseline reports in Appendix P of the draft EIS/EA. As noted in Section 6.1 of the draft EIS/EA, the local study area for each valued component (e.g., wetlands and vegetation communities, wildlife) is based on geographic extent of the potential direct and indirect Project effects. The regional study area is based on the maximum geographic extent or zone of influence in which the potential effects are assessed and used to provide regional context to the valued component. These are further refined in the effects assessment for each valued component. The rationale for the local and regional study areas for the terrestrial valued components in the final EIS/EA will include consideration for watersheds, eco-districts, Bird Conservation Regions, traditional knowledge (when if available), or other guidance made available by government agencies pertaining to development of ecologically defined study areas. ECCC recommended, for birds, "a buffered boundary of 1 km on each side of all road routes and aggregate sources to capture expected direct and indirect impacts, and a further buffer of 2 km to provide information for areas not expected to be impacted". This will be incorporated into the local study area for the final EIS/EA. The use of ecologically defined boundaries will be evaluated for the regional study area (RSA) and will be incorporated for the final EIS/EA, based on the ECCC recommendations for watersheds and patterns in land cover. Additionally, a 10 km buffer around the project development area will be evaluated as the local study area for the final EIS/EA for the effects assessment of Wolverine and Caribou, based on MECP comments, and will be inclusive of a 500 m buffer for indirect effects. A biologically relevant RSA of 50 km has been developed for Wolverine through the recent implementation of the camera-trap survey in February 2023. The RSA for Caribou takes into account the Churchill, Berens and Kinloch Ranges, as described in Section 6.13.	EIS Sections 6.11.1.3, 6.12.1.3, 6.13.1.3, 6.14.1.3, 6.15.1.3, 6.16.1.3.
MNRF-012	Throughout	The reporting of herpetofauna is very inconsistent. Sec 3.3.11.2 of main text reports only 3 amphibians (treefrog, peeper & wood frog), yet elsewhere in App P-1 & App P-3 American toad, northern leopard frog, blue-spotted salamander, and common garter snake in the study area. Revise all herpetofauna sections to report records consistently.	The existing environment (Section 3 of the draft EIS/EA) will be updated for the final EIS/EA to take into account recent baseline terrestrial information that has been collected since the preparation of the draft EIS/EA and consistency between information in Section 3 and Appendix P will be addressed.	EIS Section 3.4.10.2.
MNRF-013	Throughout	Will the proposed dewatering of part of the lake result in flooding elsewhere on the lake? If a significant portion of the north basin lake volume is no longer available will there be increases in water level & flooding elsewhere on the lake during freshet?	Hydrometric baseline data has identified that water levels are consistent across Springpole Lake. This water level, observed in the north basin, southeast arm, and outlet of Springpole Lake are controlled by the outlet. Water levels in Springpole Lake are expected to increase by approximately 10 cm as a result of the dewatering process and increased flow (assuming an average increase in flows of 1.14 cubic metres per second). This is within the	EIS Sections 6.7.1.2, 5.7.1.2, 6.7.6.1.

<table>
<tr><th>ID</th><th>Specific Reference</th><th>Initial Comments & Rationale</th><th>FMG Response</th><th>Where Addressed</th></tr>
<tr><td></td><td></td><td></td><td>natural seasonal variability of Springpole Lake water levels, as described in Section 6.7.1 of the draft EIS/EA. This analysis will be refined in the final EIS/EA. The dewatering / pumping rate will be set so that natural lake level variation is not exceeded.

Monitoring of lake levels in Springpole Lake during dewatering will be used to assess the changes to water levels or flow as a result of construction dewatering and other mining phases. Measured flows at the Springpole Lake outlet will be compared to the WSC reference station at Sturgeon River. The specific trigger flows out of Springpole Lake will be developed during the environmental approvals phase.</td><td></td></tr>
<tr><td>MNRF-014</td><td>Throughout</td><td>Please clarify whether Wenesaga Road to Slate Falls Nation is an existing road or not and whether it's year-round or winter. On many figures it appears as permanent (Fig 1-2, Fig 3.3-15) but on others it appears as a dashed line of unclear status. This is very important to understand extent of existing disturbances, new disturbances, and access to Slate Falls Nation.</td><td>The Wenesaga Road is an existing, all-season road as described in Section 4.15:

“A two-lane, all-season gravel access road is proposed that will extend approximately 17 km from the end of the existing Wenesaga Road which ends north of the Birch River crossing to the mine site (Figure 4.15 1). The Wenesaga Road is a public road that is currently used over most of its length primarily for regional forestry activities.”

The Wenesaga Road traverses southwest of the site, and does not provide access to Slate Falls Nation. That community is accessible from the south from an existing road (Figure 1.3-1).

The dash/dot line on Figure 1.5-2 and Figure 3.3-15 are for the “Proposed 230 kV Transmission Line” per the legend on those figures.</td><td>EIS Section 5.17.1.</td></tr>
<tr><td>MNRF-015</td><td>3.1.1.2</td><td>Please clarify the size of the fires in 2011, 2019 and 2021. This is to understand magnitude of landscape disturbance as well as age of vegetation. Provide a map showing locations, size, and date of fires.</td><td>Burn areas with the project development area and the regional study area for vegetation communities and wetlands is provided in the following table and illustrated in Attachment MNRF 15

<table><tr><th>Year of Burn Area</th><th>Area burned within the Project Development Area (hectares)</th><th>Area burned within the Vegetation Community and Wetland Regional Study Area (hectares)</th></tr><tr><td>2011</td><td>126.8</td><td>17,692.1</td></tr><tr><td>2019</td><td>0</td><td>0</td></tr><tr><td>2021</td><td>359.1</td><td>475.5</td></tr></table></td><td>EIS Section 3.2.1.2</td></tr>
<tr><td>MNRF-016</td><td>3.1.10 & 3.1.11</td><td>Reporting of terrestrial survey methods and details such as dates, sites, season, etc. are inconsistent between years and methods. It's unclear what differences are between each year of surveys. Also please be consistent in terminology used to identify plots/sites/ecosites/quadrats. Please revise to consistently disclose information. Currently it's confusing or incomplete. Perhaps add summary table (i.e., pg 3-26 & 27 veg surveys: how many "plots" were surveyed in 2012 and 2021? Wetland surveys: how many wetlands were evaluated in 2012 and 2021? Wildlife section is equally confusing. Seasons/dates often missing.)</td><td>Inconsistencies are due to the evolution of the Project since 2012 and will be clarified in the final EIS/EA with the use of a summary table.</td><td>Appendix P-1, Tabe 2-4</td></tr>
<tr><td>MNRF-017</td><td>Section 3.1.10 & App P-1, Sec 2.1</td><td>2012 Vegetation Survey Methods: Please provide a more informative results section for 2012 as it's doesn't provide enough detail (see other years). Please clarify why transects were undertaken in 2012 versus targeted surveys in other years.</td><td>Section 6.11.1 includes a description of the existing conditions for vegetation communities and wetlands for the Project and uses the results of the baseline studies conducted to date. This and Section 3.1.10 will be updated in the final EIS/EA, with additional data that has been collected since the preparation of the draft EIS/EA.

Data obtained in 2011 and 2012 will be used in the context of historical data and limited to informing species presence in species lists. As such, methods used in surveys from 2012 are inconsequential and the final EIS/EA will not include these previous results</td><td>EIS Section 3.1.</td></tr>
<tr><td>MNRF-018</td><td>App P-1 (app A & B) and Sec 3.1 & 3.2</td><td>Vegetation species lists for 2011 & 2012 appear to be low in number of species and lacking in ID to species level based on what's expected there and 2019 inventories. Text should clarify that 2019 results were more robust and put more emphasis on them. The concern is about species being missed during early surveys which focused more on project footprint. The low levels of graminoids (esp. sedges and grasses) is especially indicative. Confidence level is questionable that there was</td><td>The results for the surveys in 2019, 2021 and 2022 were more robust and will be emphasized in the final EIS/EA. Data obtained in 2011 and 2012 will be used in the context of historical data and limited to informing species presence in species lists. Ground truthing vegetation surveys have been extensively undertaken since 2019, including 90 plots in 2019, 111 plots in 2021 and an additional 288 plots in 2022. This information will be included in the final EIS/EA and used to further refine local levels of detail per ecosite.</td><td>EIS Section 3.1.</td></tr>
</table>

Table C-2.5: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		sufficient coverage given that 2011 & 2012 surveys report less species than likely present. The focus of the 2011 & 2012 surveys was the mine footprint and so the site of greatest impact appears to have had the poorest quality surveys. This in turn can affect Ontario Wetland Evaluation System & Significant Wildlife Habitat Technical Guide evaluations and identification of species of conservation concern & Species at Risk. The results section in 3.1 is much too lean especially for 2012 and 2019. Total number of species within site footprint should be reported across all years as well. Where is the ELC/FEC/Ontario Wetland Evaluation System mapping of communities? This should be supplied in figures in Appendix P.	The mapping used in the draft EIS/EA included ELC/FEC/wetlands and will be updated in the final EIS/EA.	
MNRF-020	3.1.10.1	It is unknown what time of year wetland evaluations were done. Ontario Wetland Evaluation System protocol applies to threatened & endangered species but also applies to "reproductive habitat" and "traditional migration, feeding & hibernation habitat" too.	Wetland evaluations/evaluation of significance will be detailed in the updated baseline terrestrial report and Section 3 of the final EIS/EA.	EIS Section 3.4.9, Appendix P-1 Section 2.3.
MNRF-021	Sec 3.3, App P-1 Sec 3.2 & App P-3 Sec 6.2.1	Evaluated Wetlands vs Species at Risk & conservation species records: The text and Ontario Wetland Evaluation System evaluation appears inaccurate as threatened species (caribou) should trigger the wetland to be deemed a Provincially Significant Wetland per Ontario Wetland Evaluation System. Also please clarify which species at risk or species of conservation concern were present within the wetlands evaluated in Sec 3.3. There appears to be several overlaps when comparing Fig 3.3-15 to App P Fig 2.2 but the scale is pretty coarse. Per main text, Sec 3 it's surprising no species at risk or S1 to S3 species were found in wetlands given some of the species at risk/species of conservation concern identified in Fig 3.3-15 are known to use wetlands (particularly caribou, black ash, floating marsh-marigold, northern marsh violet, subarctic darner). Also, Bonaparte's gull is missing from Fig 3.3-15 but is reported in Table 3.2. Please also revise text around Ontario Wetland Evaluation System evaluations to clarify that assessment includes species of conservation concern and not just species at risk on pg 13 of App P-1. Essentially the figures, tables and text in Sec 3.3 and App P are not consistent with each other and should be reconciled. Also, the scoring in appendices of AppP-1 doesn't reflect caribou presence. Caribou records reported in App P-1 from nursery surveys and incidental ungulate indicators should inform wetland evaluations. The result of revisions should be that several wetlands are Provincially Significant Wetlands due to caribou presence (per pg 190 and 215 of northern Ontario Wetland Evaluation System manual). Write up in App P-3, Sec 6.2.1 also requires updating per above statements and evaluation in 2022 should note above.	Wetland evaluations will use information collected from the 2021 to 2023 field surveys in the updated baseline terrestrial report in the final EIS/EA. The conclusions relative to wetland significance will be updated in the final baseline terrestrial report of the EIS/EA and will include a re-evaluation of wetland categorizations based on the 2021 to 2023 data. Consistency in these evaluations will be updated in relevant section of the final EIS/EA, including Section 3.	EIS Section 3.4.9, Appendix P-1 Sections 2.3, 3.1.
MNRF-022	App P-1, Sec 3.2	It's unclear why Bonaparte's gull is mentioned in the same sentence as species at risk or provincially rare species since it's S5 and not a species at risk. Please clarify in text it's relevance.	This will be clarified in the final EIS/EA.	EIS Sections 6.12.2.4, 6.12.2.7, Appendix P-1 Section 4.2.2.
MNRF-023	App P-1 to P-3, Methods Sections	In App P 1 to 3, the vintage (year) of the data used should be specified in the methods for transparency and currency. Please add these details.	The year will be clarified in the final EIS/EA.	Appendix P-1 Section 2.
MNRF-025	App P-3 (& Sec 3.3)	Red Dung Moss should be referenced in the documentation as a species of conservation concern except in appendix P-3, Sec 5.1.4 (pg 5-25)? It should be mentioned in Section 3 and in relevant figures. It should be included in wetland scoring if found in a wetland as well (which moss sometimes are).	Section 5.1.4 of Appendix P-3 of the draft EIS/EA states that "One species of moss classified as rare (S2) in Ontario was noted: Red Dung Moss (Splachnum rubrum). This unique species grows only on the dung of ungulates in wet mossy habitats and was noted at three locations." The status of Red Dung Moss will be clarified in the final EIS/EA. All Species of Conservation Concern and SAR will be considered in wetland scoring for the 2022 results.	EIS Section 6.11.2.3, Appendix P-1 Sections 3.1.5, 4.2.2.2, 4.2.2.4.
MNRF-026	App P-3, Sec 5.1.3.1 & Fig 5-1	Recent harvest sites and burn sites (and many hydro corridors) should not be classified as anthropogenic in origin and vegetation classifications must be conducted there. Images shown in Fig 5-1 clearly show spruce dominated stands regenerated and the communities there should be classified to the extent possible based on visible communities as well as past Forest Resource Inventory data. It's inappropriate to class harvest, burn sites and hydro corridors as anthropogenic with cultural areas such as base camps, staging areas and roads. Vegetation community mapping in figs 5-1 to 5-7 should be revised to show the emerging vegetation composition present rather than dumping them into a "Disturbance" group. You possess information on the past stand composition, and the current vegetation composition is apparent at sites.	Harvest sites and burn sites have been included in the vegetation survey efforts. The cultural and anthropogenic areas will be updated in the final EIS/EA.	Appendix P-1, Figure 3-1 (a to n)

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MNRF-027	App P-1, Sec 2.3.1.1 (& Sec 3.3.11.1 main text)	In App P-1, Sec 2.3.1.1 it says only a single round of migratory bird surveys were conducted in 2018 and 2019, yet earlier in this section is says that the Ontario Breeding Bird Atlas protocol was followed for those years which calls for two rounds of surveys per season to confirm breeding evidence. Why was only one round of surveys done? Why is the clarification about only one round of surveys not detailed in Sec 3.3.11.1 of main text where again it says Ontario Breeding Bird Atlas protocols were followed? Please provide justification in both sections and revise text to reflect this and explain why only one round was done. Results from 2018 and 2019 should say that data should be considered with caution as only have the survey requirements were completed. In future two rounds of surveys should be completed without exception unless there is an emergency, and the circumstance should be reported.	Two rounds of breeding bird surveys were undertaken in 2021 and 2022 and utilized autonomous recording units (ARU). The methodology and results will be provided in the updated terrestrial baseline report for the final EIS/EA and will include species data from earlier surveys in the species list.	EIS Sections 3.4.10, 6.12.2.4, Appendix P-1 Sections 2.4, 3.2.
MNRF-028	Sec 3.1.10 & 3.1.11, App P-1 & P-3, Sec 5.3.2	What insects' surveys and incidental observations were done/reported? They were reported in presentation on July 13, 2022, but not in documentation aside from two species noted in Fig 3.3-15 of main text and a brief note in App P-3, Sec 5.3.2. Please supply more details throughout documentation.	No specific insect surveys have been completed. Documented observations are incidental during other surveys. Please refer to Appendix P-3 for the 2021 Terrestrial Baseline Report. As stated in Section 4.8 the 2021 Terrestrial Baseline Report in Appendix P-3 of the draft EIS/EA includes a description of the methods as "Additionally, during the surveys outlined above, opportunistic surveys and incidental sightings of wildlife and evidence or signs of wildlife use were recorded to further document animal use." Further, Section 5.3.2 provides the results of observed insects.	Appendix P-1 Section 3.7.3.
MNRF-029	Sec 3.3.11.1 & App P-1, Sec 2.3.1.4	Why were owl surveys only conducted in one year? Surveys should be repeated and more widespread at targeted locations. Also heading in App P-1, Sec 2.3.1.4 & 3.3.1.4 should be changed from "Raptors" to "Owl Surveys" consistent with Sec 3.3.11.1 and since owls are not generally classed as raptors.	Additional owl surveys were also conducted in 2022 but are focused on areas that are safe to access at night. Details pertaining to recent owl surveys will be provided in the final EIS/EA and the updated baseline terrestrial report. Additionally, autonomous recording units placed in 2021 and 2022 can be queried for specific owl species.	EIS Section 6.4.10.1, Appendix P-1 Section 2.4.4.
MNRF-030	Sec 3.3.11.1 & App P-1, Sec 2.3.1.6	Further efforts should be made to survey for EWPW in person and with ARUs to identity locations of bird use as well as suitable habitat, particularly inland at site footprint and along preferred linear corridors.	Baseline surveys for EWPW for the Project have significantly expanded the baseline knowledge for EWPW in both distribution and abundance of this SAR in this region of Ontario. Prior to these baseline survey efforts, there were no confirmed records of EWPW in this region. The Project is located in an area well north of the currently published range boundary for EWPW in the federal recovery strategy (MECP 2019). Previously, this species has largely been associated with mixed deciduous ecosystems associated with the Great Lakes in south and central Ontario (MECP 2019). Previous survey for EWPW occurred over multiple years between 2012 and 2019 in areas around the proposed mine footprint that were accessible in areas with the best available habitat for EPWP using autonomous recording units (ARU) and EWPW was not detected in any year. Given the lack of detections up to 2021 and the uncertainty associated with the prevalence and distribution of this SAR in the boreal region of Ontario, in 2021 EWPW surveys were significantly expanded in both spatial extent and sampling effort to attempt to detect this species in areas with no road access in a wider variety of habitats including coniferous stands, wetlands, and the mixed and deciduous stands, burn and forestry disturbed edges that occur south of the proposed Project site. This approach was successful, as the first EWPW's were detected during the baseline surveys in that year. Unfortunately, surveys had to end early in 2021 due to forest fires, however the successful collection of all deployed ARU's occurred before evacuating the site. After this successful detection in 2021, survey efforts in 2022 were then expanded even further with more than double the ARU deployments across a suite of suitable habitat types as well as vegetation surveys and mapping of these habitats. The regional study area for the Project has very limited all season road access providing limited access to the broader distribution of suitable habitat for EWPW. In addition, the logging road is not safe to survey from at night as it is narrow and logging trucks are frequently using it to transport large loads. Due to health and safety concerns with fires as well as hazards associated with logging trucks, survey were focused on less remote and less isolated areas. In spite of road access limitations, EWPW surveys were conducted in accordance with the Draft Survey Protocol for Eastern Whip-poor-will (Caprimulgus vociferus) in Ontario, December 2014)", as required by MECP, to the extent practical including timing of surveys relative to the moon phase as well as three survey periods (by having	EIS Sections 3.1, 3.4.10.1, Appendix P-1 Sections 2.4.3, 3.2.2.1.

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
			an entire month of recording), recording the start and stop times recommended, and targeting habitat defined as "relatively open, coniferous, deciduous or mixed woodlands and in forest habitats, particularly along the edges of habitats where there is exposed rock, clearings, younger forest or wetlands". In addition, and as per ECCC direction, ARUs were the recommended recording method as they allow for deployment and detection of species in areas and during times when point counts could be difficult, un-safe, or impractical for human observers to conduct. ARUs continued to be used in 2022 after their success in 2021. In 2021, ARU's were in place and recording for EWPW from June 1st to June 24tht. As mentioned, EWPW were detected in 2021 for the first time in this area. In 2022, ARUs were in place and recording for EWPW from May 7th to August 7th; capturing the Draft 2014 protocol window of May 18th to June 30th and more. ARUs were set to record 30 minutes before sunset until 90 minutes after sunset and 60 minutes before sunrise to 60 minutes after sunrise; capturing the Draft 2014 protocol window of 30 minutes after sunset and continuing while the moon is still visible as well as "If conditions are favourable, surveys may extend until as late as 15 minutes before sunrise." Surveys in 2023 are also being considered, subject to further discussion with ECCC, and ARU's will be deployed from mid- May to the end of the summer. In addition, EWPW habitat will be modelled using the vegetation and habitat surveys in 2022 as well as a Habitat Suitability Index (HSI) model that was developed in conjunction with MNRF (prior to MECP adopting the ESA program) for linear corridor EAs in Northwest Ontario. The details and resultant model surface pertaining to this HSI for EWPW will be provided in the updated baseline report and final EIS/EA. This HSI will be used to identify the distribution of all suitable habitat for EWPW in the study area, irrespective of whether the species has been confirmed in all locations with quality habitat. In addition to habitat modeling, EWPW records will be used to provide a Category mapping quantification when applicable. The final EIS/EA will be updated and include EWPW results from 2022 and 2023.	
MNRF-031	App P-1, Sec 2.3.1.6, Fig 2.3.1.6	Fig 2.3.2.16 in App P-1: icons for 2019 Active and Passive EWPW survey locations are virtually indistinguishable and colours should be more distinct.	See the response to Comment #30 regarding the 2021 and 2022 survey effort for EWPW.	Appendix P-1 Figures 2-6, 3-8a, 3-8b.
MNRF-032	Sec 3.3.11.1 & App P-1, Sec 2.3.1.5	Further description is needed on the aerial stick nest surveys as virtually none is given. Please speak to methodology/protocols used, timing of surveys, survey effort and identification methods used. Text should be like that given for ungulate aerial surveys.	Stick nest surveys were completed in 2021 during aerial surveys, and the methods and results are provided in Section 4.5.2 and 5.2.3 of Appendix P-3 of the draft EIS/EA.	EIS Section 3.4.10.1, Appendix P-1 Section 2.4.5.
MNRF-033	Sec 3.3.11.1 & App P-1, Sec 2.3.3	Why were amphibian surveys only conducted in one year and so localized to the base came? Further surveys should be conducted and more widespread in study areas, particularly along preferred linear corridors and to reconfirm past survey locations. Study was not comprehensive enough to provide an accurate inventory of the project.	Autonomous recording units (ARU) were placed in 2021 and 2022 within a wider distribution area including along linear corridors than previously conducted. ARU data will be used to determine calling amphibian presence. Details of the methodology and the results of the study will be included in the final EIS/EA.	EIS Sections 3.4.10.1, 3.4.10.2, Appendix P-1 Sections 2.8, 3.6.
MNRF-034	App P-1, Sec 3.3.1.5	Beneath Table 3.3.1.1-2 is orphan owl survey text that are already reported on pg 36 and likely a copy-paste error. Please delete owl text on pg 40.	Comment noted.	Not applicable
MNRF-035	Sec 3.3.11 Main Text & App P-1, Sec 2.3.2.2.2	Sec 3.3.11 main text: In the paragraph reporting caribou observations at various lakes please add details given in App P-1 Sec 3.3.2.2.2 for Durkin Lake and Birch River around old scat, etc. found and habitat being suitable as this should not have been omitted. Start of paragraph on caribou surveys is misleading as gives impression caribou were not found during any surveys. Please bring more attention to 92 caribou observed in 2021 as information is buried in middle of paragraph. A figure depicting all caribou records (evidence and animal) across all survey years would be informative and is likely acceptable to MECP given their direction at the July 13, 2022, meeting that coarse scale mapping is acceptable to show, but please confirm.	Additional aerial surveys for Caribou were conducted in 2021, 2022, and 2023. As well, 50 satellite telemetry collars were deployed in early February 2023. Available data will be included in the updated baseline terrestrial report for the final EIS/EA.	EIS Sections 3.4.10.1, 3.4.10.2, 6.13, Appendix P-1 Sections 2.5, 3.3.
MNRF-036	Sec 3.3.11.2 Main Text	A summary of significant wildlife habitat likely present and the strength of the findings should be included here. Also included in the moose section should be the results of the Moose Aquatic Feeding Area review of existing NHIC data (in addition to field surveys).	The environmental setting (Section 3 of the draft EIS/EA) will be updated to include information on significant wildlife habitat and further information on moose aquatic feeding areas in the final EIS/EA.	EIS Sections 3.1, 3.4.10.2.

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ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
MNRF-037	App P-1, Sec 2.3.2.2.2, Fig 3.3.2.2.4	Please clarify survey year and method shown in Fig 3.3.2.2.4 given the different ways caribou records were reported and different years.	The survey year and methods are described in Section 2.3.2.2.1 of Appendix P-1 of the draft EIS/EA.	Not applicable
MNRF-038	App P-2	Please add to list of recommended best management practices those around reducing vegetation growth that attracts alternate prey and about measures to encourage habitat regeneration such as scarifying roads, restricting vehicle access during rehab, stem planting densities and rehabbing progressively rather than at project completion, as provided in Ontario's mining best management practices for caribou per link cited.	Measures to mitigate potential effects of the Project are outlined in Section 6.11.3 for vegetation communities, in Section 6.12.3 for wildlife and wildlife habitat and in Section 6.13.3 for caribou. These measures can be further refined to show the focus will be on encouraging habitat regeneration for Caribou such as scarifying roads, restricting vehicle access during rehab, stem planting densities and progressive rehabilitation rather than at Project closure, in alignment with Ontario's Best management practices for mineral exploration and development activities and Woodland Caribou in Ontario, where feasible.	EIS Sections 6.11.4, 6.12.4, 6.13.4.
MNRF-039	App P-3, Sec 5.4.3	The last two paragraphs of this section should be revised to put more emphasis on caribou observations and evidence within and near PDA. A summary conclusion highlighting caribou use in/near PDA and LSA is needed as otherwise the text is misleading as the "No Caribou groups were detected in proximity to the mine site portion of the PDA during the survey period" sentence is what is most apparent. Please emphasize further caribou presence not absence and articulate better seasons of use especially it the quoted sentence (i.e., should say during "winter" surveys).	Additional aerial surveys for Caribou were conducted in 2021, 2022, and 2023. Further, 50 satellite telemetry collars were deployed in early February 2023. Additional details and clarification pertaining to Caribou will be provided in the final EIS/EA and the updated baseline terrestrial report.	EIS Sections 3.4.10.2, 6.13.2, Appendix P-1 Section 3.3.
MNRF-040	Throughout Sec 3.0 main text & App P-3	One comprehensive figure of caribou observations and signs is needed as it is difficult to keep track of all the records from multiple figures. Records should denote type of observation, year, and season.	As noted in the response to Comment 39, additional survey results will be included in the final EIS/EA and will include a comprehensive figure with records across all years.	Figure 6.13-3
MNRF-041	App P-3, Sec 5.4.5.2 (& Sec 3.3.11.2 of main text)	Given information provided, please add a note to the species at risk presence statement at the end of this section that Northern Myotis may be present in the project area based on records in Red Lake and uncertainty in of some detector recordings. Northern Myotis is ranked as endangered provincially and federally. The same notation should be made in corresponding section 3.3.11.2 of main text. Please revise fig 5-12 (App P-3) to clarify that the "Myotis sp." and "Unknown High-freq." pie wedges could include Northern Myotis, Little Brown Myotis and Eastern Red Bat. Info as written currently is misleading about Northern Myotis potential presence. Table 6-2 (App P-3) does say all this and so make rest of documentation consistent with that.	Northern Myotis was confirmed within the regional study area in 2022. Additional details will be provided in the final EIS/EA and updated baseline terrestrial.	EIS Section 3.4.10.2, Appendix P-1 Section 3.5.
MNRF-042	App P-3, Sec 5.4.5.3	Please provide dates on when potential hibernacula sites were surveyed, and dates/times acoustic recorders were deployed.	Bat detectors were deployed at potential hibernacula from August 26 to September 7, 2021. Specific dates monitored by each bat detector are provided in Appendix D (Bat Results) of the terrestrial baseline report in Appendix P-3of the draft EIS/EA. Eleven sites were monitored between August 27 to September 5, including: Cliff 1-4, Cliff 6, Cliff 6-control, m^2, m^2 control, m^3-1, m^3-2, m^3-6-control, M5-1, M6-1, M6-2. Two sites were monitored from August 28 to September 5, including: Cliff 2-1, Cliff 2-2. Five sites were monitored from August 28 to September 6, including: Cliff 1-1, Cliff 1-2, Cliff 1-3, Cliff 1-5, Cliff 1-6. The final site, Cliff 3, was monitored from August 31 to September 5.	EIS Section 3.4.10.1, Appendix P-1 Section 4.7.3.
MNRF-043	App P-3, Sec 5.4.5.3	Last sentence on pg 5-48 has a typo. I think "at Fc" should be deleted from "Although the slope at Fc at these sites was…". Again "at Fc" appears on pg 5-49 in row 6 (1st paragraph) and seems out of place in "The very low slope at Fc at these sites..." Review and revise please. If "at Fc" has a meaning it's not clear what that is. Appears again in 2nd paragraph in 1st & 2nd sentences on pg 5-49 as well. Perhaps this is shorthand and should be avoided	Fc is defined on page 4-23 of Appendix P-3 of the draft EIS/EA where it says: "An examination of the average slope of the characteristic frequency (Fc) of bat calls from high-frequency bats at each detector was also used to gain insight into the type of activity that occurred at each detector." The language used throughout the text is correct as it is referring to the slope of the call at a given frequency.	Not applicable
MNRF-044	App P-3, Sec 6.1, Table 6-2	the list of species at risk present or potentially present in Table 6-2 is not consistent with figures and text elsewhere in documentation. Missing species should be added (i.e., Golden Eagle, Northern Myotis).	Section 6.1 of Appendix P-3 of the draft EIS/EA states that "SAR bird species that may be documented as flyovers or vagrants in the Project Area during migration, but that have not been documented in sources thus far, include American White Pelican, Buff-breasted Sandpiper, Golden Eagle, Harris's Sparrow, Horned Grebe, Hudsonian Godwit, Peregrine Falcon, Red Knot, and Red-necked Phalarope. These species are not expected to nest or overwinter, nor to have any individual site that is important as a migratory stopover location in the Project Area. These species have not been included in the SAR screening (Table 6-2)." Inconsistencies for bats could not be found. Northern Myotis is described in the section on SAR bats as potentially occurring within the Project area. As such, Northern Myotis is present in Table 6-2 of Appendix P-3 with a designated high likelihood of occurring within the Project area. Further clarification to Section 6-1 and Table 6-2 of Appendix P-3 will be addressed in the final EIS/EA.	Appendix P-1, Table 4-2

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MNRF-045	App P-3, Sec 6.1, Table 6-2 (& Sec 3 main text)	A synopsis of the Species at Risk Habitat and likely occurrence information in App P-3, Table 6-2 should be included in Sec 3 of main text. Absence/presence is not sufficient detail to base planning decisions upon. Likely present species (high and moderate probability) should also be considered in effects and mitigation assessments. Please revise Sec 3 of main text to include this information once other updates to table are complete.	Appendix T-2 of the draft EIS/EA addresses the likely species presence and identifies species are carried forward in effects assessment, depending on the level of protection under the Endangered Species Act (ESA). It should be noted that Special Concern species do not receive protection under ESA but are protected under Significant Wildlife Habitat. The effects to SAR are addressed in Section 6.13 to 6.16 of the draft EIS/EA. The environmental setting (Section 3 of the draft EIS/EA) will be updated with more direct references to the above in the final EIS/EA.	EIS Sections 3.1, 3.4.10.2.
MNRF-046	App P-3, Sec 6.1, Table 6-2	Assessment of Black Tern in Table 6-2 is inaccurate. There are numerous records in that part of northwestern Ontario in similar habitat and it does breed at that latitude. Please revise assessment to put as High or Moderate probability of breeding in the area given Ontario Breeding Bird Atlas records, geographic distribution, and sightings in comparable habitat.	Table 6-2 of Appendix P-3 of the draft EIS/EA will be updated to consider Black Tern as moderate or high in the final EIS/EA.	Appendix P-1, Table 4-2
MNRF-047	App P-3, Sec 6.1, Table 6-2	Potential for wood-pewee should be revised given there are many records in the general vicinity in Ontario Breeding Bird Atlas and probable suitable habitat present. Rationale given is inconsistent with background records	Table 6-2 of Appendix P-3 will be updated to consider Wood-pewee as moderate or high in the final EIS/EA.	Appendix P-1 Table 4-2.
MNRF-048	App P-3, Sec 6.1, Table 6-2	Occurrence info for caribou should detail other observations made at base camp site as well as scat, etc. evidence. Section should elaborate on likely caribou usage in project area as done for other species in table.	Additional aerial surveys for Caribou were conducted in 2021, 2022, and 2023. Further, 50 satellite telemetry collars were deployed in early February 2023. Additional details, incidental observations, and clarification pertaining to Caribou will be provided in the final EIS/EA and the updated baseline terrestrial report.	EIS Sections 3.4.10.2, 6.13.2, Appendix P-1 Section 3.3.
MNRF-049	App P-3, Sec 6.1, Table 6-2	Write up on monarch habitat dwells too much on life history outside Ontario and does not delve enough into larval and adult habitat in Ontario as well as threats in Ontario. Threats are not limited to agricultural landscapes as herbicide and insecticide use in forested landscapes is also a known threat. Also potential for habitat in project area is Moderate to High given that it's highly likely suitable adult nectar sources and larval food sources are present in disturbed areas such as the base camp and linear corridors as well as natural gaps. The Ontario Butterfly Atlas (& NHIC) do show records in the region and it's just a lack of observers at the right time that accounts for more records. Please revise this section.	Table 6-2 of Appendix P-3 will be updated to consider Monarch as moderate or high in the final EIS/EA.	Appendix P-1 Table 4-2.
MNRF-050	App P-3, Sec 6.2.2.1	Waterfowl Staging Areas: please clarify exact dates of surveys and whether survey intensity and coverage were sufficient to confirm no waterfowl stopover/staging areas. It appears more work would be needed before drawing conclusions as it's not apparent whether surveys were done during migration season versus breeding season to inform significant habitat assessments.	Section 6.2.2.1 of Appendix P-3 of the draft EIS/EA, notes that the candidate is listed for the Waterfowl Stopover and Staging Areas: Aquatic –. In addition, it is listed as candidate for the surveys still being completed although it is likely as stated in the SWH screening (Appendix E). The updated baseline terrestrial report will include the additional information based on the fieldwork in the final EIS/EA.	EIS Section 3.4.10.2, Appendix P-1 Sections 2.4.6, 4.2.2.1, Table 2-1.
MNRF-052	App P-3, Sec 6.2.2.1	Colonial Nests (ground): Significant Wildlife Habitat Technical Guide criteria is "greater than" 25 gull nests and greater than 5 tern nests, not "less than". Please revise first sentence. Also, discussion in this section is very ambiguous on whether species were observed during surveys and met Significant Wildlife Habitat Technical Guide criteria. Same comment for Tree/Shrub Colonial Nesters about surveys for cormorants.	Section 6.2.2.1 of Appendix P-3 of the draft EIS/EA will be updated in the final EIS/EA to confirm that both Colonially Nesting Bird Breeding Habitat: ground and Colonially Nesting Bird Breeding Habitat: tree / shrub are listed. As noted throughout Section 6.2, the species are either documented or the record is provided from NHIC	EIS Sections 3.4.9.1, 3.4.10.2, Appendix P-1 Sections 2.4, 4.2.2, Table 2-1.
MNRF-053	App P-3, Sec 6.2.2.1	Eagle/Osprey Conc Areas: again it's "greater than" 5 individuals or 35 hunting days not "less than" for Significant Wildlife Habitat Technical Guide criteria (per colonial ground nest comment). Please revise. The conclusion should reflect the uncertainty as to whether such significant habitat exists.	The description in Section 6.2.2.1 will be updated to address the uncertainty in the baseline terrestrial report for the final EIS/EA.	Appendix P-1.
MNRF-054	App P-3, Sec 6.2.2.1	Bat Hibernaculum: Why is there no significant wildlife habitat assessment for Bat Hibernacula when the field surveys did find some indications of potential hibernacula or identify the need for further field work (per App P-3). Please add this assessment to the section.	Bat hibernacula were discussed in Section 5.4.5.3 of Appendix P-3 of the draft EIS/EA, and a significant wildlife assessment was made for bat hibernacula based on the available data (2021 data) and included in Appendix E of Appendix P-3. Confirmation of the use by hibernating bats is required to qualify the feature as SWH. The available data was inconsistent with use of the candidate hibernacula by bats. Additional data from 2022 will be evaluated to strengthen conclusions and a description on bat hibernacula will be included in Section 6.2.2 of the updated baseline terrestrial for the final EIS/EA. This section will be revised based on data collected in 2022 to assess whether bat hibernacula are candidate or confirmed within the project.	Appendix P-1.
MNRF-055	App P-3, Sec 6.2.2.2	Rock Barren: Last sentence here says that all rare plants documented were found in transmission line clearings. Species at risk and Species of Conservation Concern figures show records of plants across study areas and don't appear to correspond to transmission corridors. Please provide a clarification response and revise wording here if this is inaccurate.	Rare plants specific to rock barrens were found in disturbed communities, as noted in species lists appendices of Appendix P-3 of the draft EIS/EA. Figures showing Species of Conservation Concern do not display rock barren indicator species (as prescribed by the SWH guide). Additional descriptions will be provided in the final EIS/EA and are subject to updates based on additional fieldwork.	Appendix P-1.

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MNRF-056	App P-3, Sec 6.2.2.2	Moose Aquatic Feeding Areas: Info reported here seems inaccurate as elsewhere it says 10 Moose Aquatic Feeding Areas were mapped in 2012 and ranked level 1 to 3. Combined with desk top info that suggests some Moose Aquatic Feeding Area significant wildlife habitat present. Revise this section to include field work and provide a clearer conclusion about meeting criteria.	Section 6.2.2.2 of Appendix P-3 of the draft EIS/EA will be updated with recent surveys for Moose Aquatic Feeding Areas, and species data will be added to the appended species lists.	Appendix P-1.
MNRF-058	App P-3, Sec 6.2.2.2	Marsh Bird Habitat: please clarify whether criteria were met for this significant wildlife habitat. Also add that further field work should be taken to confirm locations/criteria. Note previous comments about need to survey more for black tern to be confident of absence as expected to occur.	Additional fieldwork has been conducted and Section 6.2.2.2 of Appendix P-3 of the draft EIS/EA will be updated accordingly.	Appendix P-1.
MNRF-059	App P-3, Sec 6.2.2	It's apparent that further, more intensive field work is needed to confirm whether any significant wildlife habitat is present and should be undertaken for those types most likely to occur.	The conclusions related to significant wildlife habitat in the draft EIS/EA are based on one year of data collection and will be updated in the final EIS/EA with additional information collected to support conclusions.	EIS Section 3, Appendix P-1.
MNRF-060	App P-3, Sec 6.2.2.3	List of species on pg 6-17 should include rank in brackets (i.e., whether they are Special Concern or their S-rank) for transparency and interpretation. Also, some species appear to be missing. Please reconcile this list against my other comments about missing species at risk and species of conservation concern comments about missing species in documentation.	Species will be updated accordingly in the final EIS/EA.	Appendix P-1.
MNRF-061	App P-3, Sec 6.2.2.3 ot 6.2.2.5	Please add a conclusion section to each section about which species/habitats are known to be present and whether this significant wildlife habitat is present as there is no interpretation in text currently. Sections are much too lean and not project specific. Speak also about the need for further field work. Also note that for Sec 6.2.2.5 Moose Aquatic Feeding Areas have been identified in the study area both through fieldwork and existing data, meaning this Cervid Corridor analysis can be further undertaken.	Additional years of surveys will update the SWH findings. An interpretation and conclusion will be added to Section 6.2.2 of Appendix P-3 of the draft EIS/EA.	Appendix P-1.
MNRF-062	App P-3, Sec 6.2.2	Amphibian Movement Corridors as Northern Leopard Frog and Blue-spotted Salamander were documented present. Please insert analysis.	Additional years of surveys will be used to update the SWH, including Amphibian Movement Corridors, and analysis.	Appendix P-1.
MNRF-063	App P-3, Sec 6.2.4	Please add an analysis of current adjacent lands and their compatibility.	Based on the significance evaluation and the confirmed features, adjacent lands will be considered in the final EIS/EA.	Appendix P-1.
MNRF-064	App P-3, Fig 6-2	Fig 6-20: it very hard to tell 'marsh bird breeding habitat" from "aquatic feeding habitat" so please change colour. These and "bat maternity colony habitat" should have a border to make them more distinguishable from lakes and rivers (as done for other habitats in legend)	Comment noted and the applicable figures will be updated for final EIS/EA	Appendix P-1.
MNRF-065	App P-3 appendices	Appendices in App P-3 need page numbers and tables in App B need titles with table numbers of some kind to make commenting on them feasible	The appendices will be updated in the final EIS/EA.	Not applicable
MNRF-068	App P-3, app B	Bird Point count tables in App B of App P-1: please put lines on tables. Definitions of Ontario Breeding Bird Atlas breeding evidence codes should be provided at start of this section to allow for interpretation of breeding codes as most will not realize that the letters in the body of the table mean.	A legend is provided in Appendix B of Appendix P-1 of the draft EIS/EA, and a similar legend will be inserted in additional locations of updated Appendix P-3 of the final EIS/EA.	Appendix P-1.
MNRF-069	App P-3, app D	Bat results: please provide dates and year of surveys in title and also clarify that these are 'bat' detectors given that other acoustic devices were used and title to App D does not appear past first page.	The additional dates and year of the surveys be updated in the final EIS/EA.	Appendix P-1.
MNRF-070	App P-3, app E	All comments made to App P-3 Sec 6.2.2 should be applied here as well.	The SWH screening in Appendix E of Appendix P-3 of the draft EIS/EA will be updated for the final EIS/EA, based on the additional fieldwork and comments received on the draft EIS/EA.	Appendix P-1.
MNRF-071	4.1	Please provide figures of lakes and topography pre-construction in this chapter. It's difficult to know extent of alternation caused by cofferdams without any "before" images.	Please refer to Section 3 (Environmental Setting) of the draft EIS/EA for figures of the current existing environment, including lakes (Figure 3.3-11) and topography (Figure 3.3-9).	EIS Section 3
MNRF-073	All of App T (& Sec 5)	Overall, the conclusions drawn within the EA do not reflect the long term and short-term impacts to terrestrial ecosystems and wildlife. It is advised that acknowledging such impacts would be more productive than dismissing them as non-existent	The assessment of alternatives presented in Section 5 and Appendix T of the draft EIS/EA, has been completed to meet the requirements of the Provincial Environmental Assessment Act and Federal Canadian Environmental Assessment Act, 2012. Section 5 and Appendix T-1 have been prepared in accordance with the methodology outlined in the approved Amended Terms of Reference to allow for a structured comparison of the alternative methods of completing the undertaking. Appendix T-2 was prepared in response to comments received from the Ministry of the Environment, Conservation and Parks during the draft EIS/EA preparation as described in Section 1.1 of that document, and details an assessment of the mine access road and transmission line alternatives in relation to Species at Risk.	EIS Sections 4, 6.2 through 6.26.

Table C-2.5: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
			Further information regarding potential long term and short term effects on terrestrial ecosystems and wildlife is presented in Section 6.	
MNRF-074	All of App T (& Sec 5)	All evaluations of alternatives need to be updated based on input provided on Sec 3 and App P-1 to P-3. Much of the species occurrence info was missing resulting incomplete assessments of habitat including those for species at risk, Provincially Significant Wetlands and significant wildlife habitat. There is more habitat and impacts to terrestrial species (incl. species at risk), Provincially Significant Wetlands and significant wildlife habitat than is accounted for in the evaluations of alternatives.	The final EIS/EA will be updated as needed to reflect comments received on the draft EIS/EA. The alternative assessments methodology is consistent with the approved Amended Terms of Reference, including in regard to the performance objectives and associated criteria / indicators (Section 5.2).	EIS Section 4.
MNRF-075	All of App T (& Sec 5)	The evaluation of alternatives does not provide a comparison the negative effects of each alternative where there are marked differences. There are negative effects to removing habitat sooner. For instance, Alt 1 means habitat and merchantable timber is removed sooner when compared to Alt 2. The evaluation tables highlight too much the benefits and don't discuss the adverse effects of alternatives enough particularly when common to multiple (but not all) alternatives.	The alternatives assessment methodology is detailed in Section 5.3 of the draft EIS/EA. The assessment of feasible alternatives has been carried out at a level sufficient to distinguish the relative merits of the different alternatives to help ensure transparency regarding Springpole Gold Project design decisions (Appendix T-1, Summary of Methodology). For each performance objective, a series of evaluation criteria and indicators were selected to assess each alternative in accordance with the methodology approved through the provincial Terms of Reference process. Where there is a material difference, the timing of habitat and merchantable timber will be included.	EIS Section 4.
MNRF-076	All of App T (& Sec 5)	Please add Fish, Wildlife, and species at risk 'Mortality' as an indicator in the assessment of alternatives. It's reasonable to expect some mortality of fish, birds, frogs, small mammals, species at risk plants and insects during operations. An evaluation of mortality should be provided.	· Distinguishable differences in mortality were considered within the performance objective: Potential effects to the physical and biological environments and the indicators: Maintenance of fish population and Maintenance of wildlife population, as appropriate.	EIS Section 4.
MNRF-077	All of App T (& Sec 5)	Please add 'Invasive Species Introduction' to the evaluation of alternative and their corresponding impacts. An assessment of potential to introduce invasive species and protection/mitigation measures should be considered particularly with the potential ramifications to fish, wildlife, species at risk and their habitat.	The potential for alternatives to have a material difference due to the introduction of invasive species will be considered during the preparation of the final EIS/EA. Should material differences be identified, they will be noted in Appendix T (and/or Section 5 if applicable).	EIS Section 4.
MNRF-078	All of Sec 5 & App T	The effects to bat prey due to dewatering Springpole Lake, removal/modification of watercourses/bodies and cutting of riparian vegetation have not been considered in this chapter. Revisions should be made, and analysis provided for those activities that involve these works.	As described in response to Comment 75, the evaluation criteria and indicators were selected to assess each alternative in accordance with the methodology approved through the provincial Terms of Reference process. The methodology includes an indicator for the area, type and quality of terrestrial habitat that would be displaced or altered for the terrestrial species and habitat criteria, as well as the area, type and quality of SAR territories or habitat that would be displaced for the species at risk criteria under the natural and biological environment performance objective. The assessment of feasible alternatives has been carried out at a level sufficient to distinguish the relative merits of the different alternatives. The preferred alternative for each component has been further assessed for potential direct and indirect effects to foraging habitat for bats due to dewatering Springpole Lake and other Project activities in Section 6.15.4.1 and 6.15.4.2 of the draft EIS/EA.	EIS Sections 4, 6.15.
MNRF-079	App T Table T1-1 (& Sec 5.4.1)	The evaluations of alternatives for Alt 2 (delay till later) does not factor in the benefits of leaving trees on the stump to mature and grow resulting in both benefits to wildlife habitat (i.e., development to mature seral stage) and forest industry. This is particularly relevant when considering availability and size of mature conifer habitat for use by birds, moose, and caribou. Please provide an analysis of this in the evaluation of alternatives.	Project Alternatives are described in Section 5.4 as required by the Federal Guidelines and will be included in the final EIS/EA : Proceed with the Project as planned; Delay the Project until circumstances are more favourable; or Abandon the Project (i.e., do nothing). Purposefully delaying the Project such that there would be additional growth/maturity in those areas previously disturbed, would not alter the level of disturbance associated with the Project. This consideration will be added to Section 5.4.1 in the final EIS/EA.	EIS Section 4.

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MNRF-080	App T Table T-1 (& Sec 5)	Please add to aquatic, terrestrial and species at risk assessment that Alt 1 & 2 provide an increase in access to the region which will result in increase recreational pressures and disturbances. This will also increase the introduction of invasive species. 'Increase in Access' and 'Introduction of Invasive Species' should be a separate indicator for the biological evaluation.	The potential for individual alternatives to have a material difference in population resulting from increased access was considered under the following indicators: Maintenance of fish population and Maintenance of wildlife populations. The potential for alternatives to have a material difference in the in introduction of invasive species will be considered during the preparation of the final EIS/EA. Should material differences be identified, they will be noted in Appendix T (and/or Section 5 if applicable).	EIS Section 4.
MNRF-081	App T Table T-1	Under Terrestrial Habitat section for 'Movement Corridors' and 'Populations' indicators please provide an analysis of how road expansion will likely enable easier wildlife movement and benefit some wildlife (moose, bear, wolves, foxes, badgers, etc.) but also increase predation risks for other wildlife (caribou, moose, etc.). Same for Species at Risk sections too.	The text descriptions provided in Table T1-7 (Detailed Assessment of Mine Access Road Routing) will be expanded in the final EIS/EA to provide additional clarity. It is for this reason in part, that a shorter road route is preferred.	EIS Section 4.
MNRF-082	Sec 5 & App T	Please add in an evaluation of alternatives that included decommissioning of new roads. All roads constructed on the land base should be decommissioned and restored following completion of works. There are many significant benefits to terrestrial and aquatic ecosystems, wetlands, and species, including Species at Risk, as well as benefits to remote tourism.	Project roads will be decommissioned as indicated in Section 4.18.3.9, and in accordance with the requirements of the Mining Act	EIS Section 4.
MNRF-083	App T Table T-1	Tourism & Recreation: Please add that increased access will decrease remoteness of area from a remote based tourism perspective.	The assessment of the criteria Tourism and Recreation in Table T-1 will be clarified to reflect that mine development and associated increased access may reduce remoteness from a tourism perspective.	EIS Section 4.
MNRF-084	Sec 5.5 main text & App T, Table T1-2	Cofferdams: Evaluation should include analysis of impacts to summer caribou use areas from evidence found on island used to for coffer dams as well as adjacent islands (see App P-1, Fig 2.3.2.2.2). Also, evaluation should factor in level of terrestrial habitat disturbance to all flora & fauna as disturbance is much higher for Alt W2 & E4 due to access during conditions/decommissioning. Preference section should be revised as well to reflect this.	Table T1-2 will be updated in the final EIS/EA as needed, to reflect material differences between the alternatives related to known caribou use in the summer, as well as potential decommissioning effects associated with access as requested.	EIS Section 4.
MNRF-086	Sec 5.7.4 & 5.8.4, Table 5.7-1 & 5.8-1	Evaluation of alternatives of rock storage & tailings should note differences in overlap with species at risk, species of conservation concern, Provincially Significant Wetlands & significant wildlife habitat as there are notable differences in alternatives. Reminder to update info first with revisions & occurrences as previously noted.	Section 5 of the final EIS/EA will be updated as needed, to reflect other comments provided on baseline conditions.	EIS Section 4.
MNRF-087	Sec 5.16.2, Table 5.16-1 vs Table T1-4 of App T	The evaluation for Natural/Bio Env in main text Table 5.16-1 is not consistent with Table T1-4 of App T. Specifically the risks of cyanide to waterfowl are missing in App T and App T reports different concerns for wildlife and SAR. Human Environment reporting is not consistent between documents either. Please ensure consistency and accurate reporting of effects for all alternative assessment table in main text vs App T.	These aspects will be reviewed during the preparation of the final EIS/EA.	EIS Section 4.
MNRF-088	Sec 5.21.2 Table 5.21-1 & App T Table T1-7	Mine Access Road Alternatives: Please clarify if a loop road is created by alternatives that join what appears to be a pre-existing road to Slate Falls First Nation and Wenesaga Forestry Road. If this creates a loop road than each alternative should reflect this and speak to the negative environmental effects to fish and wildlife as well as from a conservation enforcement perspective.	There is no proposed loop road (see Section 4.15 and Figure 4.15-1).	EIS Sections 4, 5.
MNRF-089	Sec 5.21, table 5.21-1 & App T Table T1-7	On pg 5-59 main text it says that Alternative 5 crosses more low-lying areas than Alternative 1. Yet in Table T of App T1-7 it says the reverse and quotes higher kms of wetlands crossed. Please reconcile and fix this.	The text provides a more general comment about Alternative 5 requiring crossing lower-lying areas and watercourses, which is not preferred for constructability as compared to Alternative 1, rather than referring to crossing wetlands. This text will be clarified during the preparation of the final EIS/EA.	EIS Section 4.
MNRF-090	Sec 5.25	Sec 5.25 paragraph on generators: Please generally describe the amount of sound generated from the diesel-fired generators. If noise is generated it should be discussed further in alternatives for wildlife section of Table 5.25-1 main text as done already in Table T1-10 of App T.	The relative disturbance to wildlife habitat due to noise will be provided in the final EIS/EA.	EIS Sections 4, 6.12.
MNRF-091	Sec 5.25 Table 5.25-1 main text and Table T1-10 of App T	Table 5.25-1 main text and App T Table T1-10 should speak more to the effect of turbines on bats for both wildlife and species at risk sections. Also, species at risk sections should speak more to literature around caribou avoidance of powerlines and UV light, as well as general linear corridor avoidance and how they facilitate predator movement. Overall assessment of effects of these alternatives here	Additional information on the effect of turbines will be provided in the final EIS/EA. Appendix T-2 includes further assessment on the effects to species at risk, including direct and indirect potential effects on caribou due to the transmission line routes.	EIS Section 4.

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		is inadequate for wildlife and species at risk and needs more in-depth analysis. Not enough emphasis is placed upon the massively larger area of habitat loss associated with the transmission corridor and the ramifications of that. The hydro corridor should be scored as "Not preferred" from a natural environment perspective per EA definition criteria.	An alternative is considered "Not preferred" from a natural environment perspective if it is "Likely to cause significant adverse effects to the physical and biological environments that cannot be reasonably mitigated." (Section 5.2.1.1 of the draft EIS/EA). Significance has been defined consistent with interpretation of the Canadian Environmental Assessment Act, 2012 in consideration of: ecological and social context, magnitude, extent, duration, frequency, reversibility, timing and likelihood (Section 6.1.4). "An alternative is rejected if it attains a not preferred rating for any single performance objective, with the knowledge that all performance objectives are essential." (Section 5.2.1.1 of the draft EIS/EA). While development and operation a transmission line will result in change to the existing habitat within the corridor, the vegetative root mass will be retained and vegetation will be allowed to regrow during operations, unless it poses a risk to power transfer (i.e., trees that are too tall and could cause shorting or damage from falling limbs). After the transmission line is removed, the corridor will become fully naturalized. Accordingly, the effect to the natural environment is considered not significant, and the alternative is not assessed as not preferred.	
MNRF-093	Sec 5.26 Table 5.26-1 main text & table T1-11 of App T	Further emphasis should be placed on the benefits to wetlands, wildlife, and species at risk on using the existing hydro corridor (disturbance) for Alternative 1. This should be weighted more heavily in the analysis. Please add in the amount of new disturbance created by new corridors (not widening of existing corridors) for each alternative as part of this. Tt isn't evident enough what the benefits are to the environment to using an existing disturbed area. To that end the selection of Alternative 3 over Alternative 1 appears unsupported and should be re-evaluated. I don't see how Alternative 3 merited enough weighting over Alternative 1. A further alternative should be developed that is identical to Alt 3 but routes around Slate Falls First Nation reserve proper to address concerns with Alt 3.	Additional clarification will be provided in the final EIS/EA on the amount of new disturbance as compared to. the use of existing corridors in Section 5 and Table T1-11 as applicable. Section 5 of Appendix T-2 of the draft EIS/EA includes further analysis of the alternative routes for the proposed transmission line.	EIS Section 4.
MNRF-094	Table T1-12 App T	Explosives Handling: Risk of spills and contamination during transport should also be considered under offsite manufacturing for wetlands, terrestrial habitat, and species at risk habitat. Also, the risk to spills is also present in on-site manufacturing during transport of individual components as well and should be reported for the above disciplines as well as fisheries. If the severity of impacts from spills on individual components versus manufactured explosives differs this should be detailed.	Additional information will be provided in Table T1-12 of the final EIS/EA to clarify this aspect. For onsite manufacturing, the facility will be fully contained.	EIS Section 4.
MNRF-096	Sec 5.29.2 table 5.29-1 main text and table T1-14 App T	Solid Waste Management: please add attracting nuisance wildlife & associated fatalities to Onsite Landfill as well as increased risk of wildlife collisions from an onsite landfill as these are very real things that happen with landfills. Also, a benefit of trucking off site is that is that it's not creating yet another disturbance on the landscape in the vicinity of the project. There not enough emphasis on the different level of disturbance to terrestrial landscapes and Species at Risk habitat. Please add.	Attracting nuisance wildlife was considered for an onsite landfill in the draft EIS/EA as described in Section 5.29.1. Increased risk of wildlife collisions from an onsite landfill will be considered in the draft EIS/EA. Table T1-14 will be updated to clarify these aspects. Inadvertently the text of the cells under the Terrestrial Species and Habitat criteria, potential for noise (or other harm and harassment) related disturbance Indicator between the two alternatives were reversed.	EIS Section 4.
MNRF-098	Sec 5.34, Table 5.43-1 main text & App T, Table T1-18	Mine Closure - Demolition Waste: Please provide mapping & text on the location and size of proposed onsite disposal facility. It's difficult to assess the extent of impacts without this information and imagine the arrangement relative to other facilities. Evaluation should better reflect the fact that this is another permanent disturbance on the landscape with effect to terrestrial ecosystems and loss of habitat. The preferred alternative (onside disposal facility) should be shown on site overview facility maps along with other disturbances and currently is not present. Table 5.34-1 main text & Table T1-18 App T should mention that there will be a permanent loss of habitat to terrestrial fauna, vegetation, and species at risk from the onsite demolition landfill. Plus, loss of Provincially Significant Wetland if Provincially Significant Wetland identified from my revisions.	The proposed location and scale for the demolition landfill, if any, will be provided in the final EIS/EA.	EIS Section 5.
MNRF-099	Sec 5.36	Reference to facilities remaining: Currently this whole IEA states that facilities will be removed, decommissioned, rehabilitated and/or revegetated. No where in the evaluation of alternatives is there an evaluation of facilities remaining in use and onsite. If this is an option considered it should be represented in the evaluation of alternatives for transparency during the EA process and in anticipation of approvals and permits. More thought should be invested into what's written here.	The potential for future use of the site and/or select facilities are considered potential opportunities post-operations and are not part of the Project. For that reason, they are not assessed within the EIS/EA. It has been assumed for the EIS/EA that the site and related infrastructure will be required to be decommissioned in accordance with Mining Act requirements. See also Section 4.18.3.9 of the draft EIS/EA.	EIS Section 5.
MNRF-100	Sec 5.37	An analysis of the interactions between alternatives together is needed rather than just looking at the individual components. If there's a commitment to reducing disturbance footprint the EA should	The assessment of alternatives has been completed as required by the Federal and Provincial legislation, and in accordance with the Environmental Impact Statement Guidelines (Appendix B-1 for the draft EIS/EA) and the	EIS Section 4.

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		further consider the trade offs of various alternatives together. The highest scoring alternative should not always be the winning alternative where there's benefits to other alternatives and they are viable. Also figures should be included that show all the preferred alternative/facilities together as not everything is apparent on current figures (i.e. water intake, dewatering outlet, demolition dump, aggregate pits, etc.).	approved Amended Terms of Reference (Appendix B-3 of the draft EIS/EA), whereby an assessment of alternative methods is required. It is not practical to analyze all of the potential interactions between all of the alternatives being assessed. The alternatives assessment methodology provided in Section 5.2.2, was described, consulted upon and approved through the Provincial Terms of Reference process. The approach utilized relies on a comparative evaluation of the overall advantages and disadvantages of an alternative as demonstrated through the performance descriptions (that is, whether an alternative is preferred, partially preferred or not preferred for each performance objective). Using this method, the alternatives are given an overall evaluation taking into consideration the assessment for all of the performance objectives. The order of sections describing the alternatives assessed (Section 5 of the draft EIS/EA) and the project description which presents the preferred alternative (Section 4 of the draft EIS/EA) will be reversed in the final EIS/EA. The use of scoring, or the selection of the preferred alternative based on which received the greatest number of preferred ratings, was purposefully not used, as it can result in false findings when intuitively it is clear that one alternative better minimizes adverse impacts and meets Project requirements.	
MNRF-103	Sec 6.11 to 6.16	The evaluation of impacts, mitigation and residual effects should include all feasible road, hydro corridors, and aggregate pit alternatives in the assessment, not just the preferred. Perhaps a subsection can be added about the other alternatives that were highly ranked and still under consideration to each discipline chapter.	The assessment of alternative routes for the mine access road, transmission line routes and locations for aggregate sources, has been completed as required by the Federal and Provincial legislation, and in accordance with the Environmental Impact Statement Guidelines (Appendix B-1 for the draft EIS/EA) and the approved Amended Terms of Reference (Appendix B-3 of the draft EIS/EA). The assessment of these Project components can be found in Section 5.21 (Mine Access Road Routing), Section 5.26 (Transmission Line Routing) and Section 5.28 (Aggregate Supply).	EIS Sections 6.14.1.2, 5.21, 5.26, 5.28, Appendix T.
MNRF-104	Sec 6.11 to 6.16	The current proposed mitigation measures where habitat loss or wildlife/plant mortality is likely is insufficient overall. More rigorous means are needed to attenuate noise, reduce linear corridor fragmentation, address changes in wildlife use associated with linear corridors, address greater fragmentation of habitats overall (= reduction of interior habitat), control invasive species and regenerate habitat. More specific actions of a higher caliber should be supplied for the mitigation and rehabilitation of habitat. Rehabilitation/regeneration of habitat should be explored more in-depth in the documentation with metrics on how successful regeneration will be measured with concepts such as stem densities, vegetation community composition numerically and consistent with adjacent communities.	The removal of vegetation due to the Project is assessed in Section 6.11, and with the identified mitigation measures, the residual effects are not significant. As a result, no further mitigation is considered necessary. The loss of habitat is assessed in Section 6.12 for wildlife, Section 6.13 for caribou, Section 6.14 for wolverine, Section 6.15 for SAR bats and Section 6.16 for SAR birds. The assessment takes into consideration the mitigation measures identified in these sections and has determined that the residual effects are not significant, and therefore no further mitigation is required. Monitoring programs will be implemented to verify the accuracy of the predicted effects, assess the effectiveness of the implemented mitigation measures, and may be further optimized in response to monitoring data. Section 4.18 of the draft EIS/EA provides a description of the conceptual closure plan, that will be further developed during the permitting phase.	EIS Sections 6.14.1.2, 6.14.6.1, 6.14.6.3.
MNRF-106	Sec 6.11.2.2	To the vegetation indicators please add one about introduction of invasive species. Also please add metrics to measure the success of regenerating areas.	Section 6.11.2 of the draft EIS/EA includes a measurable parameter for the relative abundance of vegetation communities, however measure(s) to mitigate the introduction of invasive species to the Project Development Area will be included in the final EIS/EA. Monitoring programs will be implemented to assess the effectiveness of the implemented mitigation measures, including the success of regenerating areas.	EIS Section 6.11.
MNRF-107	Sec 6.11.3	The presumption is made that current commercially available native seed sources are available that have a composition suitable for this part of Ontario in the mitigation section. Please provide more information on the species composition of mixes relative to the native vegetation species composition of the LSA. Furthermore, plantings of trees and whole sod/clump transfers are a more effective means of regenerating native vegetation. Please include other re-vegetation methods aside from see mixes in analysis. Topsoil removed for construction should be stock-piled in such a way to maintain viability of seeds in the soil and then soil should be applied to regenerating areas.	These recommendations will be further considered for application at the Project, and refinement of the re-vegetation methods. Relevant details will be included in the final EIS/EA.	EIS Section 6.11.
MNRF-108	Sec 6.11.4.1, 6.11.4.3 & 6.11.5	These estimates of vegetation community disturbance are questionable. The percentage area should be by total footprint of the preferred alternative and not LSA as the LSA includes areas of alternatives	The total area for each vegetation community cover type removed within the Project Development Area is included in Table 6.11-6. These values are compared to the amount within the Regional Study Area (RSA) and	EIS Section 6.11.

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		not selected (Fig 1-2). The percentage loss estimates are misleading. Also, the estimate of forested area is doubtful as clear-cuts and fires were classed as 'disturbances' in your vegetation classification rather than as forested hence massive forested areas are omitted. Also, the numbers here are based on outdated Forest Resource Inventory and Far North Data that is too coarse. Please revise numbers here. This comment should also apply to Sec 6.11.4.3. Sec 6.11.5 evaluations should be redone given the higher disturbance than represented currently. The scoring of Level 1 for Magnitude (upland & wetlands) as well as the overall score now appears unfounded.	provides context to the characterization of the residual effects for the change in vegetation cover types. The majority of the changes in vegetation and wetland cover type at the regional scale are less than 3.2%, with the exception of sparse treed (5%) and bedrock (5.1%). As a result, the magnitude of the residual effect is considered to be low (Level I), and the resulting change is unlikely to affect the long-term viability of the vegetation community. FRI is not available for approximately a third of the study area. Forestry companies have been contacted for updated disturbance information. The final EIS/EA will provide a discussion of the best available information for each area used as inputs into habitat assessments. The updated disturbance information will be used to update the changes in cover types, and the results incorporated into the final EIS/EA.	
MNRF-109	Sec 6.11.4.4	Please add a clarification statement at end of 1st paragraph that although changes may be mostly from construction and operation phase, they might not be fully apparent until years later and that some impacts will occur during decom/closure phase as well.	The construction and operation phase will occur over a 15-year period. The effects to vegetation communities due to changes in flows would be expected to occur within that period.	Not applicable
MNRF-111	Sec 6.12	Please add significant wildlife habitat identified in comments for Sec 3 & App P	This will be addressed in the final EIS/EA and the updated terrestrial baseline report.	EIS Section 6.12, Appendix P-1.
MNRF-112	Sec 6.12	Please add an analysis of the impacts, mitigation, and residual effects of dewatering Springpole lake upon shorebirds, waterfowl, colonial nesting birds and raptors that feed upon fish and aquatic insects and other invertebrates.	Section 6.12.4.1 of the draft EIS/EA considers the effects of dewatering the open pit during operation as an indirect effect on wildlife habitat.	EIS Section 6.12.
MNRF-113	Sec 6.12.2.2 & Sec 6.12.4.1 & 2	To the wildlife indicators please add one about introduction of invasive species. Also please add metrics to measure the success of regenerating areas. Also add a metric about the increased edge effect (habitat change) and increase in linear corridors (avoidance, increase forage, increase predator movement). Then add to analysis in Sec 6.12.4.1 & 2.	Invasive plants are being considered in the effects assessment section for vegetation communities and wetlands in the final EIS/EA. There is no reasonable expectation that invasive wildlife species could be introduced to the local study area for wildlife due to the Project. Increased edge effect (habitat change) and increase in linear corridors (avoidance, increase forage, increase predator movement) are considered under Section 6.12.4.1 of the draft EIS/EA, as indirect effects on wildlife habitat.	EIS Section 6.12.
MNRF-115		The conclusion that increased predator movement and impacts to prey (moose & caribou) from new linear corridors is "negligible" is unfounded. There is substantial documentation around significant increases in rates of movement and hunting efficiency of wolves following installation of new linear corridors. Please revise this statement.	The effects assessment section for wildlife will be revised in the final EIS/EA to reflect the increases in rates of movement and hunting efficiency of wolves following installation of new linear corridors.	EIS Section 6.12.
MNRF-116	Sec 6.12.5	The scoring of Level 1 for Magnitude (wildlife habitat) as well as the overall score is inaccurate as there will be changes in distribution and abundance.	The definition of the Level I magnitude criteria is a measurable effect to the abundance and/or distribution of wildlife or wildlife habitat that would not change the status of the local wildlife populations or availability of unique habitats. While the Project is predicted to displace wildlife from the Project Development Area, the displacement is not predicted to change population persistence or availability.	Not applicable
MNRF-117	Table 6.12-1	Table 6.12-1: please clarify how these habitat preferences were derived and what documentation it's based upon.	The derivation of the habitat preferences will be clarified in the final EIS/EA.	EIS Section 6.12.
MNRF-118	Table 6.12-3	Table 6.12-3: please clarify how buffers were developed and what documentation it's based on. Update with significant wildlife habitat revision in Sec 3 & App P.	Additional clarification on buffers will be provided in the final EIS/EA.	EIS Section 6.12.
MNRF-119	Sec 6.13.3	Mitigation measures following mine closure should include decommissioning and revegetation of all road networks as well as barriers to impede predator, alternate prey and 4x4 vehicle access. Regenerated vegetation should be planted & tended in such a way to favour development of caribou habitat, consistent with adjacent vegetation communities and reduce alternate prey browse. Road rehabilitation will significantly reduce the footprint of habitat loss. Mitigation measures should also include control and removal of invasive species during operations and following closure.	As noted in Section 6.13.3 of the draft EIS/EA, Caribou habitat features are proposed to be included in the development of the Closure Plan, where feasible, and include consideration for the measures outlined in the Best Management Practices for Caribou. This may include scarifying roads to encourage habitat regeneration for Caribou, restricting vehicle access during rehabilitation, revegetation with appropriate stem planting densities and rehabilitating progressively rather than at Project completion.	EIS Section 6.13.
MNRF-121	Sec 6. 14.2.2. & 6.14.5	Please add a metric to assess the change in prey populations and habitat to wolverines from the proposed works and resulting impacts to wolverines themselves.	A wolverine program commenced in January 2023 to support the final EIS/EA and future ESA permitting. The intent is to collect baseline information, such as: Demographics/demography (sex, age, structure) Occupancy/population density	EIS Sections 6.14.1.2, 6.14.5.3.

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			Habitat use, dispersal Areas of concentration/activity centres Besides providing information on Wolverine ID, sex, and genotype, the cameras and hair snags can potentially provide data on familial relationships, effective population size, dispersal patterns from DNA, survival rates in multi-year studies, lactation in females, centres of activity, population density using capture-recapture models, and behavioural information such as association of individuals based on the date and time stamp on photographs. The wolverine program will inform the effects assessment for wolverine in the final EIS/EA.	
MNRF-122	Sec 6.14.2.4, 6.15.2.4 & 6.16.2.4	The 120m zone of influence distance is not provided in the Stand and Site Guide for wolverines, bats, birds or anywhere else in the document. Please provide better supporting rationale for this distance and consult further on it with MNRF & MECP.	The local study area (LSA) is intended to capture potential direct effects from the Project (such as habitat loss) and indirect effects (such as sensory disturbance) resulting from the Project. Direct effects could only occur within the project development area (PDA), however indirect effects could extend beyond the PDA. As a result, the LSA will be considered instead of a zone of influence.	EIS Sections 6.14.1.2, 6.14.5.
MNRF-123	Sec 6.15.2.2.	Bat effects indicators should include an analysis of effects to food sources due linked to the loss of aquatic habitat of aerial insects that have an aquatic larval stage. Many bats feed on flies, mosquitoes, mayflies, beetles, midges, etc. that have an obligate aquatic larval stage and this project proposes the loss of a significant basin of Springpole lake as well as the removal or modification of several wetlands and watercourses/bodies or riparian habitat. Please provide an in-depth effect upon bat food sources.	Section 6.15.4.1 of the draft EIS/EA includes an assessment of the direct loss of foraging habitat for SAR bats, and Section 6.15.4.2 includes an assessment of the indirect effects on foraging habitat. Given the relatively small area of foraging habitat directly lost (0.4% of the regional study area), along with the availability of alternate foraging habitat adjacent to the Project, residual effects are not predicted.	Not applicable
MNRF-124	Sec 6.15.3	Bat mitigation should be revised to put a set back distance around any potential hibernacula and not require confirmation of hibernacula. Given there are only a few potential locations, it's reasonable to just apply buffer to any that have attributes of a hibernacula.	This section will be revised to include a set back distance around any potential hibernacula.	EIS Section 6.15.
MNRF-126	Fig 6.15-2 (& Sec 6.15.4.1)	Fig 6.15-2 does not illustrate the location of potential hibernacula as mentioned in the first sentence in Sec 6.15.4.1. Please revise figure to better illustrate where Cliff6 is and how it will be lost to the project and further clarify why Cliff6 will be lost in text. Also clarify what the impacts will be to other suspected hibernacula along the preferred alternatives in this section.	Mapping of potential hibernacula will be updated and additional information on the potential effects to hibernacula will be updated in the final EIS/EA.	EIS Section 6.15.
MNRF-127	Sec 6.16	Please add an analysis of the impacts, mitigation and residual effects of dewatering Springpole lake upon barn swallow, eastern whip-poor-will, common nighthawk, rusty blackbird and bald eagle diet as they feed upon aquatic insects and other invertebrates, adult insects with an aquatic larval stage or fish. Discuss more the diet of these species as well in Sec 6.16.1.1 to 6.16.1.7. This is absent from this chapter and needed.	Section 6.12.4.1 of the draft EIS/EA considers the effects of dewatering the open pit during operation as an indirect effect on wildlife habitat. Additional analysis and discussion of this impact will be provided in the final EIS/EA.	EIS Section 6.16.
MNRF-128	Sec 6.16.3	Timing window given is inappropriate for bald eagle. Generally, March 1 to Aug 31. Please consult further with MNRF & MECP.	This will be revised in the final EIS/EA, in accordance with consultation with MECP and MNRF.	EIS Section 6.16.
MNRF-130	Sec 6.16.5 Pg 6-363	Residual Effects analysis is missing for other terrestrial fauna with the Attribute/Category table and analysis of Level I, II & III write up for each attribute? Please insert analysis consistent with planning approach for other wildlife.	With the implementation of the mitigation measures in Section 6.16.3 of the draft EIS/EA, there is not predicted to be residual effects on SAR birds. As a result, a determination of the significance using the attributes is not warranted. In the event that new information on SAR birds changes the assessment of residual effects, the need for a characterization of residual effects for SAR birds will be re-evaluated for the final EIS/EA.	EIS Section 6.16.
MNRF-131	Fig 6.16-1	Fig 6.16-1: Marsh bird breeding habitat can be inconspicuous and hard to see. Please fix. I made a similar comment for figure in App P-3	This will be adjusted for the mapping in the final EIS/EA and the updated baseline terrestrial report.	EIS Section 6.16, Appendix P-1.
MNRF-132	5.5-2	Table 5.5-2 indicate that the biological impact will be equal for all three Cofferdam alternatives E1, E2 and E3. This is inaccurate, E1 would have the smallest amount of loss of fish habitat from dewatering while E2 and E3 would have progressively more loss of fish habitat. Making E1 the preferred option for Natural/Biological Environmental category.	Alternatives E1, E2 and E3 are comparatively similar (dewatered area of 1.2, 1.4 and 1.5 hectares) and assessed as Preferred, while Alternative E4 affects a considerably larger area (2.8 hectares) and was assessed as Partially Preferred. The assessment of alternatives in Table 5.5-2 is in accordance with the methodology provided in Section 5.2 and is considered appropriate.	Not applicable

Table C-2.5: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

<table>
<tr><th>ID</th><th>Specific Reference</th><th>Initial Comments & Rationale</th><th>FMG Response</th><th>Where Addressed</th></tr>
<tr><td>MNRF-133</td><td>5.7-1, pg. 5-21</td><td>It would also be worth including what other terrestrial values would be directly impacted by this waste rock storage location.</td><td>Further clarification is requested regarding this comment, as it is unclear which waste rock storage location is being referred to. Table 5.2.1.1 of the draft EIS/EA provides a description of the terrestrial values that were considered in the assessment of mine rock storage locations. The specific values that are included in Table 5.7.1 only include the differentiating criteria/indicators that are different amongst the alternatives considered. A detailed assessment of the terrestrial values in included in Section 6 of the draft EIS/EA for the preferred location.</td><td>Not applicable</td></tr>
<tr><td>MNRF-134</td><td>5.8, pg. 5-24, 5-26</td><td>As identified previously, please include terrestrial values that may be directly impacted by these tailings' storage location.</td><td>The level of information provided is intended to provide for comparison across alternatives, as per Section 5.2.1. Appendix E of the draft EIS/EA includes the Mine Waste Management Alternatives Assessment, in accordance with the Guidelines for the Assessment of Alternatives for Mine Waste Disposal (ECCC 2016[1]). Section 4 of this report describes the Sub-accounts and indicators, including terrestrial values, used to evaluate the various alternatives and provides a rationale for their inclusion.</td><td>Not applicable</td></tr>
<tr><td>MNRF-135</td><td>5.19-1</td><td>Please include the distances of pipeline/corridor that will have to be created that will not already be associated with other existing linear features (i.e., roads, utility lines).</td><td>This information will be provided in the final EIS/EA.</td><td>EIS Section 4.</td></tr>
<tr><td>MNRF-136</td><td>6.10.4.1

Pg. 6-221</td><td>Bullet one, can you specify what percentage of the deep basin will be altered. It may also be beneficial to identify what percentage of overall "deep basin" habitat this would be.</td><td>Depending on the final pit design, upwards of 70% of the existing deep basin greater than 12 m in depth shown in Basin NB01 (Attachment 136) will be permanently altered with the remaining being disturbed but not permanently altered in depth. An overall summary of deep basins throughout the lake is provided below. Taking into account the dewatered basin compared to the remaining lake, approximately 87.5% of the lakes area greater than 12 m in depth would be retained until the dewatered basin can be reclaimed. Recognizing that the three most northerly basins (NB01, NB02, and NB03) are deeper and provide important Lake Trout and Lake Whitefish habitat, with the removal of NB01 approximately 75% of this important habitat will remain throughout project life.

Summary of Deep Basin Areas (Greater than 12 m)
<table>
<tr><th>Basin Number</th><th>Total Area greater than 12 m depths (ha)</th><th>Area permanently altered by project (open pit)</th></tr>
<tr><td>Basin 1(NB01)</td><td>63.1</td><td>100%</td></tr>
<tr><td>Basin 2(NB02)</td><td>84.8</td><td>0%</td></tr>
<tr><td>Basin 3(NB03)</td><td>109.2</td><td>0%</td></tr>
<tr><td>Basin 4 and 6 (NB46)</td><td>112.6</td><td>0%</td></tr>
<tr><td>Basin 5 (EB05)</td><td>136.3</td><td>0%</td></tr>
<tr><td>All Basins Combined</td><td>506.1</td><td>12.5%</td></tr>
<tr><td>Deep Basin Area Remaining</td><td>442.9</td><td>87.5%</td></tr>
</table></td><td>Not applicable</td></tr>
<tr><td>MNRF-137</td><td>6.10.3

Pg. 6-220</td><td>There is a lot of information provided on potential effects of sedimentation entering water features. Can you please provide some specific details on water quality buffers that will be implemented within the PDA.</td><td>Where possible a vegetated buffer of 120 m has been retained between site facilities and the adjacent lakes. Exceptions are areas where the lakes are intersected by site infrastructure and will require fisheries compensation (i.e., the open pit), road, pipeline and transmission line crossings and water intakes and discharge points. In addition to vegetated buffers, standard erosion and sedimentation control measures will be implemented throughout the site during construction such as physical sediment barriers, sedimentation ponds and ditches. A detailed Erosion and Sedimentation control Plan (ESCP) will be developed for the site during the environmental approvals phase prior to construction.</td><td>Not applicable</td></tr>
<tr><td>MNRF-138</td><td>Pg. 6-225</td><td>It is stated, "no predicted regional change in fish community structure".

What are the predicted effects to the lake fish community structure?</td><td>Additional fisheries and aquatic data were collected for the entire Springpole Lake and the proposed dewatered basin during 2022. This included a full lake broadscale monitoring program, ongoing lower trophic level studies, a lake-wide hydroacoustic fish community survey, and multiple eDNA metabarcoding surveys.

The additional data, in combination with previously collected aquatic data increases the confidence that although the fish habitat present in the isolated basin of Springpole Lake is important and encompasses one of six deeper water basins in the lake, the majority of the Springpole Lake area (94% area and 91% volume) will remain capable</td><td>EIS Section 6.10, Appendix O (all).</td></tr>
</table>

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
			of sustaining all fish species and all life functions present in the lake. The data collected from 2022 demonstrate that the remaining deep-water basins and lake areas support comparable, and in some cases, greater numbers of fish than the isolated basin. Detailed lower trophic studies (phytoplankton and zooplankton) presented in Appendix A2 of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA), show comparable primary resources in the six deep water sample stations in Springpole Lake and two stations in Birch Lake, and a high degree of similarity between the three most northern stations in the north basin of Springpole Lake. Removing 6% of the lake area, and one of the deep basin habitats is not expected to alter or imbalance the remaining lake's primary or secondary communities or the way the existing fish community interacts with them. The data further confirms our understanding that conditions in the isolated basin that are not unique to only that portion of the lake, and its isolation would not prevent the remaining lake from continuing to function as it does now. A summary of the findings of the broadscale monitoring results and the hydroacoustic program are provided as Attachment FH-08-1 and full results will be provided in the final EIS/EA.	
MNRF-139	6.10.5	There is not enough information provided to state there will be no predicted residual effects to fish and fish habitat. It is likely that you will see both significant and residual effects to the lake trout population in Springpole lake because of the destruction of critical habitat, and those need to be properly considered.	Based on the data collected in 2022, as described and summarized in the response to Comment 138 and included in Attachment FH-08-1, the habitat in the isolated basin is important but not unique only to that basin. Lake Trout habitat and specifically summer refugia habitat will be decreased, but the remaining lake will continue to support all resident species including Lake Trout during the Project and until the isolated basin is reconnected to Springpole Lake. In the context of environmental assessment, the final approved fish habitat offsetting and compensation plan once implemented will mitigate the impacts to fish and fish habitat and as such there will be no residual effect.	Not applicable
MNRF-140	3.6.1.1	Can you please provide more detail on how you calculated optimum and useable habitat volumes you refer to in this section as well as any relevant references.	The protocol for calculating the Mean Volume Weighted Hypolimnion Dissolved Oxygen Concentration (MVWHDO) is described by the Ministry of Natural Resources in the Eastern Region Guideline for Calculating the Mean Volume Weighted Hypolimnion Dissolved Oxygen Concentrations (MNWHDO) (MNRF, 20181). Values were calculated by using estimated volume by 1-metre depth intervals for the basin locations and temperature/dissolved oxygen (DO) levels taken from water quality profiles collected between the 15th of August and 15th of September. Optimum habitat for Lake Trout is defined as the volume at 10°C (optimal growth temperature) and a minimum of 6 milligrams per litre (mg/L) DO, whereas useable habitat is defined as the volume up to 15°C and at least 4 mg/L DO. 1 Ministry of Natural Resources. (MNR). 2018. Eastern Region Guideline for Calculating the Mean Volume Weighted Hypolimnion Dissolved Oxygen Concentrations (MNWHDO). Version 1.0 January 2018	Not applicable
MNRF-141	3.6.1.1	It would be beneficial to provide a measure of how much optimal and useable habitat will be lost by the creation of the pit area and the coffer dams.	A summary of the basin areas and what percentage of the deep basins will be temporarily lost and retained is provided in our response to Comment 136. A description of the percent optimum and usable habitat for six Springpole Lake basins and the two measured Birch Lake basins are provided in Sections 3.6 and 3.7, respectively, of the 2021 Aquatic Resources Baseline Report Appendix O-3 of the draft EIS/EA).	EIS Section 3, Appendix O (all).
MNRF-142	3.6.1.2	If possible, please try to confirm the use of the potential lake trout spawning habitat in the southeastern arm of Springpole Lake. Potential spawning habitat does not equate to actual spawning habitat.	In response to a similar comment by Fisheries and Oceans Canada on previous baseline reporting, a GIS analysis of the entire lake was completed to delineate candidate spawning areas for Lake Trout, Whitefish and Northern Pike, based on water depth, and inferred substrates and vegetation. Candidate spawning habitat is shown in Appendix A of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA).	Appendix O (all).
MNRF-143	3.6.2	MNRF still recommends completing a Broadscale Monitoring project on Springpole Lake to get an appropriate measure of the status of the fishery in Springpole Lake.	Feedback provided by MNRF as a result of their review of the previous baseline reports was appreciated and implemented during 2022 field programs. A full lake broadscale monitoring (BsM) program was completed on Springpole Lake following standardized provincial protocols; but was modified to address the request from the MNRF to reduce the number of deep-water net sets in the 12 m to 35 m strata and to increase the number of net sets in the 1 m to 12 m strata. A summary of the results are provided as Attachment FH-08-1 and full results will be provided in the final EIS/EA	EIS Section 3, Appendix O (all).

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MNRF-144	4.2 Pg. 4-2	The fifth bullet under this header specifies "...although the dissolved oxygen and temperature data suggest some potential limitations for use during the summer months when referencing spawning habitat" There is no use of spawning habitat in the summer months regardless of temperature and dissolved oxygen, please re-phrase.	With respect to Section 4.2 of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA), it is agreed that there would not be spawning considerations for Lake Trout during the summer months.	Not applicable
MNRF-145	6.11.5	Please describe in more detail why reversibility was assigned a level II. Can you describe what will be re-vegetated and what may not be and what methods are expected to be used.	Additional details of the re-vegetation methods will be provided in the final EIS/EA.	EIS Section 6.11.
MNRF-146	6.12.2.1	Worth noting the that operation of the mine access road will increase accessibility to the area and subsequently increased pressure from hunting from the public.	As noted in Section 6.18.4.2 of the draft EIS/EA, potential increases in recreational hunting by Project personnel will be mitigated by prohibiting hunting while onsite within the gated access portion of the project development area.	EIS Sections 6.18, 6.21.
MNRF-147	6.12.2.1	The third bullet states that these activities would only result in the indirect alteration of habitat. This is not substantiated by the evidence.	Site preparation activities to support the development of the features noted in the third bullet will result in the direct loss of wildlife habitat, which has been assessed in Section 6.12.4.1 of the draft EIS/EA. Further, indirect alteration of wildlife habitat due to edge effects and sensory disturbances for these features in assessed in Section 6.12.4.2.	Not applicable
MNRF-148	6.12.2.4	Can you please elaborate further on why 120m was chosen as a zone of influence, there is nothing in the Stand and Site guide that references this is as a standard for which effects in adjacent lands are measured.	The local study area (LSA) is intended to capture potential direct effects from the Project (such as habitat loss) and indirect effects (such as sensory disturbance) resulting from the Project. Direct effects could only occur within the project development area (PDA), however indirect effects could extend beyond the PDA. As a result, the LSA will be considered instead of a zone of influence.	Not applicable
MNRF-149	6.12.3	Please provide more detail on fifth bullet that speaks to implementing buffers. Where specifically will these buffers be applied? What kind of buffers will they be (prohibit all work? Timing related buffers? Etc.)?	Further details on the buffers are found in Table 6.12-3 of the draft EIS/EA, and describes the buffer size, intent and timing for implementation.	Not applicable
MNRF-151	6.12.4.1 Pg. 6 -268	I realize table 6.12-4 also characterises loss in terms of the LSA but please also include this in this section as well instead of just loss in reference to the RSA geographical area.	The local study area is the area where direct and indirect effects are anticipated. The regional study area is provided for regional context. A comparison of the direct loss of habitat within the Project development area to amount of habitat available at a regional scale, provides the appropriate context to the understanding and interpretation of the potential effects on wildlife habitat.	Not applicable
MNRF-152	6.12.4.3	The third paragraph states the increased predation from wolves is expected to have negligible effects on moose. Can you please elaborate further on how this increased predator efficiency will be negligible.	The increase in rates of predator movement and hunting efficiency of wolves following the development of the new linear corridors will be further described in the final EIS/EA.	EIS Section 6.12.
MNRF-153	6.12.2.1	The fifth bullet should indicate the definitive loss of wildlife habitat associated with the change in water management and the change in hydrology associated with draining the lake.	Section 6.12.2.1 of the draft EIS/EA includes a list of potential effects on wildlife and wildlife habitat due to various activities during all phases of the Project, without the application of mitigation measures. These are further assessed in Section 6.12.4.2, in the context of applicable mitigation measures that would reduce effects.	Not applicable
MNRF-154	6.12.4.3	The final sentence states there will be no residual effects on wildlife and wildlife habitat but the previous 3 paragraphs state effects on wildlife and wildlife habitat. Please reconcile this.	– Section 6.12.4.3 of the draft EIS/EA provides an assessment of the potential risk of mortality to wildlife due to the Project. However, with the implementation of the mitigation measures outlined in Section 6.12.3, it was determined that the potential effects would be fully mitigated and therefore, no residual effects are predicted. These mitigation measures include: During all phases of the Project, all domestic solid waste products and similar materials will be properly secured, stored, and disposed at an offsite licensed facility, particularly anything that is an attractant for scavenging wildlife. All domestic solid waste products will be transported to a landfill off site and therefore mitigating the habitat sink effect of increased predator densities that can be created due to access to landfill sites. Enforce reduced speed limits along Project-controlled roads within high quality wildlife habitat, particularly along segments with known or recurrent wildlife crossings; During all phases of the Project, wildlife awareness training will be provided to Project employees; and,	Not applicable

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			During all phases, prohibit hunting and trapping by employees and contractors within the PDA and while working on site.	
MNRF-155	6.12.5	Evidence presented is insufficient to substantiate the claim that the effects on wildlife habitat will be low (level 1). Please provide more data or references to back this claim.	It is not clear what residual effects it being reference and which attribute (magnitude, duration, extent, etc). However, the determination of significance for Section 6.12 will be reviewed and additional context and/o references will be added, as appropriate.	EIS Section 6.12.
MNRF-158	6.16.2.5	The 120m distance is not appropriate especially not for the sensory disturbance of all species, the SSG and the SWHMST identify species specific distances that might be more appropriate to use. Saying sensory disturbance are assumed greatest within 120m is not appropriate and should not be characterized a a conservative measure for effects assessment.	The local study area (LSA) is intended to capture potential direct effects from the Project (such as habitat loss) and indirect effects (such as sensory disturbance) resulting from the Project. Direct effects could only occur within the project development area (PDA), however indirect effects could extend beyond the PDA. As a result, the LSA will be considered instead of a zone of influence.	EIS Section 6.16.
MNRF-159	6.16.2.5	It is not appropriate to discount mortality associated with the decommissioning phase as it could result in the loss of nesting habitat by some species.	Habitat supporting SAR birds is conservatively assumed to be removed from within the Project Development Area during construction. As a result, the likelihood that these species would continue to use these areas during operations and closure is reduced, and therefore the risk of mortality during closure would be lower. However, the risk of mortality for SAR birds is assessed in Section 6.16.4 and determined that with the implementation of mitigation measures such as buffers, speed limits, timing windows for vegetation clearing, and pre-construction nest surveys, potential effects would be mitigated and there would be no residual effects.	Not applicable
MNRF-160	6.16.3	Please describe in more detail what an "appropriate buffer" would be for bald eagle nests. As well as any additional mitigation measures for these nesting sites.	A typically buffer for a Bald Eagle nest is between 400 to 800 m and would be determined with site specific consultation with MNRF.	EIS Section 6.16.
MNRF-161	6.11.1	In the final paragraph for this section, it is stated that "The FRI that does exist is too fine-scale to map reasonably."	At the landscape scale that some of the Project components occur (i.e. along transmission line routes), FRI mapping would require more than 200+ maps to show the FRI in a level of detail as to see what the vegetation communities are.	Not applicable
MNRF-162	6.11.2.3	There is no justification for why the RSA and LSA have been delineated as the sizes they are for vegetation and wetlands.	The local study area for vegetation communities and wetlands extends 2 km from the mine site area of the PDA, and 1 km buffer from the centreline of the transmission line. The distance was chosen in consideration of direct overprinting within the PDA, and the outer extent of potential indirect effects associated with dust deposition and groundwater drawdown anticipated to occur. The regional study area is 5 km from the PDA and is expected to be large enough to contain most of the plant communities that may be influenced by the Project and provide confident and ecologically relevant effects predictions.	Not applicable
MNRF-163	6.11.2.3	In the PDA the road corridor is described as 20m, although this isn't impossible it seems unlikely that this will be the actual width of the corridor. 30-40m seems more realistic, can you please revisit and confirm this will be the size.	The corridor width for the mine access road has been increased to 30 m and will be updated in the final EIS/EA.	EIS Sections 3, 6.11.
MNRF-164	6.11.2.5	The final paragraph describes some progressive rehab at select locations. Can you please describe that in more detail.	As discussed in Section 6.11.2.5 of the draft EIS/EA and to be conservative, progressive rehabilitation is not considered in the assessment of effects. Progressive rehabilitation is a best practice and will be completed in accordance with a filed Closure Plan under the Mining Act. A Closure Plan will be prepared and filed as part of the environmental approvals for the Project. Progressive reclamation at a conceptual level is described in Section 4.18.2 of the draft EIS/EA. The following progressive rehabilitation measures are anticipated to be practical for the Project: Removal of construction-related equipment and facilities and reclamation of disturbed lands if not to be used during operations Revegetation of final pit slopes in overburden Removal of quarry infrastructure and rehabilitation of quarry sites when new aggregate no longer required Rehabilitation of the open pit when mining ceases and initiating of filling of the open pit (see Section 4.18.2).	EIS Section 5.

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MNRF-165	6.11.3	The second bullet describes minimizing clearing of vegetation along the access road corridor. Can you please describe this in more detail	This will be further described in the final EIS/EA.	EIS Section 6.11.
MNRF-166	6.11.4.1	Please describe these changes/impacts in terms of the LSA as well not just the RSA where they appear to be watered down due to the larger geographic scale.	The change in cover type is described in comparison to the local and regional study area in Table 6.11-6.	Not applicable
MNRF-167	6.11.4.3	Please describe these changes/impacts in terms of the LSA as well not just the RSA where they appear to be watered down due to the larger geographic scale.	The change in cover type is described in comparison to the local and regional study area in Table 6.11-6.	Not applicable
MNRF-168	6.11.5	Please consider the magnitude of effects at different scales not just at the RSA where it will of course be lower.	The magnitude of effects is assessed according to the methodology outlined in Section 6.1 of the draft EIS/EA, and definitions in Section 6.11.5. Note that the change in cover types is considered at both the local and regional study areas and described in Table 6.11-6 of the draft EIS/EA.	Not applicable
MNRF-169	6.17.1.2	"A total of eight trapline areas are overlapped by the PDA which include both terrestrial and aquatic habitat. Three traplines are overlapped by the mine site area and mine access road of the PDA. The amount of overlap is 0.9% of trapline area SL194, 4.4% of SL197 and 2.3% of SL200 as indicated in Table 6.17-1 and illustrated in Figure 6.17-2. The transmission line portion of the PDA overlaps with 0.1% to 0.9% of five trapline areas." Ensure that all head trappers of traplines within the RSA, LSA, and PDA are notified of the planned activities. The following twenty-three (23) traplines overlap with the RSA, LSA, and PDA: RL001, RL002, RL004, RL005, RL007, RL009, RL013, RL014, RL058, RL070, SL116, SL183, SL186, SL191, SL192, SL193, SL194, SL196, SL197, SL198, SL200, SL201, SL202.	Comment noted, FMG will work with MNRF to notify head trappers of the proposed Project.	Not applicable
MNRF-170	6.17.1.3	"As shown in Figure 6.17-3, there are 10 BHAs overlapped by the PDA as indicated in Table 6.17-2. The PDA overlaps with approximately 2,020 ha of those BHAs. with the largest overlap with BHA RL0098 at 1,510 ha or 6.3% of the BHA. The remaining BHAs have 0.1% to 0.9% overlap with the PDA." Ensure that all BHA holders within the RSA, LSA, and PDA are notified of the planned activities. The following twenty-eight (28) BHAs overlap with the RSA, LSA, and PDA: RL0060, RL0071, RL0072, RL0073, RL0082, RL0083, RL0084, RL0085, RL0086, RL0095, RL0096, RL0097, RL0098, RL0099, RL0110, RL0111, SL0061, SL0062, SL0063, SL0073, SL0074, SL0075, SL0086, SL0087, SL0098, SL0099, SL0111, SL0124.	Comment noted, FMG will ensure that BHA holders in the RSA are notified of the proposed Project.	Not applicable
MNRF-171	6.17.1.4	"There are no outfitters in the PDA. The closest outfitter outposts to the PDA are 5.5 km to the north, 11 km to the west, and 12 km to the south. There are approximately 14 outfitters with lodges or outpost camps in or near the RSA (Table 6.17-3 and Figure 6.17-4)." Ensure that all outfitters with lodges or outpost camps within the RSA, LSA, and PDA, as well as those with lodges or camps in adjacent areas are notified of the planned activities. The following twenty-one (21) outposts/lodges overlap with the RSA or LSA: Birch Lake Lodge, Green's Fly-In Camps, Green Airways Ltd., Hidden Bay Lodge, KaBeeLo Lodge Inc. (this corporation has five outposts within the RSA), KayAir Service, Knobby's Fly-In Camps Ltd., LUP #1205-1008550, Red Pine Lodge and Outposts Inc. (this corporation has two outposts within the RSA), Shabu Wilderness Outpost Inc., Swain Post Camps, True North Outposts and Cabins Ltd., 2351387 Ontario Inc. (this corporation has three outposts within the RSA, one is O/A Northern Lights Outposts), and 647416 Ontario Inc.	Comment noted, as described in Section 9.4 of the Terms of Reference for the Project, FMG had identified potential interested stakeholders for the distribution list, and as stakeholders express their interest, submit comments or contact a member of the Project team, they are added to the distribution list. FMG will review this list and notify any outfitters that are not currently included.	Not applicable
MNRF-172	6.18.1.2	"As shown in Figure 6.18-3, there are 24 BMAs that overlap with the PDA, LSA and RSA." There are only twenty (20) Bear management areas (BMA) that overlap with the PDA, LSA, and RSA. The BMAs are as follows: RL-03-013, RL-03-016, RL-03-064, RL-16-003, RL-16-007, RL-16-008, RL-16-027, RL-16A-004, RL-16A-011, RL-16A-023, RL-16A-028, SL-04-033, SL-04-035, SL-16-005, SL-16-009, SL-16-010, SL-16-012, SL-16A-006, SL-16A-026, SL-16B-016.	The baseline socioeconomic report in Appendix Q of the draft EIS/EA defines the baseline regional study area to include the alternative routings for the transmission line. As a result, there are 24 bear management areas (BMA) that overlap with the baseline regional study area. The effects assessment for the outdoor recreation valued component in Section 6.18 defines the regional study area for the purposes of assessing potential effects of the preferred transmission line route. On that basis, there are 18 BMAs that overlap with the project development area, local study area and the regional study area, with two BMAs listed in the baseline report (RL-03-064 and SL-16-012) that do not overlap. This will be clarified in the final EIS/EA.	EIS Section 6.18.

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MNRF-182	6.17	The Draft IEA does not adequately address the impacts, short, medium, and long term to nearby tourist operations. There is known concern among tourist operators near the project area. This concern is known to FMG. For example, Birch Lake Lodge may be outside the self-determined PDA, but the light and noise pollution during construction and operation will be obvious. Furthermore, the users of the lodge will be well within the PDA as they are angling. Also, as the customers to lodges fly into the area the open pit mine will dominate the landscape, thus removing any sense of remoteness, which is the primary draw for the lodge's customers. It is very possible that the mine, at least during construction and operation, will make the nearby tourist operations unprofitable and thus shut them down completely. This was not addressed as a possibility. Ultimately, it would be in the applicant's best interest to identify impacts (potential, expected, and known) rather than dismiss them as non-existent. The methodology of quantifying the impacts does not allow the actual impacts to nearby outposts to be identified or assessed. It is very unlikely the conclusion presented in 6.17.4.4 is accurate.	Section 6.17.4.4 of the draft EIS/EA provides an assessment of the potential effects to outfitter outposts during the operation and closure phases. This included an assessment of the change in visual aesthetics, which is further detailed in Appendix U of the draft EIS/EA. The assessment determined that none of the assessed locations during any of the Project phases would result in a change in the landscape rating. With the maintenance of treed buffer along the shoreline, all of the viewpoints analyzed would have no potential visibility of the Project during the operations phase. After closure, no areas of interest would experience a change in landscape rating. Following the completion of revegetation activities during closure, the viewpoints will not return to their respective baseline visual aesthetics as the co-disposal facility will still be visible, however, the scenery will remain similar to the surrounding area. Visibility of mine features following completion of closure activities will not degrade the visual aesthetics in the area. In addition, Section 6.3 of the draft EIS/EA provides an assessment of noise due to the Project. With the proposed design and mitigation measures outlined in Section 6.3.3, the assessment does not predict effects on the acoustic environment (including the receptors located to the north of the Project, i.e. Site 14). FMG has and will continue discussions and engagement with local outfitters throughout the Project. FMG is currently in active negotiations regarding acquisitions of the closest outfitters to site. As a result, there are no residual effects predicted to the outfitter outposts.	Not applicable
MNRF-185	11.2	In areas considered under FMP planning SFL should be offered first right to refusal of wood. If SFL is uninterested in harvesting an overlapping agreement between Domtar and FMG should be endeavoured to be agreed upon to discuss planning costs.	Comment noted. The Sustainable Forest Licence (SFL) holder, Domtar, will be offered first right to refusal. If they are uninterested in harvesting, then an overlapping agreement between Domtar and FMG can be endeavoured.	Not applicable
MNRF-186	11.2	If the SFL harvests on behalf of FMG "Where the FRL or SFL holder has harvested the forest resources and has been assessed the Crown charges for them, that licensee may be compensated for the portion of the trees used for mining purposes by the mineral exploration company, in accordance with s. 92(6) of the Mining Act." A business-to-business arrangement should be sought regarding the payment of crown charges and utilization of forest resources. A permit to remove is likely the appropriate authorization. SFL should be notified of the intent to issue the authorization as parts of the area considered under the FMP planning area will be removed from the SFLs land base.	Comment noted.	Not applicable
MNRF-191	Figure 1.3-1	Please update map to identify winter road route and separate resource road from winter road in legend.	The map will be updated (or a secondary map provided in the final EIS/EA).	EIS Sections 1, 5.
MNRF-192	1.4	"which could potentially reinforce the electrical grid for future sustainable green energy development(s)". Misleading comment. There are no known green energy interests in this geography.	FMG understands that local communities and municipalities have an interest in developing green energy sources where feasible. FMG is also exploring options to supplement the Project energy source with renewable technologies. This infrastructure has the potential to be beneficial to the region in the long-term.	Not applicable
MNRF-193	1.4	"Leverages and solidifies the existing forestry road infrastructure and secures its longer-term use supporting access for local communities" Forest Management Plans have management direction for road use strategies. This comment may be inconsistent with relevant FMPs.	Local communities have expressed interest in obtaining road infrastructure and FMG aims to support this process, including related to relevant planning and permitting.	Not applicable
MNRF-194	1.4	"Diversifies the local economy which is currently heavily reliant on forestry and government " Local economy is currently heavily reliant on mining sector. Therefore, the benefit of diversification is less than proposed, as the impact of possible declining gold prices would have a negative impact overall.	This feedback is noted. The text is based on Statistics Canada published data, including as referenced in the socio-economic baseline and economic modelling studies (Appendix Q).	Not applicable
MNRF-195	1.5	"An open pit is proposed to be mined over approximately 10 years to be followed by stockpile processing, resulting in a Project life of approximately 12 years."	The description in Section 1.5 is consistent with the Pre-feasibility Study published for the Project and associated Project Description. The EIS/EA is based on the project as currently understood and proposed. Should the Project be extended, all regulatory requirements at the time would need to be met.	EIS Section 1.

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		Is this comment appropriate with Mining projects lasting longer as technology and exploration expands? IT would be appropriate to identify the mine's life could go beyond 12 years.		
MNRF-196	1.5	"Cofferdams are essential for the safe and controlled dewatering of the mining area and have been successfully implemented in a manner that protects the environment at several other northern mining projects in Canada". Please explain how a coffer dam protects the environment.	To clarify, the implementation (e.g., construction and operation) of the dikes (cofferdams) will occur in a manner that will ensure the environment is protected. Dikes (cofferdams) protect the environment by separating mining and related potential effects from the remainder of the lake.	Not applicable
MNRF-197	1.5	"Non-hazardous wastes will be transported to existing facilities such as in Ear Falls or Sioux Lookout for disposal" Are these facilities able to support the amount of waste at their facility?	Discussions are underway with potential disposal locations and FMG has confirmed that capacity is available.	Not applicable
MNRF-198	1.5	"FMG intends to explore potential collaborations with Indigenous communities, that might have fish enhancement projects that are aligned with fishery offset and compensation plans, with a goal to enhance the productivity of recreational fisheries" Please elaborate to the management direction or rational to enhance the productivity of the reactional fisheries.	The statement refers to exploring opportunities with Indigenous communities that would be consistent with guidance in DFO's Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the Fisheries Act (DFO, 20192) which includes Enhancement as a type of offsetting in Part 2 of the document. The Policy refers to "enhancement (i.e., actions taken to improve fish habitat quality) include physical manipulation of existing fish habitat to improve its capacity to produce and sustain fish" which has been inferred as productivity. Recreational fisheries have been specified as sportfish as these types of fish are identified in most comments received on the Project by government agencies and identified as important fish by Indigenous communities. 2 Fisheries and Oceans (DFO). 2019. Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the Fisheries Act. Fish and Fish Habitat Protection Program. Accessed from: https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/forms-formes/apply-policy-politique-applique-eng.pdf	Not applicable
MNRF-199	1.6	"With only a small number of seasonal cabins present on Birch Lake and Springpole Lake". Please reference the resource-based tourism lodges on and outposts.	There are 14 outfitters with lodges or outpost camps in or near the regional study area (RSA), as shown in Table 6.17-3 of the draft EIS/EA. The closest outfitter outposts to the project development area (PDA) are 5.5 kilometres to the north, 11 kilometres to the west, and 12 kilometres to the south. There are no outfitters in the PDA. There are eight seasonal cabins in the RSA. These cabins are remote with no road access. There are no cabins along the proposed mine access road or transmission line. Access to the PDA is limited to forestry roads and the road to Slate Falls Nation. There are no campgrounds within the PDA and only two designated camping sites within the southern portion of the RSA.	Not applicable
MNRF-200	2.2.2	NDMNRF (formerly and Ministry of Energy, Northern, Development and Mines [ENDM] and Ministry of Natural Resources and Forestry [MNRF]). Ministries have changed and requires updating throughout the document. The Ministry names at present are "Ministry of Natural Resources and Forestry" (MNRF) and the "Ministry of Mines" (MINES)	Prior to issuance of the final EIS/EA, government abbreviations will be re-assessed and revised (except as related to referencing documents previously issued).	Not applicable
MNRF-201	2.2.3	"Red Lake Trappers Association"; Please confirm did this include or refer to the Ear Falls Trappers council?	FMG has confirmed that the Red Lake Trappers Association is no longer active and this will be updated in the EIS/EA. Notification and communications were sent to the Ear Falls Trappers Council which have taken on the role of representing Red Lake trappers.	Not applicable
MNRF-202	2.4.3	"FMG reaches out to stakeholders through the following methods" Consideration should be given to precision targeted mailout that places flyers in mailboxes for identified area by Canada post to share information and keep the public informed who do not fall with the identified means.	Comment noted. This method was used to distribute the Notice of Commencement of the Environmental Assessment as well as Project newsletters.	Not applicable
MNRF-203	2.4.1	"Engagement in Environmental Baseline Studies: FMG is engaging local Indigenous..." can FMG confirm this is taking place?	FMG had two Environmental Monitors participate in field programs in 2022 and continues to have one in 2023.	Not applicable
MNRF-204	table 2.p-1	In section 1, there is reference to leaving the transmission line for green energy. This table speaks to decommissioning the transmission line.	The potential for future use of the transmission line is considered a potential opportunity post-operations. This opportunity is not part of the Project. It has been assumed for the EIS/EA that the transmission line will be required to be decommissioned in accordance with Mining Act requirements.	Not applicable

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MNRF-206	Figure 3.1-2	Was consideration given to place the transmission line and road within the same corridor?	Yes, and it continues to be an important consideration as the site plan is optimized based on feedback received on the draft EIS/EA and ongoing engineering.	EIS Section 5.
MNRF-207	3.3.9.2	Springpole and Birch Lake have higher levels of arsenic - will this result in waste rock arsenic concerns?	Section 3.3.9.2 of the draft EIS/EA summarizes sediment baseline (natural) results. As reported, there are sporadic samples with higher concentrations of arsenic in the natural condition. Section 4.4.4.2 of the draft EIS/EA summarizes the geochemical test work results for mine rock and indicates that arsenic is a parameter of interest for the Project. Elevated concentrations have been identified in a subset of mine rock types as part of the baseline geochemical characterization studies conducted to support the Project (Appendix K of the draft EIS/EA). As noted in Section 6.6 to 6.9 of the draft EIS/EA, predictive surface water quality modeling to support the draft EIS/EA, however, indicates that water quality parameter concentrations (including arsenic concentrations) remain below applicable federal and provincial water quality guidelines, with the implementation of the planned mitigation measures. Note, an acid rock drainage / metal leaching mine waste management plan will be developed as part of the Closure Plan that is required to be filed with the Province in accordance with the Mining Act prior to construction.	Not applicable
MNRF-208	4.4.1.2	Controlled dewatering and fish removal will occur with the involvement of interested local Indigenous communities. Please detail fish removal plan details. How will fish be caught and removed?	Additional information will be provided in the final EIS/EA. Fish removal details will be provided during the Provincial and Federal approvals process. Based on previous experience of the Project team with completing both whole and partial lake fish removals, would use capture gear that targets both large and small bodied fish. If the agreed end use of fish is redistribution to the broader Springpole Lake, then gear types with lower mortality would be utilized. A quantitative depletion model would be used to monitor the success and efficiency of the removal program. The end target for fish removal will be determined in consultation with government agencies but will likely fall within the range of 70 to 85% removal for most sport fish.	EIS Section 5, Appendix F.
MNRF-209	4.4.2	"Exposed lakebed sediment and the upper mineralized overburden primarily within the open pit footprint will be pushed into piles in the bottom of the dewatered basin" As dewatering occurs and lake bottom is exposed, how do you plan to address sedimentation during events, (rain, melt or wave action)	Runoff from the dewatering area will be as described in Section 4.4.1.2. Clean water from the isolated basin will be pumped over the cofferdam(s) back into Springpole Lake, and monitored for suspended solids. If there is a temporary change to the quality due to rain, melt or wave action, pumping may cease temporarily. Otherwise, water within the basin will be pumped to sumps / sedimentation pond to manage suspended sediments, or to the water storage pond which is part of the integrated site water management system. Flocculant or other means may be used if needed to help settle suspended sediments. Further details will be provided in the final EIS/EA.	EIS Section 5.
MNRF-210	4.4.2	"Where practical, organic materials / topsoil will be stripped and stored separately close to the source, or at the surficial soil stockpile for use in future reclamation activities". How will organic be stored? How will slumping, erosion sedimentation be addressed? Will a coffer dam structure be required around this material?	The materials will be stored in stockpiles in a manner that maintains stability. If needed, containment will be provided around the stockpile, for stability or to better contain sediment release from runoff. An erosion and sediment control plan will be established for the Project that will outline specific measures for prevention of sediment and erosion.	EIS Section 5.
MNRF-211	4.4.2	"Portage zone mine rock samples could become net acid generating within one year of exposure, while up to 25 to 30% of the samples could become net acid generating over approximately ten years. Approximately 50% of the Portage zone mine rock samples were found to only become net acid generating after several decades of unmitigated exposure" Please explain how this will impact aquatic environments	FMG has taken a conservative approach to the Project design in full consideration and to mitigate the acid generation potential of the native rock as described in Sections 4.7.2 and 4.7.3 for storage of tailings and waste rock. The assessment of effects of the Project design are inclusive of acid generation potential on fish and fish habitat is provided in Section 6.10. Discussion of impacts to the surface water systems is provided in Section 6.6 to 6.9 of the draft EIS/EA.	Not applicable
MNRF-212		Address visual aesthetics from Birch Lake and surrounding area, how will this be impacted?	Potential visual effects are provided in Appendix U of the draft EIS/EA and incorporated into the effects assessment in Sections 6.17 and 6.18.	Not applicable
MNRF-214	4.8	"Construction of a new embayment (basin) to the east of the dewatered basin of approximately 45 ha during construction and operation (fish habitat compensation area)."	The fish habitat development area is designed to be filled to the normal Springpole Lake water elevation (391 metres above sea level). It will be constructed in the dry while the dikes (cofferdams) are in place during the life of the mine. Based on engagement with government agencies and Indigenous communities, the fish habitat	Not applicable

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		Fish habitat development area. Please define how this will remain flooded once coffer dam is removed. Is the area undisturbed from mine development? But will have fish development habitat created?	development area will be contoured to depths and augmented with habitat structure to optimise the habitat for fish species of interest. On closure, the isolated basin will be filled, and the dikes breached to create a continuously wetted area between the refilled lake basin and the fish habitat development area, as shown in Figure 8-1 of the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA).	
MNRF-215	4.8	"Develop and implement a Lake Sturgeon reintroduction and restoration program harmonizing and consistent with the ongoing efforts of the Cat Lake First Nation, Slate Falls Nation and the Ministry of Northern Development, Mines, Natural Resources and Forestry" Please relate proposed activity to Ontario's stocking guidelines.	Detailed documentation on Ontario's stocking guidelines has not be been made available, other than what is available on Ontario's public web site, entitled "Ontario's fish stocking program" (https://www.ontario.ca/page/ontarios-fish-stocking-program#section-3). The web site describes fish conservation efforts as "Fish stocking also protects and rebuilds fish populations, including species at risk." Ontario's provincial fish strategy background has been reviewed, and the Fish Stocking section which states "Genetic conservation and stock restorations are also very important components of the MNR's fish culture program."; and lists several species and waterbodies where fish culture is protected, preserved and used to restore fish stocks. The Ontario provincial recovery strategy for Lake Sturgeon (Golder, 2011) states that the application of Lake Sturgeon culture and stocking may be an essential tool required to recover some Lake Sturgeon sub-populations in Ontario; and describes reintroduction stocking into waters they formerly occupied with a goal to re-establish naturally reproducing populations and supplemental stocking to address population deficiencies and weak recruitment. It is understood and acknowledged that this offset measure can only be considered successful with full cooperation and support from the Province, and Indigenous communities. Further discussions with MNRF will be undertaken on this topic.	Not applicable
MNRF-216	4.8	"Establishment of micro hatchery to strategically stock selected species of fish to mitigate the temporary loss of fish production from the dewatered basin. This effort would be continued until the dewatered basin is restored as an active part of the Springpole Lake. Hatchery programs may provide an opportunity for collaboration with Indigenous community(ies)." Please relate proposed activity to Ontario stocking guidelines	The micro hatchery offset measure was included as a means of mitigating a loss of fish production during the mine life, and as a potential capacity building opportunity for Indigenous communities with an interest. The intent was that only brood stock collected annually from Springpole Lake would be cultured, and only to limits that are justified by the ongoing fish monitoring data. The measure will only be taken forward into the final Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) with the support of Indigenous communities, government agencies, and a clear vision that would maintain the genetic stock and biodiversity of Springpole Lake.	Appendix F.
MNRF-217	4.8	Please identify if dams or re-routing of L-1 and L-19 streams are required.	Currently L1 drains to either Birch Lake or L2, depending on annual conditions. A small berm structure may be needed to isolate L1 from L2. Although flow reductions are modeled to occur in lake L-19, there are no dams or rerouting of channels proposed.	Not applicable
MNRF-218	4.8	"Re-establish flow to L-1 and L-19 as fish habitat as per pre mining conditions and enhance the connection between Birch Lake and L-1." Please identify is work will be done to stop or reduce flows to L1. Please explain why enhancement would be required.	The current connectivity to Birch Lake from L-1 is through a poorly defined channel. There is also a connection to Lake L-2 which will be blocked during the construction and the development of the water storage pond. During the life of the mine, the connection to Birch Lake may be diminished due to the predicted reduction in flows which could result in an encroachment of vegetation. The intent is to enhance the connectivity to Birch Lake, if it is considered necessary at closure to promote drainage and fish passage once flows are restored. Enhancements to L-19 are not expected to be required for fish passage.	Not applicable
MNRF-219	Figure 4.8-1	Please identify how enhance littoral basin will be established. It appears water levels will be higher than current water levels and "flooding" to create enhance littoral zones. Please identify if this is not the case and water will be returned to current water levels.	The water level in the refilled basin of Springpole Lake is expected to equalize at the same level as the remainder of the lake (approximately 391 metres above sea level), once the dike is breached. The enhanced littoral zones, whether backfilled former pit areas or the new fish habitat development area will be contoured, covered with substrate, and augmented with habitat structures.	Not applicable
MNRF-220	4.9	"An airstrip may be established to transport personnel to the site. Development of an airstrip (along with the proposed helicopter pad) would also support faster emergency response. If an airstrip is developed, it would be sized to accommodate Dash 8 or similar aircraft, and is expected to be located near the mine access road and the mine site to avoid additional footprint expansion"	An airstrip may be constructed onsite (for use by Dash-8 type aircraft) to support up to 2 flights per week during construction, operation and closure phases of the Project. The effects of the construction and operation and closure of the airstrip on air quality, noise and wildlife will be assessed in the final EIS/EA.	EIS Section 5.

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		It would be important to understand will an airstrip be part of this project to full assess the impacts of this project on the natural environment and ensure appropriate review by appropriate agencies.	The location is proposed to be within the existing project development area and co-located along a section of the mine access road. Further information will be provided in the final EIS/EA.	
MNRF-221	4.10.1.1	"Additional temporary ditching, sumps and ponds" Please consider to MNRF approvals with Lakes and Rivers Improvement Act if constructing additional coffer dams for ditching and run offs.	Provincial regulatory and approval requirements will be fully considered in the Project design, including in regards to the Lake and Rivers Improvement Act.	Not applicable
MNRF-222	4.10.1.1	"As the water level decreases within the isolated basin, sediments from the lakebed will be entrained in the water" Please identify in this section or another section at what level of sediment mixing will this trigger water to be diverted to the WSP. Will fish still be present in the basin and how will this be dealt with. Will sediment mixing result in increased metals present in the water?	It is expected that the concentration of suspended solids and/or turbidity (and metals) that would result in the need to divert the dewatering waters to the water storage pond (or similar facility), will be defined through the environmental approvals process. As stated in the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA), the end use of the fish removed from the isolated dike area and isolated north basin of Springpole Lake is to be discussed with Indigenous communities and government agencies. Following this discussion, a comprehensive fish removal plan for the isolated basin of Springpole Lake, both before and during the dewatering efforts, will be developed. Based on previous experience of the Project team with completing both whole and partial lake fish removals, capture gear would target both large and small bodied fish. If the agreed end use of fish is redistribution to the broader Springpole Lake, then gear types with lower mortality would be utilized. A quantitative depletion model would be used to monitor the success and efficiency of the removal program. The end target for fish removal will be determined in consultation with government agencies but will likely fall within the range of 70 to 85% removal for most sport fish.	Not applicable
MNRF-223	4.10.4	"effluent is proposed to be pumped to the discharge location on the southeast arm of Springpole Lake through an HDPE pipeline, a distance of 9.3 km" Are there concerns for effluent discharge to freeze with a discharge distance of the following? Will the pipe be buried or on surface?	The effluent pipeline will be designed to avoid effluent freezing and a combination of heat tracing and/or burying of the pipe will be utilized as appropriate.	Not applicable
MNRF-224	4.15	Access road - Is there an assessment on the amount of vehicle traffic that will be travelling to and from the mine site during construction stage, operating and during closure? Has an assessment been completed to the impacts from the increased traffic to the environment and wildlife?	Additional information will be presented in the final EIS/EA in regard to vehicle traffic. The potential effects of increased traffic to the environment and wildlife was considered throughout the draft EIS/EA where appropriate, including within the assessment of alternatives and potential project-related effects.	EIS Sections 4, 5, and 6 (throughout).
MNRF-225	Figure 4.15-1	Please identify an access road to the identified aggregate source located along the effluent discharge line.	The same access road will be utilized to access the potential aggregate source along the effluent discharge line, as for the pipeline itself. Figures 4.1-2 and 4.15-1 show the access road and spur access into the aggregate source areas as currently understood. Further information regarding the aggregate source development, will be provided in the final EIS/EA	EIS Section 5.
MNRF-226	4.16	"An 89 km, 230 kilovolt (kV), overhead transmission line is proposed to tie the Project into the Wataynikaneyap 230 kV line between Dinorwic and Pickle Lake (Figure 4.16-1)." How has alternative connection points been considered for connection to the Wataynikaneyap transmission grid.	Information regarding the alternative routings is provided in Section 5.2.6. The routings and potential connection locations were identified to avoid major waterbodies and minimize the overall length and associated land disturbance as reasonable. The text will be reviewed and revised in the final EIS/EA as needed to ensure clarify in the identification of connection locations.	EIS Sections 4, 5.
MNRF-227	4.18.2	"The designated fish habitat development area will be excavated to about 3 m below the baseline Springpole Lake elevation in preparation for use during closure" How will this fish habitat development be addressed should mine life go beyond 12 years? Consideration should be provided to an expanded mine life and how progressive reclamation will be addressed.	The Project is planned with an operational mine life of 12 years. The Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) would be revised to address any change to the life of the mine if and when required. It is understood that a change in mine life would need to be accounted for in obtaining the required permits and approvals.	Appendix F.
MNRF-228	4.18.3.1	"The ramp to the open pit will be barricaded until the pit is fully filled with water and reconnected to Springpole Lake (at that time the open pit ramp may be reopened so that it can be utilized to support recreational boating)"	It is currently proposed to remove the access gate when the site is fully reclaimed. The timing of the gate removal may be constrained for a period of time by requirements under Mining Act or other land tenure aspects.	EIS Section 5.

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		How does recreational boating and public access to the site co-exist with road use strategies and access gates to the site.	FMG will continue engagement regarding access management throughout the Project and expects that additional details will be provided in the Closure Plan.	
MNRF-229	4.18.3.1 Page 4-50	The following table provides a range of years to fill for the dewatered basin, allowing for average conditions as well as the 5th and 95th percentile flow years to represent very dry and very wet flow years: how does sediment mixing impact the potential for increased metal in the water? How does this impact timelines of filling of the basin and/or restoration to fish habitat?	The concentration of suspended solids and/or turbidity may be elevated at the initiation of filling of the dewatered open pit basin when the freshwater comes into direct contact with the floor of the basin. Elevated concentrations of total suspended solids in the water column at that time may be associated in elevated levels of total metal concentrations in water. As the basin filling continues however, turbulent mixing within the water column will be reduced and solids initially suspended will settle out of solution. Water quality will be regularly monitored as the open pit water level in the basin rises to verify water quality predictions and to ensure that regulatory guidelines are met. Once the water quality in the refilled basin meets all regulatory requirements, the refilled basin will be hydraulically reconnected to Springpole Lake. Further information regarding the predictive water quality modelling at closure is provided in Appendix N-3 of the draft EIS/EA.	Not applicable
MNRF-230	4.18.3	It is anticipated that the transmission line will remain in place to support regional needs and continue to benefit the region. It would be appropriate to plan for decommissioning should there be no need for power at the site and no regional need.	The Project as described in the draft EIS/EA assumes that the transmission line will be removed. Like for other mining projects in Ontario which require construction of a transmission line, there may be opportunities for it to be transferred to others to provide enhancement of the regional grid when no longer required for the mine.	Not applicable
MNRF-231	4.18.4	Physical stability monitoring will include annual Dam Safety Inspections conducted by a qualified Professional Engineer and Dam Safety Reviews will be completed every ten years following closure (or as otherwise required by regulations or best management practices); - please clarify which dam would remain on site past closure?	It is currently planned that the cofferdams (dikes) would be lowered to allow for a reconnection to Springpole Lake and therefore no water-retaining dams are currently planned to remain on site past closure. However, in the case that this concept evolves over the Project life, the commitment to physical stability monitoring would apply. The perimeter embankments of the CDF will remain on site past closure, and subject to the regulatory Closure Plan, could require post-closure monitoring. This aspect will be clarified in the final EIS/EA.	EIS Section 5.
MNRF-232	4.18.5	"The ramp to the former open pit may remain with the purpose of providing a boat ramp, further supporting recreational use of Springpole Lake." A boat ramp and access contradict earlier statements about access roads being decommissioned. See 4.18.3.9	It is anticipated that access roads will be required to be reclaimed under the Mining Act, although some may be left in place for a period of time to support ongoing monitoring. Access to Springpole Lake by means of the refilled basin may be possible, but it would be subject to all applicable regulatory requirements. This will be clarified in the final EIS/EA.	EIS Section 5.
MNRF-235	5.5	Were alternative types of coffer dams considered and would this allow a smaller footprint for dewatering?	Alternative dikes (cofferdam) types were not considered feasible, given the underlying foundation conditions and the requirements of the Project to withhold water from an operational area. Alternative locations for the cofferdam are discussed in Section 5.5 of the draft EIS/EA, however the amount of lake area requiring dewatering would not change as a result of the cofferdam type.	Not applicable
MNRF-236	5.7	Please explain how long terms environmental impacts (Acid rock generation) were considered with mine rock storage locations.	FMG has taken a conservative approach to the Project design in full consideration and to mitigate the acid generation potential of the native rock. The proposed two-cell co-disposal facility (CDF) was purposefully designed to mitigate acid rock drainage and provide secure storage of potentially acid generating (PAG) materials. Co-disposal of the non-acid generating (NAG) tailings with PAG rock is proposed to effectively encapsulate the PAG mine rock, thereby isolating the mine rock from atmospheric oxygen, which will mitigate potential acid generation and metal leaching. Following advancement of Project engineering, and in consideration of comments received from the Ministry of Mines, which generally questioned the proposed combined disposal strategy of filtered NAG tailings with mine rock, FMG has undertaken further engineering studies resulting in optimizations for the CDF The optimized strategy includes the production of a thickened NAG tailings, instead of the previously considered filtered tailings, which would have presented challenges with respect to transportation, placement, and the ability to achieve the desired co-mingled product. Hydraulic transport and deposition of a thickened NAG tailings in the CDF would utilize a pipeline instead of trucking. The hydraulic transport and placement provide a more robust operation for co-disposal while meeting the design intent, reduced energy consumption (associated with the original filtration process), reduced air emissions (dust and GHG), and additional mitigation for spill prevention.	EIS Section 4, Appendix E.

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			Additional geotechnical investigation has also further confirmed the foundation conditions for the CDF. This work has confirmed that the foundation conditions are equal to or better than previously assumed conditions. This is largely due to the low hydraulic conductivity of the andesite bedrock which provides a highly favourable foundation to limit seepage emanating from the CDF without a liner under the south cell. Further, the embankments of the south cell of the CDF will be lined as described in the EA document. Additional engineering controls, such as bedrock grouting will also be developed as needed during detailed engineering. There are no changes anticipated to seepage water quality as a result of the CDF optimization. In addition to the favourable foundation conditions, seepage mitigation will include perimeter seepage capture and management in the contact water collection system. The assessment of effects of the Project design are inclusive of acid generation potential on fish and fish habitat is provided in Section 6.10. Discussion of impacts to the surface water systems is provided in Section 6.6 to 6.9 of the draft EIS/EA.	
MNRF-237	Figure 5.28	Please note the Wenasaga road has been shifted away from Dead Dog Lake towards hailstone creek. Updated road maps are required. This may impact accessibility of the aggregate source off of Wenesaga road south.	Thank-you for this information. Mapping will be updated as needed in the final EIS/EA.	EIS Section 5.
MNRF-238	5.32	How is the long-term maintenance of the Mine Closure CDF taken into consideration? Will the reclamation cover require maintenance to prevent PAG to become exposed?	Closure of the co-disposal facility (CDF) will be detailed in the Closure Plan required as part of the Provincial environmental approvals process prior to construction. Conceptual closure of the CDF is provided in Section 4.18.3.2 of the draft EIS/EA. The design and operation as well as the decommissioning / closure concept for the CDF was developed purposefully to promote long-term chemical and physical stability, minimize erosion, provide long-term environmental protection and minimize long-term maintenance requirements. The reclamation cover will be monitored as per the approved closure plan and maintenance will be performed if required.	EIS Section 5.
MNRF-240	Table 12.3-1	Please provide more details on how and when the preliminary follow up and monitoring will take place as project is implemented and post closure of the site.	Details of the follow-up program are anticipated to be developed with the regulatory authorities during the final EIS/EA review and approval. It is anticipated that follow-up monitoring will be required during construction, operation and closure to confirm environmental assessment predictions. An annual report is anticipated to be required to be submitted to the Impact Assessment Agency summarizing the findings. Compliance monitoring and reporting is also expected to be required in accordance with Federal and Provincial environmental approvals, during construction, operation and closure phases. Post closure monitoring is expected to be required, both as a requirement of the Provincially reviewed and filed Closure Plan.	EIS Section 12.
MNRF-241	Throughout	As a general comment on the IEA, they do not quantify the impacts to meet the requirements of obtaining Location Approval. There is no quantifiable information on the impacts outline in the Technical Bulletin on Location Approval For Dams, section 2.0 Range of Effects to Consider. The proponent should be made aware that information pertained in the IEA does not address the information required to obtain location approval and will be required to meet these requirements when submitting their application for location approval.	Thank-you. Additional information will be provided during the Provincial environmental approvals processes.	Not applicable
MNRF-242	App B, 4.2.2	EIS guidelines state that the "Proponent will integrate Indigenous knowledge into all aspects of the assessment including both methodology and analysis and document in the EIS." Detail is lacking/insufficient. The proponent makes general references; however, it is unclear where and how Indigenous knowledge has been incorporated into the methodology and analysis of the EA.	This draft EIS/EA has considered the available information contained in community Land Use Plans and TK / TLU information provided to date. A detailed summary of TK /TLU information considered is provided in Section 6.21.1 of the draft EIS/EA. FMG will continue to offer opportunities to collect additional TK / TLU information throughout the environmental assessment process to inform the Project and assessment. Feedback received from Indigenous communities, will be incorporated into the final EIS/EA.	EIS Sections 6.2 through 6.26.

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MNRF-243	App B, 4.3	Study strategy and methodology states "the proponent will provide Indigenous groups reasonable opportunity to review and provide comments on the information used for describing and assessing effects on Indigenous peoples, prior to submitting the EIS. The proponent will respond to the comments of Indigenous groups prior to submitting the EIS to ensure that the comments are adequately addressed...For all predictions related to effects on Indigenous groups, the proponent will document Indigenous group involvement. Where there are discrepancies in the views of the proponent and Indigenous groups with respect to the outcomes of assessment(s), the EIS will document and provide a rationale for these discrepancies." Insufficient detail has been included in the EIS/EA to determine whether these opportunities have been provided, and if so, what the outcome of community reviews are and whether Indigenous community comments have been adequately addressed.	FMG has, and will continue to provide flexible engagement and consultation opportunities with Indigenous communities. As described in Section 2 of the draft EIS/EA, opportunities to share feedback included meetings to review baseline data and future workplans, community meetings to describe the EA process and present the Project alternatives, as well through the provision of TK / TLU information. Table 2.9-7 describes the influence of consultation on the key components of the EA process and critical EA decision-making milestones (e.g., baseline, alternatives). FMG continues to seek feedback from Indigenous communities including the provision of relevant TK / TLU information and comments received during the review of the draft EIS/EA that will be considered in the assessment of potential effects of the Project and will be updated in the final EIS/EA. For the final EIS/EA submission, an explanation will be provided on how information was shared, feedback collected, and how comments were considered for each component of the EA process.	EIS Section 2, Appendices B (all), C, D (all).
MNRF-244	App B, Part 2, Section 5	The EIS guidelines Identify the information that the EIS will document pertaining to consultation and engagement with Indigenous groups (i.e., date and means of engagement; where and how Indigenous groups' perspectives were integrated into and/or contributed to decisions regarding the project design, construction, operation, decommissioning, abandonment, maintenance, follow-up and monitoring and associated potential effects and the associated mitigation utilized to manage these effects. The EIS/EA is lacking in sufficient detail pertaining to where and how Indigenous groups' perspectives have been integrated into these components. For example, Section 6.0 Draft Effects Assessment and Mitigation identifies proposed mitigation measures but is silent on whether the perspectives of Indigenous groups have been incorporated into the development of these. The proponent needs to clearly identify where and how Indigenous communities have been involved in the development/identification regarding the project (i.e., design, construction, maintenance, mitigation, etc.).	To facilitate meaningful consultation, the draft EIS/EA was shared with Indigenous communities to support a more holistic understanding of the Project and to solicit feedback on the potential effects, mitigation and characterization of residual effects. As noted in the response to Comment 243, F an explanation will be provided on how information was shared, feedback collected, and how comments were considered for each component of the EA process in the final EIS/EA.	EIS Sections 2, 6.1 through 6.26, Appendices D-1.1, D-2.1.
MNRF-245	App D	The presentation slides delivered to Indigenous communities by the proponent include a request for Indigenous community input on the development of 13 different project components. However, the EIS/EA is lacking in sufficient detail to demonstrate where feedback was received and how that feedback has been incorporated into the various project components. Additionally, while Appendix D does include information to demonstrate the proponent's engagement efforts with Indigenous communities (i.e., copies of presentations delivered, correspondence sent, etc.), it is missing the level of detail required by the EIS guidelines. The contents do not represent a fulsome summary of effort made for each Indigenous group, concerns raised by Indigenous groups or how these have been addressed. The information currently presented in the EIS/EA does not provide the Crown with sufficient detail/information needed to assist the Crown in fulfilling its constitutional obligations to consult with potentially impacted Indigenous groups. The proponent should be aware that prior to the issuance of permits or authorizations, it must provide the Crown with a detailed record of consultation/engagement for each Indigenous group that includes: dates and means of communication; a summary of information shared by the proponent during that communication; any concerns raised or information requests made by the Indigenous group during the communication; details as to how the proponent responded to those concerns or information requests and whether issues have been satisfactorily addressed (or whether there are outstanding concerns); any field studies or other activities that have taken place, including which Indigenous groups participated, how their participation contributed to the EA and where this information can be found; clarify to what extent each Indigenous group has participated, including evidence of how their comments have informed the design of project components.	The comment is understood and the final EIS/EA will include an updated Record of Consultation, in an appropriate format and level of detail, as a result of further ongoing engagement with government agencies, Indigenous communities and stakeholders.	EIS Section 2, Appendices D-1.1, D-2.1.

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		The MNRF understands that much of information/detail required from the proponent may be sensitive and/or confidential and may not be appropriate for inclusion in the public EIS/EA. Therefore, the proponent should prepare and maintain a detailed record of consultation for each specific Indigenous group as detailed above in an appropriate format (i.e., tabular or spreadsheet) and provide this information to the Crown.		
MNRF-247	1.2 and 6.17/6.18	"A key part of the EA planning process initiated by FMG, is the early sharing of Project information, including through the publishing of this draft environmental impact statement / environmental assessment (EIS/EA) to provide a meaningful review opportunity to obtain feedback from Indigenous communities, regulators and stakeholders". Impacts in depth not reported for adjacent stakeholders/tourism operators. Would like to see included a plan to implement a variety of management strategies to avoid or reduce the adverse disturbance effects locationally for surrounding stakeholders/ tourism operators. The construction and operation of the Project has the potential to change water quality and quantity which may affect outdoor recreation by recreational land users as mentioned in 6.18. Further information required for short-term/long term strategies associated with restricted use to recreational users of Springpole Lake of the north end basin by eliminating existing portage trails. Alternate portage routes proposed require authorization (work permit under the PLA) if on public lands.	The assessment of potential effects on outdoor recreation, including navigation, is described in Section 6.18 of the draft EIS/EA, and includes the following mitigation measures: – Minimize the Project footprint (areal extent); – Implement the mitigation measures for the potential effects on surface water (Sections 6.6.3, 6.7.3 and 6.8.3); – Maintain alternate access to portages for navigation routes that traverse the PDA during construction and operation phase; – Re-establish portage routes during the closure phase in a suitable location, including based on feedback from recreational land and resource users. – This assessment is informed by the results of the analysis from Sections 6.6 to 6.9, which considers the potential effects on surface water quality and hydrology from the Project on Birch Lake and Springpole Lake, and includes the following mitigation measures applicable to outdoor recreation and navigation: – The collection of contact water around the stockpiles, co-disposal facility and plant site areas, which will be treated to regulatory water quality guidelines at the effluent treatment plant as needed, prior to discharge into the receiving environment; – The implementation of an erosion and sediment control plan to manage runoff water around the disturbed areas of the Project; – The co-management and storage of potentially acid generating mine rock and non-acid generating tailings a co-disposal facility; – The implementation of turbidity curtains during the construction of the dikes during isolation of the open pit basin, to minimize sediment release to Springpole Lake; – Pumping clean water over the dike(s) during the controlled dewatering of the north basin at a rate consistent with the natural variability of Springpole Lake; and – Minimize water takings during natural periods of low flow during the filling of the open pit basin to maintain lake levels within natural variation of Springpole Lake.	Not applicable
MNRF-251	1.2	Springpole Lake is a naturally occurring Lake Trout Lake, The Ministry of Natural Resources and Forestry's Application Review and Land Disposition Process Policy (PL 4.02.01) will not grant authorization or occupation on Lake Trout lakes. While individuals are able to place an application, Ontario generally does not dispose of Crown lands on naturally reproducing lake trout lakes; dispositions under the Mining Act are currently exempt from this policy.	MNRF's advice and direction on the matter of land tenure and approvals is appreciated..	Not applicable
MNRF-252	1.5	"Mining operations will be supported by other onsite buildings including: a maintenance garage, warehouses, laydown areas, administration buildings, and an explosives storage and manufacturing facility, an onsite accommodations complex will be established to accommodate 300 to 350 people during operations (and up to 650 during construction) along with appropriate related infrastructure" If you are a claim holder, you can construct or place a building or buildings on an unpatented mining claim, if you follow the rules, including registration with the Ministry of Natural Resources and Forestry. If buildings and site infrastructure are proposed on Crown Land and will not be registered for mining purposes (within a mining claim), a work permit and occupational authority (tenure (LUP/Lease/Sale/LO) for long-term facilities on Crown land, such as for the transmission line, buildings, or shoreline structures). Forestry Resource License is required for the Cutting of Crown merchantable timber such as clearing for the proposed onside buildings and accommodations.	Thank-you. The necessary approvals will be applied for, upon successful completion of the environmental assessment process.	Not applicable
MNRF-253	1.5	Solid and liquid wastes will be collected and managed in accordance with regulatory requirements. Non-hazardous wastes will be transported to existing facilities such as in Ear Falls or Sioux Lookout	Thank-you. This information will be reviewed.	Not applicable

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		for disposal. Hazardous waste will be transferred to licensed storage and disposal facilities off site. Suggest following The Northwestern Health regulations for Camps in Unorganized Territories		
MNRF-254	5	A spills plan will be required under the Technical Standards and Safety Authority (TSSA)	Thank-you. This is understood to be required.	Not applicable
MNRF-255	5	If the proposed pits are on private property and the property owner has the surfaces rights there is no permitting required for the Aggregate Sites by the MNRF but we suggest best management practices to keep the pits safe for operators and other people that enter the site and also any environmental impacts i.e. erosion control (slopes at 2:1 when idle, prevention of ponding within the pit etc.).	Comment noted and best management practices to keep the aggregate pits safe will be followed.	Not applicable
MNRF-257	2.3 bullet 2	Does resource capacity needs include financial support to meaningfully engage? Such as covering of meeting costs, elder honoraria, training technical advisors etc.	Yes, capacity support includes financial support for meetings, community meetings and technical advisors, as they relate to the EA process.	Not applicable
MNRF-258	4.1.1	Please outline contingencies that are in place for communities who stall or can not participate in engagement schedule for various reasons.	FMG has and will continue to provide reasonably flexible timelines for engagement in the EA process. For example, FMG has been flexible in the time communities have required to review the draft EIS/EA.	EIS Section 2.
MNRF-260	B-4-1 preliminary table of commitments	How will these commitments be tracked? There does not appear to be a record of engagement. There should be some form of record of the efforts of engagement to date including their recorded concerns and issues.	FMG has developed a process for tracking feedback provided and will provide the corresponding records in the final EIS/EA.	Appendices C, D (all).
MNRF-262	Throughout	The TOR and several locations of the draft EA mentioned a engagement plan which was to be developed throughout or during the EA process. It was expected to see a draft Engagement plan for consultation process extending past EA approval and into construction, operations etc.	FMG is committed to engagement throughout the regulatory process and the life of the mine, including construction and operations. The engagement and consultation plans approved as part of the ToR are being and will continue to be followed .	Not applicable
MNRF-263	1.2; 3.39; 5.30; 6.10.41; 13.0; F-8.1; O3-3.6.1.1, 4.4.4.2	"FMG has undertaken to optimize the project and infrastructure siting, so that the location and configuration of the Project facilities considers the above measures, to avoid or limit the potential environmental effects…Project facilities have been located to avoid and reduce interactions with sensitive environmental features...Where avoidance is not reasonable, mitigation has been proposed." (1.2 p. 1-2) "…provide a basis for developing fish habitat offsetting measures where adverse effects to aquatic ecosystems are otherwise unavoidable." (3.3.9 p 3-20) "In order for the Project to proceed and be economically viable, it will of necessity overprint some of the space currently occupied by waterbodies and watercourses…as indicated in Section 5.4 the only viable means is an open pit…" (5.30 p. 5-90) "This will result in the temporary loss of fish habitat in Springpole Lake…" (6.10.41 p 6-221) "Based on the results of the draft environmental assessment, including Project design feature and proposed mitigation measures, the Project is not predicted to cause significant adverse environmental effects…" (13.0 p 13-1) "This section of the Plan describes the currently proposed offset and compensation measure to be implemented as part of the Project. Recognizing that this is the first draft of the Plan and it will undergo review and consultation during the EIS/EA process, it is expected that proposed measures may be modified, expanded upon, substituted or removed on an individual basis to reflect the comments received from Indigenous communities, the public and government agencies." (F-8.1 p. F-8-1) "Optimum habitat volume varied between the locations and was calculated at 21.4, 0 and 0%...for the sites L-15-B1, L-15-B3 and L-15-B4, respectively." (O3-3.6.1.1 p. O3-3-11)	MNRF's concerns for the preservation of Lake Trout is appreciated and noted. The project team is committed to working with MNRF, Fisheries and Oceans Canada and Indigenous communities so that fisheries impacts are appropriately identified and mitigated. Further, MNRF's advice and direction on the matter of land tenure and approvals is appreciated.	Not applicable

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		"On the order of 54% of the mine rock samples from the portage zone, which represents the most volumetrically significant zone of the open pit, were classified as NAG…15 to 20% of the Portage zone mine rock samples couple become net acid generating within one year of exposure, while up to 25 to 30% of the samples could become net acid generating over approximately ten years."(4.4.4.2 p. 4-8, 4-9) Lake trout lakes are rare. While only about one percent of Ontario's lakes (i.e. approximately 2,280) are designated by policy and managed by the Ministry for lake trout, this resource represents 20-25% of all lake trout lakes in the world. The lake trout is an important fishery resource in Ontario and is a preferred species among many resident and non-resident anglers. The lake trout is the only major, indigenous sport fish species in Ontario that is adapted to oligotrophic lakes (i.e. lakes with low levels of nutrients, high dissolved oxygen levels and typically deep areas with very cold water). The lake trout's slow growth, late maturity, low reproductive potential and slow replacement rate make it a unique species in the province. As a top predator, the lake trout is an important part of the province's natural heritage and an excellent indicator of the health of these fragile aquatic ecosystems. Approximately 5% of the province's lake trout populations have already become extirpated. Lake trout and lake trout lakes are particularly vulnerable to the impacts of human activities including harvesting, increased phosphorus inputs from cottage septic systems and other sources of nutrient enrichment, acidification, species introductions, and habitat destruction. Development on lake trout lakes may result in habitat degradation, diminished lake trout populations and a lower quality fishing experience. Given the importance and ecological sensitivity of lake trout lakes, the Ministry has historically worked to protect lake trout lakes from the adverse impacts of lakeshore development. Dating as far back to the early 1980's, Ministry land use and resource management planning documents and guidelines have advanced a precautionary approach to the management of Crown land adjacent to lake trout lakes, including moratoriums on the sale of Crown cottage lots on lake trout lakes. The Ministry has also worked with municipalities and other ministries to advance the protection of lake trout lakes through the Planning Act and Ontario's municipal land use planning process. Ontario generally does not dispose of Crown lands on naturally reproducing lake trout lakes; dispositions under the Mining Act are currently exempt from this policy. However, that exemption in no way diminishes the importance of protecting naturally reproducing lake trout lakes. Ontario has adopted by policy a Precautionary Principle towards fish and fish habitat: Where there are threats to serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent resource degradation. Further, the same policy specifies that avoidance of impacts is the preferred approach in Ontario's risk-informed mitigation framework.		
MNRF-264	1.2; 2.7.1.1; 2.9; 3.3.9.1; 6.10.1, 6.10.1.1; 6.10.2.1; 6.10.2.3; 6.10.5,	"The following is a brief summary of key guiding principles for project development and design:…Proactively and collaboratively identify ecological values." (1.2 p 1-2) On November 2, 2021, FMG received comments from IAAC on the baseline studies. On December 23, 2021, FMG provided responses to the comments." (27.11 p 2-13) "Baseline Studies: Opportunities have been provided to review baseline reports and work plans…additional data collection has been undertaken or planned." (2.9 p 2-14)	Additional fisheries and aquatic studies were conducted for the entire Springpole Lake during 2022, including the north basin where dewatering is proposed. The studies included a full lake broadscale monitoring program (BsM), ongoing lower trophic level studies, a lake-wide hydroacoustic fish community survey, and multiple eDNA metabarcoding surveys. The BsM program was completed on Springpole Lake following standardized provincial protocols; but was modified to address the request from the MNRF to reduce the number of deep-water net sets in the 12 m to 35 m strata and to increase the number of net sets in the 1 m to 12 m strata. Subsequent discussion with DFO lead to additional deep strata nets sets added back into the program.	EIS Sections 3, 6.6 through 6.9, 6.10, Appendix O (all).

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	10.3; F-4.1; F-8.2; Table F-8-3; O1-3.1.4.1	"Aquatic assessments of 15 waterbodies and 8 watercourses within the local area of the Project were conducted between 2009 and 2019…These assessments included bathymetry, water quality, fish habitat surveys, fish community surveys, spawning surveys, fish tissue analysis and tagging."(3.391 p 3-20) "A summary of the existing conditions is presented below to support an understanding of the effects assessment. The aquatic resources technical support documentation including baseline data is found in Appendix O." (6.10.1 p 6-212) "Fish and fish habitat studies have been undertaken at the Project and surrounding area since 2011 and include multiple years and multiple seasons of investigation." (6.10.1 p 6-213) "Fish sampling has been completed over multiple seasons and years using a diversity of sampling techniques…" (6.10.1.1 p 6-213) "In undertaking the assessment of fish and fish habitat, the following indicators and measurable parameters were used: Change in relative abundance of fish species Change in fish community structure" (6.10.2.1 p 6-218) "The assessment of fish populations and abundance was determined using fish sampling surveys…" (6.10.2.3 p 6-219) "The level of confidence in the prediction is considered to be high…based on extensive field studies carried out since 2011." (6.10.5 p 6-226) Ontario does not consider confidence in the prediction to be high. "Baseline environmental research has been ongoing for several years and an extensive data set has been collected. This includes comprehensive information on water and…fish communities…" (10.3 p 10-2) "Detailed fisheries and fish habitat studies have been undertaken at the Project site and surrounding area since 2011…additional fish and fish habitat investigations are ongoing…" (F4.1 p F-4-1) "If the results of monitoring indicate that the measured are not…functioning according to the plan…" (F-8.2 p F-8-9) How will this be assessed? Table 8-4 (page 8-14) lists several "modes of failure", but a fisheries monitoring plan with indicators, targets and benchmarks, is not provided. Moreover, to date, FMG has not provided fisheries baseline data that can be used to represent the pre-construction state of the fish community, against which to compare future monitoring data. "Conduct a full lake BsM program on Springpole Lake…"(Appendix W- 2022 fish workplan p. 1) "A total of 11 broad-scale (BSM) nets were fished in Springpole Lake (Figure 20)" (O1-3.1.4.1 p. O1-38)	The additional data collected from these studies, in combination with previously collected aquatic data, supports the previous descriptions of fish communities provided in the draft EIS/EA and further increases the understanding of fish abundance and distribution throughout the Springpole Lake. A summary of the results from the BsM program and the hydroacoustic program are provided as Attachment FH-08-1 and the results of all programs will be provided in the final EIS/EA.	

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		MNRF's review of the fisheries and aquatic baseline reports described significant shortcomings in the methodology applied, particularly with regard to the fish habitat surveys, fish community surveys, and fish tissue analysis. In March 2022 FMG committed to collect new fish population data. However, it is our understanding that new data is still being collected and was not available for inclusion in the draft EA. Thus the conclusions made in the draft EA are based on the insufficient data flagged in the fisheries and aquatic baseline reports. MNRF expects that the final EA will include results of the updated data collections. Moreover, to date, FMG has not provided fisheries baseline data that can be used to represent the pre-construction state of the fish community, against which to compare future monitoring data. The Broadscale Monitoring Protocol (BsM) is Ontario's preferred approach to fisheries monitoring on inland lakes. However, its use by FMG warrants consideration of the following points: – Simply using BsM nets does not mean a practitioner is following the BsM Protocol; this was one of Ontario's major criticisms of the background reports in 2021. – FMG has committed to conducting a full BsM survey, following the protocol, in 2022. Those data have not been reviewed by Ontario, nor have they been integrated into the draft EA. – Post-construction monitoring using the BsM Protocol cannot be compared to the pre-2022 data that were collected using an assortment of capture gear. Ontario considers those data invalid. The pre-2022 baseline reports claimed to use the BsM protocol, but in fact, while BsM nets were used, the protocol was not actually followed. Please confirm that the plan for 2022 is to conduct a full BsM survey, per Ontario's manual of instructions. "A total of 11 broad-scale (BSM) nets were fished in Springpole Lake (Figure 20)" The Broad-scale Monitoring Protocol (BsM) has not been followed. For lakes 1500-5000 ha, with a maximum depth 35-50m, the protocol prescribes 18 large mesh nets and 19 small mesh nets; Figure 20 describes that the 6 large mesh and 5 small mesh nets were set. Further, the protocol prescribes that the entirety of the lake should be sampled; however, only the western portion of the lake was sampled. As such, the data cannot be used as a representative sample of the fish community. The 2012 BsM data are invalid and should not be included in the report. The baseline report represents the data as following the BsM protocol (e.g. specific references were made to the BsM method throughout 3.1.4.1). The BsM protocol only provides a characterization of a fish community when set in appropriate locations, in appropriate strata, and with appropriate net density based on the surface area and depth of the lake, which the netting program did not follow. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.		
MNRF-266	1.5;	"Dewatering of a portion of the north basin will be completed in accordance with all regulatory requirements, including for the water taking and removal of fish."	Open pit mining is typically used for large low-grade deposits and deposits where the ore distribution is uniform over a large area, which is the case for the ore grade of the proposed Project. Underground mining is typically	Not applicable

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
	4.4; 4.8; 4.18.5; 5.4; 5.30; 6.10; 6.10.2; 6.10.4.1; App F- Executive Summary; F-5.2.1	"An open pit mine is required to extract ore for onsite processing." (4.4 p4-5) No rationale or justification provided to other alternatives why an underground operation not a viable option? Mitigation measure will be implemented for the Project for these effects in accordance with offsetting or compensation methods under the Fisheries Act regulations and policies…" (4.8 p 4-31) "Approximately 228.4 ha of fish habitat is anticipated to be impacted…" (4.8 p 4-31) "Fish habitat will be increased…" (4.18.5 p 4-55) "The following alternatives to the Project were assessed: – Proceed with the Project as planned; – Delay the Project until circumstances are more favourable; or – Abandon the Project" (5.4 p 5-10) "In order for the Project to proceed and be economically viable, it will of necessity overprint some of the space currently occupied by waterbodies and watercourses…as indicated in Section 5.4 the only viable means is an open pit…" (5.30 p 5-90) "…many of the impacts…will require offsetting or compensation consistent with Fisheries Act regulations and policies." (5.30 p. 5-90) "…avoidance of fish habitat is not feasible…" (6.10, 6-212) "Many of the impacts…will require offsetting or compensation consistent with Fisheries Act regulations and policies…" (6.10, 6-212) "The following potential interactions between the Project and fish and fish habitat may cause potential effects…" (6.10.2, 6-216) "…result in the disruption of 156ha of fish habitat…" (6.10.4.1 p 6-221) "…avoidance of fish habitat is not feasible…" (App F- Executive Summary p. F-i) "…a comparison of fisheries impacts proposed for the Project as compared to other Canadian mines with similar lake interactions has been provided, including the Meadowbank Mine, Gahcho Kue Mine and Diavik Mine. All of these have previously required and implemented permanent and temporary lake habitat offsetting…" (F-5.2.1 p. F-5-3) "104 ha of deep open pit pelagic area." (F-8.1.1 p F-8-3) Dewatering of a portion of the north basin may not coincide with the purposes of the Lakes and Rivers Improvement Act, specifically: 2 The purposes of this Act are to provide for, (b) the protection and equitable exercise of public rights in or over the waters of the lakes and rivers of Ontario;	used for deep-lying, high-grade, vein or seem-type deposits or where the setting has limited access. In addition, geotechnical investigations found the underground option to be unstable and structurally unsuitable. Appendix B-3 of the draft EIS/EA, Section 5.2.1 of the approved Amended Terms of Reference (Identification of Alternatives) explains that an open pit mine is the only viable alternative to the undertaking and that alternatives will not be considered. A technical meeting with MNRF will be proposed to discuss expected approvals associated with the Lakes and Rivers Improvement Act.	

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		(d) the management, perpetuation and use of the fish, wildlife and other natural resources dependent on the lakes and rivers; (e) the protection of the natural amenities of the lakes and rivers and their shores and banks; The Act states further: 14(7) The Minister may refuse to grant an approval for the location of a dam if the Minister is of the opinion that the construction of the dam at that location would not coincide with the purposes of this Act. The Lakes and Rivers Improvement Act does not include a schema for offsetting or compensation for the loss of perpetuation and use of fish, but rather provides that these natural amenities should be protected.		
MNRF-267	1.5, 4.8; 6.10.4.1; 10.3; App F- Executive Summary; App F- Table D; F-8.1; F-8.1.8; Table F-8-1; Table F-8-3; F-8.18 p.F8-9)	"FMG intends to explore potential collaborations with Indigenous communities, that might have fish enhancement projects that are aligned with fishery offset and compensation plans, with a goal to enhance the productivity of recreational fisheries." (1.5 p. 1-7) "Establishment of a micro hatchery to strategically stock selected species of fish to mitigate the temporary loss of fish production from the dewatered basin. This effort would be continued until the dewatered basin is restored as an active part of the Springpole Lake." (4.8 p 4-31) "…establishment of a micro hatchery to strategically stock selected species of fish to mitigate the temporary loss of fish production…" (6.10.4.1 p 6-223) "…proposes the sustainable reintroduction of historic fisheries values (Lake Sturgeon)…In addition, the plan proposes the establishment of a micro hatchery to strategically stock selected species of fish…" (10.3 p 10-3) Establishment of a micro hatchery to strategically stock selected species of fish to mitigate the temporary loss of fish production from the dewatered basin. This effort would be continued until the dewatered basin is restored as an active part of the Springpole Lake." (App F-Executive Summary p. F-ii) FMG proposes creation of a Temporary fish hatchery to maintain existing productivity as part of their offsetting plan. (App F-Table D p. F-vi) "…and a strategic fish hatchery program to maintain the existing productivity of Springpole Lake…"(F-8.1 p F-8-2) "Establishment of a micro hatchery to strategically stock selected species of fish to mitigate the temporary loss of fish production from the dewatered basin." (F-8.1 p F-8-2) "Strategic Stocking of Fish in Springpole Lake" (F-8.1.8 p F-8-8) "Micro-hatcheries could be established in interested communities as well as at the Project site." (F-8.1.8 p F-8-8)	The micro-hatchery offset measure was included as a means of mitigating a loss of fish production during the mine life, and as a potential capacity building opportunity for Indigenous communities with an interest in managing lakes in their traditional territories. The intent was that only brood stock collected annually from Springpole Lake would be cultured, and only to limits that are justified by the ongoing fish monitoring data. It is agreed that the remaining lake area will have a carrying capacity limit controlled by biotic and abiotic factors and that limit should not be exceeded. The micro-hatchery measure will only be taken forward into the final Fish Habitat Offsetting and Compensation Plan with the support of Indigenous communities, government agencies and a clear vision that would maintain the genetic stock and biodiversity of Springpole Lake.	Appendix F.

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		"The intent of the strategic stocking program is to maintain the existing level of fish productivity…" (F-8.1.8 p. F-8-9) "Temporary fish hatchery to maintain existing productivity." (Table F-8-1 p. F-8-11) "Strategic fish stocking" (Table F-8-3 p. F-8-13) "Confirm support in principle from…provincial and federal agencies." (F-8.1.8 p. F-8-9) While the productive capacity of Springpole Lake will be reduced under an open pit scenario, lake trout and other species would naturally persist at a diminished population size. Ontario policy states that supplemental stocking should be discouraged in waters which contain viable populations of native fish of the same species. Ontario policy states that supplemental stocking should be discouraged in waters which contain viable populations of native fish of the same species. The technique of providing fisheries dependent on continuous stocking has been promoted and accepted with an incomplete understanding of long-term effects on the native fish community. The presence of hatchery fish in waterbodies creates the illusion that the aquatic ecosystem is in a healthy state. This false impression may lead to a loss of public support for the longer-term objective of rehabilitation. Productive capacity is a function of the abiotic characteristics of the lake in question, (e.g., temperature, dissolved oxygen, pH, shoreline complexity, substrate), as well as biotic characteristics (phytoplankton community, macrophyte community, invertebrate community, prey fish community, predator community). FMG's fishery offset and compensation plans suggest that the productivity of fisheries can be enhanced primarily through stocking of game fish species; however, there is a limit to the natural capacity of aquatic ecosystems and hence the benefits that can be derived from them. Further, establishing of a hatchery and stocking program would require an environmental assessment in its own right. Claussen, J.E. and D.P. Philipp. 2022. Assessing the role of supplementation stocking: A perspective. Fisheries Management and Ecology. DOI: 10.1111/fme.12573		
MNRF-268	2.2.3; 6.18.1.1; F-1.3	"The distribution list, as identified in the ToR and updated accordingly, includes the following…" (2.2.3 p. 2-5) "FMZ 4 is subject to a Fisheries Management Plan developed by NDMNRF [sic] with input from the FMZ 4 Advisory Council." (8.18.1.1 p. 6-392) "During the preparation of this draft Plan FMG has provided opportunities for early engagement with Indigenous communities, Fisheries and Oceans Canada (DFO) and other stakeholders." (F-1.3 p. F-1-2) The list provided in Section 2.2.3 does not include the Fisheries Management Zone 4 Advisory Council. Although the FMZ 4 Council has not met in several years, they remain Ontario's principal stakeholder group for engagement in understanding and incorporating the needs and perspectives of fisheries resource users in planning and management decisions within the zone. The FMZ 4 Advisory Council worked with Ontario to develop the fisheries management objectives for the zone and should have been afforded the same consideration as the stakeholders listed on this page.	It is understood that Fisheries Management Plans are developed and administered by MNRF. Further, it is understood that the designated MNRF contact for the advisory council (Steve Bobrowicz) is currently part of the distribution list for the environmental assessment through the "one window" approach with the Ministry of the Environment, Conservation and Parks.	Not applicable

Table C-2.5: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

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		Suggest that further engagement on fish and fisheries-related topics absent consultation with the FMZ 4 Advisory Council is inappropriate, and that group should be updated with all materials distributed to stakeholders to date.		
MNRF-269	3.1.3	"In most cases, lake management for Lake Trout will have been identified previously in either local resource management plans [sic.] (e.g., Fisheries Management Plans and District Land Use Guidelines)." This is incorrect. Neither the FMZ 4 Fisheries Management Plan nor the Crown Land Use Policy Atlas specify the lakes to be managed for lake trout. The FMZ 4 Fisheries Management Plan identifies landscape level fisheries management goals and objectives, but does not address individual lake management. The Crown Land Use Policy Atlas does not address lake trout at all. MNRF Districts are responsible for identifying lakes which will be managed for lake trout on the provincial List of Lakes Designated for Lake Trout Management. The current version of this list was published in 2015; a revised version is forthcoming. Springpole and Birch Lakes are both listed as naturally reproducing lake trout lakes on both the current and forthcoming versions of the list.	The clarification is appreciated and the text will be revised in the final EIS/EA to state that both Springpole and Birch Lakes are listed as naturally reproducing Lake Trout lakes on the provincial List of Lakes Designated for Lake Trout Management.	EIS Section 3.
MNRF-270	3.3.9.2; 4.8; 4.18.3.1; 4.18.5; 5.13; 5.31.1; 6.6.2.2; 6.10.2; 6.10.2.1; 6.10.4.1; 7.5.1; F-Table D; F-6.0; F-8.1.1;	A visual survey…was completed…to identify Lake Trout habitat…" (3.3.9.2 p. 3-24) "Approximately 228.4 ha of fish habitat is anticipated to be impacted…" (4.8 p. 4-31) "the water column will form a permanently stratified density structure (meromixis), which will limit mixing between the surface mixed layer and water at depth." (4.18.3.1 p. 4-51) "The alternative of fully backfilling (or partially backfilling) the open pit with mineral waste is not economically feasible." (5.13 p. 5-90)"Fully backfilling with mineral waste is not economically feasible…" (5.31.1 p. 5-91) "Fish habitat will be increased…" (4.18.5 p 4-55) "In undertaking the assessment of surface water effects, the following indicators and measurable parameters were used." (6.6.2.2 p. 6-108) "The following potential interactions between the Project and fish and fish habitat may cause potential effects…" (6.10.2 p 6-216) "In undertaking the assessment of fish and fish habitat, the following indicators and measurable parameters were used: – Areal extents of fish habitat, measured in ha – Change to surface water levels, measured in m – Change in drainage area, measured in hectares" (6.10.2.1 p. 6-218) "…result in the disruption of 156ha of fish habitat…" (6.10.4.1 p. 6-221) "…the basin can be filled and ready for reconnection to Springpole Lake in approximately Year 13 to 15 of the Project. As a result there will be no residual effects on fish and fish habitat due to refilling of the open bit basin." (6.10.4.1 p 6-222) "The surface waters will mix part way through the column to a depth comparable to and exceeding the natural lake basins, providing pelagic habitat for species such as lake trout, lake whitefish and walleye, similar to conditions currently provided by deep water basins." (6.10.4.1 p. 6-223)	It is agreed that all the factors listed by the reviewer are important and that together they determine the species presence and abundance that has been measured with the Project investigations to date. As per the response to Comment 138, removing 6% of the lake area, 9% of the volume, and one of the deep basin habitats is not expected to alter or imbalance the remaining lake's primary or secondary communities or how the existing fish community interacts with them. Data collected in 2022, combined with lower trophic studies presented in 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA), confirms the understanding that conditions in the isolated basin that are not unique to only that portion (deep basin) of the Springpole Lake. Further, its isolation would not prevent the remaining lake from continuing to function as it does now or its ability to continue supporting Lake Trout and other reliant species such as its pelagic prey, Cisco. It is acknowledged that the total area supporting Lake Trout will be reduced during the life of the mine but there is confidence that all species and all life history requirements will be retained in the lake, given the comparable species distribution between deep basins. Based on engagement and the identification of keys species of interest, there is confidence that the reclaimed basin can be designed and constructed to provide functional habitat for all fish species that currently utilize the basin. Preliminary analysis of the discharge associated with the basin dewatering and the water taking associated with the subsequent refilling (representing the largest water taking and discharges proposed for the Project) estimates that the water level changes are predicted to be ~ 10 cm. This is well within the natural range of water level fluctuations of Springpole Lake. Additional detail on predicted water level fluctuations will be provided in the final EIS/EA and the updated Fish Habitat Offsetting and Compensation Plan. A key aspect of the assessment of potential effects from the Project, is the prediction of surface water conditions in Springpole Lake and Birch Lake throughout the life of the Project. Due to the very small footprint of the mine site relative to the large scale and volumes within Springpole Lake and Birch Lake, a change in the thermal regime (and corresponding cold water inputs during spring and fall) due to the alteration of the associated catchment areas is considered extremely unlikely however in response to the reviewer's comment, additional discussion regarding potential effects on the thermal regime on surface water will be included in the final EIS/EA. For example, as noted in Section 6.7.4 of the draft EIS/EA, the development of cofferdams and associated water management infrastructure at the mine site will temporarily remove approximately 6.3 km^2 of the catchment area from Springpole Lake. This accounts for approximately 0.5% of the overall catchment area of Springpole Lake system. Further, Section 6.6.4 of the draft EIS/EA, notes that the catchment areas of Birch Lake are negligibly impacted by the Project. As a result, there will only be limited changes to the shoreline of Springpole lake other than the north interface with the new dikes, and the effluent discharge line into the southeast arm. This would represent a very small portion of the total lake perimeter.	EIS Section 6.7.6, Section 6.8.6 and Section 6.10.6

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		"…as a result, there will be no residual effects to fish habitat." (6.10.4.1 p. 6-224) "…water quality is not anticipated to have a residual effect on fish health…" (6.10.4.2 p. 6-226) "…the project is predicted to have minor residual effects on Birch Lake and Springpole Lake." (7.5.1 p. 7-24) ""Most predicted residual effects to fish and fish habitat…" (F-6.0 p. F-6-1) "…providing pelagic habitat for species such as Lake Trout, Lake Whitefish and Walleye, similar to conditions currently provided by deep water basins." (F-8.1.1 p. F-8-3) "104 ha of deep open pit pelagic area." (F-8.1.1 p. F-8-3) The Project, under an open pit scenario, will significantly impact all lake trout habitats, including spawning, nursery, juvenile, foraging and migration, as well as impacting the habitats of critical prey species (e.g. cisco). These habitats are not given due consideration in the assessment of effects of the Project in this draft EA, nor in the draft offsetting plan. While surface area is commonly used as the "currency" of fish habitat compensation, the Lakes and Rivers Improvement Act is concerned not with habitat compensation, but rather the use and perpetuation of fish. In that context, it is the productivity of the habitat that is important, which is a function of more than surface area. Depth, volume, substrate, temperature, pH, allochthonous inputs, shoreline complexity, macrophytes and benthic invertebrates all play a role in the perpetuation of fish. In the case of lake trout, these variables can be so critically balanced that, once diminished, populations rarely recover; this is the impetus behind Ontario's policy on the disposition of Crown land on naturally reproducing lake trout lakes. the draft EA emphasizes the quantity (i.e. surface area) of habitat reclaimed, but doesn't consider the type of habitat, or quality of that habitat, necessary to address Ontario's responsibility to perpetuate fish, fish habitat and fisheries, particularly lake trout. Suggest water budget work be extended to describe the effect of water-taking and mine operations on water levels, with particular emphasis on near-shore habitats and the seasonality of their use. The draft EA does not account for increases in the ambient water temperature of Springpole (and possibly Birch) Lake due to loss of terrestrial vegetation, loss of the deepest basin of Springpole under an open pit scenario, loss of cold water inputs, absorption of radiant (solar) energy by the exposed bedrock in an open pit scenario, and the introduction of treated water to the southeast arm of Springpole Lake. Increases in water temperature will affect cold water fish species directly, and well as indirectly due to the relationship between water temperature and dissolved oxygen. Together, these may act to reduce the volume of late summer habitat available to lake trout and other cold water species. Increases in water temperature therefore may not coincide with the purposes of the Lakes and Rivers Improvement Act. Throughout the draft EA, there are many assumptions that potential effects will be mitigated with no residual effects (e.g. Section 6.9.4.2 "With the implementation of effective sedimentation and erosion control measures there are no potential increases to TSS and turbidity…"). However, in most cases, these 'effective mitigation' measures are not described.	Currently, there are four water level logger stations in Springpole Lake, and two stations in Birch Lake, all of which record continuous water temperature. This data will enable detailed monitoring during all phases of the Project to confirm the prediction that there is no change to water temperatures as a result of the Project.	

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		The draft EA should fully explain all of these 'effective mitigation' measures, and present an assessment of the risk associated with each potential effect. the draft EA emphasizes the quantity (i.e. surface area) of habitat reclaimed, but doesn't consider the type of habitat, or quality of that habitat, necessary to address Ontario's responsibility to perpetuate fish, fish habitat and fisheries, particularly lake trout. Consider potential residual effects on the following variables: – Depth – Location of littoral habitats – Placement and composition of structure, including coarse woody debris – Currents – Upwellings – Dissolved oxygen – pH – Water temperature – Aquatic macrophytes – Allochthonous input – Benthic invertebrate community Disruption of pelagic prey populations is also a significant concern, which has not been adequately addressed in this draft EA		
MNRF-271	4.4.1.1; 5.30; 5.31; 5.31.1	"The cofferdam locations were selected in consideration of…minimizing fisheries impacts." (4.4.1.1 p. 4-5) "In order for the Project to proceed and be economically viable, it will of necessity overprint some of the space currently occupied by waterbodies and watercourses…as indicated in Section 5.4 the only viable means is an open pit…" (5.30 p 5-90) "The alternative of fully backfilling (or partially backfilling) the open pit with mineral waste is not economically feasible." (5.31 p. 5-90) "Fully backfilling with mineral waste is not economically feasible…" (5.31.1 p 5-91) Section 5.4 does not indicate that the only viable means is an open pit. No other approaches, nor an assessment of viability or economic feasibility are presented. The proposed open pit concept, which will involve the dewatering of the north basin of Springpole Lake will have detrimental impacts to lake trout. MNRF recommends that FMG consider alternatives to the open pit concept within the EA, as the bathymetry and telemetry work conducted through the baseline studies provide confirmation that the project proposal, specifically draining the north basin of Springpole Lake and creating the open pits within the drained basin, would eliminate the most important Lake trout summer habitat in Springpole Lake.	Alternatives to an open pit mine were fully considered during the engineering studies that informed the determination of the mining method. The rationale for open pit mining was summarized in the Provincial Amended Terms of Reference (Section 5.2 of Appendix B-3 of the draft EIS/EA), which in part defined the scope of the draft EIS/EA. As described in the Provincial Amended Terms of Reference, it was determined that an open pit mine is the only viable alternative. Accordingly, and following subsections 6.1(2)(b)(iii), (c) and (d) of the Environmental Assessment Act, other mining alternatives were not required to detailed in the draft EIS/EA, as development of the open pit mine is the only viable alternative that will address the opportunity identified. Further detail regarding the decision to proceed with open pit mining was included in the Technical Memo that supported the Proponent's request for a Voluntary Agreement with the Provincial Crown, to voluntarily complete a Provincial Individual Environmental Assessment. Alternatives to the proposed Undertaking (the open pit mine) were fully considered and included underground mining or a combination of open pit and underground mining. Additional fisheries and aquatic data was collected for the entire Springpole Lake and the proposed dewatered basin during 2022. This included a full lake broadscale monitoring program, ongoing lower trophic level studies, a lake-wide hydroacoustic fish community survey, and multiple eDNA metabarcoding surveys. This additional data, in combination with previously collected aquatic data increases the confidence that although the fish habitat present in the isolated basin of Springpole Lake is important, and encompasses one of six deeper water basins in the lake, the majority of the Springpole Lake area (94% area and 91% volume) will remain capable of sustaining all species and all life functions present in the lake. The data collected from 2022 demonstrates that the remaining deep-water basins and lake areas support comparable and, in some cases, greater numbers of fish than the isolated basin. This data from 2022 will be provided in in the final EIS/EA.	EIS Section 3, Appendix O (all).
MNRF-272	4.4.1.1; V-3.4.1	"The dam will be constructed primarily of crushed rock and mine rock" (4.4.1.1 p. 4-6) "The cofferdam will initially be constructed as homogenous rockfill embankments using material sourced from initial stripping of the open pit." (V-3.4.1 p. V-13)	While the primary source of material for site construction is expected to be non-acid generating mine rock from the open pit development, this will not be available immediately as you note. Rock for early construction activities, including the dikes (cofferdams), is expected to come from the excavation of the fish habitat development area, east of the open pit (Section 4.8) and re-use of rock from other site excavations in bedrock, as available.	EIS Section 5.

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		If construction of the cofferdam is the first step of constructing the mine, where is the proposed crushed rock and mined rock going to be sourced?		
MNRF-273	4.4.2	"…exposed lakebed sediment and the upper mineralized overburden primarily within the open pit footprint will be pushed into piles in the bottom of the dewatered basin." Elsewhere in the draft EA, there are several references to the dewatered basin remaining in its natural state. Burying the substrate of the dewatered basin with the lakebed from the open pit area seems contradictory to this concept. Therefore, we do not agree with this conclusion, unless further evidence is provided.	The dewatered basin will remain in a natural state as practical, except within the open pit footprint or where the materials are required to be moved / to be stored. Further detail will be provided in the final EIS/EA in regard to the area affected compared to the overall basin footprint.	EIS Section 5.
MNRF-274	4.4.4.2	"On the order of 54% of the mine rock samples from the portage zone, which represents the most volumetrically significant zone of the open pit, were classified as NAG…15 to 20% of the Portage zone mine rock samples couple become net acid generating within one year of exposure, while up to 25 to 30% of the samples could become net acid generating over approximately ten years."(4.4.4.2 p. 4-8, 4-9) It has been well established that surface water acidification has resulted in the loss of fish populations around the world, and that lake trout are particularly sensitive to surface water acidification (e.g. Beggs, G.L., Gunn, J.M. (1986). Response of Lake Trout (Salvelinus namaycush) and Brook Trout (S. fontinalis) to Surface Water Acidification in Ontario. In: Martin, H.C. (eds) Acidic Precipitation. Springer, Dordrecht. https://doi.org/10.1007/978-94-009-3385-9_73) Potentially acidifying two naturally reproducing lake trout lakes is not consistent with Ontario's policy direction.	Acidification of Springpole Lake and/or Birch Lake from the development of the Project will not occur as treated effluent discharges will be required to meet all regulatory requirements, including those administered by the Ministry of Environment, Conservation and Parts and Environment and Climate Change Canada. It will also not occur indirectly from Project-related acid rain, as all air emissions from the Project will be required to meet the Ministry of the Environment, Conservation and Parks strict emission requirements for industrial operations, and Project-related acid rain is not a possibility. The Project has been designed to mitigate the acid generation potential of the native rock. Modelling has shown that at the time of connection to the north basin of Springpole Lake, all parameter values are below applicable Provincial Water Quality Objectives (Appendix N-3). It is expected that this will need to be proven by monitoring data from the open pit basin before reconnection to Springpole Lake will be allowed by the Crown. The assessment of effects of the Project design inclusive of indirect effects from mineral waste acid generation potential on fish and fish habitat is provided in Section 6.10. Discussion of impacts to the surface water systems is provided in Section 6.6 to 6.9 of the draft EIS/EA.	Not applicable
MNRF-275	4.7.2	"Key considerations in the selection of the location of the CDF and storage methods include…avoidance of waterbodies and watercourses as practical." The preferred location of the CDF seems to have been chosen because of its practicality, with no real consideration of the location of waterbodies. Locating the CDF within 120m of two large lake trout lakes does not show consideration of the aquatic and fisheries values in this decision.	The rationale for a co-disposal facility and justification for the location for the same, is detailed in Sections 5.7 to 5.11 of the main text of the draft EIS/EA provide a step-wise assessment of the mineral waste storage alternatives for the Project that support the final mineral waste storage facility (the co-disposal facility) described in Section 4.7, and utilizing the methodology described in Section 5.2. Environmental aspects were fully considered in the alternatives assessment methodology, which follows the Provincially-approved Terms of Reference. In addition, the Federal Metal and Diamond Mining Effluent Regulations requires that an assessment of alternatives must be completed utilizing the prescribed methodology in order for mineral waste to be approved when overprinting a natural, fish-bearing water body. A draft of the Mine Waste Management Alternatives Assessment for the Project is provided in Appendix E.	Not applicable
MNRF-276	4.8; 6.10.4.1; F-8.1.8	"The primary mitigation option proposed for the Project will be the establishment of a new fish habitat area and restoration of an expanded north basin in Springpole Lake after mining ceases." (4.8 p. 4-31) "Restored and enhanced dewatered basin" (6.10.4.1 p. 6-223) "…restoring the disrupted and altered waterbodies…" (F-8.1 p. F-8-1) "…restoration of the dewatered basin…" (F-8.1.8 p. F-8-8) The terms "restore" and "restoration" of fish habitat are used throughout this draft EA to describe FMG's plans to refill the north basin and reconnect it to the rest of the lake after mining ceases.	The suggested terms will be used in the final EIS/EA, when referring to the open pit footprint where relevant. However, the new fish habitat development area would still be considered habitat creation, and the areas within the isolated basin that are dewatered but not otherwise altered could still be considered restored. Notwithstanding these individual areas, the basin as a whole will be considered and referred to as reclaimed as per the comment.	EIS Sections 5, 6.10, Appendix F.

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		In ecology and conservation biology, the term "restoration" is regarded as returning an altered ecosystem to its original state (e.g. Meffe and Carroll 1994). Clearly, this is not possible under an open pit scenario. What the draft EA describes is closer to "rehabilitation", i.e. an attempt to restore elements of structure or function to an ecological system, without necessarily attempting complete restoration to the prior condition. However, given that the draft EA and the offsetting plan do not seem to fully address the complexity of habitat variables that will be impacted by the Project (e.g. Depth, volume, substrate, temperature, pH, allochthonous inputs, shoreline complexity, macrophytes and benthic invertebrates), it is likely that the best that FMG will be able to accomplish will be "reclamation", i.e., rehabilitative work carried out on the most severely degraded sites, which does not result in a copy of the native ecosystem. Suggest that the terms "restore" and "restoration" be replaced with "reclaim" and "reclamation" throughout the document, when applied to fish, fish habitat and fisheries. Meffe, G.K. and C.R. Carroll. eds. 1994. Principles of conservation biology. Sunderland: Sinauer Associates, inc. 600 pp.		
MNRF-277	4.8; 6.10.4.1; App F- Executive Summary; App F- Executive Summary; F-8.1.3; F-8.1.3; F-9.0	"In total, there will be approximately 492.6 ha of combined new and restored habitat post closure to offset the approximate 228.4 ha of impacted habitat." (4.8 p. 4-31) "It is anticipated that 492 ha of fish habitat will be created through these offsetting measures…" (6.10.4.1 p. 6-224) "However, there are approximately 492 ha of combined new, restored or enhanced habitat proposed…." (App F- Executive Summary p. F-i) "The proposed measure in this draft Plan is to implement research and targeted implementation of Lake Sturgeon…A rudimentary framework of the offsetting measure is provided below…" (F-8.1.3 p. F-8-5) "An associated fish habitat offset and compensation credit of 2% of the total surface area (200ha) is proposed for this effort." (F-8.1.3 p. F-8-6) "…restoration or enhancement of approximately 492.6 ha of habitat…resulting in a net habitat gain or enhancement of up to 267.7 ha…" (F-9.0 p. F-9-1) Of the 492.6 ha of reclaimed habitat that FMG describes above, the offsetting plan says that 200 ha is "credit" for restoring lake sturgeon to Springpole Lake. Notwithstanding that Ontario maintains the position that they are present in the lake and that it should be treated as lake sturgeon habitat, stocking fish is not the same thing as habitat restoration, and should not be portrayed as such in the draft EA. DFO's Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the Fisheries Act indicates that "Complementary measures may comprise up to 10% of the required amount of the measures to offset (i.e., restore, enhance or create fish habitat); the remaining 90% of the amount of measures to offset should consist of habitat enhancement, restoration or creation." FMG has claimed 40.6% through this complementary approach.	The reintroduction of Lake Sturgeon in select previously inhabited waters is considered as a "Chemical or biological manipulation" as per the Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the Fisheries Act (DFO, 20193). Although some of the research and development associated with this measure could be considered as a complimentary measure, the overall reintroduction measure is considered an offsetting biological measure and not restricted to the 10% limit. In the immediate Project area, Lake Sturgeon were historically present in Birch, Springpole, and Seagrave Lakes, as well as Cat Lake, Lake St. Joseph and several lakes in between and along the Birch River flow path (Cat Lake / Slate Falls / MNRF. n.d. 2015/2016). Based on records provided by MNRF, there is no known catch observations of Lake Sturgeon in the local waterbodies, including scientific or recreational records, since the anecdotal observations more than 20 years ago, around 1997. Studies conducted at the Project Site, including a recent broadscale monitoring program and two eDNA metabarcoding events, have not identified Lake Sturgeon in Birch Lake (near the Project site) or Springpole Lake. Any additional information MNRF has to document Lake Sturgeon in Springpole Lake would be welcomed, and a technical meeting will be proposed to discuss understanding of Lake Sturgeon presence and distribution. 3Fisheries and Oceans (DFO). 2019. Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the Fisheries Act. Fish and Fish Habitat Protection Program. Accessed from: https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/forms-formes/apply-policy-politique-applique-eng.pdf	EIS Sections 5, 6.10, Appendix F.
MNRF-278	4.8; 6.10.41; App F Executive Summary	"Overbuilding and integration of spawning shoals along the active lake facing embankments…	The dikes (cofferdams) will require an engineered minimum footprint to ensure stable structures are built to isolate the dewatered basin. On the embankments facing the retained lake, additional material will be placed extending out into the lake to replace spawning habitat impacted by the dike construction. This is the	Not applicable

Table C-2.5: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		This statement occurs several times throughout the draft EA, but its meaning is unclear. Please explain the terms "overbuilding" and "integration" in this context.	overbuilding of the dike embankments and integration of spawning shoals referred to in the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA). An example is shown in Figure 8-1 of Appendix F as "new shoal (created during operations)".	
MNRF-279	4.8	"Backfilling and contouring of the north end of the open pit…to optimize fish habitat structures, substrates and depth for selected key species…" Fish habitat structures and substrate is more complex than can be addressed through coarse backfilling and contouring of mine waste rock. Organic substrates, silt, marcrophytes, coarse woody debris, and cold water upwellings take hundreds of years to develop naturally.	It is agreed that the successful recontouring (backfill and regrading) of former pit areas will require extensive habitat features to be designed and built into the enhanced littoral areas. This will be the case for both the north end of the pit, and the Phase 1 pit as shown in Figure 8-1 of the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA). Generalized habitat features will include: – Substrate placement (sediments from initial pit stripping); – Habitat structures (nearshore wood placement and rock pile features); and – Diverse basin contouring to ensure micro and macro habitat diversity and variable depths. As discussed in Appendix F, engagement with Indigenous communities and government agencies will be used to help define the key species the habitats will be designed for. Preliminary design of the recontoured areas and the fish habitat development areas will be provided in the updated version of the Fish Habitat Offsetting and Compensation Plan in the final EIS /EA, clearly showing the features and treatments proposed.	EIS Section 6.10, Appendix F.
MNRF-280	4.10.2	"Best available technologies that are economical [sic] achievable (BATEA) will be considered…" Given the ecological sensitivity of the receiving waters, the design of the ETP should be based solely upon its effectiveness. Ontario is policy-bound to follow the precautionary principle; risk assessment suggests that the threat to the resource is high enough to preclude the use of the BATEA philosophy for this project.	As discussed in the draft EIS/EA, effluent discharge(s) from the Project will be protective of the receiving environment and will occur in accordance with federal and provincial approval requirements. Draft effluent criteria for the Project is presented in Section 6.8.5 of the draft EIS/EA. Water quality in the southeast arm of Springpole Lake (the receiving environment) will not be above surface water quality guidelines during any Project phase as a result of the Project. Final effluent criteria for the Project will be determined in consultation with the Ministry of the Environment, Conservation and Parks during the environmental approvals phase.	Not applicable
MNRF-281	4.18.3.1; 6.8.4.1; 6.8.5	"…supplemental water from Springpole Lake is planned to be transferred to the pit in a controlled manner over a period of approximately four years while maintaining lake levels within natural variation (Appendix M-2)" "Change in Surface Water Quantity" (6.84.1 p. 6-180) "The residual effect on surface water quantity in the southeast arm of Springpole Lake is a seasonal decrease in catchment flows…" (6.8.5 p. 6-184) Specifies a reduction in flow at the outlet of Springpole Lake (node 10) in the realm of 10-12%. This has the potential to affect fish habitat in the Birch River, and particularly spawning habitat in the rapids at the outlet of Springpole Lake Addresses water flows within the southeast arm of Springpole Lake but does not seem to address anything pertaining to "maintaining lake levels within natural variation" (the term "natural variation" does not appear anywhere in Appendix M). Pumping water from the southeast arm of Springpole Lake into the north basin has the potential to effect fish habitat in the southeast arm, particularly overwintering lake trout eggs and fry, which may be dewatered as a result of these activities. Under an open pit scenario, Ontario would apply the combined timing restrictions for lake trout and walleye (i.e. no work in water September 1 through June 20) in order to protect the early life stages of these species. This allows FMG a period of 72 days per calendar year to complete this activity. Suggest FMG expand to consider the effects of its water budget on lake levels, as well as flows, as well as re-project the refilling time for the north basin with the understanding of the effect the timing restrictions will have on their schedule.	As per the Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada, (DFO, 20134), changes in instantaneous flows up to 10% are unlikely to have detectible ecological effects. Using A Desk-top Method for Establishing Environmental Flows in Alberta Rivers and Streams, (Locke A. and A. Paul. 20115), instream flow needs (IFN) represent an ecologically based flow regime that incorporates the spatial and temporal flow conditions necessary to ensure long term protection of aquatic environment. One method of IFN determination is 15% reduction from natural flows. Both metrics are protective of riverine systems, and as such the 10 to 15% flow reduction at node 10 is considered acceptable and not harmful. The water level in Springpole Lake is governed by the outflow resulting in a uniform water level throughout the lake including both the southeast arm and the north basin. The greatest water taking and water discharges associated with the Project will be the isolated basin dewatering and refilling. A lake level fluctuation of less than 10 cm is estimated during these activities. A detailed summary of lake level fluctuation based on the six level logger stations in Springpole Lake and Birch Lake will be provided in the final EIS/EA, but it is expected that less than 10 cm will be relatively minor compared to this natural variation. Given that Lake Trout typically spawn in water depths of approximately 2 m, and that the water level reductions would be continuous through spawning to emergence, conditions are not predicted to result in effects to eggs or fry. Expedited pit filling with river water has been shown as a successful means of preventing or neutralizing acidification of pit walls and decreasing the waiting time for beneficial end uses (Chapter: Filling and management of pit lakes with diverted river water and with mine water — German experiences; Mine pit lakes: Closure and management (pp.107-120) Edition: 1Publisher: ACG Australian Centre for Geomechanics Nedlands, Western Australia Editors: Clint D. McCullogh). A Canadian example of expedited open pit filling with water from adjacent waterbodies includes Island Copper Mine in British Columbia.	EIS Section 6.7.6, and Section 6.10.6

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
			As the reviewer correctly identified, fisheries in-water timing constraints based on the provincial guidelines would restrict in-water works in Springpole Lake to 72 total days. Construction of the west and east dikes are expected to take approximately one year to complete. Based on previous experience, barriers such as turbidity curtains could be used to isolate the dike areas during the allowable in-water work window. Once the area is isolated between barriers and fish are removed from this area, construction of the dikes could then proceed year-round until completed. Dewatering of the north basin would commence once the west and east dikes have both been constructed above the water level of Springpole Lake. It is also our experience that once the isolated basin is separated from the remainder of Springpole lake, and fish removal has been commenced, timing windows would not apply within the isolated basin and dewatering or pit filling could be continued year-round. Comments received from Fisheries and Oceans Canada (DFO) have also suggested that additional consideration be given to whether there would be advantages to isolating the basin outside the current timing windows in order to reduce the number of Lake Trout and Walleye trapped within the isolated basin. A technical meeting with MNRF and DFO will be proposed to discuss the timing of basin isolation. 4Fisheries and Oceans (DFO). 2013. Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2013/017. 5Locke A. and A. Paul. 2011. A Desk-top Method for Establishing Environmental Flows in Alberta Rivers and Streams. Water for life: Healthy Aquatic Ecosystems. Alberta Environment and Alberta Sustainable Resource Development. Edmonton, AB.	
MNRF-283	4.18.5	"Fish habitat will be increased…" FMG has claimed more "habitat credit" for the reintroduction of sturgeon than DFO policy allows	See the response to Comment 277.	EIS Sections 5, 6.10, Appendix F.
MNRF-284	5.5	"Cofferdams are commonly used and predictably effective for mining applications." This statement is not supported with any citations. Please provide peer-reviewed examples showing where a disturbance to a lake trout lake of this magnitude has been successfully rehabilitated with no long-term decline in the lake trout population.	The context of the statement was that dikes (cofferdams) are commonly used as a means of isolating work areas. The ability to reclaim the disturbed area is a separate concept.	EIS Section 5.
MNRF-285	5.5; App F- Executive Summary	"A few examples of Canadian mines which required cofferdams to access ore bodies under portions of large lakes include: – Meadowbank Mine, Nunavut – Gahcho Kue Mine, Northwest Territories; and – Diavik Mine, Northwest Territories" (5.5 p. 5-12) "This is considered a moderate fisheries impact when compared to other similar Canadian mines with lake interactions, including the Meadowbank Mine, Gacho Kue Mine and Diavik Mine…" (App F-Executive Summary p. F-i) "…a comparison of fisheries impacts proposed for the Project as compared to other Canadian mines with similar lake interactions has been provided, including the Meadowbank Mine, Gahcho Kue Mine and Diavik Mine. All of these have previously required and implemented permanent and temporary lake habitat offsetting…" (F-5.2.1 p. F-5-3) These examples are all currently operating mines. Whether the affected lakes will ever be successfully be rehabilitated remains to be seen. Therefore, from a fisheries perspective, these examples are irrelevant. Further, none of these examples are located in Ontario, and therefore not subject to Ontario legislation, regulation and policy; particularly the Lakes and Rivers Improvement Act.	The examples provided were intended to demonstrate that there are Canadian mining projects, that have had larger footprints and impacts to oligotrophic fish habitat, including Lake Trout lakes, where proponents and government agencies have worked together to responsibly develop the project despite uncertainties. The fact that all of the mines are still operating and have not yet reached the closure and reclamation phase, does not make them irrelevant for this purpose. The mines are also examples where fish communities (including Lake Trout) have been maintained in the surrounding habitats despite the ongoing projects and loss of lake area (AEM, 20226; De Beers Group, 20227; Golder 20208). In the case of the Meadowbank Mine, ten years of monitoring the outward facing dikes (simulated reef habitats), demonstrated that the fish presence around dike faces has been recorded throughout multiple rounds of monitoring at rates similar to or higher than reference areas (AEM, 2022). There are several examples of end use pit lakes that have been shown to support natural reproducing trout populations including: – Sphinx Lake and Pit Lake in central Alberta (Rainbow Trout and Bull Trout) (Sonnenberg, 20039; Brinker et. Al. 201110, Golder 2017), – Lac Des Roches, Alberta, a former truck and shovel coal mine 70 m deep open pit, with a. 5% littoral area a that supported the development of a natural reproducing population of Rainbow Trout, Bull trout and Brook Trout (Sonnenberg, 2003, Golder 2017) – The Canisteo Mine Pit - a complex of mine pits in Minnesota was abandoned in 1985. The complex has as area of 1,458 acres (590 ha), a maximum depth of 311 feet (95 m), and a mean depth of 80.5 feet (24.5 m).	Not applicable

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		Please provide peer-reviewed examples showing where a disturbance to a lake trout lake of this magnitude has been successfully rehabilitated with no long-term decline in the lake trout population. The peer-reviewed literature that is available indicates that the ecosystem-level impacts to aquatic habitats by gold mining is significant, and lasts for at least several decades (e.g. Alpers et al. 2016; Clark et al. 2021; Thienpont et al. 2016). Alpers, C.N., J.L. Yee, J.T. Ackerman, J.L. Orlando, D.G. Slotton and M.C. Marvin-DiPasquale. 2016. Prediction of fish and sediment mercury streams using landscape variables and historical mining. The Science of the Total Environment. 571: 364-379 Clark, A.J., A.L. Labaj, J.P. Smol, L.M. Campbell and J. Jurek. 2021. Arsenic and mercury contamination and complex aquatic bioindicator responses to historical gold mining and modern watershed stressors in urban Nova Scotia, Canada. Science of the Total Environment. 787: DOI:10.1016/j.scitotenv.2021.147374 Thienport, J.R., J.B. Korosi, K.E. Hargan, T. Williams, D.C. Eickmyer, L.E. Kimpe, M.J. Palmer, J.P Smol and J.M. Blair. 2016. Multi-trophic level response to extreme metal contamination from gold mining in a subarctic lake. Proceedings of the Royal Society B. 283:20161125.	(https://www.dnr.state.mn.us/lakefind/lake.html?id=31132504) – The complex has limited littoral area and was initially stocked with Isle Royale strain Lake Trout, and Cisco. Sampling in 2010 indicated that both Lake Trout and Cisco are naturally reproducing (Minnesota Department of Natural Resources as cited by Lake-Link: https://www.lake-link.com/minnesota-lakes/itasca-county/canisteo-lake-pit-pit/7862/. Several additional successful pit lake end uses for fish habitat and trout are listed by Golder 2017. It is also important to recognize that the reclaimed basin is only 6% of the lake and not a distinct and separate pit lake. Within the reclaimed basin there is approximately 78 ha where physical alterations are not proposed other than the temporary dewatering and habitat enhancements. An additional 19 ha of backfilled area will be treated with substrates and habitat structure to provide functional littoral habitat and an additional 44 ha of the new basin will be excavated for fish habitat and designed to ideal depths, substrates and cover conditions. It is acknowledged that the 104 ha, deep open pit pelagic area would not have a coupled benthic zone; however, data collected in 2022 demonstrate summer fish distribution within the deep basin is primarily in the pelagic zone (Figure HAC-01 in Attachment FH-08-01). The proposed former pit, deep pelagic area 104 ha, represents approximately 42% of the total reclaimed basin (245 ha). The existing deep basin (greater than 12 m in depth) is approximately 63 ha and represents approximately 40% of the 155 ha isolated by the Project. One of the frequent critical limitations to end use lakes is a lack of littoral zone (Gamons et.at., 2009; Golder, 2017). By integrating the areas not physically altered, the backfilled areas and the new excavated basin, the proposed offset measure will address this limitation and compliment the deep area which will provide a thermal summer refugia area. 6AEM, 2022., Agnico Eagle Mines Ltd., March 2022 – Meadowbank complex 2021 habitat compensation monitoring report. 7De Beers Group, 2022 Gahcho Kué Mine, February 2022. Aquatic Effects Monitoring Program Design Plan – Version 6.3 8Golders 2020; Diavik diamond mines (2012) inc. Aquatic effects monitoring program 2019 annual report, Doc No. RPT-1922 Ver. 0 9Sonnenberg 2003., Development Of Aquatic Communities In High-Altitude Mine Pit Lake Systems Of West-Central Alberta Rob Sonnenberg Bachelor of Science, University of Lethbridge, 2003 A Thesis Submitted to the School of Graduate Studies of the University of Lethbridge. Department of Geography University of Lethbridge 10Brinker et. Al. 2011., Curtis Brinker Marc Symbaluk J.G. Boorman., Constructing habitat for a sustainable native fisheries in the Sphinx Lake end pit lake system Mine Closure 2011 — A.B. Fourie, M. Tibbett and A. Beersing (eds)	
MNRF-286	5.7.3	"The eastern alternative requires somewhat less overprinting of waterbodies and fish habitat, but otherwise offers no advantages. It would result in…substantially greater GHG emissions and costs." The eastern alternative has the advantage of not being adjacent to Birch Lake, greatly reducing the impact to the aquatic environment of a sensitive lake trout lake in the event of a breach.	Location relative to Birch Lake will be clarified in the final EIS/EA.	EIS Sections 4, 5.
MNRF-287	5.8.3	"Disadvantages: overprints a moderate area of waterbodies (23.8 ha), and is located within Category 2 seasonal range for Caribou" Alternative 1 also has the disadvantage of being adjacent to Birch Lake, greatly increasing the impact to the aquatic environment of a sensitive lake trout lake in the event of a breach.	Location relative to Birch Lake will be clarified in the final EIS/EA. It was considered as described in Appendix E (Section 3.1.1).	EIS Sections 4, 5.
MNRF-288	5.21	"It does not require any new major crossings of watercourses…" Please explain what is meant by a "major crossing", and by extension, a "minor crossing".	The term was used in a qualitative manner and will be clarified in the final EIS/EA. As described in Appendix T-1, Table T1-7, Alternative 3 requires crossing of a 45 metre wide watercourse, which was considered major, compared to other smaller crossings that would not require a bridge.	EIS Section 4.
MNRF-289	5.31.1	"…in order to facilitate the creation of sustainable fish habitat sooner."	Sustainable habitat in this context means being able to maintain long term functionally without additional intervention. The term is consistent with text in the DFO Policy for Applying Measures to Offset Adverse Effects	Not applicable

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		Sustainability is a concept typically applied to fisheries (i.e. human harvest and use of fish), not fish habitat. Please explain what you mean by "sustainable fish habitat".	on Fish and Fish Habitat under the Fisheries Act (DFO, 2019), (i.e, "creating productive and sustainable fish habitat") associated with the offsetting measures described in the Fish Habitat Offsetting and Compensation Plan in Appendix F of the draft EIS/EA.	
MNRF-292	App F – Executive Summary	"The fisheries offset and compensation measures currently proposed were developed in consideration of the Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the Fisheries Act: • Measures to offset should support fisheries management objectives and give priority to the restoration of degraded fish habitat." The draft EA and offsetting plan does not appear to have given consideration to the following goals and objectives outline in Ontario's Provincial Fish Strategy: Goal 1: Healthy ecosystems that support self-sustaining native fish communities The health of ecosystems is usually assessed against three main attributes: • Composition, including the diversity and abundance of the species present • Structure, the physical arrangement of the ecosystem, including the types and pattern of habitats, and how they are connected; and, • Functions, the processes that drive change in the system, including photosynthesis, predation, decay and nutrient cycling, soil formation, and natural disturbances such as wind and fire. Objective 1.1: Protect and maintain aquatic ecosystem diversity, connectivity, structure, and function, including fish habitat. Objective 1.2: Protect the composition of native fish communities Objective 1.5: Anticipate and mitigate or adapt to large scale environmental changes and minimize cumulative environmental effects. Objective 2.3: Increase economic, social and cultural benefits derived from fish resources. Objective 4.1: Monitor at the appropriate spatial and temporal scale. Objective 4.2: Develop and use fisheries and aquatic science and social science Objective 5.1: Manage fisheries using an inclusive and participatory approach	The fisheries offset and compensation measures need to meet DFO's Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the Fisheries Act (DFO, 2019); but it is agreed that they should also consider provincial goals and objectives. A technical meeting with MNRF will be proposed to discuss how the proposed measures, or alternate measure suggested during engagement can meet provincial objectives.	Appendix F.
MNRF-293	6.6.4.1; 6.8.4.1	"…the PDA will return to a near-natural state…" Please describe what is meant by "a near-natural state". The terms 'restore' and 'restoration' are frequently used throughout the draft EA, which implies that habitats will be returned to their original state (Meffe and Carroll 1994). Meffe, G.K. and C.R. Carroll. eds. 1994. Principles of conservation biology. Sunderland: Sinauer Associates, inc. 600 pp.	The conceptual closure plan for the Project is presented in Section 4.18 of the draft EIS/EA and outlines closure activities and anticipated site conditions following closure. Section 4.18 also describes the main reclamation objectives, proposed progressive reclamation activities, as well as final reclamation and decommissioning activities. Mine decommissioning / closure will be completed to satisfy the Mine Reclamation Code under Ontario Regulation 240/00 of the Mining Act.	Not applicable
MNRF-294	6.6.4.2	"The model predicts water quality in the absence of seepage collection by CDF perimeter ditching…" Please explain happens to the seepage once it's collected in the ditch. Particularly post-closure?	Description of the site water balance, including inputs and assumptions for seepage, is provided in Section 6.6.2.4, Section 6.6.2.5, and Figure 6.6-6 of the draft EIS/EA. Additional technical discussion and modelling details are provided in site water balance (Appendices M-2), the receiver water balance (Appendix M-3) and the surface water quality modelling report (Appendix N-2). In summary, seepage is conservatively assumed to report directly to Birch Lake, Lake L-16 and the north basin of Springpole Lake. The potential influence of seepage on surface water is modelled as a mass balance and does not account for any attenuation of concentrations along the seepage flow path. No water quality parameters are projected to occur at concentrations greater than water quality guidelines in post-closure	Not applicable
MNRF-295	6.8.4.2	"Potential residual effects due to sedimentation and erosion will be limited with the implementation of effective erosion and sediment control measures."	A detailed erosion and sediment control plan will be developed prior to construction in support of the environmental approvals process and will be submitted with the approval application(s) as appropriate.	EIS Section 6.6.6.2

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		Please describe these measures more completely. How will these measures account for air-borne dust and other particulate matter?	Section 6.6.4.2 of the draft EIS/EA includes an assessment of air-borne dust on surface water quality and applicable mitigation measures.	
MNRF-296	6.9.4.2	"With the implementation of effective sedimentation and erosion control measures there are no potential increases to TSS and turbidity…" Culverts fail all the time.	Comment noted.	Not applicable
MNRF-297	3.3.9.2; 6.10.1.1; O1-3.1.5	"Although mercury concentrations in the baseline condition were found to be above the Health Canada mercury guideline…this is typically correlated to fish size and fish age."(3.3.9.2 p. 3-24) "Composite fish tissue samples collected from Springpole Lake outlet and Springpole Lake were submitted for contaminants analysis." (6.10.1.1 p. 6-214) "Tissue samples were collected from Walleye captured in Springpole Lake in conjunction with the Broad scale Monitoring program (nets 1, 6, 7, and 11; Figure 20) in the summer of 2012" (O1-3.1.5 p. O1-48) As noted in Ontario's comment on the baseline reports, the inappropriate implementation of the BsM protocol, as described above, invalidates the tissue sampling. Although this sampling might be considered sufficient for the MDMER regulations, the mercury reporting thus far is not sufficient to support the appropriate assessment of the impacts of the proposed project on the fish communities of Springpole and Birch Lakes. Additional mercury sampling during an index netting program is recommended, to provide a more representative sample	Fish capture methods that did not follow a provincial protocol would not invalidate tissue samples, if the samples were collected using the guidance from Environment and Climate Change Canada11, using standard sampling methods and analyzed by accredited laboratories. The Project has developed a detailed data set of fish tissue including small and large bodied fish. Additional fish tissue sampling was completed during the 2022 whole lake broadscale monitoring program on Springpole Lake and will be presented in the final EIS/EA. Tissue samples collected from large and small bodied fish in 2020, 2021 and 2022 followed the guidance from the Ministry of the Environment, Conservation and Parks, using standard sampling methods and were analyzed by certified laboratories (accredited by the Canadian Association for Laboratory Accreditation Inc. (CALA)) 11Metal Mining Technical Guidance for Environmental Effects Monitoring - National Environmental Effects Monitoring Office	EIS Sections 3, 6.10, Appendix O (all).
MNRF-298	6.10.1.4	…defined channels are not present and as such fish presence is not possible." Fish make use of ephemeral streams seasonally, particularly for YOY refugia. Suggesting that a watercourse does not provide fish habitat based simply on a cursory observation that it lacks a defined channel seems unlikely. Further, ephemeral streams contribute water, sediment, nutrients and organic matter to downstream habitats (e.g. Buttle et al. 2012), and therefore may be considered fish habitat as defined by the Fisheries Act (i.e., water frequented by fish and any other areas on which fish depend directly or indirectly to carry out their life processes, including spawning grounds and nursery, rearing, food supply and migration areas) Buttle, J.M., S. Boon, D.L. Peters, C. Spence, H.J. van Meerveld and P.H. Whitefield. 2012. An overview of temporary stream hydrology in Canada. Canadian Water Resources Journal. 37(4):279-310.	Additional field sampling in 2022 was used to further characterize the "type D" channels described in Appendix O-2 and O-3 of the draft EIS.EA. This additional data will be presented in the final EIS/EA. In terms of recognizing potential fish habitat values, the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA), currently uses a conservative approach which considers all of these drainages as fish habitat and therefore includes them in the impacts and offsetting sections of the Plan.	EIS Sections 3, 6.10, Appendices O (all), F.
MNRF-299	6.10.2.4	"Where there is uncertainty in the potential effects to fish habitat, a precautionary approach was taken and it was assumed that effect would occur and fish offsetting measures were developed." This does not actually seem to be the case. Throughout the draft EA, there are many assumptions that potential effects will be mitigated with no residual effects (e.g. Section 6.9.4.2 "With the implementation of effective sedimentation and erosion control measures there are no potential increases to TSS and turbidity…"). However, in most cases, these 'effective mitigation' measures are not described. The draft EA should fully explain all of these 'effective mitigation' measures, and present a proper assessment of the risk associated with each potential effect.	The effects assessment for fish and fish habitat in Section 6.10 of the draft EIS/EA makes reference to standard erosion and sedimentation controls, in which specific control measures would be applied at specific locations, depending on the ongoing activity (e.g., land based or in-water). Examples of industry standard controls are vegetated buffers such as the 120 m buffer around much of the site, physical sediment barriers (fences, curtains, berms), sedimentation ponds, ditches and sumps, erosion blankets, filtration devices (bags, tubes) and other measures as needed. A detailed Erosion and Sedimentation control Plan (ESCP) will be developed for the site following detailed design and during the environmental approvals phase, prior to construction. A technical meeting with MNRF will be proposed to discuss other uncertainties with potential effects and mitigation that may need additional description in the final EIS/EA.	EIS Section 6.10.

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MNRF-300	6.10.3	"Remove fish from the work area…" Please describe how and where. Does this mean all fish? All species? All life stages?	As stated in the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA), the end use of the fish removed from the isolated dike area and isolated north basin of Springpole Lake is to be discussed with Indigenous communities and government agencies. Following this discussion, a comprehensive fish removal plan for the isolated basin of Springpole Lake, both before and during the dewatering efforts, will be developed. Based on previous experience of the Project team with completing both whole and partial lake fish removals, capture gear would target both large and small bodied fish. If the agreed end use of fish is redistribution to the broader Springpole Lake, then gear types with lower mortality would be utilized. Only fish that are a catchable size would be removed / relocated (i.e., fry would not be removed). A quantitative depletion model would be used to monitor the success and efficiency of the removal program. The end target for fish removal will be determined in consultation with government agencies but will likely fall within the range of 70 to 85% removal for most sport fish and fish of a catchable size.	Appendix F.
MNRF-301	6.10.3; 6.10.4.1; 6.10.4.1; 6.10.4.3	"Undertake in-water construction activities outside of the fish spawning and egg incubation periods…" (6.10.3 p. 6-220) "Controlled dewatering is expected to take approximately six months to complete…" (6.10.4.1 p 6-221) "The transmission line is expected to be constructed primarily in the winter, from temporary winter roads that avoid construction during sensitive periods for fish, as much as practical." (6.10.4.1 p 6-224) "…in-water construction works will be completed to avoid spawning and egg incubation periods where feasible…" (6.10.4.3 p 6-225) This statement is inconsistent with the commitment the proponent makes in section 6.10.3 "undertake in-water construction activities outside of the fish spawning and egg incubation periods." In-water work timing windows will apply to the Project regardless of any commitment in the draft EA. Under an open pit scenario, Ontario would apply the combined timing restrictions for lake trout and walleye (i.e. no work in water September 1 through June 20) in order to protect the early life stages of these species. This allows FMG a period of 72 days per calendar year to complete in-water activities.	As per the response to Comment 281, based on previous experience, once the area is isolated between barriers (e.g., curtains or dikes) and fish are removed from the area, construction could then proceed year-round until completed. For example, once the isolated basin is separated from the remainder of Springpole lake, and fish removal has been commenced, timing windows would not apply within the isolated basin, and dewatering or pit filling could be continued year-round. Comments received from Fisheries and Oceans Canada (DFO) have also suggested that an exemption to timing constraints be requested to isolate the dewatered basin outside the current timing windows to reduce the number of Lake Trout and Walleye trapped within the isolated basin. A technical meeting with MNRF and DFO will be proposed to discuss the timing of basin isolation.	EIS Sections 6.7, 6.10, Appendix F.
MNRF-303	6.10.4.1; F-5.2.1	"This area will be altered in terms of depth, substrate and water quality at depth, and includes a portion of one of the six deep basins in Springpole Lake." (6.10.4.1 p. 6-221) "The dewatered lake area includes one of the six deep water basins located in Springpole Lake…" (F-5.2.1 p. F-5-3) This statement, while correct, does little to describe the importance of the impacted area. "Deep" is a relative term. Three of the six "deep" basins have a maximum depth ~50-60 ft, with very little area at depth, according to FMG's bathymetry maps (appendix O). The proposed open pit impacts the deepest of the basins, with the greatest area at depth. According to Apprendix O, the impacted area affects the highest concentration of lake trout spawning observations, and the area most frequented by lake trout according to telemetry surveys.	A summary has been provided in the response to Comment 136, which shows the total area of deep basins in Springpole Lake (>12 m) in the dewatered basin and the remaining lake. The Project will impact and partially remove part of one deep basin (NB01), but this represents only 12.5 percent of the total area greater than 12 m. The fish community data collected in 2022, discussed in the responses to Comments 138 and 139, and summarized in Attachment FH-08-01, shows that Lake Trout and other species such as Lake Whitefish, Cisco and Walleye use the other deep basins and specifically basins NB02 and NB03 at comparable levels and in some cases greater concentrations than NB01. With respect to spawning, Figures 28 and 29 of Appendix O-1 of the draft EIS/EA show the sample area and locations of observed spawning behaviour, with approximately 20 locations observed in the area to be impacted by the dikes and dewatered basin, and approximately 35 locations in the area of Springpole Lake that will be retained. One of the offset measures proposed is the overbuilding of the dikes to extend replacement spawning shoals facing into the remaining lake as shown in Figure 8-1 of the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA). Studies have shown that Lake Trout will readily move to and use alternate spawning locations including artificial spawning sites when historical spawning locations are not available (McAughey, 199812; Fitzsimons, 201413; Fitzsimons, 199614; Foster and Kennedy, 199515).	Not applicable

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
			12McAughey, S.C. 1998. Spawning Site Selection by Lake Trout Salvelinus namaycus (Walbum) After Loss of Historic Spawning Sites; A thesis submitted in partial fulfilment of the requirements for the degree of Master of Science in Biology; School of Graduate Studies and Research Department of Biology Laurentian University, Sudbury, ON. 13Fitzsimons, J.D. 2014. Assessment of measures to assess compensation and mitigation as related to the creation, rehabilitation, or restoration of spawning habitat for fluvial or lacustrine spawning salmonines Can. Sci. Advis. Sec. Res. Doc. 2013/110. iv + 33 p. 14Fitzsimons, J.D. 1996. The significance of man-made structures for lake trout spawning in the Great Lakes: are they a viable alternative to natural reefs?. Can. J. Fish. Aquat. Sci. 53(Suppl.1): 142–151 (1996). 15Foster and Kennedy 1995., Patterns of egg deposition by lake trout and lake whitefish at Tawas artificial Reef, Lake Huron, 1990-1993, N.R. Foster, G.W. Kennedy, Book Chapter, Book Chapter Index ID81441. USGS Publications Warehouse	
MNRF-304	6.10.4.1; F-8.1.1	"This area…will remain largely unaltered from existing conditions once reconnected to the main lake." (6.10.4.1 p. 6-221) "This area will remain largely unaltered…" (F-8.1.1 p. F-8-2) One might debate the meaning of the term "largely unaltered". Portions of this area will be excavated to bedrock in order to construct the cofferdams. Other portions will be buried with the stockpiles of lake bed material from the proposed open pit. The remaining area, at the very least, will be desiccated by sun and wind. In the early portion of mine development and operation, lakebed fine materials will be lost to wind (i.e. dust). Later, the area is likely to be colonized by terrestrial vegetation, insects, and possibly other terrestrial animals.	This will be revised in the final EIS/EA to acknowledge the exposed areas not overprinted by dikes, and that the open pit will undergo changes during the life of mine prior to the refilling of the basin. Additional context and discussion will be provided in the final EIS/EA.	EIS Section 6.10.
MNRF-305	App F – Executive Summary	"Construct a new and significant embayment (fish habitat development area)…" Please explain what is meant by "significant" in this statement, and how significance will be measured.	The term significant is used to describe the new embayment as a large feature that provides a meaningful new area of fish habitat that does not exist in that location under current conditions. It is recognised that "significant" has specific meaning in the context of an environmental assessment and therefore, an alternate term will be used in updated Fish Habitat Offsetting and Compensation Plan (Appendix F) of the final EIS/EA.	Appendix F.
MNRF-306	6.10.4.1; F-8.1 ; F-8.1.7	"…integration of spawning shoals along the active lake facing embankments of the cofferdams to replace Lake Trout and Whitefish spawning opportunities" (6.10.4.1 p. 6-223) "This includes building out replacement Lake Trout and Whitefish spawning shoals along the face of the cofferdams…" (F-8.1 p. F-8-2) "Overbuilding and integration of spawning shoals along the active lake facing embankments of the cofferdams, to replace Lake Trout and Whitefish spawning opportunities…"(F-8.1 p. F-8-2) "It is expected that fish that previously used the overprinted or isolated shoals will readily locate and use alternate spawning location if available." (F-8.1.7 p. F-8-7) "The installation of artificial spawning shoals has rarely been demonstrated to increase fish recruitment/production. While increased spawning has been observed on artificial reefs by lake trout (Salvelinus namaycush), lake trout populations have not increased and thus other factors are contributing to low lake trout recruitment/production (Fitzsimons, 1996)." [from Kavanagh and Hoggart n.d.]. Successful creation of artificial spawning habitat for lake trout is dependent on multiple factors, including the size and type of material used, fall water depth, minimum winter water depth, prevailing wind direction, currents and availability for suitable prey for YOY fish. Placement of angular mine rock in this location does not necessarily make it spawning habitat.	The constructed spawning shoals are intended to provide alternate and replacement spawning opportunities in an area where spawning Lake trout were observed along the proposed west and east dike locations. For this intended purpose, the conclusions stated in the abstract of the Fitzsimons (1996) support the proposed fish habitat offsetting measure. "A review of spawning at man-made and natural spawning areas indicated consistently higher abundance of eggs, fry, and young-of-the-year lake trout associated with man-made structures. Hence, artificial reefs could make a significant contribution to restoration of lake trout stocks in the Great Lakes." It is recognized that the design of the shoals will need to consider appropriate material, depth and orientation to increase the probability of success. The Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) will be revised to include design criteria with a clear linkage to preferred spawning conditions at the site and based on peer reviewed literature. Lake Whitefish would be considered a secondary and less critical target of the constructed shoals as previous spawning surveys as shown in Figure 34 of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA) found most spawning observations (all but two) were outside of the area of the dewatered basin.	Appendix F.

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		Creating artificial spawning habitat for lake whitefish has rarely been undertaken. Although it has been used for rehabilitation of endangered European whitefish, the only North American paper describing artificial spawning habitat for lake whitefish found it to be of no benefit (Fisher et al. 2018). Fisher, J.L., J.J. Pritt, E.F. Roseman, C.G. Prichard, J.M. Craig, G.w. Kennedy and B.A. Manny. 2018. Lake sturgeon, lake whitefish, and walleye egg deposition patters with response to fish spawning substrate restoration in the St. Clair-Detroit River system. Trans. Am. Fish. Soc. 147:79-93. Fitzsimons, J. 1996. The significance of man-made structures for lake trout spawning in the Great Lakes: Are they a viable alternative to natural reefs? Can. J. Fish. Aquat. Sci., 53: 142–151. Kavanagh, R.J. and C.T. Hoggarth. No date. Rehabilitation and enhancement of aquatic habitat guide. V.1.0. Burlington (ON). Fisheries and Oceans Canada, Central and Arctic Region. 96 pp.		
MNRF-307	6.10.4.1	"The surface waters will mix part way (approximately 40m)…" How was this determined?	This is based on the results of the modeling conducted for the reclaimed basin provided in the Predictive Modeling of Open Pit Basin Water Quality Report (Appendix N-3 of the draft EIS/EA).	Not applicable
MNRF-308	6.10.4.1; 6.10.4.1; App F-Table D; F-8.1; F-8.1.1	"A portion of the open pit will be backfilled…to develop an enhanced littoral area…" (6.10.4.1 p 6-223) "The objective of the fish habitat area is to provide replacement littoral habitats…" (6.10.4.1 p 6-223) FMG has claimed a total of 63 ha of fish habitat will be created through creation of a new basin (fish habitat development area) and backfilling two portions of the proposed open pit. Elsewhere in the draft EA, these areas are specified to become littoral habitat. (App F- Table D p F-vi) "An additional portion of the former open pit will be recontoured with rock to develop an enhanced littoral area…" (F8.1.1 p. F-8-3) "This new fish habitat basin is proposed to be approximately 44ha in area. The objective of the fish habitat area is to provide replacement littoral habitats…" (F-8.1.1 p F-8-3) What is meant by "enhanced"? Littoral habitat is about more than the depth of water. In particular, the littoral zone is defined by the types of aquatic vegetation that are found there (Wetzel 1983), which in turn will affect the invertebrate and nearshore fish community of the zone. One cannot create littoral habitat simply by backfilling an area with rock and filling it with water. It will literally take decades for appropriate substrate to develop, followed by colonization by aquatic vegetation, invertebrates and fish. Wetzel, R.G. 1983. Limnology. Second Edition. Toronto: Saunders College Publishing. 753 pp. plus appendices.	It is not intended to simply backfill the areas with mine rock or to excavate to depth. Based on feedback received through engagement activities, the littoral areas will be designed to reflect the species of interest identified by government agencies and Indigenous communities. Preliminary plans and design features will be provided in the updated Fish Habitat Offsetting and Compensation Plan (Appendix F) as part of the final EIS/EA. See the response to Comment 279 for further information.	EIS Section 6.10, Appendix F.
MNRF-313	6.18.11	"FMZ 4 is subject to a Fisheries Management Plan developed by MNRF [sic] with input from the FMZ 4 Advisory Council." The FMZ 4 Fisheries Management Plan includes the following fish habitat management objective and action which apply to the Project:	The objectives of the FMZ 4 Fisheries Management Plan will be considered as appropriate. See our response to Comments 138 and 216 for additional information on the isolated basin and stocking portions of the comment, respectively.	Not applicable

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		Objective: Maintain or enhance healthy aquatic ecosystem structure, function and diversity that support healthy, sustainable, naturally-reproducing native fish communities in FMZ 4. Action: All development in FMZ 4 must recognize and consider the management objectives described in this plan and ensure the potential effects from the development activity will not impact fish habitat in a manner that would result in the inability to achieve the established objectives. Dewatering and excavating 6% of the surface area of Springpole Lake, particularly given that this basin appears to be the most critical part of the lake for supporting lake trout, is not consistent with the FMZ 4 fish habitat management objective. Notwithstanding that the proposed plan to supplementally stock Springpole Lake with various species of fish is not supported by Ontario, that schema is also inconsistent with the FMZ 4 fish habitat management objective.		
MNRF-315	6.18.1.4	"None of the waterbodies in the mine site area PDA area listed as navigable waters within Schedule 1 of the Canadian Navigable Waters Act." The Act states: "9.1 An owner who proposes to construct, place, alter, rebuild, remove or decommission a work — other than a major work or a minor work — in, on, over, under, through or across any navigable water that is not listed in the schedule may do so if the work, or its construction, placement, alteration, rebuilding, removal or decommissioning, would not interfere with navigation" The Act also states: "28 (2) The Minister may make an order (a) designating any works that are likely to slightly interfere with navigation as minor works; designating any works that are likely to substantially interfere with navigation as major works;" Has the Federal Minister of Transport designated the Project as a major or minor work?	The Project team is currently working with Transport Canada to determine the navigability of Project waterbodies and approval requirements. Based on the current understanding, the Project itself will not be designated, rather the individual works at individual locations will be designated by work category.	Not applicable
MNRF-316	6.18.2.1	"These activities could also affect navigation within the north basin of Springpole Lake and the portage routes between Springpole and Birch Lakes for recreational users." Under the open pit scenario, these resources would be negatively impacted. The 300m portage between Birch and Springpole has already been impacted by the Project, bisecting the trail with a resource road and debris from roadbuilding at the south end of the portage (B. Jennings, MNRF, pers comm.)	As noted in the response to Comment 315 the Project team is currently working with Transport Canada to determine the navigability of Project waterbodies and approval requirements. As described in Section 6.18.4.4 of the draft EIS, the effect on the portage route will be offset by providing an alternate route to users during construction and operation of the Project. During closure, the open pit basin will be refilled with water within 3 to 5 years and a connection with the north basin of Springpole Lake will be re-established. This would allow the previous navigation route and portage routes to be used in the same or similar area prior to the construction of the Project.	Not applicable
MNRF-317	6.18.2.1	"To support the effects assessment, indicators are qualitatively assessed…" By definition, a "measurable parameter" should be measured; 11 of the 13 measurable parameters listed in section 6.18.2.1 indicate some kind of numerical measure. "Qualitative assessment" does not seem consistent with the measurable parameters listed.	The indicators are used to provide a qualitative assessment of the potential effects of the Project and are supported with quantitative analysis using the measurable parameters. As noted in Section 6.18, the analysis from the assessment of other valued components in other sections of the draft EIS/EA (such as noise, surface water quantity, fish and fish habitat and vegetation communities) provides a detailed quantitative assessment and is used to support the qualitative assessment for outdoor recreation valued component.	Not applicable
MNRF-318	6.18.2.1	Section 6.18.2.1 does not consider loss of access to campsites within the PDA: "Not on the map, but from personal observation, the shores of Springpole north of the first marked campsite and just south of the Springpole camp, had several (3-5) first nations hunt/fish camps setup at various spots." (B. Jennings, MNRF, pers. comm.) Further, Section 6.18.2.1 does not consider the changes in navigability at the outlet of Springpole	Consultation and engagement will continue during the environmental assessment process and extend throughout the life of the mine. The information provided in this comment is appreciated, and additional understanding of the seasonal use of campsites and the rapids at Birch River for navigation through a follow up discussion with MNRF would be appreciated. Additional information received on seasonal campsite(s) within the local study area will be incorporated into the assessment of potential effects on recreational areas in the final EIS/EA, as relevant.	EIS Section 6.18.

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		Lake. Currently, the lake empties into the Birch River through a series of Class I and II rapids. (B. Jennings, MNRF, pers. comm.). There is no evident portage trail around these rapids. Changing the water levels, particularly during the refilling period of the proposed open pit, may make these rapids unnavigable.	It should be noted that Section 6.8 of the draft EIS/EA provides an assessment of the potential effects on water quantity (including flows) due to the Project. As shown in Table 6.8-6, it has been estimated that the changes in the flows at the outlet of Springpole Lake (SW-22) will be less then 1% throughout the Project, with the exception of the period during which the open pit basin is being refilled. There is no anticipated effect, however, the effect of this change on navigation in the Birch River rapids will be further evaluated (Section 6.18) for the final EIS/EA, based on the outcome of additional discussions with MNRF.	
MNRF-319	6.18.3	"Maintain alternate access to portages for navigation routes that traverse the PDA during construction and operation phases." "The Springpole-Birch portage is the easiest summer route to access Birch Lake for Cat Lake/Slate Falls FN. There is a more direct route to Cat Lake, albeit with much longer portages, heading from Birch to Jackpine. Ortho imagery would suggest this is primarily a winter route." (B. Jennings, MNRF, pers. comm.)	This comment will be fully considered during preparation of the final EIS/EA.	EIS Section 6.18.
MNRF-320	6.18.4.1	"…there will be no residual effect on recreational fishing." Loss of productivity and access will reduce opportunities for recreational fishing during the life of the Project. Potential changes to fish community structure and overall productivity of Birch and Springpole lakes will affect recreational fishing following closure of the Project. Elements of the Project are not consistent with four fisheries management objectives and one fish habitat objective in the FMZ 4 Fisheries Management Plan. The FMZ 4 Advisory Council has not been engaged in the fisheries components of the background information or draft EA to date. The mitigation measures suggested in the EA are either untried, or contrary to Ontario legislation, regulations and policy.	A loss of access is not expected, other than to lands controlled and operated by the mine operator. It is not predicted that a change in the fish community structure or productivity of Birch Lake will occur, or the fish community and productivity of the remaining Springpole Lake (see our response to Comment 138 for further detail). Engagement with MNRF will continue with the intent to align the management goals of the Project with the FMZ Fisheries Management Plan as outlined in the response to Comments 268 and 313. A meeting with MNRF will be proposed to discuss the expected regulatory approvals and other MNRF policy matters.	Not applicable
MNRF-321	7	Why is there no cumulative effects assessment for fish and fish habitat? Lake trout lakes are rare. While only about one percent of Ontario's lakes (i.e. approximately 2,280) are designated by policy and managed by the Ministry for lake trout, this resource represents 20-25% of all lake trout lakes in the world. The lake trout is an important fishery resource in Ontario and is a preferred species among many resident and non-resident anglers. The provincial lake trout resource is predicted to be directly impacted by climate change through loss of thermal habitat. Currently, it is estimated that suitable thermal habitat comprises 40% of the volume of lake trout lakes monitored by the provincial Broadscale Monitoring Program. Modelling under two climate change scenarios (Smith et al. 2021) suggest this will be reduced to 35-36% by 2050, and 31-36% by 2080. Springpole Lake is not a BsM lake and therefore was not included in the modelling, but Birch Lake was included. The results indicate that 58% of Birch Lake comprised lake trout thermal habitat in the 2000s; that it currently comprised 56% lake trout thermal habitat; and that thermal habitat for lake trout will be reduced to 53-54% by 2050, and 49-53% by 2080. Although these values exceed the provincial average, the magnitude of loss over time is more significant in Birch Lake. The fact that lake trout thermal habitat conditions in northwestern Ontario are currently above the provincial average does not mean that they have more capacity to absorb perturbations… rather, it suggests that the protection of these waters is more critical, as they are likely to persist longer as thermal refugia for the species over time.	The assessment of potential effects on fish and fish habitat are fully described in Section 6.10 of the draft EIS/EA. The assessment of effects follows the methodology outlined in Section 6.1. With the proposed design of the Project and the suite of mitigation and offsetting measures described in Section 6.10.3 for fish and fish habitat, residual effects are not predicted. As described in Section 7.1 of the draft EIS/EA, the Project can only have a potential cumulative effect if a residual effect is predicted, and the residual effect overlaps spatially and temporally with the residual effects of other projects for the same valued component. As these conditions have not been met, the Project is assessed as not contributing cumulatively to the residual effects on the VC of other physical activities, and therefore no further assessment is warranted.	EIS Sections 6.10, 7.

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		Adding the impact of an open pit mine, including loss of aquatic and riparian vegetation, increased solar absorption by the bedrock, loss of cold water inputs, altered flow patterns and retention time, may all cumulatively impact lake trout thermal habitat on Springpole, and to a lesser extent Birch Lakes, beyond the effects predicted by Ontario's climate change model. Smith, D., S. Ramirez, D. Lix and C. Chu. 2021. Ontario Lakes and Climate Change Database: A guide to projected changes in the thermal conditions of Ontario's inland lakes. Ontario Ministry of Northern Development, Mines, Natural Resources and Forestry, Science and Research Branch, Peterborough, ON. Climate Change Research Report CCRR-55. 50 p. + appendices.		
MNRF-322	7.5.1	"…the project is predicted to have minor residual effects on Birch Lake and Springpole Lake." Changes to the retention time and flow patterns through the reclaimed north basin are not addressed.	A discussion and data on retention time and flow patterns within the north basin will be included in Section 6.7 of the final EIS/EA.	EIS Section 6.7.1.2, Appendix N-2 Section 3.
MNRF-323	13	Based on the results of the draft environmental assessment, including Project design feature and proposed mitigation measures, the Project is not predicted to cause significant adverse environmental effects…" 1. The fish and fish habitat sections of the draft EA are premised upon fisheries data collected using poorly designed assessment projects. Ontario communicated these concerns to FMG in 2021. MNRF considers these data to be inadequate, and disregards the conclusions drawn from them. In December 2021, FMG committed to collecting new fisheries data using properly designed index netting techniques. Those surveys have not yet been completed. 2. Excavating a naturally reproducing lake trout lake is not consistent with Ontario's policy direction, nor is it consistent with FMG's statement that the Project should be located to avoid interactions with sensitive environmental features. Alternate approaches to accessing the ore body (i.e., underground operations) which avoid impacts to lake trout should be fully considered. 3. Ontario has adopted by policy a Precautionary Principle towards fish and fish habitat: Where there are threats to serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent resource degradation. Further, the same policy specifies that avoidance of impacts is the preferred approach in Ontario's risk-informed mitigation framework. Ontario has also adopted the Precautionary Principle in MNRF's Statement of Environmental Values. 4. FMG's fishery offset and compensation plans suggest that the productivity of fisheries can be enhanced primarily through stocking of game fish species; however, there is a limit to the natural capacity of aquatic ecosystems and hence the benefits that can be derived from them. While the productive capacity of Springpole Lake will be reduced under an open pit scenario, lake trout and other species would naturally persist at a diminished population size. Ontario policy states that supplemental stocking should be discouraged in waters which contain viable populations of native fish of the same species. 5. The Lakes and Rivers Improvement Act does not include a schema for offsetting or compensation for the loss of perpetuation and use of fish, but rather provides that these natural amenities should be protected. 6. The establishment of a micro hatchery is contradictory to current scientific understanding of the role of supplemental stocking (e.g. Claussen and Philipp 2022) and Ontario policy direction on same.	The summary of comments is appreciated. It is noted that several have been addressed in the responses above, which are identified below: 1. See the response to Comment 138. 2. See the response to Comment 266. 3. A meeting with MNRF will be proposed to discuss MNRF regulatory policy. 4. See the response to Comment 267. 5. A meeting with MNRF will be proposed to discuss expected regulatory approvals and other MNRF policy matters. 6. See the response to Comment 267. 7. See the response to Comment 270 and item 5 above. 8. See the response to Comment 270 and item 5 above. 9. See the response to Comment 270. Predicted changes to ambient water temperatures are not predicted in the remainder of Springpole Lake. Additional discussion regarding potential effects on the thermal regime on surface water will be included in the final EIS/EA. Currently, there are four water level logger stations in Springpole Lake, and two stations in Birch Lake, all of which record continuous water temperature. This data will enable detailed monitoring during all phases of the Project to confirm no change to water temperatures as a result of the Project. 10. See the response to Comment 306. 11. See the response to Comment 308 and Comment 279. 12. The potential effect of increased local population during the life of the mine leading to a potential increase fish harvesting from Birch and Springpole Lakes is assessed in Section 6.18 of the draft EIS/EA. 13. See the response to Comment 320 and item 5 above 5. 14. See the response to Comment 285.	EIS Sections 6.7, 6.8.

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		7. FMG's assessment that the deep-water portion of the refilled pit will emulate pre-disturbance conditions does not consider the importance of deep-water structure for bottom-oriented fish species, including juvenile lake trout and important prey species such as sculpins. While surface area is commonly used as the "currency" of fish habitat compensation, the Lakes and Rivers Improvement Act is concerned not with habitat compensation, but rather the use and perpetuation of fish. In that context, it is the productivity of the habitat that is important, which is a function of far more than surface area 8. While surface area is commonly used as the "currency" of fish habitat compensation, the Lakes and Rivers Improvement Act is concerned not with habitat compensation, but rather the use and perpetuation of fish. In that context, it is the productivity of the habitat that is important, which is a function of far more than surface area. Depth, volume, substrate, temperature, pH, allochthonous inputs, shoreline complexity, macrophytes and benthic invertebrates all play a role in the perpetuation of fish. In the case of lake trout, these variables can be so critically balanced that, once diminished, populations rarely recover; this is the impetus behind Ontario's policy on the disposition of Crown land on naturally reproducing lake trout lakes. In short, the draft EA emphasizes the quantity (i.e. surface area) of habitat reclaimed, but doesn't properly consider the type of habitat, or quality of that habitat, necessary to address Ontario's responsibility to perpetuate fish, fish habitat and fisheries, particularly lake trout. 9. The draft EA does not account for increases in the ambient water temperature of Springpole (and possibly Birch) Lake due to loss of terrestrial vegetation, loss of the deepest basin of Springpole under an open pit scenario, loss of cold water inputs, absorption of radiant (solar) energy by the exposed bedrock in an open pit scenario, and the introduction of treated water to the southeast arm of Springpole Lake. Increases in water temperature will affect cold water fish species directly, and well as indirectly due to the relationship between water temperature and dissolved oxygen. Together, these may act to reduce the volume of late summer habitat available to lake trout and other cold water species. Increases in water temperature therefore may not coincide with the purposes of the Lakes and Rivers Improvement Act. Increases in water temperature resulting from mining activities will exacerbate climate change impacts to thermal habitat for lake trout. 10. The installation of artificial spawning shoals has rarely been demonstrated to increase fish recruitment/production. While increased spawning has been observed on artificial reefs by lake trout (Salvelinus namaycush), lake trout populations have not increased and thus other factors are contributing to low lake trout recruitment/production. 11. One cannot create littoral habitat simply by backfilling an area with rock and filling it with water. It will literally take decades for appropriate substrate to develop, followed by colonization by aquatic vegetation, invertebrates and fish. 12. Increased local population during the life of the mine will result in increased fish harvest from Birch and Springpole Lakes. 13. Many of the proposed mitigation approaches are contrary to Ontario legislation, regulation, or policy		

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		14. Rehabilitation of a lake trout lake following a perturbation of the scope and magnitude proposed by FMG has never been successfully completed. This section of the Plan describes the currently proposed offset and compensation measure to be implemented as part of the Project. Recognizing that this is the first draft of the Plan and it will undergo review and consultation during the EIS/EA process, it is expected that proposed measures may be modified, expanded upon, substituted or removed on an individual basis to reflect the comments received from Indigenous communities, the public and government agencies." MNRF has provided several comments in its review of the draft Compensation Plan. We look forward to seeing our concerns addressed in the next version of the Plan.		
MNRF-324	F-5.2.1	"Considering the impact at a landscape scale is in keeping with the provincial Fisheries management Plan for Zone 4…" Although Ontario manages its recreational fisheries on a landscape scale, and those landscape level objectives apply to the review of this draft EA, given the sensitive nature of lake trout populations, potential perturbations to lake trout habitat are assessed on an individual lake basis. Further, approval of dam locations under the Lakes and Rivers Improvement Act is completed on a site-specific basis. Potential impacts to the lake trout populations of Springpole and Birch Lakes are the primary considerations from a fisheries perspective.	A meeting with MNRF will be proposed to discuss the expected regulatory approvals and MNRF's primary considerations.	Not applicable
MNRF-325	F-7.1	"A list of typical measures, standards, codes and contingency measures that may be implemented during the Project to avoid or mitigate impacts to fish habitat as applicable to each circumstance, are provided in Table 7-1." The list in Table 7-1 does not fully agree with DFO's Measures to Protect Fish and Fish Habitat	Table 7-1 will be reviewed against DFO's Measures to Protect Fish and Fish Habitat and modify as appropriate in the updated Fish Habitat Offsetting and Compensation Plan (Appendix F) for the final EIS/EA.	Appendix F.
MNRF-326	F-7.3	"…the timing of in-water works should avoid restricted periods to protect fish, including their eggs, juveniles, spawning adults and/or the organisms upon which they feed….Once the initial isolation of specific areas is complete, fish are removed and the risk of impacting downstream habitats is removed, this timing window would no longer apply." Fish are removed…How? To where? Do you mean all fish? All species? All life stages? Regardless of any commitment made in the EA, Ontario and/or Canada (depending on the authorization in question) establishes the work-in-water timing windows	It is predicted that the concentration of suspended solids and/or turbidity (and metals) that would result in need to divert the dewatering waters to the water storage pond (or similar facility), will be defined through the provincial and federal environmental approvals process. As stated in the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA), the end use of the fish removed from the isolated dike area and isolated north basin of Springpole Lake is to be discussed with Indigenous communities and government agencies. Following this discussion, a comprehensive fish removal plan for the isolated basin of Springpole Lake, both before and during the dewatering efforts, will be developed. Based on previous experience of the Project team with completing both whole and partial lake fish removals, capture gear would target both large and small bodied fish. If the agreed end use of fish is redistribution to the broader Springpole Lake, then gear types with lower mortality would be utilized. Only fish that are a catchable size would be removed / relocated (i.e., fry would not be removed). A quantitative depletion model would be used to monitor the success and efficiency of the removal program. The end target for fish removal will be determined in consultation with government agencies but will likely fall within the range of 70 to 85% removal for most sport fish and fish of a catchable size; however, removal success will vary for some species with lower capture efficiencies. A discussion of how the Project would comply with timing constraints during construction is provided in the response to Comment 281.	Appendix F.
MNRF-328	F-8.1	"…harmonizing with the ongoing efforts of Cat Lake First Nation, Slate Falls Nation and NDMNRF [sic]."	It was our understanding from the Cat Lake/Slate Falls 2015/2016 Species at Risk Stewardship Fund Project document that the study findings could be further integrated into the existing provincial management framework for Lake Sturgeon. We had interpreted this as ongoing collaboration that could help inform decisions	Appendix F.

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		MNRF does not have any "ongoing efforts" towards lake sturgeon reintroduction or restoration on Springpole Lake, nor any awareness of such effort by Cat Lake or Slate Falls First Nations.	on reintroduction and restoration, but will revise the text in the Fish Habitat Offsetting and Compensation Plan (Appendix F) for the final EIS/EA based on this clarification.	
MNRF-329	F-8.1.1	"The mixolimnion is expected to stratify…similar to existing conditions with oxygenated water extending to a depth of up to 40m." Please explain how this was determined.	This is based on the results of the modeling conducted for the reclaimed basin provided in the Predictive Modeling of Open Pit Basin Water Quality Report (Section 4.2 of Appendix N-3 of the draft EIS/EA).	Not applicable
MNRF-330	F-8.1.1	"…greater than 5 milligrams per litre; mg/L dissolved oxygen…" Field and laboratory research has shown the detrimental effects of low dissolved oxygen levels on lake trout. In order to protect adult and juvenile lake trout habitat, Ontario has adopted a 7 mg/L mean volume weighted hypolimnetic dissolved oxygen (MVWHDO) criterion to determine lakeshore development capacity on all inland lake trout lakes on the Precambrian Shield. Although some documents cite 4 mg/L as the lower boundary for usable lake trout habitat, optimum habitat is defined as >6 mg/L (Ontario Ministry of the Environment, 2010). Plumb and Blanchfield (2009) rarely encountered lake trout in habitats >6 mg/L. Ontario Ministry of the Environment. 2010. Lakeshore Capacity Assessment Handbook: Protecting Water Quality in Inland Lakes on Ontario's Precambrian Shield Appendix C : Dorset Environmental Science Centre Technical Bulletins. https://www.ontario.ca/page/lakeshore-capacity-assessment-handbook-protecting-water-quality-inland-lakes-ontarios-precambrian-1. Retrieved 08 July 2022. Plumb, J.M. and P.J. Blanchfield. 2009. Performance of temperature and dissolved oxygen criteria to predict habitat use by lake trout (Salvelinus namaycush). Canadian Journal of Fisheries and Aquatic Sciences. 66: doi.org/10.1139/F09-129	Comment acknowledged and the information is appreciated.	Not applicable
MNRF-331	F-8.1.1	"This area can be progressively enhanced with fish habitat structure and substrate…" Please explain this statement more fully. In particular, with what material will the fish habitat be enhanced?	The statement refers to the dewatered basin in Springpole Lake that would not be permanently altered by open pit excavation. The intention is to assess the existing basin for structure such as submerged and exposed wood, boulder and cobble habitat, shoals, macrophytes and review the current basin morphology. Additional cover, structure or basin recontouring could be constructed to optimize the area for specific fish species based on the feedback received through engagement activities. The fish habitat enhancements could include different types of substrate placement, contouring and substrate placement to promote the establishment of macrophytes, shoal expansion, additional juvenile habitat. As discussed in the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA), the use of feedback from engagement with Indigenous communities and government agencies will support defining the key fish species and the design of fish habitat types. Additional information and descriptions of enhancements for this area and the fish habitat development areas will be provided in the updated Fish Habitat Offsetting and Compensation Plan for the final EIS/EA.	EIS Section 6.10, Appendix F.
MNRF-332	F-8.1.3	"The nearest connected waters to the Project considered as having/had Lake Sturgeon presence according to the Sturgeon Atlas of Ontario (Kerr 2002) area Cat Lake and Lake St. Joseph." Birch Lake and Shabumeni Lake are both listed in Kerr 2002.	Comment is acknowledged, the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) will be updated for the final EIS/EA.	Appendix F.
MNRF-333	F-8.1.3	"The strategy states that the application of Lake Sturgeon culture and stocking may be an essential tool…" (F-8.1.3 p. F-8-5) "…the measure is considered feasible and appropriate…" (F-8.1.3 p. F-8-5) The Lake Sturgeon Recovery Strategy also points out that "The stocking of Lake Sturgeon is currently not endorsed within the Ontario fish stocking guidelines for inland Waters" and identifies that the	These appear to be contradictory statements in the recovery strategy, and a meeting with MNRF and Fisheries and Oceans Canada will be proposed to discuss an approach to the identified offset measure.	EIS Section 6.10, Appendix F.

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		creation of fish culture guidelines specifically for lake sturgeon is a necessary first step. Sturgeon culture and stocking guidelines have not yet been developed.		
MNRF-334	F-8.1.4; F-8.1.5; F-8.1.6	"…an option of transferring fish from the adjacent water bodies during post-project monitoring will be retained." Such a transfer may require an environmental assessment in its own right.	· Comment acknowledged. The provincial individual environmental assessment is intended to cover activities associated with the Springpole Gold Project, as described in the project description of the draft EIS/EA. Section 4.8 of the draft EIS/EA includes the following activities: Re-establish flow to L-1 and L-19 as fish habitat as per pre mining conditions and enhance the connection between Birch Lake and L-1. Reinstate L-2 as fish habitat as per baseline (pre-mining) conditions and enhance the connection between Springpole Lake and L-1.	Not applicable
MNRF-335	F-8.1.7	"Ongoing studies area developing shoal structure criteria that will be used in the detailed design of the replacement shoals." This information is required in order to evaluate the draft EA and offsetting plan.	Sufficient peer reviewed literature exists to characterise spawning habitat requirements, and to demonstrate that artificial shoals can be successfully established (Fitzsimons, 199616). Additional details and design criteria for the constructed shoals will be provided in the final EIS /EA with supporting references. 16Fitzsimons, J.D. 1996. The significance of man-made structures for lake trout spawning in the Great Lakes: are they a viable alternative to natural reefs?. Can. J. Fish. Aquat. Sci. 53(Suppl.1): 142–151 (1996).	Appendices F, O (all).
MNRF-336	F-8.1.8	"Establish a targe list of species to include in the program…Develop a brood stock collection program…" Notwithstanding that Ontario does not support the establishment of a micro hatchery, the description of the fish culture program envisioned by FMG does not seem consistent with operation of a "micro" hatchery. For example: Brood stock is not maintained by micro hatcheries. Maintaining brood stock is a year-round operation that requires significant space, water supply, food supply, etc., and would require a significant investment of space and resources. Micro hatcheries are not typically designed to culture multiple species, particularly because of the amount of space required, varying conditions (especially water temperature) required to culture multiple species, and control of disease and pathogens within facility.	The brood stock collection was intended to be an annual collection program from within Springpole Lake. Micro-hatcheries are small units, and therefor separate units would be used for each fish species. Based on feedback from engagement activities, if the hatchery measure is carried forward, a technical meeting with MNRF and Fisheries and Oceans Canada would be proposed to further define the brood stock collection program.	Not applicable
MNRF-337	F-8.2	"A combination of onsite monitors, and qualified designates as required will be used to document compliance with approved plans." Please provide peer-reviewed examples showing where a disturbance to a lake trout lake of this magnitude has been successfully rehabilitated with no long-term decline in the lake trout population	See the response to Comment 285 for a list of examples.	Not applicable
MNRF-338	Table F-8-3	"It is expected that even at 80% species matching, the new habitat will represent a functional fish community." That really depends on which species are missing from the 80%. Losing one of the top predator species (lake trout, walleye, pike) does not result in the same functioning fish community, nor does it consider the impacts to the human use of those species. Losing one of the preferred prey species for these top predators, especially for lake trout, may have a negative effect on the fitness of the piscivorous species, which, while they may not be extirpated, may not function as well as they do in an unperturbed system.	Table 8-3 of the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) specifies that in the cases where a sportfish community is predicted to be established, this is supported by occurrences in the baseline fisheries programs, and therefore the presence of the sport fish will be part of the success criteria used to evaluate the offsetting measure.	Not applicable
MNRF-340	Table F-8-3	"Average CPUE/abundance consistent with baseline values…" Catch per unit effort (i.e. relative abundance) is no longer considered the most suitable indicator of fish population status in Ontario. Ontario standards for piscivorous fish are to estimate harvestable	The Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) will be updated in the Final EIS/EA to commit to using the provincial broadscale monitoring protocol as a key monitoring program in addition to other metrics.	Appendix F.

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		biomass, and annual mortality. This represents the best available science, as required by Ontario's Provincial Fish Strategy.		
MNRF-341	Table F-8-3	"…hydroacoustic, electrofishing, minnow traps, gill nets…" The assortment of capture gear, and lack of any standardized assessment protocol are, in large part, the basis of Ontario's criticism of the fisheries baseline reports. Ontario policy requires robust monitoring at appropriate scales, using standardized approaches, to support fisheries planning and management.	Additional fish community data was collected in 2022 including a full broadscale monitoring study that followed provincial protocols, and a full lake hydroacoustic fish community survey. See the response to Comment 138 and Attachment FH-08-01 for further detailed information.	Appendix O (all).
MNRF-342	Table F-8-3	"A specific Lake Sturgeon Reintroduction Plan will be developed in cooperation with Indigenous communities and regulators as part of the final offsetting plan." Notwithstanding that Ontario considers lake sturgeon as present in Springpole Lake, the Lake Sturgeon Reintroduction Plan has not yet been developed makes it problematic to evaluate this component at the draft EA phase.	The advice and input from both Fisheries and Oceans Canada and the appropriate provincial government agencies will be solicited to develop a draft Lake Sturgeon Restoration Plan and will be included with the final EIS/EA.	EIS Section 6.10, Appendix F.
MNRF-343	Table F-8-4	"Contingency measures for implementation success" The contingency plan seems to largely rely on re-doing the items listed in the offset plan, e.g. adding more substrate, planting more plants, stocking more fish. This approach does not consider the possibility that the offset plan is based on the idea that one can excavate a healthy lake trout lake, and then restore it. It does not address the possibility that the Project will result in irreparable changes to water depth, thermal habitat, prey availability, etc., which have not been addressed in the offsetting plan.	The fish community and habitat investigations completed in 2022 increases the confidence of the Project team that the remaining Springpole Lake area will remain capable of sustaining all fish species and all life functions present in the lake. The reclamation of the dewatered basin as described in Section 8 of the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA) is considered a viable offsetting measure, despite having a longer lag time. The current Fish Habitat Offsetting and Compensation Plan proposes measures that are meant to be discussed through engagement activities during the preparation of the final EIS/EA. The Project team will continue to work with Indigenous communities and government agencies to explore alternative options that may become part of the final Fish Habitat Offsetting and Compensation Plan, or used as additional contingency measures.	EIS Section 6.10, Appendices F, O (all).
MNRF-344	Appendix W – 2022 fish workplan	"…applicable protocols regarding contaminant in fish tissue sampling (e.g., MECP, ECCC)…" Fish tissue samples collected by Ontario are submitted to MECP and are collected to meet their standards, which are known to be different than the standards required by Health Canada (this reviewer is unfamiliar with ECCC standards). Please confirm the collection protocol that will be used.	Tissue samples collected from large and small bodied fish in 2020, 2021 and 2022 followed guidance from the Ministry of the Environment, Conservation and Parks, using standard sampling methods and analyzed by certified laboratories (accredited by the Canadian Association for Laboratory Accreditation Inc (CALA)).	Not applicable
MNRF-345	O1-3.1.2	"Dissolved mercury levels exceeding PWQO were detected at several stations in Springpole Lake. Although dissolved mercury concentrations were highly variable, and mostly below lab detection, these exceedances are likely due to contamination through sample handling or lab error." Dissolved mercury levels are a critical measure in the evaluation of the impacts of the project on lake trout and other fish species. New baseline studies of dissolved mercury should be conducted, to eliminate variability and potential human error.	Detailed discussion of surface water quality baseline conditions, including mercury concentrations, are provided both in the surface water effects assessment (Section 6.6 through Section 6.9 of the draft EIS/EA), as well as the Cumulative Surface Water Quality Baseline Report (Appendix N-1). No additional baseline study is required to support the environmental assessment in this regard. In summary, total and dissolved concentrations of mercury have been monitored in the Project Area since 2011, with ultra-low detection total mercury and methylmercury added to the program in 2021. Across the entire program, which included more than 200 samples, concentrations of total mercury range from less than 0.000005 mg/L to 0.0000238 mg/L, which is below the Canadian Water Quality Guidelines (CWQG) value of 0.000026 mg/L for total mercury. As noted by the reviewer, and discussed in the cumulative surface water quality baseline report (Appendix N-1 of the draft EIS/EA), several samples in Springpole Lake and Birch Lake were above the CWQG value for total mercury in the natural condition during 2011 and 2012; however, it was confirmed through consultation with the laboratory that these results reflect contamination by an external source through laboratory handling and error. The determination of laboratory error causing contamination of these samples is further substantiated by results of subsequent years of baseline sampling programs wherein total mercury concentrations measured between 2013 through 2021 at stations in Birch Lake and Springpole Lake are all below the CWQG. Thus, the 2011 and 2012 results for total mercury are not considered representative of baseline	"Comment included in Section 6.6.1.2. (IoC) Addressed in Baseline Surface Water Quality Report (Appendix N-1)."

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			(natural) conditions. No additional baseline study is required to support the environmental assessment in this regard.	
MNRF-346	O1-3.1.3	"The group of smaller basins (4, 5, and 6) had lower D.O. concentrations in the hypolimnion when compared to basins 1, 2, and 3. The average D.O. below the thermocline in basins 4, 5, and 6 were 5.12, 4.89, and 5.46, respectively". These values are all well below the 7ppm threshold necessary for lake trout, highlighting the importance of the deeper basins (i.e., Basin 1) in providing late summer lake trout habitat.	Appendix O-3 of the draft EIS/EA provides recent and comprehensive results for six deep basins identified in Springpole Lake and two deep basins in Birch Lake, as shown in Figure 2-1a. The basins were sampled multiple times in 2021 and included water quality samples, dissolved oxygen and temperature profiles, and lower trophic parameters (phytoplankton and zooplankton). Additional fish community studies in 2022 demonstrate that the three most northern basins (NB01, NB02 and NB03) provide comparable late summer Lake Trout habitat. See the response to Comment 138 for further details.	Appendix O (all).
MNRF-350	O1-3.1.3	"In Springpole Lake, average D.O. concentrations were above 3 mg/L throughout the water column, and at depths less than 30 m, averaged more than 7 mg/L". On p 24, the reported mean hypolimnetic dissolved oxygen values for basins 1-6 as 6.97; 6.51; 6.99; 5.12; 4.89; 5.46 (respectively). If all of the individual basins are below 7ppm, the statement that the lake average is more than 7ppm is not correct.	Appendix O-3 of the draft EIS/EA provides recent and comprehensive results for six deep basins identified in Springpole Lake and two deep basins in Birch Lake, as shown in Figure 2-1a. The basins were sampled multiple times in 2021 and included water quality samples, dissolved oxygen and temperature profiles, and lower trophic parameters (phytoplankton and zooplankton).	Not applicable
MNRF-351	O1-3.1.4.1	"The FWIN is the preferred fall fishery assessment protocol and has been widely used by the OMNRF". This statement is not correct. FWIN was the preferred assessment protocol for walleye prior to 2008 when the broadscale monitoring protocol was implemented. Using FWIN to assess a lake trout lake is not appropriate. The FWIN data should be disregarded, and appropriate studies to evaluate the status of the lake trout population should be conducted. The baseline report represents the data as following the FWIN protocol (e.g. specific references to the FWIN method are made throughout 3.1.4.1). Additionally, "various gill net sizes" being utilized does not follow an acceptable index netting protocol. Also, although walleye are a valued species, an index of lake trout is necessary. FMG should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	Additional fish community data was collected in 2022 including a full broadscale monitoring study that followed provincial protocols, and a full lake hydroacoustic fish community survey. See the response to Comment 138 and Attachment FH-08-01 for further detailed information.	Appendices F, O (all).
MNRF-352	O1-3.1.4.1	"Only two net sets were conducted during the 2011 FWIN survey (Figure 15). Due to a high Walleye catch averaging 40 individuals per net, it was decided that fishing should stop". Two FWIN nets in a 2800ha lake cannot be used as a representative sample of the fish community. The 2011 FWIN data are invalid and should not be included in the report. The baseline report represents the data as following the FWIN protocol (e.g. specific references to the FWIN method are made throughout 3.1.4.1). Additionally, "various gill net sizes" being utilized does not follow an acceptable index netting protocol. Also, although walleye are a valued species, an index of lake trout is necessary. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	The 2011 fish capture data represents direct fish sampling observations using standard fish sampling methods regardless of whether it met provincial protocols and should not be discarded. Section 3.1.4.1 of Appendix O-1 of the draft EIS/EA explains that the effort was discontinued after only two nets due to high Walleye capture rate (80 fish in two net sets) relative to the provincial License to Collect Fish for Scientific Purposes, with a condition limiting the catch to 150. Additional net sets would have put the capture team in a position of potentially contravening the provincial license conditions which is subject to enforcement action. Additional fish community data was collected in 2022, including a full broadscale monitoring study following provincial protocols. See the response to Comment 138 for further details.	Appendices F, O (all).
MNRF-353	O1-3.1.4.3	"Table 8. 2011 Springpole Lake minnow trap catch summary". Minnow traps are useful for presence/absence data only. Reporting on relative abundance and size distribution is not appropriate.	Respectively, minnow traps can be an appropriate sampling method for reporting on relative abundance. Like all fishing gear, minnow traps have biases and limitations. However, minnow traps have an advantage of portability and are usually expressed in terms of catch per trap per length of time set (Portt, et.al., 200617), which is a measure of relative abundance. If used in a consistent manner, minnow traps are a good method of sampling small-bodied fish. Several papers are available that discuss advantages and disadvantages of minnow traps and their use in population estimates, which report results as catch per unit effort (Bryant, 200018; He and Lodge, 199019; and Portt, et.al., 2006). Table 8-1 of Appendix O-1 does not report sizes, and the supporting text only provides the size range of captured fish; it does not infer a complete size distribution.	Not applicable

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
			17Portt, C.B., G.A. Coker, D.L. Ming, and R.G. Randall. 2006. A review of fish sampling methods commonly used in Canadian freshwater habitats. Can. Tech. Rep. Fish. Aquat. Sci. 2604. 18Bryant, M.D. 2000. Estimating fish populations by removal methods with minnow traps in southeast Alaska streams. North American Journal of Fisheries Management 20: 923-930. 19He and Lodge, 1990. Xi He' & David M. Lodge2, Using minnow traps to estimate fish population size: the importance of spatial distribution and relative species abundance, Hydrobiologia 190: 9-14, 1990.	
MNRF-354	O1-3.1.6.1	"To identify Lake Trout spawning habitat within the northern portion of Springpole Lake". It is not understood why only the northern portion of the lake would be surveyed. In order to gain an understanding of the impact of the project on Springpole Lake, the impacted area needs to be considered in the context of the entirety of the lake, not an isolated portion.	In response to a similar comment by Fisheries and Oceans Canada on previous baseline reporting, a GIS analysis of the entire lake was completed to delineate candidate spawning areas for Lake Trout, Whitefish and Northern Pike, based on water depth, and inferred substrates and vegetation. Candidate spawning habitat is shown in Appendix A of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA).	Not applicable
MNRF-356	O1-3.1.6.1	"scan the bottom substrates along each shoreline (Figure 28) segment for spawning groups of trout." Lake trout also spawn on offshore reefs and in deep water	As shown in Figure 29 and stated in Section 3.1.6.1 of Appendix O-1 the survey included offshore islands and reefs. The comment that Lake trout spawn in deeper water is consistent with the Project team's understanding, and it is recognized that spawning could occur below the visible survey depth.	Not applicable
MNRF-357	O1-3.1.6.3	Only the north basin was surveyed for northern pike spawning areas. To outline a complete picture of the potential impacts to the fishery, the entire lake should be surveyed.	In response to a similar comment by Fisheries and Oceans Canada on previous baseline reporting, a GIS analysis of the entire lake was completed to delineate candidate spawning areas for Lake Trout, Whitefish and Northern Pike, based on water depth, and inferred substrates and vegetation. Candidate spawning habitat is shown in Appendix A of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA). Additional field surveys were conducted in 2022 to ground truth some of the GIS inferred locations for spawning Northern Pike and will be included in the baseline data with the final EIS/EA.	EIS Sections 3, 6.10, Appendix O (all).
MNRF-358	O1-3.1.6.4	only the north basin was surveyed for whitefish spawning areas. To outline a complete picture of the potential impacts to the fishery, the entire lake should be surveyed.	In response to a similar comment by Fisheries and Oceans Canada on previous baseline reporting, a GIS analysis of the entire lake was completed to delineate candidate spawning areas for Lake Trout, Whitefish and Northern Pike, based on water depth, and inferred substrates and vegetation. Candidate spawning habitat is shown in Appendix A of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA).	Not applicable
MNRF-359	O1-3.1.7.4	"Temperature, dissolved oxygen, and pH measurements were recorded at the same location in Birch Lake every summer over a period of 6 years, from 2011 to 2016 (SW-4,/15 U 543178, 5693762). These were collected as part of the aquatic baseline and surface water field programs at the project site. The maximum sampled depth at this location was 11 m". This approach to determining the baseline data for Birch Lake is not adequate. Multiple sites, with depths representative of the basins of the lake, should have been sampled.	The 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA) provides the results for six deep basins identified in Springpole Lake and two deep basins in Birch Lake, as shown in Figure 2-1a. The basins were sampled multiple times in 2021 and included water quality samples, dissolved oxygen and temperature profiles, and lower trophic parameters (phytoplankton and zooplankton).	Not applicable
MNRF-360	O1-3.2.4	"Fish community data for Birch Lake were collected as part of the OMNRF Broad-scale Monitoring Program, which was completed between July 16th, and 19th, 2009." Birch Lake was also sampled by NDMNRF's BsM Program in 2014 and 2019. It is unclear why the more recent results have not been included.	Section 3.7.2.2 of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA) provides a summary of the MNRF broadscale monitoring conducted in all years to date as follows: "The NDMNRF conducted BsM using small and large mesh gillnets to assess the fish community of Birch Lake in 2009, 2014 and 2019. For a detailed assessment of catch and community composition refer to NDMNRF (2020a,b,c). Sampling dates occurred from July 16 to 20, 2009, July 10 to 15, 2014, and July 29 to August 2, 2019. The recorded species from all three years of monitoring were: Walleye, Cisco [odoonibiins], Lake Whitefish, White Sucker [nambin], Northern Pike, Burbot [mizay], Lake Trout, Rock Bass, Moxostoma species, Shorthead Redhorse, Yellow Perch, as well as forage fish species including Blacknose Shiner, Bluntnose, Minnow, Emerald Shiner, Iowa Darter, Lake Chub, Logperch, Mottled Sculpin, Mimic Shiner, Johnny Darter, Slimy Sculpin, Spottail Shiner and Trout-perch. In 2009, three species composed the highest proportion of catches: Walleye (55%), Cisco (13%) and Lake Whitefish (8%). In 2014, Walleye represented the highest proportion of fish caught (62%) followed by Burbot (10%) and Lake Whitefish (8%). During the 2019 survey, Walleye were still the most frequently caught species (73%), followed by Northern Pike (9%) and Burbot (5%). The proportion of Walleye caught in these BsM programs have increased from 55 to 73% during the monitoring cycles, while other species such as Lake Whitefish have decreased (8 to <1%)."	Not applicable

Table C-2.5: First Mining Gold Response to the Ministry of Natural Resources and Forestry Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
MNRF-361	O1-3.2.5	"Only six Lake Trout were caught in Birch Lake. Although this confirms that they are present in the lake, it provides little insight into the characteristics of their population." Birch Lake will be directly impacted by the proposed project. More sufficient baseline data should be collected. The proposed fall 2021 sampling was not permitted out of concern for disruption of spawning activities. Sampling outside of the fall spawning season would have been permissible. This does not preclude the need for more suitable baseline data.	In addition to the data provided in Appendix O-1, Section 3.7.2.2 of the 2021 Aquatic Resources Baseline Report (Appendix O-3 of the draft EIS/EA) references the three cycles of full broadscale monitoring surveys completed by the MNRF on Birch Lake in 2009, 2014 and 2019. See our response to Comment 360 for further details. Additional fisheries investigations were completed along the south shore of Birch Lake, adjacent to the Project in 2022 and will be included in the final EIS/EA.	EIS Sections 3, 6.10, Appendix O (all).
MNRF-362	O1-3.2.5	"Lake Trout were the least common sport fish in all net catches". The 2009 BsM survey was designed to target walleye. More sufficient data to assess lake trout should be collected by the proponent. The proposed fall 2021 sampling was not permitted out of concern for disruption of spawning activities. Sampling outside of the fall spawning season would have been permissible. This does not preclude the need for more suitable baseline data.	Additional fish community data was collected in 2022 including a full broadscale monitoring study that followed provincial protocols, and a full lake hydroacoustic fish community survey. See the response to Comment 138 and Attachment FH-08-01 for further detailed information.	EIS Sections 3, 6.10, Appendix O (all).
MNRF-363	O1-5.1	"providing qualitative assessments of species abundance". It is unclear what is meant by "qualitative assessment of abundance". Abundance, by definition, is a quantitative measure. Single-pass electrofishing is useful for presence/absence surveys only; it cannot provide a measure of abundance.	The term used in Appendix O-1 was taken from the Ontario Stream Assessment Protocol (MNRF, 2005), which states under Section 3 (Single Pass Surveys) that "This approach can be used to produce a comprehensive fish species list for a site. It will characterize the fish community and provide a qualitative assessment of species abundance at the site." However, it is recognized that the most recent version of the Ontario Stream Assessment Protocol no longer uses this term in favour of multi-pass surveys.	Not applicable
MNRF-364	O2 Figure 2-1	The 2020 sampling locations do not adequately represent the entirety of Springpole Lake. Fish are mobile organisms and will use the entirety of the waterbody. Concentrating sample sites in one basin is not appropriate for baseline studies.	Additional fish community data was collected in 2022 including a full broadscale monitoring study that followed provincial protocols, and a full lake hydroacoustic fish community survey. See the response to Comment 138 and Attachment FH-08-01 for further detailed information.	EIS Sections 3, 6.10, Appendix O (all).
MNRF-365	O2-3.1.2.1	"The summer temperature suggests the thermal guild classification for S-9-US01 represent cool water fish habitat". MNRF and DFO have not used thermal regimes for fish habitat management since 2013. Work-in-water timing windows are based upon species assemblages. During the permitting phase of a project, in the absence of verifiable, species-specific data, the most restrictive timing windows are to be applied.	Thermal classifications provided in the baseline documents were intended to describe the ecological characteristics of fish and not timing windows. As noted in the Fish Habitat Offsetting and Compensation Plan (Appendix F of the draft EIS/EA), in-water work activities are based on the current MNRF in-water timing restrictions and DFO Guidance, as stated in Section 7.3 of Appendix F "In-water works are to be avoided during the timing constraints of any given year as per the In-water Work Timing Window Guidelines (MNR 2013) and the Ontario Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat (DFO 2017)."	Not applicable
MNRF-366	O2-3.3.1	"represented by nine species with Yellow Perch as the most abundant." There was no reliable sampling technique described in this baseline report that would give an accurate measure of abundance in Springpole Lake.	Fish collections were completed using standard fisheries capture techniques and multiple gear types. The statement identified by the reviewer, refers to the most abundant species captured out of 562 individual fish. A full lake broadscale monitoring (BsM) program was completed on Springpole Lake using provincial protocols as recommended in previous MNRF comments. The results of the BsM program (See the response to Comment 138 and Attachment FH-08-01) also found Yellow Perch to be the most abundant species, based on catch per unit effort, followed by Walleye.	Not applicable
MNRF-367	O1 and O2	There is little useable baseline fisheries data for Springpole Lake, apart from the bathometry and telemetry work, as per the comments above regarding the validity of the FWIN and BsM data collected. Given the nature of the proposed project and potential impacts, new index netting surveys should be conducted to support the Environmental Assessment process.	Additional fish community data was collected in 2022 including a full broadscale monitoring study that followed provincial protocols as recommended in previous MNRF comments, and a full lake hydroacoustic fish community survey. See the response to Comment 138 and Attachment FH-08-01 for further detailed information.	EIS Sections 3, 6.10, Appendix O (all).

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		As a point of clarification, the issuance of a License to Collect Fish for Scientific Purposes does not indicate endorsement for a given methodology, such as with regards to the appropriateness of a study in relation to the intended use of the data. The information provided through the reports thus far are not sufficient to support the appropriate assessment of the impacts of the proposed project on the fish communities of Springpole and Birch Lakes. The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.		
MNRF-368	O1 and O2	The bathometry and telemetry work thus far provides confirmation that the project proposal, specifically draining the north basin of Springpole Lake and creating the open pits within the drained basin, would eliminate the most important lake trout summer habitat in Springpole Lake, and would also prevent access by walleye to their most important spawning habitat. Therefore, it seems prudent for First Mining Gold to consider alternatives to the open pit concept within the Environmental Assessment. For greater clarity, NRF is concerned with potential impacts of the open pit proposal on lake trout spring juvenile and summer adult habitat, as well as forage habitat, within the north basin which additional spawning surveys would not address. Also, of note, is the Fisheries Management Zone (FMZ) 4 objectives for lake trout which includes the objective of maintaining lake trout abundance; reducing the volume of Springpole lake will reduce its productive capacity. The FMZ objectives inform NRF planning and decision making with regards to fish.	The Project would temporarily reduce the surface area of Springpole Lake by 6%, its volume by 9% and reduce important summer habitat for Lake Trout by 25% (See the response to Comment 136). Based on the 2022 fisheries data presented in the response to Comment 138 and Comment 270, it is expected that the productivity of the remaining lake area will remain the same, and will fully maintain all requirements to sustain Lake Trout. Appendix B-3 of the Draft EIS/EA, Section 5.2.1 of the Final Approved Terms of Reference (Identification of Alternatives) explains that an open pit mine is the only viable alternative to the undertaking and that alternatives will not be considered.	Not applicable
MNRF-370	O1-3.1.4.1	"Comparison between FWIN and Broadscale catches". Notwithstanding that both the FWIN and BsM data presented in the report are invalid, as described above, FWIN has only been calibrated to BsM for walleye. It is inappropriate to compare data for any other species. Moreover, where walleye data have been compared, the method of comparison has not accounted for the calibration of the two protocols. (e.g. Walker et al. 2013, Giacomini et al 2020) The proponent should conduct new index netting surveys to represent the status of the fisheries and support an appropriate assessment of potential impacts.	Additional fish community data was collected in 2022 including a full broadscale monitoring study that followed provincial protocols as recommended in previous MNRF comments, and a full lake hydroacoustic fish community survey. See the response to Comment 138 and Attachment FH-08-01 for further detailed information.	EIS Sections 3, 6.10, Appendix O (all).
MNRF-373	3.3.10.2 Overview of Results Wetlands	The text reads: During the 2011, 2012, 2019 and 2021 vegetation surveys, 331 species of plants were identified. Four provincially rare plant species were identified during these surveys: Black Ash, Lakecress, Small Yellow Pond Lily and Northern Marsh Violet. Vegetation surveys up to the end of 2021 identified a total of 368 plant species. Six plant species were documented in 2021 and are considered to be Species of Conservation Concern. Please clarify why these two statements don't align and indicate how the additional six species compare to the four listed earlier in the section.	Noted. This will be clarified in the final EIS/EA	EIS Section 3.
MNRF-375	6.12.1 Existing Conditions	Wildlife species are grouped into the following assemblages: • Furbearers • Large Mammals • Herptiles • Migratory Birds • Raptors • Waterbirds • Resident Birds	Species of Conservation Concern will be added as an assemblage group to Section 6.12.1 (Existing Conditions) of the final EIS/EA. The assessment of several species at risk is included in Section 6.13 (SAR Caribou), Section 6.14 (Wolverine), Section 6.15 (SAR Bats) and Section 6.16 (SAR Birds) of the draft EIS/EA.	EIS Section 6.12.

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		Species of Conservation Concern should also be considered. MNRF recommends adding an assemblage specific to those species to the assemblage list.		
MNRF-376	6.12.1 Existing Conditions	Significant Wildlife Habitat (SWH) An absence of information within Natural Heritage Information Centre and government databases (e.g., element occurrences and observations) does not mean that a location has no natural heritage areas, species of conservation concern (including species at risk), plant communities or wildlife concentration areas. These data are not a substitute for site visits. MNRF recommends using the Forest Resource Inventory (FRI) to identify candidate SWH by ecosite. Where FRI data is unavailable, habitat classification could be used to similarly identify potential candidate sites, which could be refined through field work. Please clarify how the study areas were investigated and the seven SWH types chosen. Describe how Figure 6.12-5 determined candidate versus confirmed habitat along with a description of how remaining candidate habitats will be considered. Please provide rationale for why bat hibernacula are not considered.	FRI data was used in 2022 to further refine SWH habitat types. Additional information will be provided the final EIS/EA to clarify the methodology, and include the results of the 2022 baseline studies.	EIS Sections 3, 6.12.

Table C-2.6: First Mining Gold Response to the Ministry of Mines Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
MINES-377	4.18.4 p. 4 - 54	Please be advised that monitoring requirements during the operational phase can and will be significantly different with respect to water quality objectives, and mandatory monitoring for specific water attributes at closure. The client is advised to review their requirements for post closure monitoring, particularly water quality objectives and the list of required water parameters to be reported as stated in Section 5 of the Ontario Mine Rehabilitation Code (O.Reg 240/00 Schedule 1).	Comment acknowledged. This will be fully considered in the preparation of the Closure Plan, as required by the Mining Act.	Not applicable
MINES-378	4.7.3	There are concerns regarding the proposed design and construction of the CDF, particularly the use of filter tailings in an unlined storage facility. Given the proximity of the proposed facility to critical animal habitat, the risk of an unintended release of tailings that contain cyanide, as well as a non-industry standard design, there is a high threshold of design and testing required to illustrate that this facility can safely contain the required tails. Because the north cell is not lined with some sort of water flow retardant (a membrane clay layer or similar), nor does the north cell contain water intrusion counter measures during operations, we are not convinced that contaminants will be sequestered from environmental flows, particularly ground water. Additionally, no acceptable alternatives to the design and placement of the CDF were presented. A higher degree of design, testing and proof will be required for this design to be put into operations. Non-standard designs should be reviewed by our Engineering Support Unit to provide comment. The placement of the CDF is also highly questionable given its close proximity to freshwater ecosystems, being completely surrounded by water on three sides.	The preliminary design and construction of the CDF was determined in part through an assessment of alternative locations, methods and technologies to manage mine waste, as described in Sections 5.7 to 5.11 and Appendix E of the draft EIS/EA. A commitment has been made to meeting the industry standard for cyanide management and use, as represented by the International Cyanide Management Code For the Manufacture, Transport, and Use of Cyanide in the Production of Gold (Cyanide Code). The design of the CDF has been optimized based on comments received from technical reviewers on the draft EIS/EA, as well as additional engineering, and field investigations. The CDF description will be revised as needed in the final EIS/EA to reflect the progression of the Project design since the draft EIS/EA was prepared. The optimized strategy includes the production of a thickened non-acid generated tailings, instead of the previously considered filtered tailings. The thickened tailings provide a more robust operation for co-mingling with mine rock, reduced energy consumption and reduced air emissions (including greenhouse gases). Additional geotechnical investigation since the preparation of the draft EIS/EA, has also confirmed that the natural foundations conditions for the CDF are equal to or better than previously assumed conditions. This is largely due to the low hydraulic conductivity of the andesite bedrock which provides highly favourable foundations to limit seepage emanating from the CDF without a liner under the south cell. The perimeter dams will be designed during detailed engineering with embankment liners and where required with engineering controls, such as bedrock grouting. There are no changes anticipated to seepage water quality as a result of the CDF optimization. In addition to the favourable foundation conditions, seepage mitigation will include perimeter seepage capture and management in the contact water collection system.	EIS Sections 5.3.3, 5.10.
MINES-379	3.14	While the proponent does hold several mining patents and leases, they have yet to procure the mining rights to the wider project area. To date, the client has only submitted an “intent to lease” document to the Provincial Recorders Office. The process of taking unpatented mining claims to lease can be expected to take over a year, as the project will require a survey of lands, all water bodies, etc, which will not be feasible during the winter months. Additionally, the client will be requesting the waiver of shoreline reserves (areas of land where surface rights are reserved to the Crown), which requires inter-ministerial analysis and co-operation to release. It is recommended the client proceed to be more secure in their land tenure and have a better idea of the land required for operation prior to proceeding with submission of the Environmental Assessment.	Thank you for this guidance.	Not applicable
MINES-380	Throughout	Assessment of alternative methods and infrastructure placement has not been conducted/presented in a way that makes it clear why the proponent has chosen their course of action over alternatives that could pose less environmental impact. Of particular concern is the placement of the tailings impoundment facility in close proximity to two large freshwater bodies containing critical trout habitat, the lack of lining in the north tailings impoundment and why pit mining was chosen over underground mine development. These choices pose considerable risk during development, operation and closure that threaten the integrity of an otherwise pristine habitat. The proposed method of mixing filtered and slurry tailings in the northern	A description of the proposed co-disposal facility is provided in Section 4.7 of the draft EIS/EA. The design of the facility was determined through an assessment of alternative locations, methods and technologies to manage mine waste for the Springpole Gold Project and is found in Section 5 of the draft EIS/EA. Section 5.8 describes the identification and assessment of tailings storage locations which is also assessed Appendix E. A number of environmental, technical and socioeconomic performance objectives were used to evaluate the various alternatives, including consideration of surface and groundwater quality, aquatic resources and potential effects to waterbodies. The CDF location was selected on balance of all aspects. Additional information will be provided in the final EIS/EA.	EIS Section 4.5 to 4.9, and Appendix E

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		impoundment cell has not been well discussed and leaves many questions on how the client will manage fugitive dust, run off and groundwater infiltration. We would like to see better discussion of alternatives on the placement of the tailings impoundment, an assessment on underground mine development vs pit mining, as well as the design of the co-disposal facility. The materials presented make it unclear why the client has chosen the proposed development options over other options and the associated risks.	This has been supplemented with Appendix E that includes the draft Mine Waste Management Alternatives Assessment report. This report provides a structured approach to considering various locations, methods or combined methods, and technologies to manage mineral waste at the Springpole Gold Project, and was prepared in accordance with the rigorous guidelines developed by Environment and Climate Change Canada, entitled Assessment of Alternatives for Mine Waste Disposal. The preferred method of disposing mine waste for the Project was further assessed in Section 6 of the draft EIS/EA, and included a detailed assessment of the potential effects on dust (Section 6.2), runoff (Section 6.6 and 6.7) and groundwater (Section 6.5) as a result of the proposed design. As noted in the response to Comment 378, the design of the CDF has been optimized based on comments received from technical reviewers on the draft EIS/EA, as well as additional engineering, and field investigations. The existing CDF description will be revised as needed in the final EIS/EA to reflect the progression of the Project design since the draft EIS/EA was prepared. Alternatives mining methods were fully considered including underground mining or a combination of open pit and underground mining as described in the approved Amended Terms of Reference. Open pit mining is typically used for large low-grade deposits and deposits where the ore distribution is uniform over a large area, and this is in alignment with the ore grade of the Project. Underground mining is typically used for deep-lying, high-grade, vein or seem-type deposits or where the setting has limited access. For the most part, a combination of open pit and underground mining is used when open pit resources are mined until it may be no longer economically feasible and there is an available high-grade underground deposit that is economical to extract. In addition, local geotechnical conditions were determined to be unsuitable for underground mining. Development of an underground mine was determined to be not economically viable as documented in the 2019 Preliminary Economic Assessment (AGP Mining Consultants (AGP). 2021. NI 43-101 Technical Report and Pre-Feasibility Study on the Springpole Gold Project, Ontario, Canada. Report Date: February 26, 2021).	
MINES-381	4.18 Conceptual Closure Plan	As an EA/EIS document is not intended as a stand-alone closure plan, we did not expect extensive planning at this stage. Because the design of the facility is still in flux, the ability to generate a concrete plan is infeasible at this time. The proponent has indicated that they will be adhering to the strictures of O.Reg. 240/00 with respect to rehabilitation of the site, however a comprehensive post closure monitoring plan, a full understanding of the post closure landscape, and several other critical components remain unknown. We are encouraged that the proponent has shown awareness of the need for any closure plan to conform to the Mine Rehabilitation code, however the Ministry of Mines will reserve their comments on closure planning until presented with a draft copy of an official closure plan for the site. The client is encouraged to reach out to ministry specialists for guidance in closure planning in order to produce a plan that conforms to the code.	Comment acknowledged. This will be fully considered in the preparation of the Closure Plan, as required by the Mining Act.	EIS Section 5.19
MINES-382	4.7	Section 4.7 of the EA/EIS discusses the development of a co-disposal facility (CDF) that will be used to manage PAG mine rock and tailings stating, "During operations, filtered NAG tailings and PAG mine rock will be trucked to the north cell for co-disposal, while PAG conventional slurry will be pumped to the south cell. The PAG mine rock and NAG tailings will be co-disposed in the north cell to isolate PAG mine rock from atmospheric oxygen using a sufficiently thick layer of NAG tailings. It is expected that the PAG mine rock and NAG filtered tailings will be dumped from trucks in piles on the surface of the north cell and mixed as the piles are progressively pushed outward using bulldozer(s) of equivalent." It is also understood from the geochemistry studies that some of the PAG mine rock has rapid onset to acidic conditions, where some of the mine rock has the potential to become acidic within one year of exposure (Section 4.4.4.2). At this stage, an ARD/ML Management Plan is not available (required by Part 7 O.Reg. 240/00), however, the submission does not detail how the proponent will monitor and manage this material with consideration for the rapid onset to acidic conditions time window. The submission also does not discuss	The design of the co-disposal facility (CDF) and additional detail regarding ARD/ML management will be provided during the environmental approvals process. It is expected that the CDF design would be reviewed by the Engineering Support Unit as part of the provincial permitting process. ARD/ML testing is ongoing, including a supplemental humidity cell initiated in late 2021 utilizing samples more representative of the typical sulphide and metal contents relative to the overall Project dataset. Updated information on ARD/ML management will be provided in the final EIS/EA on the aspects requested as available.	EIS Sections 5.10, 5.12.3.

ID	Specific Reference	Initial Comments & Rationale	FMG Response	Where Addressed
		how the proponent will eliminate/avoid voids between the waste rock being placed in the facility, which may impact surface stability at closure. It is recommended that the proponent discuss these details in the EA/EIS. These details are important for understanding how the material will be managed to maintain chemical and physical stability. The CDF design should be reviewed by our Engineering Support Unit to provide comment regarding physical stability at closure.		
MINES-383	4.5.2	Section 4.5.2 of the submission states "the NAG mine rock will be preferentially used as a construction material for the project". At this stage, an ARD/ML Management Plan is not available (required by Part 7 O.Reg.240/00), however the submission does not detail how the NAG mine rock for construction will be selected/segregated from the PAG rock during operations for re-use. It is recommended that the proponent discuss these details in the EA/EIS. These details are important for understanding the management of materials on site and to ensure acid generating materials are not used for construction purposes.	The requested information will be provided in support of the Closure Plan during the environmental approvals process. Confirmatory testing is proposed to be completed during operations. Additional information regarding the proposed approach will be provided in the final EIS/EA.	EIS Section 5.16.
MINES-384	4.4.4.2	Section 4.4.4.2 indicates that the mine rock on site has the potential for neutral metal leaching conditions. At this stage, an ARD/ML Management Plan is not available (required by Part 7 O.Reg.240/00), however, the submission does not detail how metal leaching under neutral conditions from mine rock across the site will be managed.	The potential for ARD/ML was fully considered in the design of the project. Please refer to the following sections: 4.5, 4.7, 5.7.2, 5.9.2, 5.10.2 and 5.11, in addition to Section 4.4.4.2 which provides an overview of the geochemistry of mined materials. In addition, a conservative approach was taken in water management facilities (Section 4.10) and the water quality projections and potential for environmental effects related to surface and groundwater as described in the Section 6 Effects Assessment, in full consideration of available geochemistry information, including related to metal leaching under neutral conditions. Detailed information related to this comment is provided in the following appendices of the draft EIS/EA: • K-1 Static Geochemical Testing Baseline Report • K-2 Kinetic Geochemical Testing Baseline Report • K-4 Mine Site Water Quality Estimate for Mine Operation • N-2 Surface Water Quality Modelling Report • N-3 Predictive Modeling of Open Pit Basin Water Quality. Updated information on ARD/ML management, including with respect to metal leaching under neutral conditions as applicable and water quality modelling that will inform site water management, will be provided in the final EIS/EA.	EIS Sections 5.7.4.3, 5.12, 5.19, Appendix K.

Table C-2.7: First Mining Gold Response to the Ministry of Tourism, Culture and Sport Comments on the Springpole Gold Project Draft Environmental Impact Statement/ Environmental Assessment

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Where Addressed
MTCS-HPU-001	Section 3.3.14.1	All references to 'Stage 1 assessment' should be revised to 'Stage 1 archaeological assessment'.	Revision to document.	Comment noted.	
MTCS-HPU-002	Section 3.3.14.1	A Stage 1 Archaeological Assessment (under Project Information Number P236-0141-2020 prepared by Northwest Archaeological Assessments dated December 30, 2020), was undertaken and included in Appendix S-1. The archaeological assessment has not yet been entered into the Ontario Public Register of Archaeological Reports and is currently awaiting review. A Stage 2 Archaeological Assessment (under Project Information Number P236-0170-2021 prepared by Northwest Archaeological Assessments dated November 21, 2021), was undertaken and included in Appendix S-2. The archaeological assessment has not yet been entered into the Ontario Public Register of Archaeological Reports and is currently awaiting review. A Stage 1 Archaeological Assessment (under Project Information Number P236-0163-2021 prepared by Northwest Archaeological Assessments dated December 14, 2021), was undertaken and included in Appendix S-3. The archaeological assessment was found to be compliant and has been entered into the Ontario Public Register of Archaeological Reports.	No action required.	No response required.	Not applicable
MTCS-HPU-003	3.3.15 Cultural Heritage Resources	MTCS recommends renaming this section 'Built Heritage Resources and Cultural Heritage Landscapes' rather than 'Cultural Heritage Resources'. Cultural heritage resources also include archaeological resources.	Revision to document.	Section to be renamed in the final EIS/EA as 'Built Heritage Resources and Cultural Heritage Landscapes'.	EIS Section 6.23.1.2.
MTCS-HPU-004	3.3.15 Cultural Heritage Resources	MTCS recommends revising the following definition of cultural heritage assessments: *Cultural heritage assessments address above-ground structures and resources that have been constructed, and are 40 years of age or older, in the study areas around and including the Project site. This is an accepted federal and provincial practice for the preliminary identification of cultural heritage landscapes and built heritage resources that may be of heritage value or interest. Data collected is used to assess the potential effects of the Project on built heritage resources.*	MTCS suggests the following revisions to this paragraph: Cultural heritage assessments ~~address~~ **assess known and potential built heritage resources and cultural heritage landscapes** ~~above-ground structures and resources that have been constructed, and~~ within the **Project** study ~~areas around and including the Project site~~ based on historical summary of the development of the study area, screening criteria developed by MTCS and professional judgement. This is an accepted federal and provincial practice for the preliminary identification **and assessment** of cultural heritage landscapes and built heritage resources that may be of **cultural** heritage value or interest. Data collected is used to assess the potential effects of the Project on built heritage resources and **cultural heritage landscapes**.	Paragraph to be updated in the final EIS/EA with suggested text as needed.	EIS Section 3.4.16
MTCS-HPU-005	6.22 Archaeology	Section 6.22 states that there are no direct linkages associated with archaeology from or to other VCs. This comment is incorrect and should be revised. For example, historic travel routes might constitute cultural heritage landscapes, which could also include archaeological resources. Similarly, to say there is no direct linkage to Traditional Land Use and Resource to a cultural heritage landscape is contrary to the definition of	MTCS suggests reviewing the first few paragraphs in section 6.22 and clarify the linkage between archaeology and other VCs.	Section to be updated in the final EIS/EA to clarify linkages between archaeology as needed.	EIS Sections 6.22, 6.22.1.

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Where Addressed
		cultural heritage landscape. For example, it could be a landscape that had been identified by an Indigenous community from their traditional land use. (See definitions in the Provincial Policy Statement, 2020)			
MTCS-HPU-006	6.22.3 Mitigation Measures	The outcomes (conclusions and recommendations) of the archaeological assessments (AAs) are to be articulated in the EIS/EA report. If archaeological potential or resources are present, the AA may recommend further archaeological assessment to be undertaken (up to a Stage 4). If the there is no archaeological potential or resources present, the AA would clearly state that the area specified (and mapped) has no further archaeological concerns. NOTE: The conclusions/ recommendations are typically included in the Executive Summary of the AAs and should be reiterated (cut and paste) in the EIS/EA report.	MTCS recommends revising the mitigation measures to include the recommendations found in the Stage 1 AAs and Stage 2 AA once accepted into the register. This should be a cut and paste of the recommendations found in the completed archaeological assessments.	Section to be updated in the final EIS/EA once the Stage 1 Archaeology Assessments and Stage 2 Archaeology Assessments have been accepted into the register.	EIS Section 6.22.1.
MTCS-HPU-007	6.22.3 Mitigation Measures	MTCS recommends revising the below paragraphs in section 6.22.3 to clarify the steps required if archaeological resources or human remains are encountered: If chance finds or deeply buried archaeological resources (including paleontological resources in organic deposits beneath lakes, marshes and peat) are encountered during the construction phase, a Chance Find Procedure (Appendix S-6) will be implemented, appropriate site personnel will be notified and the site secured. If human remains are encountered, work will immediately stop and the police or coroner, Registrar or Deputy Registrar of the Cemeteries Regulation section of the Ontario Ministry of Government and Consumer Services, as well as the Archaeology Program Unit of the MHSTCI will be contacted.	MTCS recommends the following language replace the two paragraphs in section 6.22.3: Please notify MTCS (at archaeology@ontario.ca) if archaeological resources are impacted by EA project work. All activities impacting archaeological resources must cease immediately, and a licensed archaeologist is required to carry out an archaeological assessment in accordance with the Ontario Heritage Act and the Standards and Guidelines for Consultant Archaeologists. If human remains are encountered, all activities must cease immediately, and the local police and coroner must be contacted. In situations where human remains are associated with archaeological resources, MTCS should also be notified (at archaeology@ontario.ca) to ensure that the site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act.	Section to be updated in the final EIS/EA as recommended.	EIS Sections 6.22.1, 6.22.4.
MTCS-HPU-008	6.23 Cultural Heritage	Cultural heritage resources include all 3 types – archaeological resources, built heritage resources and cultural heritage landscapes. This section only addresses BHR and CHL. Therefore, terms need to be edited.	Title of section should be changed to "Built Heritage Resources and Cultural Heritage Landscapes. Delete 1st sentence of first paragraph. Change throughout the document. 2nd paragraph include the reference to the definitions of BHR and CHL. It should be from the Provincial Policy Statement, 2020. However, given that this project is also going through a federal EA, there should be a paragraph explaining and aligning the terms of federal and provincial jurisdiction.	The title of the section to be updated in the final EIS/EA, as recommended. The first sentence to be deleted and the term 'cultural heritage' to be updated to 'built heritage resources and cultural heritage landscapes' throughout the document. The second paragraph to be updated to the PPS 2020 definitions of BHRs and CHLs. Federal and provincial jurisdiction to be clarified as needed.	EIS Section 6.23.1.2.
MTCS-HPU-009	6.23.2.1 Identification of Potential Environmental Effects	This section needs to include a paragraph on what type of effects will happen on BHR and CHL (e.g, demolition, removal, alteration).	The recommendations identified in the EIS should be aligned with the recommendations identified in the Cultural Heritage Report.	The recommendations in the final EIS/EA to be aligned with recommendations in the Cultural Heritage Report and associated evaluation reports as necessary.	EIS Sections 6.23.1.2, 6.23.3, 6.23.4.

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ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Where Addressed
MTCS-HPU-010	6.23.3 Mitigation Measures	The outcomes (conclusions and recommendations) of the Cultural Heritage Report: Existing Conditions and Preliminary Impacts Assessment are to be articulated in the EIS/EA report. The conclusions/recommendations are typically included in the Executive Summary of the Cultural Heritage Report and should be reiterated (cut and paste) in the EIS/EA report.	MTCS recommends revising the mitigation measures to include the recommendations found in the Cultural Heritage Report: Existing Conditions and Preliminary Impacts Assessment Executive Summary.	Mitigation measures in the final EIS/EA to be consistent with the Cultural Heritage Report.	EIS Sections 6.23.1.2, 6.23.3, 6.23.4.
MTCS-HPU-011	11.2 Provincial Environmental Approvals	MTCS recommends clarifying that although no permits are expected to be issued, a letter indicating that applicable Archaeological Assessments have been accepted into the Ontario Public Register of Archaeological Reports will be issued to the licensed archaeologist, Proponent and approval authority.	MTCS suggested language: Ministry of Tourism, Culture and Sport (MTCS) or subsequent ministry with a mandate to conserve cultural heritage may also be involved with permitting of project components. Although no permits are expected to be issued a letter indicating that applicable Archaeological Assessments have been accepted into the Ontario Public Register of Archaeological Reports will be issued to the Proponent.	The suggested language to be incorporated into applicable section of the final EIS/EA.	EIS Sections 6.22.1.2, 6.22.1.1.
MTCS-HPU-012	Appendix S-5 Cultural Heritage Evaluation	MTCS would also like to know if Indigenous Communities have been given an opportunity to review this Cultural Heritage Report and how their comments were incorporated or addressed.	Response to MTCS with additional information requested.	Indigenous Communities have been provided an opportunity to review the report through their review of the draft EIS/EA. Comments to be considered the final EIS/EA.	EIS Section 6.23.1.2.
MTCS-HPU-013	Appendix S-5 Cultural Heritage Evaluation, 7.0 Summary and Findings	MTCS concurs that a CHER should be undertaken during the EA. MTCS would appreciate to know the status of any CHERs. When undertaking the CHERs, it would be helpful to understand the ownership of each of the built heritage resources/cultural heritage landscapes identified in the Cultural Heritage Report.	Provide update to MTCS on status of CHERs.	The CHERs are planned to be completed in advance of a final EIS/EA submission. The five potential heritage resources identified that may be impacted (CHRs 1 – 5) are all currently owned by FMG or there is an agreement for purchase in place.	EIS Section 6.23.1.2.
MTCS-TPU-001	3.3.15.2 Cultural Heritage Resources (Environmental Setting): Overview of Results	Built heritage resources in or near the study area include eight cabins or camps, consisting of small, framed buildings, generally less than 50 years old, with a kitchen, dining area, and living quarters, which were used as outpost camps.	Additional clarity is needed regarding the reference to "outpost camps" in order the better understand if the proponent believes they were commercial outpost camps or whether they may have been private cabins or camps utilized by First Nations.	Further information regarding the cabins / outpost camps will be documented within the Cultural Heritage Evaluation Report. Clarity on the use and ownership of these properties will be provided in the final EIS/EA, following the completion of these studies.	EIS Sections 6.23.1.2, 6.23.2, Appendix S-5, S-8 to S-11.
MTCS-TPU-002	4.5.3 Ore Stockpiles (Project Description)	Ore stockpiles will be at least 120 metres from Birch Lake and will range from 30-60 metres in height	Concern that the buffer may not be sufficient given the expected height of the stockpiles, especially for any guests of tourism facilities on Birch Lake that may travel to that end of the lake to fish. The extent of forest cover and topography in the area will determine how visible the stockpiles may be from the water. In addition, 120 metres may not effectively limit noise when the ore in the stockpiles is being accessed by equipment for use in the processing plant.	Appendix U of the draft EIS/EA provides the Visual Aesthetics Desktop Baseline Study and Assessment. The study notes that the locations in the study area have high scenic quality but low viewer sensitivity, and are predominantly background viewing distances. As a result, none of the locations during any of the Project phases result in a change in the landscape rating. With a treed buffer maintained along the shoreline, none of the viewpoints analyzed would have visibility of the Project during the operations phase. After closure, no Areas of Interest would experience a change in landscape rating. During the final years of operation, the ore stockpiles would be processed, and revegetation would occur during closure. As a result, these views will be consistent with baseline visual aesthetics and the scenery will remain similar to the rest of the study area. Visibility of mine features following completion of closure activities will not degrade the visual aesthetics in the study area.	Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Where Addressed
				Appendix H-3 includes the noise modelling report, which assesses the impact of noise from the Project on the surrounding environment. The model conservatively assumed that foliage (trees) would not attenuate the effects of noise and the surrounding area was modelled as semi-absorptive / reflective. As a result, the predicted noise levels in the surrounding environment were overestimated. Under the predictable worst-case scenario, the modelled sound levels are expected to comply with the applicable MECP NPC-300 guideline limits at all points of reception, during daytime and evening / nighttime periods, for all modelled scenarios.	
MTCS-TPU-003	4.18.3.9 Conceptual Closure Plan: Infrastructure (Project Description)	Site roads and the mine access road will be decommissioned when no longer needed to support final reclamation, long-term management and environmental monitoring, assuming that the roads are no longer required to support any developments onsite or local needs.	We support the primary intent to decommission the mine site access road when no longer needed. Given that this is a remote area, the desire to restore that remoteness beyond the project should be positive from a tourism perspective. The words "local needs" need some clarification. For example, when roads are built for forest management purposes they may be left open once operations end to allow local recreational users (i.e., anglers and hunters) to use the road. This can be a concern when those road are built in proximity to remote areas/lakes/ facilities used by the tourism industry. With regard to the Springpole project, if the mine access road is left open for recreational use (local need) the remote tourism operators in proximity to the project may be concerned about the potential for long-term road access into the area.	This will be updated in the final EIS/EA to confirm "it is anticipated that site roads and the mine access road will be decommissioned when no longer needed to support final reclamation, long-term management and environmental monitoring" Comments from tourism operators in proximity to the project and local Indigenous communities will also continue to be considered in closure planning.	EIS Section 5.
MTCS-TPU-004	5.2.1.2 Effects to the Human Environment (Alternatives)	Under the "Effect on local residents and recreational users" criterion, an indicator is "maintenance or provision of local access." Under the "Effect on tourism and recreation" criterion, an indicator is "maintenance or improvement of tourism and recreational opportunities."	As per comment above on Section 4.18.3.9, maintenance or enhancement of access may not be preferred by remote tourism operators in the area. While this indicator is acceptable, consider adding maintenance of tourism facilities during mining activity as an indicator. The intent being that additional tourism facilities are not closed, or purchased by FMG, due to the mining activity associated with the project.	This aspect will be considered for inclusion in the alternatives assessment in the final EIS/EA.	EIS Section 4.
MTCS-TPU-005	5.2.1.6 Amenability to Reclamation (Alternatives)	Under the "Effect on land use" criterion the indicator is "Provides, or is associated with, a preferred, manageable or acceptable financial risk."	The indicator doesn't seem to match the criterion.	The indicators under the 'Effect on land use' criterion should be 'Provide opportunities for productive land uses' and 'Provide for an aesthetically pleasing site'. This will be updated in the final EIS/EA, consistent with the assessment in Appendix T-1.	EIS Section 4.
MTCS-TPU-006	5.26 Transmission Line Routing (Alternatives)	Primary considerations for identifying potential transmission line routes includes avoiding conflicting land uses as reasonable, including mining claims and active dispositions.	Intent is to avoid conflicting land uses but tourism is not specifically referenced. Is the intent that tourism would be considered under "active dispositions"? If not, consider adding tourism to bullet.	Appendix T-1, Table T1-11 provides a detailed assessment of the alternative routes for the transmission line. The table includes an assessment of the alternative for the criterion 'Tourism and Recreation' using an indicator 'Maintenance or improvement of tourism and recreational opportunities.'	Not applicable
MTCS-TPU-007	6.1.1.2 Selection of Biophysical Valued Components (Methods)	Lists the biophysical valued components selected for assessment in relation to the effects of the project.	The list does not visual impacts and it is suggested that visual impacts from the project also be assessed. Visual impacts from projects are important from a tourism perspective, especially in remote locations. In considering visual impacts, consideration should be given to whether any of the remote outfitters in the area have flight paths that traverse	Appendix U of the draft EIS/EA provides the Visual Aesthetics Desktop Baseline Study and Assessment. The study notes that the locations in the study area have high scenic quality but low viewer sensitivity, and are predominantly background viewing distances. As a result, none of the locations during any of the	Not applicable

ID	Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Where Addressed
			the project location. If so, discussions should be held with outfitters regarding any concerns or the potential to modify those to avoid the area if possible.	Project phases will have a change in the landscape rating. With a treed buffer maintained along the shoreline, none of the viewpoints analyzed would have visibility of the Project during the operations phase. The results of the Visual Aesthetics Assessment and determination of effects on commercial outfitters and cabins are considered in Section 6.17 and 6.18. During operation and closure phases, the visual effects assessment determined the mine site will not be visible at the three outfitter outposts closest to the Project, including Sites 6, 14 and 17. As a result, there are no residual effects on the outfitter outposts. Relevant mitigation measures include: – During all phases, implement mitigation for lighting and changes to viewscapes to minimize sensory disturbance, including to: – Prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; – Minimize light spill and glare by through the use of shielding on stationary light sources and direct lighting downwards where practical Preserve a tree line as practical, as a buffer to minimize the amount of the mine site that can be seen from recreational areas.	
MTCS-TPU-008	Table 6.2-4	Section 6.2.5 indicates that the likelihood of residual effects from the air quality valued component is low. Table 6.2-4 identifies eight receptor sites for the air quality assessment and provides UTM coordinates. Section 6.3.1.1 (Noise and Vibration chapter) notes these same receptors were used as sound receptors for that assessment.	Table 6.2-4 does not describe what each of the sites are (i.e. private cabin, tourism facility etc.), though Section 6.2.2.4 notes cabins near the project were identified as receptors. Section 6.3.1.1 notes that the receptors include seasonal cabins and outfitters locations (not owned by FMG) which is positive, but it would be simpler to describe the sites in Table 6.2-4 versus having to try and figure them out from maps elsewhere in the document.	The receptors included in the air quality assessment (Section 6.2, Table 6.2-4) include a mix of private cabins and tourism facilities and this can be clarified in this section of the final EIS/EA	EIS Sections 6.2.1.2, 6.2.5, Figure 6.2-2, Appendix G-2 Attachment D.
MTCS-TPU-009	6.3 Noise and Vibration	Construction and operation has potential to increase sensory disturbances, which may affect the use of lands and resources by commercial operations.	Agreed. Noise can be a concern for remote tourism businesses as it erodes the remoteness characteristic they market.	Comment noted.	Not applicable
MTCS-TPU-010	6.3.2.3 Spatial and Temporal Boundaries (Noise and Vibration)	Local Study Area extends approximately 3 kms from the Project Development Area (PDA – the PDA covers about 250 metres around the mine site). Regional Study Area extends about 6 kms from PDA.	Figure 6.3-11 (page 25) indicates that it is about 5 kms to the closest receptor on Birch Lake to the north (appears to be a tourism facility). Depending upon the types of noises generated by the project (i.e. constant noise versus short-term events like blasting), consideration needs to be given to how noise may travel across a waterbody like Birch Lake.	As noted in Section 6.3.2.5, the Project and surrounding surfaces were modeled as semi-absorptive / reflective surface, as this is representative of how noise travels across a waterbody such as Birch Lake. This assumption was included in the noise modelling completed for the Project, as described in Appendix H-3.	EIS Section 6.3.1.2, Appendix H-3 Section 6.1.
MTCS-TPU-011	6.3.4.1 Noise Levels	This section concludes no predicted residual effects to the acoustic environment are expected from project-related noise. Noise modelling was conducted.	It is wondered how well the concept of remoteness may fit into the noise modelling used. Target noise parameters may not be exceeded though the modeling but it may not mean the project could occur without noise impacts to remote tourism. One-off noises like blasting and horns may cause concerns for some of the receptors as the noise will mostly travel across water.	Appendix H-3 includes the noise modelling report, which assesses the impact of noise from the Project on the surrounding environment. Baseline sound levels were determined to be Class 3, which is a rural area with an acoustical environment dominated by natural sounds (e.g. rustling leaves) having little or no road traffic. The model conservatively assumed that foliage (trees) would not attenuate the effects of noise and the surrounding area was modelled as semi-absorptive / reflective. As a result, the predicted	Not applicable

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			Section 6.17 (Commercial Land and Resource Use chapter) also notes that the construction and operation of the project will create noise and vibration which could disturb trapping. It may also disturb the remoteness associated with tourism.	noise levels in the surrounding environment were overestimated. Under the predictable worst-case scenario, the modelled sound levels are expected to comply with the exclusion limits under MECP NPC-300 guideline at all points of reception, during daytime and evening / nighttime periods, for all modelled scenarios.	
MTCS-TPU-012	6.10.3 Mitigation and Offsetting Measures (Fish)	Fishing will be prohibited by non-Indigenous employees and contractors while working on site.	In a recent working group meeting, MNRF staff indicated that the company may be able to ban fishing on the mine property but cannot do it off the property. So, there needs to be clarification of what the company can and cannot mandate employees to do both on the mine site and beyond. Upwards of 650 employees are projected to work on site at times during the project. If they can potentially fish in the area outside the mine site (will be limited by who has a fishing license), it could impact local fishery resources and potentially impact commercial tourism interests in the area (i.e. impacting remoteness).	Employees and contractors will not be allowed to fish on FMG property while working on site. The mine site is remote and employees will be transported to site by busses, where they will be provided accommodations until the end of their work cycle. The majority of employees will not have access to transportation to travel off site to fish in other areas. It is also of note that the FMG property boundary extends beyond the mine site development area.	Not applicable
MTCS-TPU-013	6.12.1 Existing Conditions (Wildlife)	Lists black bear as a mammal on page 6-261 and then as a furbearer on page 6-262	Be consistent with terminology re: how black bear is categorized.	Black bear are considered large mammals for the purposes of the effects assessment in Section 6.12. This inconsistency will be addressed in the final EIS/EA.	EIS Section 6.12.
MTCS-TPU-014	6.12.3 Mitigation Measures (Wildlife)	Hunting and trapping will be prohibited by employers and contractors within the PDA and while working on site. This is also highlighted in Section 6.18.4.2 (Change in Recreational Hunting: Outdoor Recreation)	What is the reason why in Section 6.10.3, fishing will be prohibited for just non-Indigenous employees and contractors but all employees and contractors are covered by the hunting and trapping ban? Similar to the proposed fishing ban, please clarify what can the employer actually mandate for employees both on site and in the area outside the mine site. If employees on site can potentially hunt in the area outside the mine site (limited by who has a hunting license), it could impact local wildlife resources and potentially impact commercial tourism interests in the area (i.e. impacting remoteness).	The mitigation measure will apply to all employees and contractors while working on site. Employees and contractors will not be allowed to hunt on FMG property while working on site. The mine site is remote and employees will be transported to site by busses, where they will be provided accommodations until the end of their work cycle. The majority of employees will not have access to transportation to travel off site to hunt in other areas. It is also of note that the FMG property boundary extends beyond the mine site development area.	Not applicable
MTCS-TPU-015	6.12.4.1 Direct effects on Wildlife Habitat (Wildlife)	Forage availability from linear disturbances may be locally enhanced for Moose, which is predicted to offset residual effects. Section 6.12.4.3. also makes some reference to this issue as follows - Moose may be attracted to the infrastructure corridors to exploit habitat for browsing. Although Wolves may use the corridors for travel, and increase the risk of predation on Moose, the effect is anticipated to be negligible.	Agree that linear disturbances can act as migratory corridors for predators like wolves. So while there may be some browse creation which is positive, it may also increase predation risk which is negative. Section 6.12.4.2 also states the creation of linear corridors can act as semi-permeable movement barriers for some species and movement corridors for others.	The effect of changes in linear disturbances, including the creation of semi-permeable barriers and the creation of potential migratory corridors for predators is assessed in Section 6.12.4.2 as an indirect effect on wildlife habitat.	Not applicable
MTCS-TPU-016	6.12.4.2. Indirect Effects on Wildlife Habitat (Wildlife)	Species including Moose, Wolf, Black Bear may become less abundant, proximate to the construction and operation at the mine site. It is anticipated there will be habituation to ambient noise from mining activities, but short-term negative response to brief sources of sounds (i.e., blasting) are predicted.	See comment above on Section 6.3.4.1. Short-term sounds like blasting may also be of concern for tourism businesses on Birch Lake depending upon how well sound will travel across the lake toward their facilities.	As noted in Section 6.17, there are no outfitters in the Project Development Area (PDA). The closest outfitter outposts to the PDA is 5.5 km to the north. The effect on sound due to blasting from the Project was detailed in Appendix H-4 (Blasting Impact Assessment Report). The results of the modelling were compared to the regulatory guideline NPC-119 and results were predicted to meet the threshold for sensitive land uses, including residential dwellings.	Not applicable

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MTCS-TPU-017	6.12.4.3 Risk of Mortality (Wildlife)	The risk of collisions with Project-related traffic will be mitigated with speed limits applied during the operation phase and providing wildlife awareness training to Project employees. As a result, there would be no residual effects on wildlife and wildlife habitat.	Additional vehicles will mean accidents, regardless of speed limits and wildlife awareness training. Wild animal behaviour cannot be predicted.	The assessment of the risk of mortality on wildlife included the consideration of mitigation measures such as enforced speed limits and awareness training. Observations of wildlife along transportation corridors will be logged including potential wildlife-vehicle collisions. This information will be used to alter mitigation measures, if necessary, to minimize or reduce the potential risk of wildlife collisions.	Not applicable
MTCS-TPU-018	6.17.2.1 Identification of Potential Environmental Effects (Commercial Land and Resource Use)	Recognition of potential viewscape issues for tourism during construction phase and potential noise issues during operations phase.	Positive recognition. See earlier comments relating to potential viewscape and noise concerns from a tourism perspective.	Comment noted.	Not applicable
MTCS-TPU-019	6.17.2.2 Indicators and Measurable Parameters (Commercial Land and Resource Use)	Change at outfitter outposts is an indicator combined with a measurable parameter of number of outposts with altered viewscapes.	Positive to see a tourism-related indicator. A suggested addition - proximity of road/transmission corridors to outposts.	There are no outfitters in the Project Development Area (PDA). The closest outfitter outposts to the PDA are: 5.5 km to the north, 11 km to the west, and 12 km to the south. There are approximately 14 outfitters with lodges or outpost camps in or near the Regional Study Area (RSA; Section 6.17, Table 6.17-3 and Figure 6.17-4). Figure 6.17-4 shows that there are no outfitter outposts identified along the proposed access road or transmission line corridor.	Not applicable
MTCS-TPU-020	6.17.3 Mitigation Measures (Commercial Land and Resource Use)	Lists a number of potential mitigation measures to avoid, minimize or manage adverse effects, or enhance beneficial effects to commercial land and resources use.	Suggest adding work with local tourism outfitters to minimize access-related impacts from the project.	Comment noted and this will be included in the final EIS/EA.	EIS Sections 2, 6.17.
MTCS-TPU-021	6.17.4.4 Changes at Outfitters Outposts (Commercial Land and Resource Use)	During operation and closure phases, the visual effects assessment determined the mine site will not be visible at the three outfitter outposts closest to the Project, including Sites 6, 14 and 17. As a result, there are no residual effects on the outfitter outposts.	As referenced above, did the assessment take into account aerial fly-over impacts if any?	The Visual Effects Assessment provided in Appendix U focused on identifying effects at the ground level. Aerial fly-overs are currently used in the area and are anticipated to be infrequent and uncommon once construction and operation of Project begins.	Not applicable
MTCS-TPU-022	Table 6.17-3 Outfitters (Commercial Land and Resource Use)	Table outlining 14 tourism establishments and a brief description of their operations including location of facilities within the project LSA/RSA.	Good overview and related map in Figure 6.17-4. As noted in the General Comments, during a July 25th meeting an MNRF colleagues indicated the map is missing Excellent Adventures tent sites on Springpole and Pickerel Arm Camps outpost on Springpole Lake. Does FMG know the current status of those facilities? Were the assets purchased by FMG?	The Pickeral Arm Camps outpost located on the northern shore of the arm of Springpole Lake is owned by FMG. Excellent Adventures does not list any campsites on Springpole Lake on their website and FMG is unaware of any permitted site.	Not applicable
MTCS-TPU-023	6.18.1.2 Hunting (Outdoor Recreation)	The estimated number of active hunters and the number of moose harvested is presented in Table 6.18-1. Between 2013 and 2020, the number of active hunters in WMU 4 ranged from 806 to 1,000 and the total number of Moose harvested ranged from 104 to 165 annually. In WMU 16A, there were an estimated 292 to 403 active hunters annually who harvested 22 to 47 Moose, between 2013 and 2020. The estimated harvest numbers are based on questionnaire responses from a sample of hunters and are therefore subject to statistical correction.	For the sake of clarity, do the harvest numbers include any harvesting by guests of outfitters in those WMUs?	The information source (Moose hunting activity and harvests - Datasets - Ontario Data Catalogue) does not indicate if harvest numbers include harvesting by guests of outfitters. FMG will follow-up with MNRF and outfitters as appropriate, to confirm if harvest numbers include harvesting by guests of outfitters.	Not applicable
MTCS-TPU-024	6.18.1.2 Hunting (Outdoor Recreation)	As shown in Figure 6.18-3, there are 24 Bear Management Areas (BMAs) that overlap with the PDA, LSA and RSA.	Based on Figure 6.18-3, it appears that two BMAs would be directly overprinted by the mine site and part of the PDA where the access road and transmission line are located north of the south arm of Springpole Lake.	As noted in Section 6.18.3, the mitigation measures outlined for potential effects to wildlife and wildlife habitat, and prohibition of hunting within the gated portion of the Project Development Area (PDA) will reduce potential effects on bear management areas.	EIS Section 6.18.

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			Is there any planned mitigation to the tourism operators who hold those BMAs for loss of access to, or use of, those areas over the life of the project? If not, the proponent should engage with the outfitters in question as well as MNRF (who issues BMAs) to discuss how to mitigate those losses.	Input received through ongoing engagement activities during the environmental assessment process will be considered in the assessment of potential effects on tourism, and will be used to update the final EIS/EA, as appropriate.	
MTCS-TPU-025	6.18.4.2 Change in Recreational Fishing (Outdoor Recreation)	Construction of the transmission line corridor may increase access to additional waterbodies and improve opportunities for recreational fishing within the LSA.	As noted in previous comments about, this could be a potential tourism concern if any of these waterbodies are remote and used by outfitters.	There are no outfitters in the Project Development Area (PDA). The closest outfitter outposts to the PDA are: 5.5 km to the north, 11 km to the west, and 12 km to the south. There are approximately 14 outfitters with lodges or outpost camps in or near the RSA (Section 6.17, Table 6.17-3 and Figure 6.17-4). Figure 6.17-4 shows that there are no outfitter outposts identified along the access road or transmission line corridor. FMG will continue ongoing engagement with outfitters regarding potential use of other waterbodies.	Not applicable
MTCS-TPU-026	Table 7.2-1 Summary of Valued Components and Residual Effects Prediction (Cumulative Effects)	No residual effects predicted for Change at Outfitting Outposts indicator.	This conclusion is questioned given potential concerns about long-term road access to area, noise considerations etc.	There are no outfitters in the Project Development Area (PDA). The closest outfitter outposts to the PDA are: 5.5 km to the north, 11 km to the west, and 12 km to the south. There are approximately 14 outfitters with lodges or outpost camps in or near the RSA (Section 6.17, Table 6.17-3 and Figure 6.17-4). Figure 6.17-4 shows that there are no outfitter outposts identified along the access road or transmission line corridor.	Not applicable
MTCS-TPU-027	7.11.1 Summary of Project Residual Effects: Commercial Land and Resource Use (Cumulative Effects)	The residual effects from the Project on commercial land and resource use are: – A minor and localized loss of forestry resources in the PDA that will occur once during the Project; – A localized reduction of trapping in the PDA that will occur once during the Project and affect 0.6% of the total trapline area; and – A localized reduction of baitfish harvesting in the PDA, ranging from 0.1% to 6.3% of individual baitfish harvesting areas, that will occur once during the Project and will be reversible at closure.	This section doesn't list the loss of BMA access as a residual localized effect given it appears two BMAs will be overprinted by the PDA and it is likely that area would not be used for bear hunting by the outfitters who hold the BMAs.	As noted in Section 6.18, although two bear management areas (BMA) overlap the Project Development Area (PDA), there will not be a change in access due to the Project as other areas of the BMA will still be available.	Not applicable
MTCS-TPU-028	7.11.3	There would not be a predicted cumulative effect between the Project and the effects of other projects in the surrounding area. Without a residual cumulative effect on commercial land and resources, a characterization of cumulative effects is not warranted, nor is an assessment of the Project's contribution to cumulative effects on commercial land and resources.	We remain concerned about the potential creation of long-term road access in the area and the potential for access expansion through the hydro corridor on top of whatever forest management activities may be planned in the area. As noted earlier, long-term road access could diminish the remoteness of the area and increase harvest pressure on fish and wildlife resources, which would be of concern from a remote tourism perspective.	Comment noted. See response #3	Not applicable