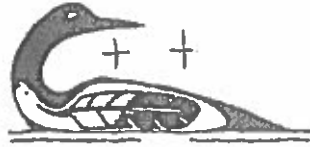


Long Lake #58 First Nation

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January 28, 2020

Caitlin Cafaro, Crown Consultation Coordinator
Impact Assessment Agency of Canada (IAAC)
600-555 York Street
Toronto, ON M5J 1R7
via email: iaac.martenfalls.asic@canada.ca; iaac.webequie.asic@canada.ca

Re: Request for Input on Marten Falls Community Access Road and Webequie Supply Road Project Documents

Dear Ms. Cafaro,

Long Lake #58 First Nation (LL58) provides the attached comments in response to the Impact Assessment Agency of Canada's (IAAC) letter dated December 19, 2019 requesting comments on the Draft Tailored Impact Statement Guidelines and Draft Indigenous Engagement and Partnership Plans prepared for the Marten Falls Community Access Road (MFCAR) and Webequie Supply Road (WSR) projects.

LL58 would like to emphasize the challenge of meeting the timelines associated with these Impact Assessment processes to date. LL58 underwent significant efforts to gather community comments through technical staff discussions, meetings with the IAAC and a community engagement session hosted by LL58 on January 27, 2020. LL58 looks forward to receiving the IAAC's response to these comments.

Sincerely, <Original signed by> *Per:* <Original signed by>

Chief Judy Desmoulin
judy.desmoulin@longlake58fn.ca

cc. Chief Bruce Achneepineskum (bruce.achneepineskum@gmail.com)
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Kimberly Jorgenson (kjorgenson@fourrivers.group)

Restrictive Timelines & Capacity

LL58 does not currently have the required resources to conduct a thorough technical review of the Draft Tailored Impact Statement Guidelines (TISG) within the stated deadline (January 28, 2020). While LL58 has made all efforts to be engaged and informed on these projects (including two meetings with the IAAC and hosting a community engagement session with the assistance of Four Rivers (our technical services group)), our Lands & Resource department does not have dedicated staff fluent with Impact Assessment (IA) legislation and processes (especially in light of the new and evolving IA Act). Additional timeline and capacity restrictions have been encountered due to the holiday season (two-week office closure), community elections (last week), lack of in-community engagement to-date from the Project Proponents and limited funding to support community capacity in IAs. Furthermore, as detailed in our Engagement & Accommodation Protocol (provided to the IAAC on January 8, 2020), appropriate community consultation and engagement requires the time and resources to engage all members of our community (from Elders to youth) in this process.

It is also understood by LL58 that Marten Falls First Nation (MFFN), Proponent in the MFCAR project, requested an extension of the comment period for the draft TISG and associated planning documents which was not granted by the IAAC. During the January 8th conference call with the IAAC, LL58 specifically asked if anyone had the authority to ‘pause’ on the timeline on the Planning Phase of the Project, to which the IAAC replied that “flexibility to suspend the 180-day time limit of the Planning Phase lies with the Proponent”. While LL58 (understandably) is not privy to the correspondence between the IAAC and MFFN on this matter, on the surface it is disappointing that no First Nation was successful in requesting a more manageable timeline for feedback on this process. The IAAC must recognize and respect that LL58 has internal processes and timelines for appropriate and meaningful consultation and engagement in these project assessments moving forward.

Communications

Regarding communication methods, both teleconference and in-person meetings are appropriate, as desired and coordinated with LL58’s Lands & Resource Team (detailed below), and as available funding permits (i.e. ability to travel or arrange community gatherings is budget/capacity support dependent).

LL58 asks that the IAAC be mindful of communications overload to the LL58 Team, and that efforts be made to streamline the number of communications (emails, letters, etc.) wherever possible. While it is understood that two separate IA processes are occurring for the MRCAR and WSR roads, duplicate emails that mirror communications on the two IAs are difficult to navigate and are at risk of being overlooked. LL58 asks that the IAAC communicate information on both IAs in single correspondence methods whenever possible.

Team Member	Title	Expectation
Chief Judy Desmoulin judy.desmoulin@longlake58fn.ca	Chief of Long Lake #58 First Nation	Primary contact for formal communications (e.g. letters). Copy on informal communications (e.g. emails, meeting requests).
John O’Nabigon john.onabigon@longlake58fn.ca	Consultation and Development Protocol Coordinator	Primary contact for phone communications. Primary contact for informal communications. Copy on formal communications.
Ervin Waboose ervin.waboose@longlake58fn.ca	Community Communication Liaison Coordinator	Copy on all communications.
Zoey Kakegabon zoey.kakegabon@longlake58fn.ca	Economic Development Assistant Coordinator	Copy on all communications.
Kimberly Jorgenson kjorgenson@fourrivers.group	Environmental Services Coordinator, Four Rivers Inc.	Copy on all communications.

In general, the communications materials received to-date from the IAAC are too complex in nature. Most of the documents received (including presentation/handout materials) intended to assist dialogue on the technical planning documents have been too technical, text-heavy and with unclear messaging (further complicated by the quantity of documents; e.g. 20 documents for one conference call). The materials do not encourage an understanding of the project details that are pertinent to the target local audience (i.e. LL58). LL58 would like to encourage the IAAC to simplify their messaging surrounding these IAs, to focus less on communicating the details of the technical IA process, and more on the local context. Please also be mindful of email size and bandwidth limitations, and make efforts to combine multiple pdf documents into concise correspondence.

In an effort to improve teleconference communications, LL58 would appreciate if the IAAC would consider video conferencing options (such as WebEx® or Zoom® options). While internet speeds may limit two-way video conferencing, LL58 would likely be able to receive video conferencing online while participating via traditional teleconference methods. At minimum, this would assist LL58 in receiving information from the IAAC team, especially in understanding who is presenting the information, which slide they are on, etc. (this may also provide a solution to the multiple teleconference material email challenges). LL58 is interested in ‘trying out’ such a method in a future scheduled call and understands that it may have an unpredictable level of success.

Scheduling

Regarding dates to be mindful of when scheduling community meetings, implementing comment deadlines, etc., please note the following times to avoid:

- Christmas holiday season (early December to early January)
- Elections (scheduled every two years in mid to late January; next election in 2022)
- March break (coincides with the annual school closure for spring break)
- Community member losses (respectful of an appropriate mourning period, as communicated on a case-by-case basis)

LL58 hosts annual gatherings around the hunting seasons, including the spring Goose Rally, fall moose hunt, and an annual Pow Wow (scheduled every August). While there are specific days that are best to avoid during such events, the events are also times when the community comes together (including off-reserve membership) and could present opportunities for engagement and communications on these projects. LL58 asks that the IAAC provide early notice when asking to arrange an in-community meeting to allow time and flexibility for the LL58 team to schedule engagement events.

Indigenous Knowledge Sharing

LL58 is currently updating the official boundary map of our traditional homelands (expanded through ongoing values data collection), and will provide the IAAC with an updated boundary in the near future. As per the updated boundary, the collection of IK values data will have to be supported in the northern portion of the homelands (as it intersects with the proposed MFCAR area). LL58 also requires support to generate IK maps that intersect with the proposed projects, and to present to the community for conversations regarding potential impacts to values from the project activities.

As per LL58's Engagement & Accommodation Protocol, LL58 would like to schedule further discussions with the IAAC regarding the details of support for IK studies, compilation and inclusion of LL58's IK data in these Impact Assessments (including data security and confidentiality concerns). The potential development of a community-specific consultation work plan can be explored at this time.

Valued Components/Community Priorities

Through initial community engagement efforts, the following priority areas have been identified by LL58 community members as requiring specific attention as the project IAs proceed. They are listed in no particular order and are not to be considered a full and comprehensive list of LL58's interests; they are provided to help assist in future focused communication efforts surrounding these IAs.

- Environmental protections: Ensuring measures are in-place throughout the project life to protect the waters, fish, land, animals (notably moose) and air quality surrounding the projects and associated watersheds, including a rigorous environmental monitoring program.
- Meaningful engagement: Ensure the IAAC and both Proponents understand LL58's internal processes (as detailed in the LL58 Engagement & Accommodation Protocol), the hierarchy of advice and necessity of full-community involvement in decision-making processes.

- Cultural & spiritual significance of the lands and waters: IK data collection/gathering/mapping efforts need to be supported to ensure that conversations surrounding the potential impacts of the Projects to LL58's homelands are understood and accommodated in the project IAs. LL58's IK needs to be incorporated into the baseline conditions for these IAs.
- Transportation: LL58 understands that the both projects will lead to increased traffic through LL58's homelands in the future, most notably once a connection is established to the Ring of Fire. LL58 needs to understand the implications for the health and safety of our members while travelling on the provincial highway system, and what increased traffic loads will mean to our membership (especially in light of increasingly tragic traffic accidents with transport trucks observed in recent years). LL58 would like to see measures in-place to improve driver safety throughout the Trans Canada Highway system.
- Economic opportunities: LL58 is interested in learning more about potential economic development opportunities to work with the Proponents in supporting road construction contracts, and would like to encourage both Proponents to source local, First Nation-owned business contractors. Community members are also interested in employment and training opportunities surrounding road construction work, including camp support, aggregate extraction and baseline data collection.
- Tourism opportunities: LL58 understands that the increased traffic in LL58's homelands in the future will result in increased tourism opportunities for LL58 businesses.
- Improved communications and partnerships with neighbouring First Nations: LL58 views these projects as an opportunity to improve dialogue with our neighbouring Matawa member First Nations, most notably Webequie and Marten Falls First Nations, and we welcome the anticipated increased interactions, communications and potential partnerships with our neighbours. LL58 is also open to sharing our experience in becoming connected to the provincial highway system, and the changes it brought to the well-being of our community and homelands.
- Increased hunting: LL58 is concerned with the current moose population, having observed local declines in population that may be exacerbated by increased human traffic/tourism.
- Fish populations: LL58 would like to understand how the proposed corridors (and resulting increase in traffic/tourism) could impact fish communities and fishing opportunities within LL58's homelands.
- Increased load on infrastructure in Geraldton: LL58 members current seek health care services, groceries, and other services in the neighbouring town of Geraldton, with the proposed corridors anticipated to result increased loads to this infrastructure (especially in-light of the anticipated future development of the Greenstone Gold Mine (GGM)). LL58 would like to understand how increased loads to Geraldton's infrastructure (including community roads, the hospital, landfill and police services) could be affected by the proposed project, and to ensure that the eventual development of the GGM is included in the assessment of cumulative effects.
- Aggregate resources: LL58 would like to see further information on aggregate sources for the road projects (especially the MFCAR), as it is recognized that these resources are limited in the north and present both economic development opportunities and potential risks to local IK values. If there is not enough aggregate resources located along the pathway of the proposed corridor, will aggregate be sourced from locations further south of the proposed undertaking?

- Eventual connection to the Ring of Fire: Since both Project Descriptions state that the proposed roads will eventually connect to future mineral developments in the Ring of Fire, LL58 would like to have a better understanding of the potential future cumulative effects of such mining developments on LL58's homelands.
- Engagement by the Province of Ontario: LL58 has not been meaningfully engaged to-date by the Province of Ontario, in spite of numerous communication attempts (including formal letter correspondence). LL58 will continue to voice their disappointment with the provincial government in appropriately engaging LL58 on these project environmental assessments, and expects this situation to be resolved immediately.