



## CONSTANCE LAKE FIRST NATION

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December 9, 2022

Impact Assessment Agency of Canada, Ontario Region  
**Attn: Caitlin Cafaro, Crown Consultation Coordinator**  
600 – 55 York Street  
Toronto, ON M5J 1R7  
Via e-mail: [martenfalls@iaac-aeic.gc.ca](mailto:martenfalls@iaac-aeic.gc.ca)

### **Re: Time Limit Extension Request for the Federal Impact Assessment Process of the Marten Falls Community Access Road Project**

Dear Ms. Cafaro,

I am writing in response to the IAAC's letter dated November 9, 2022, regarding the Time Limit Extension Request for the Federal Impact Assessment (IA) Process of the Marten Falls Community Access Road (MFCAR) Project. Constance Lake First Nation (CLFN) was asked to provide input on the extension request and the MFCAR's engagement plans.

CLFN is in support of MFCAR's request for a timeline extension (to July 2026) to complete their IA, and understands the challenges and limitations placed on the IA to-date due to the global pandemic. CLFN also continues to experience ongoing challenges surrounding participation in this IA, thus a thorough review of this document respective of CLFN's community communication processes was not possible.

Regarding the Indigenous Knowledge (IK) Program and Aboriginal & Treaty Rights & Interests presented in section 2.4, CLFN is concerned with the information provided on page 10, notably:

*“To date, the Proponent has received minimal IK and information on Indigenous land and resource use from Communities... participation is very low. A key milestone date to receive information was June 30, 2022. However, no information has been received to date.”*

CLFN acknowledges the efforts of the MFCAR team to engage CLFN in IK data collection, and appreciates the inclusion of 'expressed challenges from communities' highlighted in section 2.5. Since both the proponent and all Indigenous communities involved have experienced challenges in advancing the planned IK program schedule to-date for similar reasons, CLFN would like to know how the MFCAR project plan/timeline has been adjusted to accommodate the acknowledged challenges? It is concerning that a 'key milestone' has passed with zero IK information having been provided, and even more concerning that a desktop literature of documented Indigenous land and resource use has been relied upon to-date. CLFN would like to better understand how the information we are currently working to gather will be appropriately incorporated into the MFCAR IA, especially after having missed this milestone deadline?

Regarding the technical studies completed to-date, please note that a thorough review of related technical documents respective of CLFN's community communication processes was not possible. At a high-level, the summary of 'Field Work Completed' presented in Table 2-2 is difficult to determine if survey efforts have been appropriate to the vastness of the study area. Field work 'duration', presented as the number of field days, is not an appropriate measure of the work completed while in the field, and leaves CLFN with many questions on the thoroughness of the programs. While CLFN appreciates the conciseness of this document, additional detail in the form of summary maps or study metrics would have been appreciated.

While we respect the need for Marten Falls First Nation to advance this project for the betterment of their people and community, CLFN would like to see this project take into consideration the full cumulative effects of impacts to the region as this road contributes to the opening of the Ring of Fire area for mineral development. The road cannot be discussed in isolation of the larger development looming on the horizon, since its very construction will increase the feasibility of mineral development in the area. All of the waters surrounding the project will be affected by this road's construction (impacting flows in the region, animal pathways, etc.), and the growth-induced cumulative effects of opening up access to the north need to be fully assessed.

To assist in future communications, please note that CLFN's current technical team is as follows:

- Chief Ramona Sutherland, Constance Lake First Nation ([chief@clfn.on.ca](mailto:chief@clfn.on.ca))
- Councillor Wayne Neegan, Community Communications Liaison Officer ([wayne.neegan@clfn.on.ca](mailto:wayne.neegan@clfn.on.ca))
- Bertha Sutherland, Lands & Resources Officer ([bertha.sutherland@clfn.on.ca](mailto:bertha.sutherland@clfn.on.ca))
- Stephen Peltonen, Consultation Coordinator ([stephen.peltonen@clfn.on.ca](mailto:stephen.peltonen@clfn.on.ca))
- Kimberly Jorgenson, Four Rivers, CLFN Technical Support ([kjorgenson@fourrivers.group](mailto:kjorgenson@fourrivers.group))

CLFN welcomes continued engagement by the MFCAR team and the IAAC throughout this IA process.

Respectfully,

<Original signed by>

Councillor Wayne Neegan

cc. Chief Ramona Sutherland ([Ramona.sutherland@clfn.on.ca](mailto:Ramona.sutherland@clfn.on.ca))  
Chief Bruce Achneepineskum ([bruce.achneepineskum@gmail.com](mailto:bruce.achneepineskum@gmail.com))  
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