



MATACHEWAN, MATTAGAMI AND FLYING POST FIRST NATIONS' VALUES, CONCERNS AND COMMENTS FOR THE CANADA NICKEL COMPANY'S CRAWFORD PROJECT IMPACT ASSESSMENT: INITIAL PROJECT DESCRIPTION SEPT 2022

Wabun Tribal Council is privileged to support our member Nations' meaningful participation in the Federal Impact Assessment process. Upon a review of the Initial Project Description for Crawford, Matachewan, Mattagami and Flying Post First Nations have agreed to take a collaborative approach to engage with Canada Nickel Company and the Agency to present their preliminary thoughts and questions and to participate in the phased Impact Assessment process.

The First Nations are pleased and confident in the partnership and consultation framework that has been established with Canada Nickel Company to date and are eager to forge an equally collaborative approach with the Agency. Each Nation has appointed an IA Coordinator and a project-specific Committee, representative of various demographic groups within their community. Each member is committed to engaging with their broader community to gather various perspectives to better inform the Committees' views. Through community-wide engagement, the Committees will report back to their broader community membership, leadership and participate in baseline studies, workshops, and opportunities for community engagement.

Through community engagement, the First Nations reviewed the Initial Project Description (IPD) for the Crawford Project and understand that the main project components will include a Open Pit Nickel Mine, Milling Facility (Plant), Tailing Storage Facility, low-grade, waste rock and overburden stockpiles, water management and other ancilliary infrastructure. The project also entails the extension of a railway and a transmission line and will also require the relocation of Hwy 655 and a 500kV transmission line.

While it is anticipated that the Crawford Project will bring economic benefits to the Matachewan, Mattagami and Flying Post First Nations, the development will undoubtedly also have direct, indirect, and even perceived impacts to the land and inherently, the exercise of aboriginal and treaty rights. As committed stewards of the land, the First Nations use a relatively more holistic approach to the assessment of potential impacts and strongly consider the project's impacts in the context of the cumulative effects of development across their traditional territories over time. Although our First Nations are progressive and not opposed to development or mining, the Nations also take their responsibility to protect the land and the exercise of rights for generations to come, very seriously. Hence, the decision of

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the Nations to use a shared approach and to actively collaborate with Canada Nickel Company and the Impact Assessment Agency of Canada in the Impacts Assessment of the Crawford Project.

The First Nations are pleased to provide the following preliminary comments and concerns to clearly illustrate the need for the Impact Assessment of the Crawford project. The First Nations are confident in the engagement process established directly with Canada Nickel Company and are pleased with the various outreach initiatives conducted during the pre-planning phase. The First Nations look forward to working with Canada Nickel Company to address and mitigate the concerns raised to date and any concerns that may be raised during the Impact Assessment Process.

The First Nations have already indicated their need for a Traditional Knowledge and Land Use Study of the project area and a Socio-Economic study. Based on the preliminary comments and concerns, it is also clear that the First Nations require the incorporation of First Nations' Knowledge and Values into various baseline studies to ensure the ability to monitor impacts of the project on those First Nations Values. For example, but not limited to, incorporating the assessment of baseline conditions of moose, fish, medicines, or other country-food. The TKLUS and other preliminary engagement opportunities will help the First Nations identify and better define the Values of concern in the project area and will better inform the rest of the Impact Assessment process.

Furthermore, the First Nations have already expressed their interest in collaborating with the Agency to conduct a Rights Impact Assessment and actively participate throughout the process.

Please do not hesitate to reach out to our Mineral Development Advisor and Impact Assessment Coordinators listed below, should you have any further questions.

- Nicole Charbonneau: <email address removed> Mineral Development Advisor Wabun Tribal Council
- Julie McKay Mattagami IA Coordinator IAC@mattagami.com
- Delta Flood Matachewan IA Coordinator IAC@mfntrez.ca
- Jeff Berube/Shane Woodhouse Co-IA-Coordinators <email address removed>
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Sincerely,

[original signed]

Chief Alex Batisse
Matachewan First Nation

Chief Chad Boissoneau
Mattagami First Nation

Chief Murray Ray
Flying Post First Nation

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The Mattagami, Matachewan and Flying Post First Nations expect that the following concerns and key issues will inform continuing engagement with the Proponent, the Agency and the future drafting of the detailed project description. Please note that these comments are preliminary and may change as the First Nations learn more about the project and are able to complete and review various baseline studies and TKLUS and socio-economic studies.

The First Nations' preliminary comments and concerns raised during the review of the Initial Project Description have been listed under twelve categories including:

1. Water and Water Management
2. Tailings Management
3. Rock Overburden and Stockpiles
4. Wildlife
5. Aquatic Life
6. Land Use
7. Sensory Impacts
8. Socio-economic issues
9. Mine/Mill infrastructure
10. Heritage/Culture
11. Closure & Decommissioning and
12. Cumulative effects

#	Project Component/Activity/Impact	Key Concerns and Recommendations
Water and Water Management (Surface and groundwater quality, quantity, and flow)		
1.	Water Management Discharge Locations	FN would like to be part of the discussion on final discharge area to ensure appropriate consideration of traditional ecological knowledge was considered. FN would like to understand rational used to determine final numbers and locations of effluent discharges to the environment. FN concerned with the cumulative effects of multiple inputs to the receiving water body (e.g. Mattagami River used in IPD)
2.	Water Management Facilities	FN would like to provide input to the water management plans on site, including dewatering, storm runoff studies, surface water and ground water pond level and water quality monitoring and related emergency warning infrastructure. FN also want to provide input to any site-specific Closure Plans, including decommissioning of ground water wells, water treatment ponds and water management infrastructure on site.

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3.	Water withdrawal and related effects	Water taking for processing and dewatering open pit/mine workings- concerns on surrounding water levels, flows and subsequent impacts to aquatic life and the health of affected waterbodies, including groundwater. FN needs to be part of discussions concerning the amounts and timing of water taking and ability to provide input on any related permit applications such as Permit to Take Water and associated monitoring requirements, including on-going compliance with permits and monitoring.
4.		Concerns about how any activity affecting Mattagami River will also impact wildlife and aquatic life as the river system is important for the exercise of harvesting rights and other cultural practices and ceremonies.
5.		Concerns about impacts to aquatic life in Mattagami River including sturgeon, suckers and spawning areas.
6.	Mine-water and Surface Contact Waters	Concerned about the potential metal concentrations from the runoff of ore, mine rock, tailings and overburden.
7.		Concerned about the final discharge location, volume of effluent and concentration limits. FN will provide input to any related permits and on-going compliance with such permits (e.g. Environmental Compliance Approvals).
8.	Alteration of Local Waterbodies/watercourses and changes in flow (General)	Concerned about the dewatering and diversion of any waterbodies since water management is a sacred First Nation responsibility to protect.
9.		Concerned about how dewatering or effluent discharge will affects other waterbodies within the project area and affected watersheds.
10.		Concerned about the potential of intake and discharge to affect water quality and flows as water management is a sacred First Nation Responsibility to protect. FN request involvement in baseline water flow studies and modelling.
11.		Community members active on water – and have a close relationship with the area and local waterbodies.
12.		Concerned with the proximity of tailings to waterbodies and potential contamination from any tailings seepage (e.g. mercury, cyanide).
13.		Concerned about any emergency response and spill contingency plans to address any potential risks to waterbodies and/or related to tailing management on-site.

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14.	Project Blasting	Concerned about physical impact of blasting and seismic activity may have on waterbodies and associated aquatic life.
15.	Groundwater	Concerned about impacts to water quality, volume and migration of potential contamination.
16.	Alterations to waterbodies (e.g. rivers, lakes)	Concerned about impacts to from dewatering/diversion including altered water flows and levels, changes in navigation and boating, and impacts to connected waterways.
17.		Concerned about impacts from underground blasting to fish and fish habitat within affected watersheds.
18.		Concerned about cumulative effects and using too-narrow of a scope when assessing project-specific impacts. FN want to better understand rationale of any selected discharge locations and how cumulative effects or a more holistic approach was considered in making that determination.
19.		Concerned about requirements for relocations of fish and the methodology used in doing so. FN want more information on how relocations are accomplished and have the ability to participate.
20.	Water-crossing(s)	FN would like to provide input to the locations of any proposed water-crossings and want to reduce the number for water crossings required as much as possible.
21.		Concerned about water-crossings being potential inputs of contamination and want adequate storm water management on site to ensure contaminated/contact-water is treated as required before discharge to the environment.
Tailings Management		
22.	Tailings Storage -	Concerned about the permanent alterations to the landscape and risk associated with long-term tailing storage. FN understands that a portion of tailings will be used to backfill mined-out open pits – FN want to reduce final volume of tailings left permanently within the Tailing Storage Facility. Please provide additional details and include the FN in any Alternatives Assessment for tailings management.
23.		Concern with wind and impact to surrounding plants and wildlife as cumulative effects and forestry operations have exacerbated wind conditions. Wind dispersal of tailings would be detrimental to the environment and is a known

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		issue with any “dry stack” tailings. FN are concerned with any perceived risks or impacts to the environment from fugitive dust from site. FN want to provide input to any Dust Management plans developed on-site, including the use of any chemical dust suppressants.
24.		FN want to have input to the final land use plans of the site, which would be incorporated into the Closure Plan. FN want to see native plant species being incorporated into any revegetation occurring on site.
25.		Concerns with on-going risk of tailing management (e.g. physical stability and risk of contamination, monitoring and emergency response plans) that if any tailings get in the water, given fast flow, it would spread everywhere.
26.		Considering FN have experienced a breach of tailing dam within traditional territory and heavily impacted by historical mining activity, the FN are concerned with the adequacy of Alternative Assessments, Community risk perception for tailings accidents and seepage is sensitive given experience with previous tailings failures.
27.		Concerned with physical stability of Tailing Storage Facility (TSF) due to being built on clay. FN want to better understand the engineering, technology and assessment being conducted as part of designing the TSF.
28.		Concerned with the final surface area of the TSF with tradeoff between height/risk and footprint. FN want to better understand rationale behind TSF design.
29.		Concerned about the impact of the dry stack tailings on flora and fauna.
30.		Tailing management is a novel concept to most FN members. FN want the development of plain language information on tailings management options.
31.		Concerned with fugitive dust and tailings spills. FN would like to be involved in developing air monitoring requirements for the site and associated modelling.
Rock Overburden and Stockpiles		
32.	Rock Overburden and Stockpiles	Stockpiles will be visible by MFN land-users affecting quality of life and ability to enjoy the land as it once was.

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33.		FN prefer referring to overburden as soil. FN would like to see the implementation of best practices in the maintenance (e.g. aeration, maintain microflora/fauna) of soil (overburden) piles that would be used in progressive reclamation. FN want to reduce the potential need of disturbing/soil stripping an area to provide the topsoil required for revegetation.
34.		Concerns over runoff from stockpiles and the adequacy of storm water management plans.
Wildlife		
35.	General	FN would like to be informed of any incidents or mortalities on site. Wildlife log for employees on site. Wildlife effects monitoring to be implemented.
36.		Concerned with wildlife nursery area (waterfowl brood rearing habitat) in and near project area.
37.		Concerned with the impacts on moose and loss of Moose habitat (e.g. calving sites, wintering grounds)
38.		Concern with any beavers on site and the potential for increased presence.
39.		Concern with any otters on site and the potential for increased presence.
40.		Concerned about the loss of habitat for wildlife.
41.		Concern for eagle and osprey nesting in or near the project area.
42.		Concerns for changes in location and behavior of wolves, subsequently affecting moose populations which are vital source of country food for many FN members.
43.	Species At Risk	Concerned with the impact of SAR. MFN would like to be involved and consulted on the plan for mitigation.
44.		Concern for impacts to Little Brown Myotis, Whippoorwill, and Canadian Warbler.
45.	Culturally Important Species	FN wants to ensure that potential impacts to culturally valued wildlife such as moose, are adequately included in baseline and on-going monitoring.
46.	Emissions – Air quality, Noise, Vibrations, Light	Concerned that noise levels will impact migratory birds and other wildlife, especially those harvested as country foods by FN members.
47.		Concerned with the impact of use of light fixtures that can potentially disturb nocturnal species such as the Common Nighthawk and Brown Myotis.
48.	Influx of workers	Concern with potential increase in access to hunting grounds and hunting pressures on wildlife

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		from influx of workers. Concerned about the increased population and its impact on traditional hunting activities. Impacts to lifestyles due to increased population or other socio-economic impacts.
49.	Habitat Compensation	Concerned about the clearing of habitat and return of native wildlife. FN would like to be included in any habitat compensation plans.
Aquatic Life – Fish and Fish Habitat		
50.	General	Impacts to spawning sites. FN needs to be consulted on impacts to Walleye spawning locations.
51.	Stockpiles	Potential impacts to creeks from overburden management that may contain fish. FN would like to review overburden management plan.
52.	Water Crossings	Concern with location, construction, and operation of crossing over Victoria creek and how it could impact fish.
53.	Aquatic Habitat Plan	Concerned about Beavers present near project site. FN would like to be involved in the compensatory aquatic habitat plan.
54.	Water quality	FN want to ensure adequate baseline water quality data is being collected and is representative of seasonal and annual changes.
55.	Blasting	Concern for impacts on aquatic habitat, aquatic life; vibration.
56.	Accidents and malfunctions	Concerned about the impact to fish and potential for impacts should there be a tailings breach. The water moves so fast in there, it will spread everywhere.
57.	Species of Concern	FN values and is concerned about impacts to fish and fish habitat, including not only sturgeon, but also other game fish used as country food such as walleye, pike, and trout. FN requests involvement in baseline and long-term monitoring of fish identified as Species of Concern and impacts to aquatic life in general.
Land Use		
58.	Traditional practices	To include traditional practises on site for indigenous employees. FN would like to see areas for traditional practices ie: tobacco offering, smudging area on site.
59.	Access to site and surrounding areas.	FN would like to be consulted on the location of any new access roads that could lead to increased access by non-members to areas used for harvesting by members.

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60.	Dust on medicines/plants	Concerned with aerial deposition to surrounding areas, including dusting of medicines. FN want to provide input to and ensure implementation of adequate dust management plans.
61.	Hunting	FN is concerned about permanent loss of access/use of land, especially related to Tailing Storage Facility and long-term impacts to hunting and harvesting rights. A permanent loss of land directly reduces the total area available to members for the exercise of hunting and harvesting rights and should be considered more holistically and in the context of cumulative effects.
62.	Loss of land	Transfer of Elders' knowledge; access to future generations.
63.	Air emissions	What chemicals used in the mill and dry stack? The tailings blowing around. Arsenic?
64.	Enjoyment of land	Concerned about the perceived impacts which reduce members feelings of confidence and safety in exercising rights, especially harvesting rights which reduces their quality of life and ability to enjoy the land as they once did.
65.		Restricted land use, harvesting from real/perceived risk of contaminants.
66.	Access to important areas	FN is concerned about any changes to access, primarily eliminating current access or increasing access to rivers and other waterbodies in the project area.
67.		FN is concerned about the ability to access preferred hunting, harvesting, ceremonial or cultural areas in and around the project site.
Sensory Impacts		
68.	Visuals	FN concerned about impact of the changes to the landscape would have on quality of life, ability to enjoy the land as it once was. Will the project site (stockpiles, tailing, other tall infrastructure) be visible from Mattagami River?
69.	Light pollution	Affecting nocturnal species: common nighthawk, brown myotis and other wildlife.
70.	Noise from mine workings	Impacts Member's quality of life, wildlife.
71.		Seismic concerns.
Socio-economic Issues		
72.	Employment barriers	Concerned about barriers for employment for women FN members. Please work with FN to find way to improve recruitment and retention of women in the industry. FN want to consider how working hours (business hours) affect the lives of

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		parents, especially women working in the industry who are primary caretakers of children.
73.	Racism	Increased discrimination from outside workforce. Concerned about increased harassment and discrimination from outside workforce. FN requests involvement and support for development of a cultural awareness program for all mine employees and contractors.
74.	Social, Economic and Health Conditions	Concerned that increased population with influx of workers could result in higher crime rates and discrimination towards FN members. There are also concerned with the limited housing in the area and what Proponent could do to help provide some housing since FN express that lack of housing is a barrier to employment in the area.
75.	Labour opportunities	Recruitment of outside workforce for high ranking and high salary positions. FN left with entry level positions and least opportunity for advancement. FN want concrete investment in education, training, and skills enhancement for FN members.
76.	Mental Wellbeing	Concerned about perceived risks and impacts and fear or lack of confidence affecting the exercise of rights and passing down of knowledge. Concerns with fear of impacts from emergency type situations and lack of adequate response plans for things like tailing storage facility failure. To alleviate stress and concerns, FN want best practices for emergency prevention, response and preparedness be implemented on site.
77.		Air emissions, unknown chemicals, distribution. Being breathed by community, being breathed by wildlife and food, medicines. Ingesting these. Actual or perceived risk. Any assumption made in modelling, such as country food consumption rates, should be validated by the FN members exercising their harvesting rights.
78.	Indigenous/Public health and safety	Concerned about increase in population and impact to hunting, fishing, harvesting and gathering.
79.		Concerned about safety of those harvesting in and around site or FN working on site. Concerned about appropriate signage indicating proximity to active mine site for those accessing surrounding areas.
80.	Housing and Infrastructure	Concerned about Increased rent rates; lower availability due to the Project and increase in population.

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81.	Youth	Youth need access to new opportunities for jobs, training, apprenticeships, formal long-term education.
Mine Infrastructure		
82.	Haul roads/ Railways	Concerned with safety if any crossing public roadways, and concerned with fugitive dust from roads. Concerned with impacts to wildlife from collisions, noise, dust, etc...
83.	Power supply	FN would like to consider impacts of any transmission lines as part of the cumulative impacts of the project. The FN want to better understand the plans regarding the power supply to the site and want to re-use existing infrastructure as much as possible. FN want further time to consider and assess impacts of transmission lines that are not areas currently included in baseline studies.
84.	Aggregate operations	FN would like to be consulted on the potential off-site source for aggregate or use of waste rock as aggregate.
85.	Water Management Facilities	FN would like to be consulted and provide input to water management on site and decommissioning of any water management infrastructure. FN want to provide input to any Closure Plans.
86.	General site area	Waste management, FN want to provide input to waste management plans, that is off-site storage, handling of hazardous waste, spill or environmental clean-up plans.
87.		FN would like to be consulted regarding access in and around the site at closure and decommissioning of any current access roads/trails.
88.	Preliminary Mine Plan	Concerned about total footprint of project and open-pit mining method having relatively large, impacted surface area and large volume of mining wastes such as rock or tailings being permanently stored on land.
89.		FN want to better understand the mine layout plans and reduce the overall footprint of the impacted area.
90.	Air emissions	Concerned about the impact to traditional medicines and berries. FN would like to be consulted on the dust suppressants to be used. FN would like to conduct monitoring of medicines, plants or berries that are affected by fugitive dust.
91.	Noise emissions	Concerned about impacts of increase noise in otherwise quiet area, to FN members exercising their harvesting rights in the surrounding area.

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92.	Mine water and Surface Contact Waters	Concerned about the potential metal concentrations from the runoff of ore, mine rock and overburden.
93.	Domestic Water	Concerned about the source of any water taking and discharges to environment.
94.	Demolition Waste	Concerned waste management practices on site and if landfill will be required. Consider presence of landfill and other ancillary infrastructure as part of assessment of cumulative effects.
Heritage and Culture		
95.	Traditional practices	There is a need to include traditional practices on site for indigenous employees. FN would like to see areas for traditional practices ie: tobacco offering, smudging area on site.
96.	Archaeology Studies	FN has identified potential burial ground in north end of project area- *more details available from WTC to identify source of information* FN Provided contact information of trusted Archeologist to Proponent- for any archeological studies. FN requires opportunity to review the study results and discuss any need for further work or other next steps. FN would like to provide input to identifying areas of potential archeological significance. Especially true for the shoreline of the Mattagami river and any tributaries. FN want to establish a “chance find procedure” to direct proponent on how to respond to a “change find” having potential archeological significance.
97.	Heritage, Traditional lands and other	FN would like to review any archeological studies or provide input to the need for studies. Need to ensure no archeological potential within project area and address any potential finds.
98.		FN would like to have a ceremony to acknowledge mine is occurring on traditional land and incorporate land acknowledgements in the workplace culture.
99.	Community feasts, family traditions	Community feasts and family traditions could potentially be threatened by a large project affecting various members of the same community or household. Flexibility is required to allow FN members to participate in traditional and cultural activities.
100.	Way of life	For those involved in the mine economy – potential loss of time to interrupt family traditions. E.g., go see pickerel spawn, check out sucker spawn. No time available to do it (or have all family members attend). Because of lack of flexibility in schedules

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		and working hours, many members abandon longstanding family traditions such as family hunts or the ability to gather large families is hindered.
101.	Hunter and gatherer participation rates, knowledge levels/familiarity	Concerned that the effectiveness of hunters and gatherers can be compromised through the loss of ecological knowledge (this can also affect community feasts and family traditions) through change in or loss of access to preferred harvesting areas.
102.	Traditional fishing	Concerned about the impact to traditional fishing activities in Mattagami River.
103.	Traditional hunting activities	Concerned about indirect effects going unnoticed, or un-monitored or mitigated. For example-impacts to wolf population having indirect effects on moose population or increased access into traditional hunting areas could result in impacts to moose population.
104.	Physical and Cultural Heritage	FN want to review any studies, desktop or otherwise, used to assess the potential presence of physical and cultural heritage features.
105.	Elders	Limited amount of time left to pass on knowledge. FN want to identify the knowledge holders and Elders that could potentially be most affected by the projects to ensure they are given the opportunity to participate in any Traditional Knowledge
106.	Life on the water	View and noise from perspective of being on the water, looking at the mine site.
Closure & Decommissioning		
107.	Closure Plan	FN want to better understand the methods used to calculate the financial assurance required as part of Closure Plans (permitting)
108.		FN want adequate time and resources (budget, technical advisor) to review Closure Plans and provide meaningful input to Closure Plans
109.		FN want input on final land use incorporated into Closure Plan
110.		FN want to ensure adequate long-term assessment of potential for metal leaching or acid mine drainage. FN want conservative approach and long-term study to assess this risk.
111.		FN need provide input to Closure Plan and any amendments thereof.
112.	Seepage	Concern for seepage from stockpile and TSF over time. FN needs to be part of closure and post-closure monitoring.
Cumulative effects		

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113.	Legacy impacts	Recognize the number of historical impacts from mining and forestry the FN are also considering when assessing project-specific impacts. There has been a significant amount of surface area of the FN traditional territories that have been heavily impacted by development. FN take a more holistic, "big-picture" approach when assessing impacts and consider historical impacts in assessment of cumulative effects. FN want support to assess cumulative impacts within each of the territories.
114.	Tailings storage – dry stacking	Concern with wind and impact to surrounding plants and wildlife. Cumulative effects from mining & forestry - increased wind gust could have negative effect of environment.
115.	General	Concerned about the cumulative effects on FN traditional and treaty territory because of development such as mining and forestry. Proponent and Agency need to consider project-specific impacts in the context of cumulative effects within the FN territories.