

Mushkegowuk Council

Attawapiskat First Nation | Kashechewan First Nation | Fort Albany First Nation | Moose Cree First Nation | Taykwa Tagamou Nation | Chapleau Cree First Nation | Missanabie Cree First Nation | Head Office – *Moose Factory*: 12 Centre Rd., P.O. Box 370, Moose Factory, ON POL 1W0 | T: 705-658-4222 F: 705-658-4250 Sub Office – *Timmins*: 101 Cedar St. S., Timmins, ON P4N 2G7 | T: 705-268-3594 F: 705-268-3282

03/21/2023

Re: Northern Road Link Initial Project Description Plain Language Summary

To whom it may concern,

Mushkegowuk is submitting comments on the Northern Road Link Project Summary under the Impact Assessment Agency of Canada.

The feedback provided is based on our expertise and traditional knowledge on the region in the proposed area. Mushkegowuk engineers and scientists come forward with years of multi-level environmental studies including impact assessments.

We currently have several concerns regarding all ecosystems that encompass the proposed area including endangered species, waterways, and pollution.

Regarding the Project Description Plain Language Summary feedback, we respectfully submit the following:

The construction of a new road in the habitat of endangered species such as; sturgeon, wolverine, golden eagle, eastern migratory caribou as well as the boreal population of caribou, cause several negative affects on the species at large. Impacts include:

- 1) Habitat fragmentation: Roads can divide the habitat of endangered species into smaller, isolated fragments, which can make it more difficult for them to find food, mates, and suitable nesting or denning site.
- 2) Habitat loss and degradation: The construction of a road may require clearing of vegetation and destruction of natural habitats of endangered species, which can directly reduce the amount of available habitat for these species. The road may also increase the noise level, pollution and disturbance which will degrade the remaining habitat quality.
- 3) Increased mortality: Roads cause increased risk of mortality for endangered species through collisions with vehicles, which can result in a population decline and genetic diversity.
- 4) Disruption of migration and dispersal: Endangered species may use roads to disperse, migrate, or move between habitats. The construction of a road can disrupt these natural movements and fragment populations.

New construction also poses a great threat to waterways in all affected areas resulting in:

 Increased runoff and erosion: Construction activities can lead to increased runoff of sediment and other pollutants into nearby waterways. The removal of vegetation and soil can also increase erosion and sedimentation, which can degrade water quality and harm aquatic ecosystems.

- 2) Alteration of hydrology: the construction of roads can alter the natural flow of water in streams and rivers. The installation of culverts, bridges and other drainage structures can change the timing and volume of water flows, which effects all species that depend on them.
- 3) Habitat destruction: Construction of these roads may require filling in wetlands or other bodies of water, which destroy important habitats for aquatic species. It also leads to the fragmentation of habitats and disrupt aquatic connectivity, which impacts their ability to move and disperse.
- 4) Increased pollution: roads and associated infrastructure are a source of water pollutant such as, gas, oil, and road salts, which contaminate nearby waterways and harm aquatic life.

Road developments contribute various types of pollution, some of which are:

- 1) Air pollution: Vehicles traveling on roads emit pollution such as, nitrogen oxides, particulate matter and volatile organic compounds, contributing to smog, resulting in respiratory problems for those living in close proximity.
- 2) Noise pollution: The increased traffic and associated noise from road development cause negative impacts on nearby residents, wildlife and ecosystems.
- 3) Land pollution: Road construction generates debris, contributing to land pollution.

The impacts of road development are significant, we consider these issues to be serious due to the area being "untouched" since time immemorial. Mushkegowuk will feel all the repercussions caused by this road development being directly downstream.

We ask for these reviews to be considered as damage will be irreversible and unavoidable. We're requested an impact assessment as well as First Nation community review panel before development is to begin.

We're always available for further discussion if you shall choose to do so.

Submitted respectfully,

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Vern Cheechoo, Interim Executive Director