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 on 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 on the Draft EIS/EA
C-3 Shared Territory Protocol Nations Comments on Baseline Study Reports
C-4 Cat Lake First Nation and Lac Seul First Nation Comments on the Draft EIS/EA
C-5 Mishkeegogamang Ojibway Nation Comments on Baseline Study Reports and on the Draft EIS/EA
C-6 Slate Falls Nation Comments on Baseline Study Reports and the Draft EIS/EA
C-7 Northwestern Ontario Métis Community Comments on the Draft EIS/EA

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
STPN-2021-001	Sections 3.3.2, 6.2 Appendix G	The baseline report is labelled "interim" and does not appear to have required information for the baseline component of an assessment. The report states: This report provides a summary of the interim results of the onsite measurements and regional data assessment. Furthermore, in Section 3.2.1 it states: Sampling was put on hold after 20 December 2020 until March 2021 to avoid low temperature related sampling issues.	We recommend FMG update report after review of these comments and the addition of any measurements implied using the word "interim".	The draft EIS/EA includes a summary of onsite baseline data that has been collected and considered in the assessment.	FMG fully addressed STPN's original comment.		Appendix G-1
STPN-2021-002	Sections 3.3.2, 6.2 Appendix G	The report presents the results of monitoring data but does not provide information on how the values will be used to establish baseline in the dispersion modelling.	We recommend FMG identify how the monitoring data is used to establish baseline (or background) information for the dispersion modelling component of the air quality assessment.	The draft EIS/EA will provide rationale for the baseline concentrations used for the assessment of effects. For Criteria Air Contaminants, the 90th percentile of the regional data collected and Thunder Bay and/or Winnipeg will be used for averaging periods shorter than 1-year, and the average (mean) concentrations will be used where the air quality criteria are for the annual averaging period. Where onsite data have been collected, it will be used to supplement the regional data and include a discussion of existing air quality at the remote site and how it compares with the regional data. For parameters, not measured at the regional National Air Pollution Surveillance (NAPS) stations, such as the larger particulates, metals, and silica, baseline concentrations will be established using appropriate methods, such as use of a particle size distribution or the speciation of the measured suspended particulate matter. This is being detailed in the draft EIS/EA.	FMG fully addressed STPN's original comment.		EIS Section 6.2.1.2. Appendix G-1, Appendix G-2 Section 4.
STPN-2021-003	Sections 3.3.2, 6.2 Appendix G	The report does not clearly outline the sources of emissions effecting the baseline air quality and does not provide a study area to understand what sources are captured. The objectives of the baseline are stated to be: a baseline survey of ambient air quality in the project areas and in the airshed likely	We recommend FMG list the baseline emission sources in the area, including emissions from Communities if they are part of the air quality study area. Identify the air quality study area.	The draft EIS/EA is considering the surrounding land uses that may influence air quality at the Project.	FMG partially addressed STPN's original comment. The draft EIS/EA provides a general description of emission sources in Section 3.3.2.1 and some distinctions in air quality measured in the regional data versus what would be experienced locally. The draft EIS/EA does not, however, describe a study area (local or regional) nor does it provide a list of emission sources and their location within the	The Baseline Air Quality and Air Quality Modelling Report in the final EIS/EA are currently in production and will describe the existing local and regional conditions which includes consideration of roads, mining, wildfires, exploration, and forestry activities, genset, recreational vehicles, and transboundary sources.	Appendix G-2.

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		to be affected by the project, by identifying and quantifying emission sources for, but not limited to, the following contaminants in concentration units comparable to guidelines (i.e., µg/m^3): total suspended particulates, fine particulates smaller than 2.5 microns ($PM_{2.5}$), respirable particulates of less than 10 microns (PM_{10}), diesel particulate matter, carbon monoxide (CO), sulphur oxides (SOX), nitrogen oxides (NOX), and volatile organic compounds (VOCs).			respective study area. Local sources include such things as roads, forest fires, exploration related sources, etc. Request: CLFN and LSFN requests that FMG: – Identify type, known or expected emissions concentrations, seasonality and location of sources and place these sources on appropriately scaled study area map(s); – Describe how these existing sources influence the baseline with the primary focus being on the local study area and local sources or regional sources that heavily influence the local study area; and – Describe the ability of the on-site monitoring stations to detect emissions from local sources.	The regional airshed being characterized is influenced by local, regional, and long-range (e.g., international) sources. While it is not practical to identify sources on a map because sources such as forestry activity are transient; many of the stationary sources are located in the communities as identified in the Baseline Air Quality Report (Figure 1-1) currently in preparation. The combined expected emission concentrations from these sources are what was measured by the air quality baseline program. The purpose of the baseline air quality monitoring program was to measure the cumulative effects of existing sources (local, regional and long-range) on the concentrations of air contaminants of concern to understand the cumulative background air quality that results from these sources. Seasonal variability and the influence of local sources are both captured by the monitoring program. The sensitivity of on-site air quality monitoring equipment was determined as a function of the MECP's Ambient Air Quality Criteria (AAQC). The methods selected are industry standard and capable of detecting contaminant concentrations at levels appropriate for comparison against the relevant criteria.	
STPN-2021-004	Sections 3.3.2, 6.2 Appendix G	The report does not identify the sources of the ongoing exploration that will generate emissions. Are there any elements of the mining project or ongoing exploration that would generate emissions of diesel particulate matter (DPM), CO, VOCs?	We recommend FMG expand on the justification for not including these compounds as they may be generated by the project (presumably, ozone, dustfall and metals are included because they will be generated directly or indirectly by project operations). If excluded from measurement, identify how baseline values will be determined for the assessment.	The draft EIS/EA will include the rationale used to select parameters for the onsite baseline air monitoring, and how baseline concentrations were established for those parameters not measured onsite or regionally at the NAPS stations.	FMG did not address STPN's original comment and recommendation; therefore the comment and recommendation still applies. The draft EIS/EA does not provide a rationale for the air quality parameters selected for monitoring, including justification for any parameters that are not being monitoring or otherwise analysed. Section 6.2.4 describes emissions including description of where data came from to understand baseline conditions, for example fuel combustion associated PM2.5 as a surrogate for DPM justification for not including these compounds (i.e., DPM, CO,	The purpose of a long-term baseline air quality monitoring program is to measure the cumulative effects of existing sources (local, regional and long-range) on the concentrations of air contaminants of concern. Volatile Organic Compounds (VOCs), Carbon Monoxide (CO), and Diesel Particulate Matter (DPM) were assessed in the Air Quality Modelling Report, and will be appended to the final EIS/EA. The air quality monitoring program was expanded and data for VOCs and CO is	EIS Section 6.2.1.2, Appendix G-1 Section 5, Appendix G-2 Section 4.

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					VOC) as they may be generated by the project (presumably, ozone, dustfall and metals are included because they will be generated directly or indirectly by project operations) is outstanding. If excluded from measurement, identify how baseline values will be determined for the assessment. Request: CLFN and LSFN requests that FMG create and provide a table that identifies emissions from exploratory activities and mining, identifies which emissions will be monitored for baseline understanding, and lists any data source(s) applied to understand baseline conditions for any air quality parameters not measured under the on-site monitoring program (if applicable).	included in the Baseline Air Quality Report, which is currently in production and will be appended to the final EIS/EA. The average background Particulate Matter less than 2.5 microns (PM2.5) concentration in Canada was used as a conservative proxy for baseline DPM, as recommended by Health Canada. This will be included in Section 4.1.1 of the Air Quality Modelling Report. Where data could be collected onsite in a robust and representative manner, these data were preferentially used to establish baseline concentrations; other data collected onsite were used to evaluate the suitability of regional data for use as baseline. In some cases, multiple concurrent monitoring methods were employed for a single contaminant for redundancy. Side-by-side comparisons of the onsite methods and Environment and Climate Change Canada (ECCC) National Air Pollution Surveillance (NAPS) data for each parameter are provided in the Baseline Air Quality Report. Table 4-2 of the Air Quality Modelling Report provides the selected baseline concentrations and the associated reference for the value.	
STPN-2021-005	Sections 3.3.2, 6.2 Appendix G	The report has made general statements of corroboration without providing adequate references or studies. Regarding the minivol sampler, the report states: however it provides results that closely agree with reference method samplers.	We recommend FMG justify the statement that the sampler provides close agreement with reference methods by providing support from regulatory sources such as the U.S. Environmental Protection Agency (US EPA) or from the literature.	The expanded baseline air monitoring program includes suspended particulate (SP) sampling using the reference high-volume method. Performance data for the MiniVols is available from the supplier airmetrics at: http://www.airmetrics.com/products/studies/1.html The following reports provide information and experience on the performance of the MiniVol samplers: – Hill et. al, 1999. Performance Characterization of the MiniVol™ $PM_{2.5}$ Sampler.	FMG fully addressed STPN's original comment.		Appendix G-1

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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				– Lane Regional Air Pollution Authority. 1994. Oakridge, Oregon, 1994 PM_{10} Saturation Monitoring Study. – Chan et. al. 1998. Study of Particulate at Roadside Microenvironments in Selected Heavily Trafficked Districts in Hong Kong. – Howes. Et. al. Ambient $PM_{2\cdot5}$, PM_{10}, and Lead Measurements in Cairo, Egypt.			
STPN-2021-006	Sections 3.3.2, 6.2 Appendix G	The report assumes the Ministry of Environment and Parks will accept the use of the radiello sampler without providing justification. Important components of the baseline measurements are based on passive sampling and use of the radiello sampler.	We recommend seeking clarification on the use of the radiello in Ontario and identification of example projects in which its use has been reviewed and accepted by the Ministry of Environment and Parks for year-round sampling.	The MECP's Ambient Air Operations Manual includes trace gas passive sampling as a method acceptable to MECP for measuring NO_2 and SO_2. This method includes a 30-day exposure to improve the capture to identify trace concentrations at the Project site at levels lower then radiellos; however, regional NO_2 and SO_2 data will be used to establish background concentrations.	FMG did not address STPN's original comment and recommendation; both of which still apply. The word 'radiello' does not appear in Sections 3.3.2 or 6.2. Appendix G does not provide confirmation from MECP on the acceptability of radiello use, nor does it provide evidence of other projects reviewed and accepted by MECP for using radiello samplers in this context. Request: CLFN and LSFN requests that FMG convene a meeting with MECP to review the sample plan including sampling method, sampling station(s) and location(s), and duration (i.e., spatial and temporal coverage).	FMG consulted the Ministry of the Environment, Conservation and Parks (MECP) on the development of the baseline air quality monitoring program in 2021. Comments were received from the MECP and subsequently addressed in a revised air quality monitoring program. Appendix W of the draft EIS/EA describes the 2022 Air Quality Technical Workplan for the air monitoring. Comments received from Slate Falls Nation, other Indigenous communities and the MECP are described in the workplan including how they were incorporated into the baseline program. The baseline air quality monitoring program included another passive method called the "All-Season Passive Air Sampling System" (PASS). This methodology has been accepted by the MECP for other mining projects, and for this Project, and is useful in measuring long-term low-level concentrations. Baseline nitrogen dioxide (NO2) and sulphur dioxide (SO2) were determined using regional data (Thunder Bay and Winnipeg) and qualified using the onsite passive data. The baseline concentrations determined at these regional sites are comparable or conservative, particularly at the 90th percentile, as both are from stations located in a more urban environment in comparison to the remote location of the Project. Onsite baseline concentrations of NO2 (approximately 0.5 micrograms per cubic metre [µg/m3]) are much lower than those	Appendix G-1

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						at regional stations (approximately 16 µg/m3). Concentrations of SO2 measured onsite and regionally were effectively the same (approximately 0.5 µg/m3) and as a baseline concentration was not a driver of effects.	
STPN-2021-007	Sections 3.3.2, 6.2 Appendix G	There is a proposal for updates to the Canadian Air Ambient Quality Standards (CAAQS) for some air quality components in 2025. The report makes reference to the 2020 standards and does not appear to consider the requirements in 2025, when the mine is proposed to operate.	We recommend referencing 2025 CAAQS thresholds and the mine's ability to meet these thresholds.	The draft EIS/EA and the supplemental baseline report will reference the 2025 CAAQS.	FMG fully addressed STPN's original comment.		EIS Section 6.2.1.2, Table 6.2-3.
STPN-2021-008	Sections 3.3.2, 6.2 Appendix G	National Air Pollution Surveillance Program (NAPS) data from Winnipeg and Thunder Bay are included in the baseline assessment. The 98th percentile 1-hour NO_2 measurements in both locations exceed the 2020 CAAQS. These locations may not be a good representative of the project area as they are industrialised compared to the remote project area.	We recommend the project explain how NAPS data from the cities of Winnipeg and Thunder Bay will be used in the assessment, as representative of a remote area with much lower emissions in baseline and perhaps operations stages of the project.	The assessment will use 3 to 5 years of data from the two referenced NAPS stations, to ensure a robust, long term monitoring data has been collected. The selected NAPS locations are influenced by long range transport but are reflective of regional air quality, and from an EA perspective overestimates parameters relative to the Project site which lends itself to a conservative approach when considering the Project in addition. The onsite data collected in the baseline air monitoring program will provide data for comparison against the regional NAPS data, and will appropriately characterize the existing air quality at the remote Project. The draft EIS/EA will include a discussion on the difference in air quality between urban and remote areas.	FMG did not address STPN's original comment and recommendation; both of which still apply. It is still difficult to understand how ambient air quality criteria determined using data from more industrialised areas are suitable to this Project. It is also not clear how closely air quality conditions at any or all receptors (see Figure 6.2-5) align with what is experienced in Winnipeg and Thunder Bay without data from these receptor locations. Request: CLFN and LSFN requests that FMG undertake this additional monitoring, update baseline understanding, effects assessment, and mitigation/monitoring proposal, as necessary.	The onsite baseline air quality monitoring program was extended into 2022 to assess local air quality, which included monitoring of local nitrogen dioxide (NO2) concentrations. Regional data were used to supplement the onsite measurements where measuring hourly or daily concentrations was not feasible. Use of air quality data from industrialized areas results in a more conservative prediction of cumulative air quality effects. The cumulative air quality effects are dependent on baseline conditions plus Project contributions. If the baseline conditions use higher values from industrialized areas, the cumulative air quality predictions would be higher and require increased design features and mitigation measures to manage the effect resulting in a conservative overdesign of mitigation for the project. See the response to STPN-2021-6.	EIS Section 6.2.1.2, Appendix G-1 Section 5, Appendix G-2 Section 4.
STPN-2021-009	Sections 3.3.2, 6.2 Appendix G	Winter data for some instrumentation is not available. Winter data will be required to understand what emissions will be generated and how it could affect the local communities and wildlife. This information is necessary to assess the differences between the seasons prior to	We recommend capturing winter air quality sampling such that baselines levels can be assessed or clarification on how the interpretation will address this data gap.	The baseline air monitoring program is ongoing, and will collect data during autumn and winter conditions, to allow for discussion of seasonal variability of air concentrations.	FMG partially addressed STPN's original comment. FMG did conduct monitoring for a more extended period of time, although not a full year, and there were gaps in data coverage due to equipment malfunction, etc. Request: CLFN and LSFN requests that FMG:	The air quality monitoring program was expanded and extended into 2022 to ensure the seasonal variability of parameters was captured in a year of data. This included more frequent sampling during the winter season and redundancy measures to support continued data collection.	EIS Section 6.2.1.2, Appendix G-1 Section 4.

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		the impact assessment being submitted. Data collection over a full year of weather conditions is standard.			– Maintain monitoring until at least one full year of data is captured; – Update baseline understanding, effects assessment and mitigation/monitoring, as necessary; and – Incorporate sample plan revisions developed as a result of the MECP meeting (see Requests STPN-2021-6, STPN-2021-11, and STPN-2021-16), as necessary.	The expanded air quality monitoring workplan was submitted to the Ministry of the Environment, Conservation and Parks (MECP) for review in 2021. Comments were received from the MECP and addressed in a revised air quality monitoring program.	
STPN-2021-010	Sections 3.3.2, 6.2 Appendix G	All metals measurements were less than detection levels, making it difficult to understand the metals expected in the area. Below the limit the laboratory equipment can detect, it is not possible to know if the metals are not present or in low levels.	We recommend using alternative assessment methods that will allow for detection of airborne metals.	The baseline monitoring program was expanded in 2021 to include the collection of SP and metals data using high volume (hi-vol) sampling. This method has detection limits suitable for metals. Where on-site metals are present in concentrations below the detection limit of the hi-vol sampling method, either ½ the detection limit will be used or an alternate method to quantify the baseline will be used (such as literature, speciation of particulate matter).	FMG fully addressed STPN's original comment. Request: CLFN and LSFN requests that FMG incorporate sample plan revisions developed as a result of the MECP meeting (see Requests STPN-2021-6, STPN-2021-11, and STPN-2021-16), as necessary.	Appendix W of the draft EIS/EA describes the 2022 Air Quality Technical Workplan for the air monitoring. Comments received from Slate Falls Nation, other Indigenous communities and the MECP are described in the workplan including how they were incorporated into the baseline program.	Appendix G-1
STPN-2021-011	Sections 3.3.2, 6.2 Appendix G	The current analysis method means that the laboratory detection levels are above the Ontario ambient air quality criteria, making it not possible to determine if the air quality meets the criteria. It also means that there is no value in determining air concentrations if the project proceeds. It is not possible to understand if emissions will cause health effects if the analysis method does not assess the material at the level required. The Wood 2021 workplan does not provide enough detail to understand if the methodology will be changed to address the concern.	We recommend investigating the use of alternative analytical (laboratory or assessment) techniques that can provide detection levels below the ambient air quality criteria.	The 2021 baseline monitoring program includes the measurement of SP and metals concentrations using hi-vol sampling, with notably lower detection limits for metals. Where onsite metals are present in concentrations below the detection limit of the hi-vol sampling method, either ½ the detection limit will be used or an appropriate alternate method to quantify the baseline will be used (e.g. literature, speciation of particulate matter).	FMG fully addressed STPN's original comment. Request: Despite FMG addressing this comment, CLFN and SLFN requests that FMG please convene a meeting(s) with MECP to review thresholds that will be used to understand potential health effects and to develop a sample plan, including sampling method, sampling station(s) and location(s), and duration (i.e., spatial and temporal coverage) that will be implemented to develop a thresholds framework. See Requests STPN-2021-6 and STPN-2021-16.	The provincial criteria (Ontario Ambient Air Quality Criteria [AAQC]) are a concentration of a contaminant in air that is protective against adverse effects on health and/or the environment. (MECP, 2023) and are being applied to the Project. The baseline sampling program developed in consultation with MECP was used to inform our air quality modelling and in the context of being able to compare project effects to the AAQCs. The results of the model are currently being prepared and will be presented in the final EIS/EA, and a detailed monitoring program will be established in consultation with the MECP as part of the provincial permitting process. Please see also responses to STPN-2021-9 and -10. MECP. 2023. Ontario's Ambient Air Quality Criteria. https://www.ontario.ca/page/ontarios-ambient-air-quality-criteria	Appendix G-1

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STPN-2021-012	Sections 3.3.2, 6.2 Appendix G	All passive NO_2 sample results were below detection limits. This does not allow for an assessment of the baseline conditions so that the health effects can be understood.	We need to better understand NO_2 baseline concentrations: – If no NO_2 was detected, did FMG try to collect more sample by sampling longer? – Did FMG use a different (more sophisticated) technique in the lab to detect NO_2 in the sample?	Passive NO_2 sampling continues in the 2021 monitoring program using a 30-day exposure period, and will be included in the draft EIS/EA. Continuous NO_2 data collected at the regional stations in Thunder Bay and Winnipeg (Ellen St.) will be used as a conservative approach for baseline concentrations for the 1-hour and 24-hour averaging times.	FMG did not address STPN's original comment and recommendation; both of which still apply. See Comment STPN-2021-8. Request: See Request STPN-2021-8.	See the response to STPN-2021-6. Additional samples were collected, and the methods were able to detect nitrogen dioxide (NO2) and sulphur dioxide (SO2) at low concentrations. Further, the detection limits were appropriately low relative to the provincial Ambient Air Quality Criteria (AAQCs). The detection limits for the passive NO2 and SO2 samplers were both 0.1 ppb, while the 24-hr NO2 AAQC is 100 ppb and the annual SO2 AAQC is 4ppb; the detection limit is <10% of the criteria for each contaminant which is consistent with MECP guidelines.	Appendix G-1, Section 4.5
STPN-2021-013	Sections 3.3.2, 6.2 Appendix G	Some measurement passive SO_2 concentrations were above the detection level. Baseline sources of SO_2 are not clear in the report, which will make assessment of the future project effects difficult. The monitoring program ran from July 2020 to January 2021. SO_2 was detected in September, October, and November.	We need to better understand the following: – We need to understand the possible sources of SO_2 in baseline data. What sources might be contributing? – Why SO_2 was detected in some months and not others. We recommend using alternative analytical techniques so that the detection levels are improved.	Passive SO_2 sampling continues in the 2021 monitoring program using a 30-day exposure period, which is an analytical technique approved by MECP for low levels. The maximum 7-day average concentration was equivalent to <2% of the 10-minute AAQC. At such low concentrations, attributing SO_2 to specific sources is not possible as they are indistinguishable from regional background. 1. Continuous SO_2 data collected at the regional stations in Winnipeg (Ellen St.) will be used as a conservative approach for baseline concentrations for the 1 hour averaging time. 2. There are fluctuations in regional SO_2 concentrations that are particularly relevant where concentrations are at, or near, detection limits.	FMG did not address STPN's original comment and recommendation; both of which still apply. See Comment STPN-2021-8. Request: See Request STPN-2021-8.	See the response to STPN-2021-12. Regional and long-range transport of sulphur dioxide (SO2) will contribute to local air quality concentrations, with sources such as biomass combustion, smelters, electricity generation, and the combustion of fossil fuels that contain sulphur. Local sources of SO2 may include combustion of fuels (e.g., exploration activities), however the sulphur content of diesel is minimal due to the use of low sulphur fuels. Forest fires are also a source of SO2 emissions that vary seasonally.	Appendix G-1, Section 5.2
STPN-2021-014	Sections 3.3.1, 3.3.2, 6.2 Appendices G, M-1	Meteorological data are not included in the baseline report.	We recommend the inclusion of representative meteorological data in the baseline report, because meteorology is important to understand impacts. We need to understand if the wind blows emissions to the land or the water. Meteorology also determines how much dilution occurs from the source of emissions to the environment.	Meteorological data are presented in Appendix C of the Baseline Hydrology Report. The draft EIS/EA will also provide a summary of the meteorological data relevant to discussions of air quality modelling, and the supplemental air quality monitoring report will include a summary of meteorological data during the monitoring program.	FMG fully addressed STPN's original comment.		Appendix G-1, Section 4.7

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STPN-2021-015	Sections 3.3.2, 6.2 Appendix G	It is not clear from the various monitoring programs summarized what baseline conditions will be used in the assessment, making it difficult to understand how the effects will be assessed and what information is relevant. Without this information the Communities cannot understand the effects to their environment and the ecosystem in the vicinity of the mine site.	We recommend preparing a table with proposed baseline concentrations of all compounds used in the assessment for all relevant averaging periods, reflecting the commonly used 90th percentile for shorter averaging periods, and annual averages.	The draft EIS/EA includes a summary table of baseline concentrations and provide the rationale for the selection of the baseline concentrations used for the assessment of effects.	FMG fully addressed STPN's original comment.		Appendix G-2, Table 4-2
STPN-2021-016	Sections 3.3.2, 6.2 Appendix G	Air quality assessments have not included mercury, which has been identified as a bioavailable pollutant in the local flora and fauna. Community traditional foods are affected by local air quality and fish from the area are known to have been affected by mercury. Understanding the levels of mercury in baseline and operating conditions is important to understanding the effects of the mine on traditional foods like fish, moose and grouse.	We recommend considering assessment of the baseline levels of mercury so the effects of the project can be assessed ecosystem wide.	The SP sampling by hi-vol sampler includes analysis of filters for particle-bound mercury. No detectable concentrations have been observed to date; background concentrations will be based on available literature.	FMG fully addressed STPN's original comment.		Appendix G-1, Section 3.1.1
STPN-2021-017	Sections 3.3.9, 6.10 Appendix O	It is difficult to understand what area is being studied in the baseline as the report used several different terms. For example, "for selected waterbodies, in the Study Area", and "around the Project Area", while "Project Location" is indicated on the map. The report refers to the ToR as a source of the definition of the study area. If the intent is to characterize the fish/fish habitat in the study area defined in the ToR this should be clarified. Currently the baseline is unclear and may also be characterizing fish/fish habitat in the vicinity of the project, or fish/fish habitat in waterbodies that could be affected by the project, or according to Environmental Effects Monitoring protocol?	We recommend you clarify by providing definitions for "Study Area", "Project Area", and "Project Location", indicate where these areas are/what their boundaries lie, and the baseline assessment area.	Within the context of the 2018 report, "Project Location" refers to the mine infrastructure as it was understood during the early baseline studies. As a result, the baseline investigations defined the "Study Area" and "Project Area" according to the "Project Location". For the purposes of undertaking an effects assessment, a mine site development area (MSDA), a local study area (LSA) and regional study area (RSA) will be assessed based the Project described in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-018	Sections 3.3.9, 6.10 Appendix O	It is unclear how "selected waterbodies" were chosen to be assessed making it difficult to determine if the baseline will help with the assessment of project effects.	We recommend you provide methodology used to select the waterbodies that were assessed and how they relate to the project effects.	The general Project footprint was used to identify the inland waterbodies that would potentially be impacted directly (overprinted) or indirectly (flow alterations). The general arrangement of mine infrastructure has been advanced since the 2012 to 2018 studies, and has been used to inform the 2019 to 2021 baseline fisheries resource study designs. Any	FMG partially addressed this STPN's original comment. CLFN and LSFN understands that waterbodies were selected for assessment if they would potentially be impacted either directly or indirectly according to their position relative to the project footprint. However, sampling varies greatly from year to year, and it is unclear why some locations were chosen over others. For example, in the 2019 - 2020	Baseline data collection has been undertaken since 2009 in Birch Lake, and since 2011 in Springpole Lake and adjacent waterbodies. To better clarify and consolidate the completed studies over time, a tabulated chronological record of the sampling efforts has been prepared along with the specific location of the collected data in the completed or	EIS Sections 4, 5, 6.11.

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
				future optimizations will further inform the evolution of studies.	assessments, almost all monitoring was completed exclusively for waterbodies south of the project, with little to no work completed in Birch Lake, which surrounds the Project to the north. The lakes and rivers are fundamental to CLFN and LSFN way of life and must be respected. Request: CLFN and LSFN requests that FMG provide a table and an associated map with a summary of assessments completed from 2012-2022. Within this table, please provide rationale for sampling location choices. This will also help clarify STPN's original Comment STPN-2021-17, which addresses the discrepancies in terminology throughout the assessments when referring to the areas being assessed (e.g., project location, study area, project area). Note: this is a reoccurring CLFN and LSFN comment in response to the updated EIS. Please refer to Request STPN-2021-47 which emphasizes the need for an improved methods section in the EIS/EA. Roads and powerlines will impact aquatic vegetation and should be included .	pending documents. The record is provided as attachment STPN-2021-18. The mine access road has been optimized to follow high ground where possible and as such there is only one (1) water crossing near the east end of the alignment that is planning to use a small culvert and is expected to avoid impacts to aquatic vegetation. The transmission line will avoid having an in-water footprint (including impacts on aquatic vegetation) and therefore aquatic habitat assessments were not needed for this component of the Project. The potential effects of roads and powerlines on aquatic vegetation will be discussed in the final EIS/EA.	
STPN-2021-019	Sections 3.3.9, 6.10 Appendix O	It is not clear if 2019/2020 studies are included in summary.	We recommend you provide reference to the names of the studies/dates the studies took place that are discussed in this report.	The aquatic report (March 2018) presents data collected during aquatic studies completed between 2012 and 2018, and does not include study results from 2019 to 2020. However, the study results from 2019 to 2020 are included in the 2019 - 2021 aquatic report (Wood March 2021).	FMG fully addressed STPN's original comment. Request: CLFN and LSFN requests copies of the results of the 2022 and 2023 baseline studies, including translated copies.	Results of the 2022 and 2023 aquatic baseline studies are in production and will be provided in a baseline aquatic resources report to be appended to the final EIS/EA. Results from the broadscale monitoring study, acoustic fish community study and lower trophic community sampling are provided in Attachment STPN-2021-19 which is intended to demonstrate the similarity of the three deep basins in the north end of Springpole Lake for Lake Trout and Whitefish, fish distribution throughout Springpole Lake; and the comparability of the lower trophic communities between Birch Lake and Springpole Lake. The baseline reports are hundreds of pages and include a lot of scientific	Appendix O (all).

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
						terminology and data and nonpractical to translate. However, FMG has provided translated summary documents and fact sheets in the past and is open to continuing this if it would be helpful to community members. A meeting has been proposed for June/July 2024 to present the recent baseline data in production for the final EIS/EA and discuss comments/questions.	
STPN-2021-020	Sections 3.3.9, 6.10 Appendix O	The term "submerged" or "submergent" vegetation is not clearly defined?	We recommend you provide clarification for which term was intended to be used and update appropriately.	These terms are synonymous with each other and can be used interchangeably. A consistent term will be used for the draft EIS/EA.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-021	Sections 3.3.9, 6.10 Appendices O, W	Sampling was completed to target Lake Sturgeon in 2018. Were Lake Sturgeon targeted during 2019/2020?	We recommend you clarify if Lake Sturgeon were targeted in any other years and if they were not, provide rationale given their importance to the Communities.	The 2012 and 2013 baseline fish community surveys specifically targeting Lake Sturgeon did not detect any individuals. Wood has reviewed the three cycles of Ministry of Northern Development, Mining, Natural Resources and Forestry (MNDMNRF) Broadscale Monitoring (BsM) data from Birch Lake (2009, 2014, 2019), which have not detected Lake Sturgeon either. The data suggest a low likelihood of Lake Sturgeon presence within Springpole Lake, and as such additional Lake Sturgeon surveys were not conducted. However, based on input received from Indigenous communities, a targeted Lake Sturgeon survey is being considered for 2022.Opportunities to enhance Lake Sturgeon can be considered through the EA process if there is interest from the communities.	FMG fully addressed STPN's original comment, but additional information is required given cultural importance of water and lake sturgeon. Request: Please follow up with results from the 2022 and 2023 eDNA Lake Sturgeon surveys. CLFN and LSFN requests that a lake sturgeon restocking program occurs if the proposed project goes ahead, regardless of the results from western-science data collection (FMG 2023). CLFN and LSFN also request more information on water and sturgeon to support the Kita-ki-nan process. Reference: FMG. 2023. "Advancing the Environmental Assessment at Springpole Gold Project – What We've Heard and Next Steps" Presentation #2 Fish and Fish Habitat. MNRF has had difficulty rehabilitating and maintaining lake trout populations throughout Ontario. Identification of spawning areas with the use of traditional Knowledge is required. Re-stocking with hatchery fish has been the only proven method to restore lake trout numbers. Baseline numbers required. Ongoing monitoring of lake trout numbers will be required throughout the Mine life and after	See response to STPN-2021-19 regarding the 2022 and 2023 aquatic baseline report. Lake Sturgeon stocking was introduced in the draft EIS/EA for review and has continued to be included as an offset measure for discussions with Indigenous communities, Fisheries and Oceans Canada (DFO), the Ministry of Natural Resources and Forestry (MNRF) and will be included in the updated Fish Habitat Offsetting and Compensation Plan (FHCOP). To date, no government agency or Indigenous community other than CLFN and LSFN (in these provided comments) have requested the stocking take place immediately, but rather have asked for an additional step of information gathering. DFO and MNRF have raised questions with a stocking program, and the potential for unbalancing the existing fish populations. It has been requested that more information on the Lake Sturgeon status in the Cat River system be collected prior to reintroduction/supplementation efforts to increase their effectiveness. With respect to species other than Lake Sturgeon questions have been raised with the micro hatchery offset measure due to the potential to upset the natural balance of the remaining fish communities. Introducing hatchery fish to natural	EIS Sections 3, 6.10, Appendices F, O (all).

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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					closure. There is no mention of the impact of the project on walleye and northern pike nor any baseline testing for mercury, methylmercury and other contaminants. What studies are available to determine the mortality of fish in waters adjacent to blasting in mines. Band members report seeing many dead fish in the water adjacent to the site. Band members believe that blasting at the site caused the fish to die. How can fish mortality during blasting operations be monitored and rules enforced?	populations is managed by MNRF, who have been engaged on this Project and candidate stocking options. FMG will bring forward CLFN and LSFN's position regarding stocking Lake Sturgeon as it is understood their comment relates to the potential to use of stocking to restore a population that have been affected rather than just increasing numbers. The need to monitor Lake Trout and other species is acknowledged, and that long term biological monitoring studies will be required to measure potential mine-related effects and the use of performance criteria to evaluate the success of the FHCOP measures. Studies completed in 2022 included a lake wide Broadscale Monitoring (BsM) program in Springpole Lake that provided additional and extensive baseline data including both relative abundance and biomass, as well as fish production numbers for Walleye and Lake Trout. Proposed monitoring for the mine includes an additional pre-development BsM study, and recurring studies throughout mine life and into closure. Mercury, methylmercury, and other parameters have been measured in Walleye, Northern Pike, Lake Whitefish, Lake Trout, Yellow Perch as well as small-bodied fish (e.g., minnows) during the baseline studies. Sampling occurred in representative inland lakes, Springpole Lake and Birch Lake. Results have been reported to date in the draft EIS/EA as Appendix O1 (Walleye) and Appendices O2 and O3 (Minnows, Yellow Perch, Northern Pike). Data will also be reported with additional samples in the new baseline aquatic resources report (minnows, Yellow Perch, Northern Pike, Walleye, Lake Trout and Lake Whitefish) that will be appended to the final EIS/EA.	

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						The draft EIS/EA assumed the DFO Guidelines (Wright and Hopky 1998) of 100 kilopascals (Kpa) of overpressure and 13 millimetres per second (mm/s) peak particle velocity (ppv) to protect fish and fish habitat. DFO has identified more conservative blasting criteria of 50 Kpa for overpressure and 13 mm/s ppv and has requested these thresholds be applied to this Project. This will be updated in the effects assessment for fish and fish habitat in the final EIS/EA. Project interactions with the aquatic environment, specifically blasting effects to fish and fish habitat are discussed within the draft FHCOP appended to the draft EIS/EA (Section 5.0, and Table 5-2). To date, blasting has not been used at the Springpole Project during exploration activities.	
STPN-2021-022	2018 Fish Community and Habitat Existing Conditions	Report objective is to summarize the results/information from previous studies to describe the existing conditions. There is no inclusion or reference to traditional practices and priorities making the future assessment of effects challenging.	We recommend you provide more information/ consultations with the Communities in order to include traditional practices and priorities.	Please refer to the response to Comment 1) under the general comments above. FMG has inquired about information regarding traditional practices as they pertain to the Project be shared and discussed so that the Project can incorporate such important information. We understand that the SEC is currently reviewing what information to share with FMG and how to share it. We look forward to the information.	FMG partially addressed STPN's original comment. In the absence of information from CLFN and LSFN, FMG needs to ensure that culturally important fish species will exist at quantities and qualities that will allow for continuous harvest from now and long into the future. Please also see Comment STPN-2021-34 and STPN-2021-67. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. In order to inform assessment of effects, reference to cultural practices, and traditional knowledge and use needs to be considered. This includes baseline and effects analysis that uses sufficient quality and quantity of culturally important fish species as a desired future state, even with a potentially higher number of CLFN	Recent work during 2022 and 2023 has expanded the understanding of Springpole Lake and the surrounding systems, including additional information on Walleye, Yellow Perch, Northern Pike, Lake Trout, Lake Whitefish and Lake Sturgeon which have been identified as culturally important species by CLFN, Slate Falls Nation and LSFN. This additional information includes the results of the 2022 broadscale monitoring (BsM) program within Springpole Lake, and a summary of three cycles of BsM data from Birch Lake. The BsM Program uses a rigorous, standardized methodology that was created by the Ministry of Natural Resources and Forestry to evaluate Ontario's fisheries on a broad level. The BsM collects detailed information from a representative number of lakes, including information on fish species and fish communities, physical and chemical water characteristics, aquatic invasive species, and fishing effort. A summary of this data has been provided as Attachment STPN-	EIS Sections 6.10, 6.21, 6.26.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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					and LSFN harvesters. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	2021-19. FMG welcomes Indigenous Knowledge from CLFN and LSFN that can inform the Project during all phases.	
STPN-2021-023	2018 Fish Community and Habitat Existing Conditions	For communities to properly discuss and understand the project effects the use of local names for water courses and species should be incorporated into the reports.	We recommend you provide Indigenous names for watercourses to Table 1.	Please refer to the response to Comment 3) under the general comments above. FMG would be pleased to incorporate local names into consultation materials where available and appropriate to the scope. Executive summaries/Factsheets of the baseline reports were prepared and provided to facilitate community members understanding. Where possible FMG would ask that the SEC provide names of local common names and terminology that would be useful to incorporate.	FMG partially addressed STPN's original comment. Please see Comment STPN-2021-53.	Please see the response to comment STPN-2021-53.	Appendix O (all).
STPN-2021-024	Sections 3.3.9, 6.10 Appendix O	The proposed mine can impact aquatic habitat beyond the property boundary. If the highlighted large waterbodies provide the extent of the survey areas, that should be made clear in the legend.	We recommend you add the Study Area boundary to the figure. We recommend more consideration be given to how the runoff from McIntyre Mine could be impacting the downstream catchment area (i.e., Birch Lake).	The local and regional study areas for the purpose of effects assessment will be described within the draft EIS/EA. However, the 2018 study included sample locations that will support the effects assessment. Baseline water quality sampling in Birch Lake is located downstream of the McIntrye Mine. Water quality samples would be representative of any historical influence of the mine, if present, and would be compared to other reference sites in Birch Lake. The samples taken illustrate that Birch Lake has very good water quality.	FMG fully addressed STPN's original comment.		Appendix O-1, O-2 and O-3
STPN-2021-025	Sections 3.3.9, 6.10 Appendix O	The criteria used to determine which small waterbodies and watercourses were included in the surveys is not clear making it difficult to understand how the selection may affect Community traditional practices.	We recommend you provide methodology used to select small waterbodies and watercourses.	As per the response to comment #18, the Project footprint was used to identify the inland waterbodies that would potentially be impacted directly (overprinted) or indirectly (flow alterations). The general arrangement of mine infrastructure has been advanced since the 2012 to 2018 studies, and has been used to inform the 2019 to 2021 baseline fisheries resource study designs.	FMG partially addressed original STPN's comment. Please see Comment on STPN-2021-18. CLFN and LSFN understands that waterbodies were selected for assessment if they would potentially be impacted either directly or indirectly according to their position relative to the project footprint. However, reasoning for the variations in sampling and monitoring from 2019-2020 were not provided.	Adjustments in sampling protocol and monitoring locations from 2019 to 2023 were made to align with optimizations in the general Project arrangement and in response to government agency and Indigenous community review comments regarding earlier baseline monitoring programs. Sampling locations were added to address information gaps and included small inland waterbodies and watercourses that were deemed to potentially have	Appendix O-1, Section 2.2

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					Request: See Requests STPN-2021-18 and STPN-2021-47. Note: this is a reoccurring CLFN and LSFN comment on the updated EIS/EA. Please refer to Request STPN-2021-47 which emphasizes the need for an improved methods section in the EIS/EA.	direct or indirect interactions with the Project. A table describing the rationale for each of the sampling programs / baseline documents is provided in Attachment STPN-2021-18.	
STPN-2021-026	Sections 3.3.9, 6.10 Appendix O	The species assessed in 2018 and 2019 are not completely consistent, with no explanation provided. For example, the large-bodied sentinel species Walleye was studied in 2018 and this sentinel species changed to Pike/Perch in 2019?	We recommend you provide rationale for why the large-bodied sentinel species was changed and any effects this may have on the assessment.	Fish tissue sampling conducted in 2018 reported mercury concentrations in Walleye, whereas the 2019 studies targeted Northern Pike (another upper trophic level, sportfish species) as well as forage fish species that were observed to be abundant (young-of-the-year Yellow Perch) in order to assess the variability in contaminant concentrations. These studies assessed different species and not change over time in concentration for one species.	FMG partially addressed STPN's original comment, but more information on change over time in concentration for individual species is warranted during the monitoring phase. Request: CLFN and LSFN request that once the proposed construction begins, sampling should be conducted yearly, for the life of the mine, to assess mercury and methylmercury levels and other contaminants in all potentially impacted species (including upstream and downstream of Springpole Lake, and long-term impacts as raised by many community members in interviews for the Indigenous Knowledge and Use Study currently in development8 to document any changes over time. 8 C21. 2023. Transcript of November 22, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Cat Lake First Nation and L15 Transcript of November 16, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Lac Seul First Nation.	Long term biological monitoring studies will be implemented to measure potential mine-related effects with the use of performance criteria to evaluate the success of the FHCOP measures throughout the life of mine and as required by the respective regulatory authorities and are extensive in nature. Annual contaminant monitoring in fish would require lethal sampling of numerous fish to collect a proper sample size for multiple species, and is unlikely to detect small annual changes given the range of natural variation. However, a regular broadscale monitoring program (3-year cycles) has been proposed that would include tissue sampling for contaminants. The schedule for this program would reduce the necessary mortality of fish for study purposes while collecting frequent data to detect trends or changes in mercury and other parameters. The final monitoring schedule would be determined during the permitting phase of the Project.	EIS Section 12.7
STPN-2021-027	Sections 3.3.9, 6.10 Appendix O	The assessment of invertebrates does not appear to be complete. For example it is unclear what criteria were used to determine the depths the invertebrate community samples were taken? why there was no sampling completed within the littoral zone?; what sampling was completed in the deeper basins?; and what sampling was completed in the different substrate areas? This gives an incomplete picture of the	We recommend you provide methodology for Springpole Lake Benthic invertebrate sampling along with rationale for why no sampling was completed in the littoral zone and why some of the deeper basins were missed.	Previous sampling in Springpole Lake was targeted on fish communities as the key indicator based on the understanding of the Project at the time. In 2020, a benthic invertebrate community sampling was completed that targeted the candidate treated effluent discharge location in the central basin, nearshore (littoral zone) and offshore locations of Springpole Lake. This candidate location is now proposed for the southeast arm of Springpole Lake. A targeted benthic invertebrate sampling program occurred at this	FMG partially addressed STPN's original comment. The following documents were reviewed for this comment: – Appendix O (O-1, O-2, and O-3) – Draft EIS/EA Section 3 – Draft EIS/EA Section 6. It appears that sampling of the benthic invertebrate community (BIC) occurred in 2012, 2019, 2020, and 2021. There is a lack of sampling methodologies in each document. In	1. The data is available in the baseline aquatic resources reports appended to the draft EIS/EA (Cam & Portt 2018 and Wood 2021). The data for 2022 and 2023 will be provided in the baseline aquatic resources report to be appended to the final EIS/EA. For additional clarity, Attachment STPN-2021-18 incudes a summary of the aquatic studies completed to date in chronological order with descriptions of the work, and where the data and maps can be located within the document. Note that FMG	EIS Sections 3, Appendix O (all).

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		baseline for Aquatics making the assessment completeness and potential effects to traditional practices and priorities difficult.		location in 2019, and in the fall of 2021, using the study design outlined in the Federal Environmental Effects Monitoring (EEM) for metal mines.	the methods section of each document, minimal information is given about invertebrate sampling, and none is given explaining the reasoning behind sample locations and depths which differ from year to year. An example of methods description includes: "...during the fall sampling program" and "three grab sub samples were taken at each transect or lake sample location and pooled." In both these situations, the year/month of sampling and the number of samples taken was not indicated. Additionally, in the draft EIS/EA, there is conflicting information about when and where sampling took place. In Section 6, the methods state that "[invertebrate] sampling included nearshore (16m) and offshore (26m)." However, in Appendix O, it's clear that sampling took place at a wide range of depths (0.2 - 40m). In Section 3, the methods section states that "further assessment was conducted for aquatic habitat… and benthic community surveys in summer 2020." The section later contradicts this, saying that "sediment sampling was conducted concurrent with benthic invertebrate community samples… during fall sampling programs in 2012 - 2021" and states the number of sample locations only in 2012 and 2021. Request: CLFN and LSFN requests the following of FMG: – A table and associated map of all sampling locations, depths, and number of replicated samples to resolve the lack of summary information on sampling locations, sampling depths, and replicated samples from 2012 - 2021 and updated to 2023, including translation of species on map; – Information on the rationale for why some deeper basins, and many key littoral zones, were not sampled (an issue STPN's original comment draws attention to); – A plan needs to be made and implemented to properly compare communities over time, which includes set locations and depths for	proposes to provide a translated version of a plain language summary of the final EIS/EA documents when submitted. Baseline documents have attempted to provide a translation of fish species where available, but many aquatic species such as benthic invertebrate data are presented using scientific nomenclature and many do not have common English names. All six deep basins identified in Springpole Lake and two stations in Birch Lake were sampled seasonally (generally quarterly) for lower trophic communities (Chlorophyll a, phytoplankton and zooplankton) between June 2021 and March 2022 to establish baseline conditions and comparable relationships between Birch Lake and Springpole Lake. All six basins in Springpole Lake were also included in the 2022 broadscale monitoring which followed provincial standard fish sampling. Summary information is provided in Attachment STPN-2021-19. Metal mines within Canada are regulated under the Metal and Diamond Mining Effluent Regulations (MDMER) and are required to conduct biological Environmental Effects Monitoring (EEM) programs which will compare benthic invertebrate communities (BICs) throughout the life of mine. Current baseline data will inform the process and site selection for future biological monitoring. Baseline BIC data, although collected in several locations, still offers inter and intra-site comparability due to the replicate stations and sampling at similar depths. Sample stations have varied over time due to the evolving project optimizations, observed data evaluations and data requirements over the years. Results from the 2022 invertebrate sampling events are in production and will be available in the baseline aquatic	

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					consistency and comparability, ensuring that any future samples are compared only when taken from similar habitats, at similar depths; and – Provide results from the 2022 invertebrate sampling. – Include sampling sites both upstream and downstream of Springpole Lake.	resources report to be appended with the final EIS/EA. Sites upstream of Springpole Lake, within Birch Lake, have been sampled and downstream sample locations will be considered during the EEM process.	
STPN-2021-028	Sections 3.3.9, 6.10 Appendices O, W	It is unclear why the Fall Walleye Index Netting (FWIN) Survey, a Broad-scale Monitoring (BsM) Survey, and a Lake Sturgeon specific survey were completed but not a Summer Profundal Index Netting (SPIN) survey even though Lake Trout were caught. Is Springpole Lake known as a Walleye fishery? This should be clarified to improve the completeness of the baseline.	We recommend providing the rationale for surveys chosen, e.g., why complete a Walleye specific survey but not specific surveys for any other significant fishery species (it is understood that Lake Sturgeon surveys were completed due to their Species at Risk status). Lake Trout are a culturally significant species and of great concern to the local Indigenous communities. Understanding the population throughout the lake could help determine impacts associated with the loss of the one basin.	The baseline studies utilized net mesh sizes specific to the FWIN and BsM protocols that inherently targeted different fish sizes. The studies did not propose or complete formal BsM or FWIN surveys. The comparison presents the difference in catch relative to protocol-specific gear and helps to characterize the fish community. As a result of input received from the Springpole Environment Committee, additional fish population surveys specific to Lake Trout and Lake Whitefish are planned for 2022 since the (MDMNRF did not approve the proposed 2021 fall Lake Trout and Lake Whitefish survey program.	FMG partially addressed STPN's original comment. FMG stated in Appendix W that additional Lake Trout and Lake Whitefish surveys will be completed in 2022. To properly address STPN's original comment, a summary of those surveys must be provided. Additionally, FMG did not address the question of why specific surveys were employed and provided no background information on dominant fishery species. It is important to CLFN and LSFN that details of these studies be reviewed and that these studies are conducted properly. This includes consideration of CLFN and LSFN studies, where it is expected that these sections will be updated to reflect information presented therein. At this time, CLFN and LSFN have not been directly engaged in developing data collection methodologies or field work. Fish in this region and locally are integral to CLFN and LSFN way of life and culture. The CLFN and LSFN knowledge and values must be weaved into this section of the EIS/EA, as outlined in the CLFN and LSFN requests. Fishing is food, sustains CLFN and LSFN, and requires travel over land and water. Recent interviews with CLFN members highlighted the importance of the area or fishing a range of species, such as "moose hunting, duck hunting, fish, trout. Trout right where – in Springpole". 9 9C13. 2023. Transcripts of November 22, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Cat Lake First Nation. Request: CLFN and LSFN requests the following of FMG: – Provide a summary of the 2022 fish	1. The 2022 fish community surveys write up is in production and will be available in the baseline aquatic resources report to be appended to the final EIS/EA. A summary of information from the 2022 studies is provided in Attachment STPN-2021-19. Previous fish community surveys using Broadscale Monitoring (BsM) and Fall Walleye Index Netting (FWIN) net mesh sizes were used as these methods inherently targeted different fish sizes and species. Culturally important sportfish and forage fish species were sampled to compile a comprehensive baseline assessment of existing conditions. Despite using BsM and FWIN net mesh sizes, the earlier studies did not propose or complete formal BsM or FWIN surveys. Instead, the appropriate net mesh sizes were used for each protocol and general setting conditions stipulated (i.e. location in waterbody and depth) to ensure efficient capture of targeted species. Specific protocol items such as the total number of sets stipulated per waterbody, set duration, and set timing were not followed as the intent was to characterize the existing fish communities using the most appropriate sampling gear, rather than conduct a formal BsM or FWIN assessment at the time. Furthermore, restrictions on the allowable mortality of fish during the surveys would have prevented the completion of the full protocols. However, in all cases, efforts were made to sample Walleye, Yellow Perch, Northern Pike, Lake Trout, Lake Whitefish and Lake Sturgeon which have	EIS Sections 3, 6.10, Appendix O (all).

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ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					community surveys; – Provide rationale for why specific surveys were employed, including the historical use of species from both fisheries and Indigenous perspectives integral to CLFN and LSFN way of life and culture; – For greater clarity in future reporting, please explain that Broad-scale Monitoring (BsM) protocols were followed but that the assessment was not part of the BsM program and that some methods were slightly altered from the base program. Please also add information about any changes made to the protocols for the past baseline and future assessments. Please also clarify if the 2022 BsM program followed provincial standards with now alterations; – For greater clarity in future reporting, please explain that Fall Walleye Index Netting (FWIN) protocols were modified, and the rationale behind the changes. Please also elaborate on any changes made to the protocols for the past baseline and future assessments; – To ensure Indigenous perspectives are considered, please provide how traditional knowledge was incorporated into the methodology and how Indigenous representatives were directly engaged in data collection activities.	been identified as culturally important to CLFN and LSFN, as well as the baitfish community such as minnows that support them. Noted, future reporting will clearly describe alterations from the base protocols as described to the above response. Studies conducted in 2022 included a full, formal BsM survey following all provincial protocols. This survey included extra net sets in the shallow (1 to 3 metre (m), and 3 to 6 m) and deep (20+ m) depth stratas as requested by DFO and MNRF (Red Lake District). Noted, this clarification will be made in future reports. Available traditional knowledge was considered when determining the types of fish targeted in surveys (Walleye, Yellow Perch, Northern Pike, Lake Trout, Lake Whitefish and Lake Sturgeon and baitfish). Lake Sturgeon sampling was informed by the Cat Lake/Slate Falls 2015/2016 Species at Risk Stewardship Fund Project to understand historic presence and spawning locations. When able to coordinate participation, Indigenous community members were included during the baseline field studies, accompanying FMG staff during the various seasonal sampling programs.	
STPN-2021-029	Sections 3.3.9, 6.10 Appendix O	Were both FWIN net sets set in the same depth strata?	We recommend you confirm strata for 2010 FWIN sets. If the same strata were used for both sets, please provide rationale.	As noted in the response to Item #28, a formal FWIN protocol survey was not completed; however, as noted in Section 3.1.4.1 of the 2018 Report, "FWIN nets were fished in one of two depth strata; shallow sets were between 2 m and 5 m deep, and deep sets were between 5 m and 15 m deep."	FMG fully addressed STPN's original comment. Request: See Request STPN-2021-28 (4). CLFN and LSFN expect that FMG will share all of their baseline program and monitoring plans in advance of field work activities. For aquatics programs, details such as sampling methods, locations of sampling sites, and dates/times should be disclosed at least three months prior to undertaking this work. Field	The fish and fish habitat baseline studies in support of the EIS/EA are in production and results are being compiled and analyzed to be included in the final EIS/EA. . Members of CLFN and LSFN have been invited (and participated) in past monitoring programs and FMG will continue to send invitations to participate in future field programs. An environmental monitoring committee is also proposed for all phases of the mine.	EIS Sections 3, 6.10, Appendix O (all).

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					reports with detailed results (e.g. sampling results, species identified, and any incidental mortality) should be provided shortly after the field event.	A meeting has been proposed for May/June 2024 (in advance of the final EIS/EA) to present the more recent baseline data and discuss comments/questions.	
STPN-2021-030	Sections 3.3.9, 6.10 Appendix O	Did BsM net sets cover all depth strata in the lake? Wording in this section makes it sound as through they tried to do that but didn't get all strata within the lake.	We recommend you clarify if netting effort was evenly distributed over the entire lake or not.	As noted in the response to Item #28, a formal BsM protocol survey was not completed and as such, all strata were not sampled using the BsM protocol.	FMG fully addressed STPN's original comment. Request: See Request STPN-2021-28 (3).	See additional response to Request STPN-2021-28.	Appendix O-1
STPN-2021-031	Appendix F	Separating large mesh gill net and small mesh gill net results could lead to more of a comparison of the small-bodied fish community results.	We recommend you consider adding tables similar to Table 6 but showing the catch summary for large mesh and small mesh nets.	Acknowledged. Relevant summary tables will be included in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. A table with fish community catch summaries for large mesh and small mesh nets was not included in the draft EIS/EA for sampling completed from 2012 - 2018. These tables were provided for 2019 - 2020 in Appendix A (2019 - 2020 Aquatic Resource Assessment) but were not provided for the 2021 gillnet assessment (2021 Aquatic Resource Baseline Report). CLFN and LSFN requests greater consistency in reporting across years. Please provide tables for all years when gillnets were used, tables should separate the Catch per Unit Effort (CPUE) based on mesh size.	Noted, tables are available in the baseline aquatic resources reports (Cam & Portt 2018; Wood 2021; and Wood 2022). The data for 2022 and 2023 will be provided in the baseline aquatic resources report to be appended to the final EIS/EA. The catch per unit effort (CPUE) tables are separated by standard (15.2 m) and Broadscale Monitoring (BsM;25.0 and 49.6 m) length nets, with BsM (large vs small mesh) being separated by mesh size. Other fisheries surveys did not distinguish between mesh sizes in the CPUE tables, as the net types varied. For example, riverine index nets (RIN) and BsM nets, which use multiple panels of varying mesh size, were used alongside single mesh size nets and CPUE tables standardized to a specified length net due to the smaller sample size. Tables that summarized the 2022 BsM study that followed provincial protocols are provided as Attachment STPN-2021-19.	EIS Sections 3, 6.10, Appendix O (all).
STPN-2021-032	Appendix F	The methods used in the report in this section vary from the protocols and the differences and rationale are not provided. For example: "The period of sampling for both Large and Small Mesh effort spans" "… in such a way that soak time is a minimum of 16 hours up to a maximum of 22 hours (target duration is 18hrs). There is an option for a minimum set time of 12 hours for Small mesh only in situations where late arrival at a lake may not permit setting before 17:00. However, all Small mesh sets must fish overnight and include both	We recommend you clarify that methods were based on Broad-scale Monitoring protocol but varied slightly. We also recommend that results be expressed in a Catch per Unit Effort. This will allow for population abundance estimate comparison across all data sets.	As noted in the response to Item #28, surveys were not completed according to the Fall Walleye Index Netting (FWIN) and BsM protocols. However, these protocols were used to guide sampling and provide general community assessment results. Relevant summary tables are being included in the draft EIS/EA.	FMG partially addressed STPN's original comment. Request: See Request STPN-2021-28 (4) and Request STPN-2021-31.	See the response to comment STPN-2021-28 and comment STPN-2021-31.	Appendix F, Table A1

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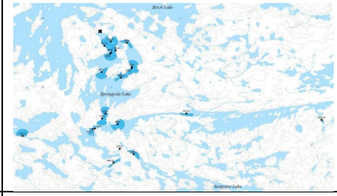
ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
		crepuscular periods" (Sandstrom et. al, 2013).					
STPN-2021-033	Sections 3.3.9, 6.10 Appendices O, W	The protocol for the assessment of Lake Sturgeon sampling is unclear making it difficult to assess.	We recommend you provide references of where the methodology for Lake Sturgeon sampling was sourced.	The extra-large mesh gillnets were utilized during the baseline studies as outlined in the MNRF Riverine Index Netting protocol (March 2010). The intent of these mesh sizes is to target adult Lake Sturgeon, as well as other large bodies species that were caught (e.g., Walleye, Lake Trout, Lake Whitefish and Northern Pike). However, no Lake Sturgeon were caught during these sampling events. Based on input received from Indigenous communities, a targeted Lake Sturgeon survey is planned for 2022.	FMG fully addressed STPN's original comment. Request: CLFN and LSFN requests that FMG provide a report on the 2022 large mesh targeted netting program for lake sturgeon for review.	A Lake Sturgeon netting program was implemented during the 2022 field season to assess potential presence in Springpole Lake, specifically, the southeast arm of Springpole Lake along the flow path between the Cromarty Lake inflow (Birch River) and the outflow of Springpole Lake. The assessment used a modified Riverine Index Netting (RIN) protocol for the capture of Lake Sturgeon, including extra-large RIN nets with stretched mesh sizes of 204, 230, 255, and 306 millimetres (8, 9, 10, and 12 inches, respectively). A total of 12 overnight net sets were fished for 18 hours (± 2-hours) and set perpendicular to flow. Net sets were conducted in the spring to target Lake Sturgeon during the spring migration period to identify if fish were traveling to or from spawning locations. No Lake Sturgeon were caught during the netting program. A total of six fish were captured: three Lake Trout and three Walleye. The environmental DNA (eDNA) sampling conducted in spring (concurrently with netting) and summer 2022 and spring 2023 did not detect any Lake Sturgeon DNA in Springpole Lake or any of the other sample areas, suggesting Lake Sturgeon are not likely present. A meeting has been proposed for May/June 2024 (in advance of the final EIS/EA) for WSP to present the more recent baseline data and discuss any comments/questions from the communities.	Appendix O-1, Section 2

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
STPN-2021-034	Section 6.21	Cultural significance for Lake Sturgeon was highlighted in the report but not for any other fish species. The baseline should consider the species that have cultural significance to the Communities.	We recommend you describe the cultural significance of the other fish species (in appropriate section) similar to what was done for Lake Sturgeon. (Walleye, yellow perch, northern pike, lake trout, lake whitefish and lake sturgeon are all important species in the planning area.)	Acknowledged, the cultural significance of specific fish species is being described in the draft EIS/EA.	FMG partially addressed STPN's original comment. Cultural significance for lake sturgeon was highlighted in the report but not for any other fish species. The baseline should consider the species that have cultural significance to the communities. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	The comprehensive fisheries programs completed in 2022 collected detailed information including abundance, biomass and distribution of the culturally important species described by CLFN and LSFN. A summary of the 2022 fish sampling results is provided in Attachment STPN-2021-19.	Appendix O (all).
STPN-2021-035	Sections 3.3.9, 6.10 Appendix O	It is difficult to determine where location(s) of importance are in relation to habitat features on the waterbody.	Please overlay Gill net locations, minnow trap locations, and spawning habitat locations with other habitat data such as vegetation, substrates, depth etc. for respective figures.	Relevant habitat mapping with gear-specific fishing efforts will be presented in the draft EIS/EA.	FMG fully addressed STPN's original comment, but additional work is needed once the CLFN and LSFN studies are available. Request:: CLFN and LSFN request that spawning areas are updated based on information provided in the CLFN and LSFN studies, including Indigenous knowledge.	FMG welcomes Indigenous knowledge shared by CLFN and LSFN.	Appendix O (all).
STPN-2021-036	Sections 3.3.9, 6.10 Appendix O	The rationale for sampling methods is not clear making the assessment of the baseline difficult. For example, why were fish from various trophic levels not sampled? and why only top predator fish?	We recommend you provide rationale for why only top predator species were sampled. Lake Whitefish is a benthivore (bottom feeder) and is also a culturally significant species. It may be worth adding it to the fish tissue analysis to provide a baseline to future EEM and impacts to this species. This would also provide a baseline for potential bioaccumulation impacts.	The 2019 to 2021 baseline studies included lower trophic level (forage fish and young-of-the-year) sampling that have been provided in the 2019-2020 Report and will be included in the 2021 baseline report. These results are being summarized and included in the draft EIS / EA. As a result of input received from Indigenous communities, Lake Whitefish are being proposed for tissue sampling during the 2022 field program.	FMG fully addressed STPN's original comment. Request: CLFN and LSFN requests that FMG provide results from the 2022 tissue sampling program.	A detailed record of fish tissue results, and sampling program will be provided in the baseline aquatic resource report to be appended with the final EIS/EA. A summary of the tissue results is provided in Attachment STPN-2021-19.	EIS Sections 3, 6.10, Appendix O (all).
STPN-2021-037	Appendix O-3	It is unclear if there are confirmed and potential spawning habitat locations in relation to the Study Area, which is important to fish stocks.	We recommend providing a figure showing the potential and confirmed spawning habitat locations. A figure confirming the spawning habitat for each species would be ideal.	Relevant habitat mapping with potential and confirmed spawning habitat is being presented in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Appendix O (all).
STPN-2021-038	Sections 3.3.9, 6.10 Appendix O	The information in this section should be clarified to include the location of the spawning surveys conducted in the Birch River.	We recommend confirming if spawning surveys were conducted and if not provide rationale. Were any survey works completed downstream in Cat Lake First Nation fishing areas?	The acoustic telemetry data shows Walleye travelled out of Springpole Lake, moving upstream into the Birch River which is not anticipated to be impacted by the project. As such, spawning surveys within the Birch River were not proposed or conducted. Survey works were completed in areas where potential mine-related effects are conservatively predicted and downstream to the outlet of Springpole Lake.	FMG fully addressed STPN's original comment.		Appendix O-1 and O-2

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
STPN-2021-039	Section 3	Adding the total number of Walleye and Lake Trout tagged and the number of receivers deployed in the beginning of this section would clarify things for the reader.	We recommend providing an additional sentence in the Acoustic Telemetry introductory section summarizing total number of fish tagged and total number of receivers deployed.	A summary of the acoustic telemetry results is being incorporated into the draft EIS/EA.	FMG fully addressed STPN's original comment.		EIS Sections 3, 6.10, Appendix O (all).
STPN-2021-040	Section 3.6.1.2	It would be helpful if a brief QA/QC protocol was provided. Was data filtered for any false detections?	We recommend providing a brief QA/QC protocol used to audit the data.	A summary of the acoustic telemetry QA/QC is being incorporated into the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. FMG did not describe QA/QC protocols used to audit telemetry data and filter for false detections. Request: CLFN and LSFN requests that FMG clearly define the QA/QC protocols used to check the acoustic telemetry data and explain how the data was filtered for false detections.	Acoustic telemetry data presented in the 2018 Fish Community and Habitat Existing Conditions Report, Section 3.1.7.1 was collected using VEMCO tags and analyzed with the VEMCO VUE software. Typically, a False Detection Analysis (FDA) is run in the software to determine if any detections were duplicates (false positives or "false detections"). The FDA uses an algorithm identifying short interval detections separated by long intervals to flag detections that require more scrutiny. Usually, this occurs when tags can be recorded on multiple receivers at the same time due to receiver location and their read range. Using professional judgement, the biologist identifies and removes false positives. For more information on the FDA and questionable data, please see the INNOVA SEA VUE Software Manual (Document # DOC-4399-32; DOI: https://www.nautilusoceanica.com/images/datasheets/vemco/vue_manual_vemco_nautilus_oceanica.pdf).	Appendix O-1
STPN-2021-041	Sections 3.3.9, 6.10 Appendix O-3	These tables may not be easily understood by readers.	We recommend creating a figure to display data.	FMG will consider alternate methods of data presentation for the information in Tables 18 and 21 as appropriate for the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. FMG did not follow STPN's original recommendation to create figures when displaying the acoustic telemetry data. It is challenging to understand spatial distribution of a species and their migratory patterns without visual representation. Request: CLFN and LSFN requests that FMG create spatially mapped figures to display information collected from all acoustic telemetry studies, both past and future.	Due to earlier comments on baseline studies regarding the previous telemetry study, additional fish community studies were undertaken in 2022 to better describe fish distribution of multiple species throughout Springpole Lake. The telemetry study design utilized fixed receiver stations, as shown in the image below, which recorded the individual presence of a fish with the VEMCO tag when within the range of the receiver as a data point. This data point does not provide for continuous movement maps (such as with other remote telemetry programs like Caribou).The data allows a determination of when a fish moved from one receiver to the next. As such, the most	Appendix O-1

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
						useful and informative means of presenting the data is to display the Walleye and Lake Trout distribution pattern in tabular format with number of fish per station per month, along with the detailed tables of data provided for each individual fish. A technical meeting has been proposed for May/June 2024 to discuss whether further analysis of the historic telemetry data would add value to the current analysis. 	
STPN-2021-042	2018 Fish Community and Habitat Existing Conditions	Information required for the assessment of the baseline doesn't appear to be complete. For example, what criteria was used to select the small waterbodies that were sampled?	We recommend providing the rationale/ criteria for selection of the small water bodies that were sampled.	As noted in the response to comment #18, the project footprint was used to identify the inland waterbodies that would potentially be impacted directly (overprinted) or indirectly (flow alterations). The general arrangement of mine infrastructure has been advanced since the 2012 to 2018 studies, and has been used to inform the 2019 to 2021 baseline fisheries resource study designs.	FMG partially addressed STPN's original comment. CLFN and LSFN understands that planned mine infrastructure has changed since the original baseline studies were conducted, and that is reflected in Figures 6.10-2 and 6.10-3. Baseline studies since 2019 have focused on small waterbodies directly impacted by proposed mine infrastructure; however, there are additional small waterbodies that will be impacted by mine access roads, effluent discharge pipelines, 230 kV Transmission lines, and/or effects of their close proximity to the project (e.g., dust, changes to water flow, etc.). Therefore, these additional impacted waterbodies should be assessed. Request: CLFN and LSFN requests that FMG: Provide rationale for the exclusion of small water bodies that will be impacted by: – Mine access roads; – Effluent discharge pipelines; – 230 kV Transmission lines; and/or – Effects of close proximity to the project (e.g., dust, changes to water flow, etc.)	1. The rationale for the exclusion of small water bodies is as follows: Mine access roads – The mine access road has been optimized to follow high ground where possible and as such there is only one (1) water crossing near the east end of the alignment. A second potential minor water crossing occurs along the co-located airstrip, closer to the mine area. Both crossings will be noted in the final EIS/EA and included in the updated draft Fish Habitat Offsetting and Compensation Plan (FHOCP), which will be appended to the final EIS/EA. Effluent discharge – The effluent discharge pipeline and access have been located to avoid water crossings. The only direct contact with a waterbody is at the discharge location in the southeast arm of Springpole Lake, which is discussed in Sections 6.8 and 6.10 of the draft EIS/EA and the draft FHOCP that was appended to the drafted EIS/EA. The transmission line will avoid having an	EIS Sections 4, 5, Appendices, O (all).

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ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					Create a list of all potentially impacted small waterbodies, develop a risk matrix for each one, and share this analysis with CLFN and LSFN. This will help clarify whether further baseline studies are needed; and Provide the results and locations of the 2022 and 2023 habitat surveys on inland waterbodies.	in-water footprint (impacts) and therefore aquatic habitat assessments were not needed for this component of the Project. Section 6.9 of the draft EIS/EA includes an assessment of potential effects on local inland waterbodies and considers potential changes in surface water quantity (flows) and other changes to the environment such as changes in air quality (i.e. dust). This will be updated for the final EIS/EA, to include additional baseline data that has been collected and feedback received from reviewers during the draft environmental assessment process. A summary of potential effects to fish and fish habitat is provided in the draft Fish Habitat Offset and Compensation Plan (FHOCP) (Wood 2022), which includes Tables 3-1 and 3-2 for impacted waterbodies. As requested, a risk matrix will be added to the updated FHOCP to be appended with the final EIS/EA. Additional data collected for the inland waterbodies will be provided in the baseline aquatic resources report which will be appended to the final EIS/EA.	
STPN-2021-043	Sections 3.3.9, 6.10 Appendix O	Information required for the assessment of the baseline doesn't appear to be complete. For example, which size of gill net was used for sampling the Small Lakes?	We recommend identifying if large mesh, small mesh, or both sized gill nets were used for each of the Small Lakes that were sampled.	Various gill net mesh sizes were utilized to survey the fish community within the "Small Lakes". Additional sampling of the inland waterbodies occurred during the baseline studies conducted during the period 2019 to 2021, and the information will be presented in the draft EIS / EA.	FMG fully addressed STPN's original comment.		Appendix O-1
STPN-2021-044	2018 Fish Community and Habitat Existing Conditions	Information in the baseline may indicate a problem with the data collection method. In some lakes only predators were captured. Is it possible the minnow traps were set too long and the small-bodied fish were eaten by the larger fish?	We recommend providing sampling methodology/ reference protocol and timing that nets were set.	It is not uncommon for Northern Ontario inland waterbodies to contain low species richness (e.g., Lake 14 only has Northern Pike and Yellow Perch) and fish in low abundance. It is unlikely that forage fish species caught within the minnow traps were consumed by similar sized predatory species that were also caught in the traps. Further, Northern Pike are commonly caught in gill nets when attempting to prey on small-bodied fish that are already in the nets; thereby, being caught by their teeth	FMG partially addressed STPN's original comment. Tables A1.4a - 4c in the 2019-2020 Aquatic Resources Assessment and Table A1-3 in the 2021 Aquatic Resources Baseline Report (Appendix O) did provide some clarity on methods; however, no reference protocol was used for minnow trapping methods. Methods used for each sampling technique should be clearly explained. There are field data sheets attached in Appendix O, but this information should be summarized into set protocols used	Minnow trapping used baited, gee-style minnow traps set around the perimeter of each waterbody from shore or deployed via small watercraft. Traps were left in the water for a minimum of 12 hours and maximum of 24 hours, with a targeted total trap hour (number of traps x number of hours soaked) effort of 300 trap hours. The number of traps set varied by waterbody size, however the typical effort	Appendix O-1

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
				and maxilla. As such, these data are considered reliable and reflect the species assemblage.	for minnow trapping. Information such as the number of hours set (for each trap, not the cumulative total) and the timing of these sets (morning, afternoon, overnight) should be included in the methods section. Information must be complete as the Kita-ki-nan assessment will apply Anishinaabe laws. CLFN and LSFN require fulsome datasets to address questions raised from an Anishinaabe perspective. In recent CLFN member interviews, for example, concerns were raised regarding fish and fish habitat, fishing activities now and into the future at the project site, but also about "smaller little crustaceans and other little minnows and all those stuff. So, she was referencing that when if they do this dam here, they're gonna move the fish, right? So, she had questions about all the other stuff. What are they gonna do with these? And she was making reference to those crabs"10. (C21 22, November 2023) 10 C21. 2023. Transcripts of November 22, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Cat Lake First Nation. Request: CLFN and LSFN requests that FMG describe the methods used, or the reference protocol followed, for minnow trapping into the EIS/EA. Note: this is a reoccurring issue throughout this review. Please refer to actions listed under CLFN and LSFN's request on STPN-2021-47 which emphasizes the need for an improved methods section in the EIS/EA.	was 20 traps set for 16 hours (320 trap hours).	
STPN-2021-045	2018 Fish Community and Habitat Existing Conditions	Broadscale Monitoring protocol referenced in this section is different than BsM protocol referenced in section 3.1.4.1 (Sandstrom et al 2013 vs Sandstrom et al 2010).	Please confirm if this is a typo or if different methods were used for Springpole Lake and the Smalls lakes. If they are intentionally different provide rationale.	The BsM protocol was updated during the baseline studies and the earlier reference was not updated. The references are for the same BsM protocol; however, they are different versions.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-046	2018 Fish Community and Habitat Existing Conditions	Information required for the assessment of the baseline doesn't appear to be complete. Provide rationale for change in procedure between the 2012 and 2017 BsM surveys	Please provide rationale for change in procedure.	As noted in the response to Item #29, a formal BsM protocol survey was not completed and as such, set timing were not as per the BsM protocol.	FMG fully addressed STPN's original comment. Request: See Request STPN-2021-28 (3).	See the response to comment STPN-2021-28.	Not applicable

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		(nets were aimed to be set for 18hrs in 2012 but were only set for 4 hours in 2017).					
STPN-2021-047	Sections 3.3.9, 6.10 Appendix O	Information required for the assessment of the baseline doesn't appear to be complete. For example, were other sampling methods (fyke nets, hoop nets, minnow traps etc.) of fishing completed at the same time as the BsM surveys or were they done at separate times? Why were only the Hoop Nets baited?	We recommend you provide more details about alternative sampling methods on the Small Lakes.	A variety of gear types were used to characterize the general fish community concurrently with the BsM-style sampling. Minnow traps were also baited.	FMG partially addressed STPN's original comment. FMG has provided the rationale for their chosen fish sampling methods. However, in all three documents (Appendix O), there are a variety of methods used, in different areas, and at different times with little to no explanation. More information needs to be included in the methods section of the EIS/EA so reviewers can fully understand the rationale behind sampling methodologies. Request: CLFN and LSFN requests that FMG includes descriptions of all methods used for fish sampling in the methodologies section of the EIS/EA. Information to include: – Sampling type; – Protocols followed (or an explanation of methods if no protocol was followed including mesh sizes, baited, time in water, etc.); – Dates of sampling; – Number of replicates; and – Rationale for method and location.	Additional details have been summarized in Attachment STPN-2021-18 to clarify the studies completed to date and where the data can be located. Additional details are in production and will be provided in the baseline aquatic resources report that will be append to the final EIS/EA.	Appendix O (all).
STPN-2021-048	2018 Fish Community and Habitat Existing Conditions	Information required for the assessment of the baseline doesn't appear to be complete. For example, water quality data has not been filled in for these tables.	Please fill in Table data.	There appears to be an error in the pdf of this report. Please find the complete tables attached to these responses.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-049	2018 Fish Community and Habitat Existing Conditions	Information required for the assessment of the baseline doesn't appear to be complete. This section jumps from Lake 6 to Lake 10.	Please confirm if Lakes 7, 8, and 9 were missed or if they were not completed.	Section 1, Table 1 of the Report includes Site IDs for the sampled locations. There are no locations identified as L7, L8 or L9.	FMG partially addressed STPN's original comment. CLFN and LSFN understands that no lakes were labeled with Site ID's L-7, L-8, or L-9. However, we would like clarification on the Site ID labeling from monitoring years 2012 - 2021. It is unclear whether all sites have been identified consistently or if changes have been made to the identification system throughout the years. Request: CLFN and LSFN requests that FMG: – Clarify whether all sites have been identified consistently throughout baseline monitoring (2012 - 2021); and – Provide a table (or reference to an existing table) of Site ID classification methods. For	1. All sites have been consistently identified throughout the baseline monitoring. Sample location nomenclature uses "S" to denote stream sections and "L" to denote lake or waterbody (inland ponds, inland lakes, and larger lakes [Birch/Springpole]) areas. Other subtext used is based on relative geographic position to the Project, including "US" to refer to upstream and "OUT" to refer to stream outlet.	Not applicable

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					example, please explain sites such as S-9-US01, L-2-OUT, L-15-S series.		
STPN-2021-050	2018 Fish Community and Habitat Existing Conditions	There are concerns with the assumptions that may be made with the statements in these sections.	We recommend clarifying the wording signifying that no fish were caught during these surveys; for example: "due to survey results it is thought that fish are not likely present in the lake."	Comment noted.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-051	2018 Fish Community and Habitat Existing Conditions	The resources used for the baseline assessment are not always clear and there is no list of online/secondary sources that were consulted.	We recommend creating list of online/secondary sources to summarize all resources that were consulted in the report. This will provide readers with clarity on the sources used.	Comment noted.	FMG did not address STPN's original comment. FMG did not provide a list of secondary sources consulted for the assessment. This list is different than the reference list and should include protocols (e.g., FWIN, BsM) and standards. Request: CLFN and LSFN requests that FMG include a list of secondary sources used for the EIS/EA in said document.	Most of the data used to characterize the baseline condition for the Project were collected during the site and Project specific field programs as secondary source information is less common for remote areas. Exceptions to this would include Indigenous Knowledge and data previously collected from the Ministry of Natural Resources during their Broadscale Monitoring (BsM) program (Birch Lake), and general community based and provincial knowledge (Ontario's Fish ON-line). Secondary sources are described in the reports and included in the list of references for each report.	Not applicable
STPN-2021-052	2018 Fish Community and Habitat Existing Conditions	Missing references in the reference section.	We recommend providing in-text citations and citations in the reference section for all secondary sources that were consulted.	Comment noted.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-053	Appendix O-3	Inconsistent with naming, some incorrect fish names (e.g., occasional capitalization of fish names, occasional inclusion of Latin names for vegetation, Common White Sucker, Northern Mottled Sculpin, etc.), and common community names not provided.	We recommend updating the document with corrected naming as well as the common community names and picture of the species.	Comment noted.	FMG partially addressed STPN's original comment. Naming was more consistent throughout the draft EIS/EA and Appendix O-3; however, very little attempt was made to include local community names. This should be included throughout Section 6.10 of the EIS/EA as well as in 6.21-6. CLFN and LSFN understands that this is a process, and more engagement is needed to understand common community names. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies. Local names should be used in all documentation where possible and appropriate.	Additional data was collected to confirm the understanding of the aquatic environment during 2022 and 2023. A summary of this data is provided in Attachment STPN-2021-19. Additional details are in production and will be provided in the baseline aquatic resources report that will be append to the final EIS/EA. FMG encourages CLFN and LSFN to provide local names to be integrated into future documentation where appropriate.	Appendix O (all).

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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STPN-2021-054	Appendices D, O-3	The local names for the fish species and waterbodies are not provided making the review of the report by community members difficult.	We recommend using local names of species and locations (waterbodies).	Please refer to the response to Comment 3) under the general comments above. FMG would be pleased to incorporate local names into consultation materials where available and appropriate to the scope. Executive summaries/Factsheets of the baseline reports were prepared and provided to facilitate community members understanding. Where possible FMG would ask that the SEC provide names of local common names and terminology that would be useful to incorporate.	FMG partially addressed STPN's original comment. Follow-up on this point is still necessary, as community names were not included in the draft EIS/EA. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	Available Ojibwe/Anishinaabemowin species names were incorporated into the Aquatic Baseline Report included as Appendix O-3 of the draft EIS/EA FMG would ask that CLFN and LSFN provide names of local common names and terminology that would be useful to incorporate into future reports.	Appendix O (all).
STPN-2021-055	Appendix W	Cat Lake First Nation and Slate Falls Nation are concerned about the downstream impacts to their water quality and hunting and fishing grounds.	We recommend the sampling program be expanded to include the lakes surrounding Cat Lake First Nation and Slate Falls Nation.	Mine-related effects are not anticipated to occur to water quality, hunting and fishing grounds located downstream within the Cat Lake FN or Slate Falls FN areas. As part of a TK/TLRU study scope, FMG would also consider supporting some community-based baseline water sampling in areas of interest to Indigenous communities. For the 2022 surface water sampling program, additional surface water quality stations are being established downstream of Cat Lake First Nation and upstream of Slate Falls Nation.	FMG fully addressed STPN's original comment. Request: CLFN and LSFN requests that FMG follow up with details on: – Support for community-based water sampling; and – Established water sampling locations and data from the 2022 and 2023 studies.	FMG has offered participation in water sampling and other monitoring facets and would be pleased with participation in the future. FMG is also interested in working with CLFN and LSFN to develop a monitoring committee for the mine that can help develop and implement programs. Water sampling locations continued into 2022 and 2023 and are generally consistent with the locations and results described and shown in the baseline water quality report appended to the draft EIS/EA. An updated baseline water quality report is in production and will be appended to the final EIS/EA.	Appendix N (all), O (all).
STPN-2021-056	Appendix O-3	Information required for the assessment of the baseline doesn't appear to be complete. Habitat description is more characteristic of ephemeral flow, not intermittent flow.	We recommend that stream permanency be described as per the Ontario Ministry of Natural Resources Stream Permanency Handbook for consistency or adapted as appropriate for Northern Ontario.	Acknowledged, the habitat characterization data is being presented in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Appendix O (all).
STPN-2021-057	Appendix O	There is use of fine substrate, soft substrate, fine organic substrate etc. Definitions would be helpful to the reader. It is not clear if the naming is inconsistent or whether the substrate types are different.	Please provide more details and definitions to improve clarity of report.	The noted descriptions are qualitative field descriptions; whereas Appendix D provides location-specific particle size distribution data from laboratory analysis which are consistent metrics for comparison among sample locations.	FMG fully addressed STPN's original comment. Request: CLFN and LSFN requests that, for future clarity, FMG provide field technicians with a list of acceptable substrate descriptions and their definitions.	Acknowledged.	Appendix O-1
STPN-2021-058	Appendix O-3	This section of the report may create confusion because of inconsistencies. The summary table states that Type D are not	We recommend adding a sentence to section 2.2.4 in-text indicating that the habitat is not considered fish habitat.	Acknowledged, the habitat D description will be adjusted and incorporated in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Appendix O (all).

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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		fish habitat. This is not included in text in section 2.2.4.					
STPN-2021-059	2019-2020 Aquatic Resource, Section 2.2.4	The claims of "not fish habitat" are not well substantiated. Features with intermittent or ephemeral flow and dry at the time of assessment is not sufficient to make a determination that the habitat is not used by fish in the spring. There are no details re. connectivity in the descriptions.	We recommend language such as "not likely fish habitat" should be used. Claims of "not fish habitat" should be better validated.	Acknowledged.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-060	Appendix O-3	Information required for the assessment of the baseline doesn't appear to be complete. Habitat I is the only habitat description that includes the potential spawning habitat that could occur for that habitat type. Is there no potential for suitable spawning habitat in other habitat types, i.e. Northern Pike in Habitat A or B, or even D?	We recommend clarifying if Habitat I is the only habitat type that has potential spawning habitat and include rationale as to why the other habitat types do not appear to be suitable spawning habitat, if that is in fact the case.	Other habitat types may be suitable spawning areas for other fish species and are being presented in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Appendix O (all).
STPN-2021-061	Appendix O-3	Information required for the assessment of the baseline doesn't appear to be complete. For example, why were fish not sampled from the different trophic levels (e.g., benthivorous fish) in addition to the top predator fish.	Please provide rationale for why fish from various trophic levels/feeding guilds were not sampled.	The 2021 baseline studies included lower trophic level (forage fish) sampling and this information is provided in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-062	Appendix O-3	The local Indigenous communities are concerned about the impacts to fish and how the mine could impact contaminant levels in fish near the downstream communities such as Cat Lake First Nation and Slate Falls Nation.	We recommend you add a tissue sampling program within the fishing grounds of the Cat Lake First Nation and Slate Falls Nation.	Contact water at the Project will be collected and treated as required to meet effluent limits. Therefore, mine-related changes to fish tissue are not anticipated downstream and extensive data is available for Springpole and Birch Lakes. Should the communities wish to understand the baseline fish tissue in other areas of interest, a community-based sampling program can be considered as part of a TK/TLRU Study.	FMG fully addressed STPN's original comment. This comment has not been addressed. The effluent limits set by provincial regulations will contaminate fish tissue	FMG shares Cat Lake First Nation and Lac Seul First Nation's interest in protecting water quality in the Birch Lake watershed and the aquatic resources that are dependent on it and aims to work effectively with Indigenous communities and regulatory authorities to achieve this goal. Water quality guidelines for the Protection of Aquatic Life (WQG PAL) are based on rigorous study to specifically safeguard the most sensitive life stages of aquatic species for periods of indefinite exposure. By ensuring that effluent limits are set at levels to achieve compliance with WQG PAL in the receiving environment, the integrity of water bodies and the health of aquatic life throughout the life of the Project will be protected. Therefore, the effluent limits that will be established to achieve water quality guidelines in the receiving environment and set in consultation with provincial regulators will be protective of aquatic life, including fish tissue.	EIS Section 12.

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						In accordance with regulatory guidance and as per industry standards, FMG will collaborate with the Ministry of the Environment, Conservation and Parks (MECP), and Indigenous communities to transition from baseline monitoring to comprehensive follow-up and effects monitoring programs, including for fisheries and fish tissues as well as triggers for adaptive management, as appropriate. FMG is interested in working together to establish a monitoring committee with CLFN and LSFN for the mine that would participate in refining and implementing monitoring programs.	
STPN-2021-063	Appendix O-3	Was a Bluntnose Shiner caught in Northern Ontario, or was this supposed to be a Bluntnose Minnow?	Please confirm if Bluntnose Shiner is the correct species that was captured.	Bluntnose Minnow (Pimephales notatus) were caught as noted in Section 3.4.2 of the Report.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-064	Sections 3.3.9, 6.10 Appendix O	Information required for the assessment of the baseline doesn't appear to be complete. The map of sampling locations and description doesn't include the overall study area. The map shows that selected lakes were sampled where data gaps were identified but doesn't include the study/claims area provide in the 2018 reports.	Please provide a map of the overall Study Area and the sampling point and data.	A map showing the overall Study Area is being provided in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Appendix O (all).
STPN-2021-065	2021 Aquatic Workplan	It is unclear if the information will be sufficient to for the permitting requirements (previous studies as well as 2021).	We recommend reviewing the federal Impact Assessment requirements to confirm if the information collected will be sufficient to support a Federal Impact Assessment, future EEM surveys and a Fisheries Act Authorization.	Acknowledged.	FMG addressed STPN's original comment, but the FMG response does not point to the relevant section where it is demonstrated that the information will be sufficient to address these requirements. Request: CLFN and LSFN requests that FMG provide clear documentation outlining where FMG demonstrates that these federal impact assessment and Fisheries Act requirements are met.	The Project will only be approved if it is demonstrated that the impacts to fish and fish habitat can be counterbalanced by appropriate offsets and compensation measures for fish habitat. The details on how this is achieved is included in the draft Fish Habitat Offsetting and Compensation Plan included in the draft EIS/EA, which is being updated and appended to the final EIS/EA.	Appendix F.
STPN-2021-066	2021 Aquatic Workplan	Information required for the assessment of the baseline doesn't appear to be complete. What are the target sentinel species for fish tissue sampling?	Please provide fish species that tissue sampling will be completed.	The workplan included tissue sampling of forage fish, as well as Lake Trout and Lake Whitefish. The sampling of small-bodied fish included various species and will be presented in the 2021 baseline report. The Red Lake District of MNDMNRF did not approve the fall tissue sampling of Lake Trout or Lake Whitefish	FMG fully addressed STPN's original comment. Request: CLFN and LSFN requests that FMG follow up with rationale for the lack of approval from MNDMNRF for tissue sampling of lake trout and lake whitefish, and whether FMG received	FMG received approval for fish tissue sampling in 2022 as a component of the standardized Broadscale Monitoring study conducted in Springpole Lake with tissue samples collected from multiple species including Lake Trout, Lake Whitefish, Blacknose Shiner, Yellow Perch, Northern	Appendix O (all).

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				and FMG will continue to engage the MNDMNRF to complete this sampling in 2022.	approval for fish tissue sampling in 2022 and results of these studies.	Pike and Walleye. A detailed record of 2022-2023 fish tissue results, and sampling program is in production and will be available in the baseline aquatic resources report which will be appended to the final EIS/EA. A summary of the tissue results is provided in Attachment STPN-2021-19.	
STPN-2021-067	2021 Aquatic Workplan	Community priority fish and fish habitat use does not appear to be assessed for the baseline. For example, which species are most often consumed.	We recommend confirming with the Communities the traditional practices and priorities for fish and fish habitat as well as species that may be part of the food chain while developing fish tissue sampling plan.	Please refer to the response to Comment 1) under the general comments above. FMG has inquired about information regarding traditional practices as they pertain to the Project hoping they be shared and discussed so that the Project can consider and incorporate such important information. We understand that the SEC is currently reviewing what information to share with FMG and how to share it. We look forward to the information.	FMG partially addressed STPN's original comment. As stated previously, the information about freshwater fisheries is limited, and more engagement needs to take place in order to fully understand the potential impacts of the project on communities' traditional practices. This information also needs to be used throughout the methodologies in Section 6.10 as rationale for fish and fish habitat sampling methods. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. It is expected that this information will provide a list of priority species and possibly estimates of consumption. Request: CLFN and LSFN requests that FMG incorporate Indigenous Knowledge into the selection of methods for fish and fish habitat assessments. CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies. As noted in comment STPN-2021-1) above, several sections of the EIS/EA will need to be updated following receipt of these studies that will include Indigenous knowledge, including selection of methods for fish and fish habitat assessments.	The aquatic studies completed to date have occurred over several years and are very extensive for the stage of the Project providing a comprehensive understanding of the system. The work compliments the Indigenous Knowledge shared to date and is generally aligned with the information. FMG views Indigenous Knowledge sharing as a continual process that should be supported during all phases of the Project and future studies will further consider the sharing.	EIS Sections 6.10, 6.21, 6.26, Appendix O (all).
STPN-2021-068	2021 Aquatic Workplan	Lake Trout is the species of highest concern for the Communities. If it not clear if SPIN surveys for Lake Trout to determine density and population have been considered.	We recommend considering adding the SPIN survey to the 2021/2022 field surveys.	Survey methods to assess the Lake Trout population in Springpole Lake are under development and will include fish tissue sampling to assess contaminant levels.	FMG did not address STPN's original comment. These surveys are different than tissue sampling surveys, which to our understanding were not approved by MNDMNRF for 2021.	1. Sampling methods during 2022 included a detailed provincially standard Broadscale Monitoring (BsM) survey, which is a robust and well-established preferred method of	Appendix O (all).

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				Sampling methods will require approval from the Red Lake District MNDMNRF.	Request: CLFN and LSFN requests that FMG: – Provide rationale for the lack of incorporation of SPIN surveys into the 2021 fish sampling or the summer 2022 fish sampling plan; and – Provide a summary plan of how lake trout will be properly assessed without the use of SPIN protocols. – Identify if and how the summary plan will utilize Indigenous Knowledge. – Ensure translation takes place, consistent with previous comments.	sampling lakes in Ontario (Broad-scale fish community monitoring | ontario.ca). The BsM methodology includes the sampling of all depth strata including the profundal zone and as such, a separate Summer Profundal Index Netting (SPIN) program was not proposed as it would increase the mortality of Lake Trout and other species which are already part of the BsM program. The BsM study was conducted during the summer which gave broader understanding of the lake community and will provide a means of long-term monitoring and comparison throughout the life of mine. BsM and hydroacoustic studies were conducted during 2022, which assessed Lake Trout populations and overall fish community in Springpole Lake. The combination of these two techniques gives relative abundance, biomass, density, and population estimates for the affected basin and Springpole Lake as a whole. Furthermore, since BsM is a provincial standard, results can be compared to other lakes which have undergone the survey, including Birch Lake. Indigenous community members were included during the baseline field studies assessing Lake Trout, their habitat (including spawning habitat and habitat in the basin proposed to be dewatered) in Springpole Lake, the BsM program, and the hydroacoustic program, accompanying FMG staff during the various seasonal sampling campaigns. Known names for fish species have been included in the Aquatic Baseline Reports. See the response to comment 2021-19 regarding the translation of reports.	

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STPN-2021-069	2021 Aquatic Workplan	Lake Whitefish is a species of cultural concern, is consumed widely, and is commonly sampled in mining assessments. Has FMG considered adding surveys to confirm spawning areas and population and baseline contaminant levels? It also occupies a different feeding guild/trophic level compared to Lake Trout and Walleye and Pike.	We recommend adding surveys to determine baseline conditions habitat and contaminant levels for Lake Whitefish. Lake Whitefish feed at a different level in the food chain (benthic/bottom feeder), which can provide a picture of the bioaccumulation and biomagnification levels in bottom level feeders.	Further to the response to Comment #66; Wood is developing a survey program to assess the Lake Whitefish population and contaminants levels in tissue in Springpole Lake. The specific sampling methods will require approval from Red Lake District MNDMNRF	FMG fully addressed STPN's original comment.		Appendix O-1
STPN-2021-070	Sections 3.3.9, 6.10 Appendix O	Information required for the assessment of the baseline doesn't appear to be complete. Are Phytoplankton and zooplankton surveys proposed?	We recommend adding surveys to determine baseline conditions for phytoplankton and zooplankton.	Phytoplankton and zooplankton sampling occurred in 2021 at six locations within Springpole Lake and two locations in Birch Lake and will be included in the draft EIS/EA.	FMG fully addressed STPN's original comment on adding baseline surveys for phytoplankton and zooplankton. Six samples for only one year are not sufficient baseline data. Request:: Please outline reasons for the limited number of samples and plans for increasing this sample size.	Lower trophic sampling was conducted at seven total locations in Springpole Lake and three total locations in Birch Lake. These locations coincided with the six Springpole Lake basins, the two near-Project Birch Lake basins, and two additional sample locations near the Project area. One of the additional locations is immediately south, and beyond the proposed dike location, in Springpole Lake while the other is near-shore to the main Project facilities in Birch Lake. Sampling in this manner targeted all main basin areas of Springpole Lake and the near-Project areas in Birch Lake, allowing for comparison across varying in-lake conditions. All areas sampled, across all sampling events, displayed consistent lower trophic communities and biomass. No outliers were detected. A summary of this data is provided in Attachment STPN-2021-19. Additional details are in production and will be provided in the baseline aquatic resources report that will be appended to the final EIS/EA.	Appendix O (all).
STPN-2021-071	Stage 1 Archaeological Assessment. (P236-0141-2020)	Participation of Indigenous community members was not possible due to Covid-19 restrictions for fieldwork in 2020. Further the report states, "remote engagement and data gathering were not pursued for a variety of reasons. Primary among these was the limitations presented by existing technology, and the relatively low priority of archaeological assessment in the face of	While Covid presented a number of challenges especially for Indigenous communities, it is recommended that the Indigenous communities must be permitted to review and provide comment on the Stage 1AA report via email and provide any input prior to Ministry submission. Confirm if all affected Indigenous communities were provided with the report for review.	FMG has provided a copy of the Stage 1 Archaeological Assessment to the local Indigenous communities for review and comment. We agree and FMG has provided funding for AECOM's technical review of this report and look forward to further sharing. FMG will work with the Springpole Environment Committee to incorporate any comments into future programs and provide	FMG has partially addressed STPN's original comment. FMG has provided local communities with the Stage 1 Archaeological Assessment for review. FMG has not provided any information regarding how it will ensure that Indigenous communities will have the opportunity to participate in fieldwork or how Indigenous	FMG is committed to continuing to provide opportunities for community members to participate in archaeological work, as we have in the past, and will continue to reach out to the community representatives to offer these opportunities as they arise.	EIS Section 6.22.1.2.

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		a significant health emergency". However, a recommendation (#3) is made that states the conclusions and recommendations may change once the report is reviewed by communities, and any additional/different information should be incorporated into the subsequent Stage 2 work.	All affected Indigenous communities must be given the opportunity to participate in fieldwork, review archaeological reports, and incorporate Traditional Knowledge for all archaeological work.	opportunity for community members to participate in fieldwork.	Knowledge will be incorporated into future archaeological work. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. CLFN is planning on conducting a community led archaeological assessment in 2024-2025 at Springpole Lake. The FMG study should not be considered complete and CLFN remains concerned that the work was done without CLFN involvement. Request: CLFN and LSFN requests that FMG provide information detailing how Indigenous Knowledge will be incorporated into future archaeological work and how FMG will ensure that all affected communities continue to have the opportunity to review archaeological reports. CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies. First Mining Gold needs to provide further funding for archeological work being planned by CLFN.	To date, a Stage 1 Archaeological Assessment was conducted for the mine site area and the transmission line and parts of the mine access road, with the results found in Appendix S-1 and S-3, respectively, of the draft EIS/EA. Further, a Stage 2 Archaeological Assessment was conducted for the mine site area and the results can be found in Appendix S-3 of the draft EIS/EA. Since then, one (1) additional Stage 1 Archaeological Assessment (PIF P327-0043-2022; WSP 2023) was completed to cover portions of the Project footprint that extended outside the lands assessed by two previous studies (Appendix S-1 and Appendix S-2). The additional areas were found to be of no to low archaeological potential requiring no further archaeological assessment. The report will be appended to the final EIS/EA.	
STPN-2021-072	Stage 1 Archaeological Assessment. (P236-0141-2020)	Does not incorporate Traditional Indigenous Knowledge of the area when evaluating archaeological potential.	As per the Far North Act, we recommend FMG review the Cat Lake - Slate Falls Community Based Land Use Plan as a starting point and incorporate relevant information followed by consultation. We recommend the Communities review of archaeological reports.	FMG has provided a copy of the Stage 1 Archaeological Assessment to the local Indigenous communities for review and comment. We agree and FMG has provided funding for AECOM's technical review of this report and look forward to further sharing. FMG will work with the Springpole Environment Committee to incorporate any comments into future programs and provide opportunity for community members to participate in fieldwork.	FMG partially addressed STPN's original comment. FMG has provided local communities with the Stage 1 Archaeological Assessment for review. FMG has not provided any information regarding how it will ensure that Indigenous communities will have the opportunity to participate in fieldwork or how Indigenous Knowledge will be incorporated into future archaeological work. FMG has not indicated whether it has reviewed the Cat Lake-Slate Falls Community-Based Land Use Plan. However, FMG have	See response to STPN-2021-71. The Cat Lake-Slate Falls Community-Based Land Use Plan has been reviewed and incorporated into various sections of the draft EIS/EA, including Section 6.11 (Vegetation Communities and Wetlands), Section 6.12 (Wildlife and Wildlife Habitat) and Section 6.21 (Effects assessment of Traditional Land and Resource Use). FMG appreciates CLFN and LSFN sharing their Indigenous Knowledge and Use Study and Socio-economic Study.	EIS Sections 6.22.1.2, 6.21.1.

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					acknowledged the plans have been reviewed in other sections of the draft EIS/EA (e.g., Section 6.21 Traditional Land and Resource Use). CLFN and LSFN recommends FMG to review the Cat Lake - Slate Falls Community Based Land Use Plan as a starting point and incorporate relevant information. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. Request: See Request STPN-2021-72.		
STPN-2021-073	Stage 1 Archaeological Assessment. (P236-0141-2020)	The dewatering for the open pit will impact the north basin of Springpole Lake, and mine rock facilities will impact shorelines on the north and west basin, as well as several small water bodies. Shorelines within this basin and the island were reviewed. However, negative impacts of flooding on adjacent watercourses and land as a result of dams are not considered. There are a number of examples where damming on waterbodies in the north has severely impacted adjacent watercourses.	We recommend that once determined, the effects of flooding on adjacent land/water basins as a result of the construction of the dams to facilitate dewatering be considered.	The proposed cofferdams within the north basin of the Springpole Lake will not impede the lake's hydraulic flow path. Flows reporting to the north basin will continue to naturally outlet towards the southeast arm. Therefore, the construction of the proposed cofferdams will not cause flooding in adjacent land/water basins.	FMG did not address STPN's original comment and recommendation; both of which still apply. Request: CLFN and LSFN requests that FMG address the original comment and recommendation.	The current mine site plan does not propose impounding adjacent lands. Springpole Lake water levels are controlled by the lake outlet, and as such the proposed dikes will not influence the overall lake levels as described in the Receiver Water Balance (Appendix M-3 of the draft EIS/EA). The design, construction and operation of the dikes will meet strict regulatory requirements including those under the provincial Lakes and Rivers Improvement Act, and the Canadian Dam Association. However, Section 9.5 of the draft EIS/EA includes an assessment of changes in water levels in the unlikely event there is a malfunction of the dikes.	EIS Section 6.7.6
STPN-2021-074	Stage 1 Archaeological Assessment. (P236-0141-2020)	First Mining Gold Inc. is preparing an Environmental Impact statement (EIS) assessment to meet federal and provincial environmental assessment requirements. This archaeological assessment has been prepared in support of the provincial requirements. It is unclear if the current assessments will meet the requirements of the federal Impact Assessment process.	We recommend FMG review Impact Assessment Agency of Canada (IAAC) requirements to confirm if the information collected thus far will be sufficient to support a Federal Impact Assessment.	Comment acknowledged.	FMG did not address STPN's original comment and recommendation; both of which still apply. Request: CLFN and LSFN requests that FMG demonstrate that it has reviewed IAAC requirements in order to determine whether it has collected sufficient data to support a Federal Impact Assessment Process. Please refer to Information and Time Limit Management materials (available here:	Information and Time Limit Management Regulations are applicable to the Impact Assessment Act, and the associated schedules are relevant to the development of an initial and detailed project description for the determination of whether an environmental assessment is required by the Impact Assessment Agency of Canada (IAAC). However, the Springpole Gold Project is	EIS Sections 6.22.1.1, 6.22.1.2, Appendix B-2.

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					https://laws.justice.gc.ca/eng/regulations/SOR-2019-283/index.html) as a guide for this process.	subject to the requirements of the Canadian Environmental Assessment Act (CEAA 2012). A detailed project description was submitted to IAAC on February 23, 2018. On April 20, 2018, IAAC determined that a federal environmental assessment was required for the Springpole Gold Project pursuant to the CEAA 2012. The requirements for an environmental impact statement (EIS) are described in the final EIS guidelines for the Springpole Gold Project. The final EIS will include a concordance table for the EIS guidelines to ensure that all requirements have been addressed.	
STPN-2021-075	Stage 1 Archaeological Assessment. (P236-0141-2020)	Only the open pit, stockpiles, process plant, and mine rock areas were considered in this Stage 1 Archaeological Assessment. The proposed transmission line, tailings management facility, access road and aggregate sources were not considered in the 2020 fieldwork and reporting. Further Stage 1 archaeological assessment will be required for all areas of proposed impacts not previously subject to Stage 1 archaeological assessment.	We recommend FMG confirm area of impacts for all activities relative to the proposed mine, and determine what outstanding archaeological work is required.	As the project planning evolves, FMG will ensure that areas of impact relative to the proposed mine are included in the archaeological assessment work. FMG is consulting on alternative routes for the road and transmission line and when the potential final route is more known, additional work will be carried out in consultation with the Springpole Environment Committee.	FMG partially addressed STPN's original comment. FMG determined what outstanding archaeological work is still required based on potential transmission line corridors and mine access roads. FMG has not confirmed areas of potential archaeological impact for all relevant, mine-related activities, including tailings ponds and aggregate sources. Request: CLFN and LSFN requests that FMG confirm area of impacts for all activities relative to the proposed mine, and determine what outstanding archaeological work is required.	See response to STPN-2021-71 for a summary on completed archaeological assessments. Based on the results of the Stage 1 Archaeology Assessment report for the transmission line (Appendix S-3 of the draft EA) alternatives, a Stage 2 assessment will be required for identified areas of archaeological potential along the transmission line route prior to construction. FMG is committed to providing continuing to provide opportunities for community members to participate in future archaeological work, as we have in the past, and will continue to reach out to the community representatives to offer these opportunities as they arise. Work and planning for the Stage 2 Archaeological Assessment fieldwork will commence once additional engineering in support of permitting has been completed for the transmission line.	EIS Section 6.22.1.2, Appendix S-7.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
STPN-2021-076	Stage 1 Archaeological Assessment. (P236-0141-2020)	A request was made to the MHSTCI regarding the previous assessments – the response indicated that the project under P307-0019-2011 has not been registered with the MHSTCI. Further, the report associated with P041-158-2011 has not been received by the MHSTCI.	We recommend FMG: Confirm previous assessments and if the reports have been accepted into the MHSTCI Public Register of Reports. Confirm a copy of the report associated with P307-0019-2011 was located for review and is a project registered with the MHSTCI. If not, the results cannot be utilized to determine archaeological potential. Additionally, the recommendations obtained from the Stage 1 associated with P041-158-2011 have not been accepted by MHSTCI and therefore cannot be used as a determination of archaeological potential of the area until the report has been accepted into the register.	Verification of the reports and projects under licences P041 and P307 was completed as set out in the report. Neither report is in the ministry report register. Reports that have not been reviewed and accepted into the Register are treated as 'grey literature' and used accordingly.	FMG did not address STPN's original comment. The Ontario Ministry of Tourism, Culture and Sport requires, as per section 65.1 of the Ontario Heritage Act, "as a condition of their licence, archaeologists must document the results of the fieldwork they carry out in Ontario by filing archaeological reports with this ministry" (source: https://www.ontario.ca/page/archaeology). This enables any member of the public to request a copy to view. Request: CLFN and LSFN requests a rationale from FMG on why the two archaeology reports referenced in the original comment were not provided to the Ministry and any guidance received from Ontario on approach used by FMG in the draft EIS/EA.	Per Section. 1.1.1(b) of the Standards and Guidelines for Consulting Archaeologists (MCM 2011), all previous archaeological assessment fieldwork conducted within 50 metres of a property must be reviewed. Since both Ministry of Citizenship and Multiculturalism (MCM) issued Project Information Form (PIF) numbers P307-019-2011 and P041-158-2011 (possibly P041-158-2012) were referenced in Horizon Archaeology Inc.'s Stage 2 Archaeological Assessment (P335-015-2012, which has been entered into the MCM's Ontario Public Register of Archaeological Reports) these PIF numbers were investigated as part of background research. According to the Stage 1 Archaeological Assessment under P236-0141-2020, neither P307-019-2011/P330-015-2011 nor P041-158-2011/2012 are compliant with the MCM Standards & Guidelines. The MCM also communicated that the PIF associated with archaeological assessment P307-019-2011 was cancelled and likely replaced with P330-015-2011. Neither P307-019-2011/P330-015-2011 nor P041-158-2011/ P041-158-2012 have been entered into the MCM's Ontario Public Register of Archaeological Reports.	Not applicable
STPN-2021-077	Stage 1 Archaeological Assessment. (P236-0141-2020)	The portion of the subject property lying beyond 50 m inland from the water bodies, and the portion of the subject property that is under water has not been included in this report. Inland lakes must also be considered and evaluated for archaeological potential.	We recommend FMG determine if underwater archaeological assessment will be required. As per Section 2.1.5 of the Standards and Guidelines for Consultant Archaeologists, confirm if Springpole Lake was determined to be a "modern water source" in this report? Consider recommending spot checks of the interior for areas retaining dry soils, given all the portage routes throughout the area. Engagement with affected Indigenous communities can help refine areas of inland archaeological potential related to portage routes or other activities. This should be covered in the Stage 2 Archaeological Assessment.	Springpole Lake and all smaller lakes and streams were considered modern water sources for the purpose of addressing S&Gs Section 2.1.5. Marine (underwater) archaeology is not required or recommended for the Project or for similar undertakings. Additional work to identify and define portage routes is of value and would be in the nature of TK/TRLU work that the communities have been engaged in.	FMG partially addressed STPN's original comment. This underwater analysis is requested by CLFN and LSFN. Underwater archaeology is not scoped within the Indigenous Knowledge and Use or Socioeconomic Studies being conducted by CLFN and LSFN. The underwater area that is expected to be removed is important to CLFN in particular and this information is critical to inform the Kita-ki-nan assessment process. Request: CLFN and LSFN requests that a marine (underwater) archaeology work be conducted in consultation with CLFN and LSFN.	The watersheds of Northern Ontario have been subject to change since the recession of the Laurentide Ice Sheet, roughly 11,000 years ago. The bathymetry of the study area indicates that the lake is very steep and deep in most locations. As such it is unlikely that areas of the lakeshore, within the study area, would have been suitable for habitation in the event that historical water levels were lower than the modern high-water mark. Bathymetry in the location of the proposed dewatering area shows a steep slope from the shoreline, reaching a depth of approximately 25 metres (m) over a	EIS Sections 6.22.1.2, 6.22.2.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
						distance of 60 m. This represents an approximate slope of 22.6 degrees. Consistent with applicable standards of best practice, slopes in excess of 20 degrees are not considered to retain archaeological potential. With a slope of over 20 degrees, this is not a likely location for archaeological resources. Furthermore, bottom hardness mapping along this area indicates a very hard rocky bottom, which is not conducive to the preservation of buried archaeological resources. Based on review of this data and geological characteristics of the location, this is not an area of the lake where a marine archaeological assessment would be required. Contractors involved in the construction of the Project will be made aware of the Chance Find Procedure (Appendix S-6 of the draft EIS/EA) for information on the identification of archaeological resources and protocols to follow.	
STPN-2021-078	Stage 1 Archaeological Assessment. (P236-0141-2020)	Archaeological status of known cabin sites is incomplete. Were these locations confirmed during the Stage 1 property inspection or is this to be completed during the Stage 2 Archaeological Assessment?	We recommend FMG clarify which of the cabins are still visible by confirming their status. If not currently visible, then these will need to be considered from an archaeological perspective, not only as a contributor to the Cultural Heritage Landscape study. Please also indicate this on the mapping either in the report or the Supplementary Documentation.	Fieldwork at Stage 2 examined the cabin sites noted on the 1935 Harding map. Additional information was gathered from existing and empty outpost camp buildings within the mine site development area for the cultural heritage research report. Further evaluation will be done to support the EA process and will clarify this.	Surveyed sites have been mapped separately from historically identified sites (1935 map) making comparison difficult. It is therefore hard to evaluate whether the archaeological status of all known, relevant cabin sites have been properly confirmed. Additionally, the language of the Stage 2 Archaeological Assessment does not correspond to either the language of Stage 1 (Appendix S-1) or that of the comments – namely, it does not identify 'cabin' sites as such – again making it difficult to determine whether cabin sites specifically have been adequately assessed. FMG has not clarified which cabins are still visible and which are not. Request: CLFN and LSFN requests that FMG make some relatively minor changes which would bring greater clarity to this section and allow for a more confident assessment of its completeness. Mirroring the language used elsewhere – namely with regards to identifying	Information on the existing cabin sites within the local study area (LSA) can be found on Figure 4-1 and Table 5-1 of the Cultural Heritage Report (Appendix S-5) of the draft EIS/EA.	EIS Section 6.22.1.2, Appendix S-2, Appendix S-4.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					the 'cabin' sites – and mapping which overlays historically identified cabin and portage sites with the sites evaluated during fieldwork would accomplish this. Additionally, FMG should clarify which cabin sites are still visible, as requested, in order to confirm which sites need to be considered from an archaeological perspective rather than only as an element of the Cultural Heritage Landscape Study. And, as noted in comment STPN-2021-1), CLFN and LSFN requests that FMG update this section following receipt of the Indigenous Knowledge and Use Study, which will include Indigenous knowledge information necessary to inform methods of assessment.		
STPN-2021-079	Stage 1 Archaeological Assessment. (P236-0141-2020)	Further Stage 1 archaeological assessment may be required for other areas of the project not previously assessed.	We recommend FMG consider adding a recommendation that upon confirmation of the complete area of impacts for all activities relative to the proposed mine, Stage 1 Archaeological Assessment will have to be completed for areas not previously assessed (e.g., proposed transmission line, tailings management facility, access road, areas impacted by flooding, and aggregate sources). Consider including a cumulative map of all of the previous assessments within the study area on one figure in order to better illustrate what areas of the Project have or have not been studied.	Please refer to the response to comment #75.	FMG partially addressed STPN's original comment. FMG determined what outstanding archaeological work is still required based on potential transmission line corridors and mine access roads. FMG has not confirmed areas of potential archaeological impact for all relevant, mine-related activities, including tailings ponds and aggregate sources. Request: CLFN and LSFN requests that FMG confirm area of impacts for all activities relative to the proposed mine, and determine what outstanding archaeological work is required. CLFN and LSFN additionally requests that FMG include a map depicting previous assessments of the study area to better understand what areas have or have not been studied.	See the response to STPN-2021-75 concerning future work. A map of the previously completed archaeological assessment can be found in Section 6.22 (Figure: 6.22-2) of the draft EIS/EA.	EIS Section 6.22.1.2, Appendix S-7.
STPN-2021-080	Sections 3.3.14, 6.22 Appendix S	The location of the study area is unclear making assessment of the completeness of the report difficult.	Recommend including the study area polygon illustrated on Map 7 in the report.	In general, the report covers the mine site development area, Further reporting will be done to support the EA process and will clarify this.	FMG fully addressed STPN's original comment.		EIS Section 6.22.1.2, Appendix S-1.
STPN-2021-081	Stage 1 Archaeological Assessment. (P236-0141-2020)	Unclear on the map legend for the general location of tailings management facility and recommendations for that area. The map indicates it was "Not assessed in 2020" but it is the same colour in the legend as "Stage 1 assessment Area (all	Please clarify the mapping.	Map 7 includes the stage 1 assessment area. In addition, other reported archaeological sites and cultural landscape features in the area were identified.	FMG fully addressed STPN's original comment.		Appendix S-1, Map 7

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		high potential as described in the accompanying report)".					
STPN-2021-082	Stage 1 Archaeological Assessment. (P236-0141-2020)	Report not accepted by MHSTCI.	Recommend indicating in the legend that the results of the report associated with P041-158-2011 have not been accepted by MHSTCI and therefore cannot be used as a determination of archaeological potential of the area until the report has been accepted into the register.	Please refer to the response to comment #76.	FMG did not address STPN's original comment. The Ontario Ministry of Tourism, Culture and Sport requires, as per section 65.1 of the Ontario Heritage Act, "as a condition of their licence, archaeologists must document the results of the fieldwork they carry out in Ontario by filing archaeological reports with this ministry" (source: https://www.ontario.ca/page/archaeology). This enables any member of the public to request a copy to view. Request: CLFN and LSFN requests a rationale from FMG on why the two archaeology reports referenced in the original comment were not provided to the ministry and any guidance received from Ontario on approach used by FMG in the draft EIS/EA.	See the response to STPN-2021-76.	Not applicable
STPN-2021-083	Sections 3.3.1, 3.3.15, 6	Recommends a Cultural Heritage Evaluation Report (CHER) and Statement of Cultural Heritage Value or Interest (SCHVI).	This CHRR is only a presentation of the baseline conditions (a screening report). Since potential built heritage resources were identified in the CHRR, a "Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment" (hereafter 'Cultural Heritage Report' (alternative names for this type of report includes: Cultural Heritage Assessment Report or Cultural Heritage Resource Assessment) should be completed, prior to Cultural Heritage Evaluation Reports (CHERs), in order to present a detailed inventory of cultural heritage resources extant within the PDA and LSA. Cultural Heritage Reports are completed as requirements in EA studies. The Cultural Heritage Report should take a landscape approach based on Indigenous Knowledge input, which will describe the landscapes present, including all heritage features within those landscapes inventoried in the field investigations. All heritage features should be photographed, if possible. This inventory should verify the presence or absence of the potential cultural heritage resources documented in the CHRR. Following the completion of an inventory, the	We acknowledge that the Cultural Heritage Research Report (CHRR) is a presentation of baseline conditions. To support the draft EIS/EA, an assessment is being completed. FMG will consider traditional knowledge input when received.	FMG partially addressed STPN's original comment. FMG has prepared Cultural Heritage Baseline and Evaluation Reports as recommended. However, there is no evidence of the inclusion or application of Indigenous Knowledge in these reports. CLFN and LSFN are also concerned that FMG has stated that it will 'consider' Indigenous Knowledge; Indigenous Knowledge must be treated as a non-negotiable element of cultural heritage assessments. CLFN and LSFN have lived on the land and waters of the affected area, which have sustained the communities since pre-colonial times. As stewards of the lands and waters, CLFN and LSFN have core responsibilities that must be upheld. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies. This includes consideration of historic and ongoing cumulative effects on LSFN and CLFN culture	Non-confidential Traditional Knowledge and Land Use information provided to FMG by CLFN and LSFN will be incorporated into the final EIS/EA. Opportunities to review the final EIS/EA will be provided to CLFN and LSFN during the review of the final EIS/EA once submitted targeting end of September 2024.	EIS Section 6.23.1.2, Appendix S-12.

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
			Cultural Heritage Report will include an assessment of the effects (impacts) of the project on cultural heritage resources and provide mitigation measures in order to minimize impacts on those resources (i.e. follow-up work such as the completion of a Cultural Heritage Evaluation Report and/or Heritage Impact Assessments). The Cultural Heritage Report may be completed in phases as project specific impacts may not be known. In summary, the purpose of a Cultural Heritage Report is to: – Identify the baseline cultural heritage conditions within the study area. – Present an inventory of known and potential built heritage resources and cultural heritage landscapes. – Identify preliminary project-specific impacts on the cultural landscape(s). – Propose appropriate mitigation measures and recommendations for minimizing and avoiding negative impacts on heritage features (i.e., recommend a Cultural Heritage Evaluation Report).		that have occurred since the early colonial time period, including as it relates to dispossession, settlement, forestry, exploration and development, climate change.		
STPN-2021-084	Sections 3.3.1, 3.3.15, 6	Recommends the next step is a CHER.	See Item #83 recommendation as the next step in EA process regarding a "Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment".	Please refer to response to Comment #83.	FMG partially addressed STPN's original comment. FMG has prepared Cultural Heritage Baseline and Evaluation Reports as recommended. However, there is no evidence of the inclusion or application of Indigenous Knowledge in these reports. CLFN and LSFN are also concerned that FMG has stated that it will 'consider' Indigenous Knowledge; Indigenous Knowledge must be treated as a non-negotiable element of cultural heritage assessments. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	See the response to STPN-2021-83.	EIS Section 6.23.1.2, Appendix S-12.
STPN-2021-085	Appendix S-4	No methodology or clear explanation of the fieldwork investigation undertaken for the CHRR. The Stage 1 archaeological assessment report states that there was no comprehensive survey of the cabin and	Typically, the methodology also follows the MHSTCI Ontario Heritage Tool Kit: Heritage Resources in the Land Use Planning Process. The key tasks of the CHRR (screening report) should be outlined in this section.	The Stage 1 archaeological assessment and CHRR are separate reports. The 'comprehensive survey' is the Stage 2 fieldwork undertaken in 2021, and was therefore not reported in the CHRR. Future reporting will	FMG partially addressed STPN's original comment. FMG has provided clarification between what can be expected in the CHRR and what is contained in other, companion reports. However, FMG has not included any	FMG has provided opportunities for communities to participate in field work, offering Cat Lake and Lac Seul First Nations to hire an environmental monitor to work with FMG on behalf of their	EIS Section 6.23.1.2.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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		portage locations due to time limitations. This statement was not included in the CHRR. It is generally unclear what was identified in research, what was investigated in the field, and what is still present within the PDA and LSA.	We recommend that for the Cultural Heritage Report, FMG should ensure fieldwork is completed with the Indigenous communities accompanying during fieldwork, if possible. Clearly explain the fieldwork strategy.	include a more detailed methodology section to reflect the direction in the MHSTCI Toolkit and related policy direction. With regard to the fieldwork strategy, this will be in the nature of ongoing and future work that is planned to involve the communities.	mention of the involvement of Indigenous communities in future fieldwork; relegating even the initial formulation of such a strategy to the realm of future engagement with communities is insufficient. Request: CLFN and LSFN requests that FMG, at minimum, provide an outline for a fieldwork strategy/plan which meaningfully involves Indigenous communities. Though it is understood and expected that this strategy will evolve, the inclusion of a framework for collaboration, based on existing best practices, would signal FMG's commitment to the rights and interests, as well as the Indigenous Knowledge, of impacted Indigenous communities as well as ongoing coordination and integration of the Indigenous culture in both the construction and mine operation.	community.in the field work planning and implementation. FMG remains committed to providing opportunities for community members to participate in various facets of future fieldwork. FMG is interested in working together to establish a monitoring committee for all phases of the mine. Additionally, with the receipt of community studies additional consideration will be made to incorporate traditional knowledge and land use information that is shared by CLFN and LSFN studies in future cultural heritage reporting. We are appreciative of this.	
STPN-2021-086	Sections 3.3.14, 6.22 Appendix S	No mention of the registered pictograph sites within the PDA or LSA. These are registered archaeological sites protected under the Ontario Heritage Act.	We recommend adding the descriptions of the registered pictograph sites to the Heritage Recognition section.	Agreed. Descriptions of the registered pictograph sites is being included in the draft EIS/EA.	FMG fully addressed STPN's original comments.		EIS Section 6.23.1.2, Appendix S-5 Section 5.1, Appendix S-2.
STPN-2021-087	Sections 3.3.15, 6.23 Appendix S	This section notes "there are a few buildings or structures within the LSA…". However, there are no photographs of any buildings shown within LSA. It is unclear how this was determined. How many buildings are extant within the LSA? It is difficult to follow what was there historically and what currently exists.	See Item #83 recommendation and ensure that the Cultural Heritage Report clarifies the historical section of the report.	FMG is aware of the cabins and their owners, some of which are outfitters, and are keeping them informed about the project. Additional information on the buildings or structures in the LSA will be included in the draft EIS/EA. Former and currently visible structures will be identified separately.	FMG partially addressed STPN's original comment, but it will be important for FMG to consider CLFN and LSFN Indigenous Knowledge and Use Study to update this section. Request: CLFN and LSFN requests that FMG update this section once the CLFN and LSFN Indigenous Knowledge and Use Study is provided to FMG. As noted in comment STPN-2021-1), CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	See the response to STPN-2021-83.	EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.
STPN-2021-088	Sections 3.3.1, 3.3.15, 6	Paragraph 2 on this page notes that Harding documented 4 cabins on Springpole Lake. The description needs to be clarified including - Are they within the LSA? Paragraph 3 states there are 5 cabins in or	See Item #83 recommendation. Clarify the land use history – organize maps to show the landscape development with past and present heritage features.	Please refer to the response the comment #83.	FMG partially addressed STPN's original comment. FMG has prepared Cultural Heritage Baseline and Evaluation Reports as recommended. However, there is no evidence of the inclusion or application of Indigenous Knowledge in these reports. CLFN and LSFN is also concerned that FMG has stated that it will	See the response to STPN-2021-83.	EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.

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		near the LSA. It is unclear how the 5 cabins in Paragraph 3 were identified. The conclusion is drawn in this section: "in addition to the existing outpost camp buildings, a number of sites with cabin or other building ruins are present within LSA". It is unclear if the 5 cabins were verified in the field investigation.			'consider' Indigenous Knowledge; Indigenous Knowledge must be treated as a non-negotiable element of cultural heritage assessments. Request: As noted in comment STPN-2021-1), CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.		
STPN-2021-089	Sections 3.3.15, 6.23 Appendix S	Unclear the number of built heritage resources that were documented during the fieldwork. Is the description of the cabin components referencing a cabin documented during the field review for the CHRR? It is unclear if the locations presented in the historical section were investigated and confirmed.	See Item #83 recommendation. Clarify the land use history – organize maps to show the landscape development with past and present heritage features.	Please refer to the response the comment #83.	FMG fully addressed STPN's original comment.		EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.
STPN-2021-090	Cultural Heritage Research Report: Built Heritage and Cultural Heritage Landscapes	Terms have not been fully defined making assessment of the baseline difficult. Does "interactions" mean impacts?	We recommend that for the Cultural Heritage Report, use language of impacts as described in the MHSTCI Information Bulletin 3: Heritage Impact Assessments for Provincial Heritage Properties.	Comment acknowledged.	FMG did not address STPN's original comment and recommendation; both of which still apply.	The MCM Information Bulletin 3 was not referenced within the Cultural Heritage Report (Appendix S-5 of the draft EIS/EA) as no Provincial Heritage Properties or Provincial Heritage Properties of Provincial Significance were identified in the Study Area. Instead, the following guidelines were used in the preparation of the report: Canadian Environmental Assessment Agency's Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act; MCM Infosheet #5; and, Canada's Historic Places Standards and Guidelines for the Conservation of Historic Places in Canada (CHP S&Gs).	Not Applicable
STPN-2021-091	Sections 3.3.15, 6.23 Appendix S	Paragraph 3 states that some potential built heritage resources have been identified within the PDA. Again, uncertain what has been identified in the PDA and LSA. The report states that "Additional review of these structures will be completed as part	See Item #83 recommendation. Prior to CHERs, a full detailed inventory of resources should be completed and documented.	Please refer to the response the comment #83.	FMG fully addressed STPN's original comment.		EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.

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		of the CHER report to be completed after 2021 fieldwork". Completing a CHER prior to a Cultural Heritage Report, does not align with the typical EA study process for Cultural Heritage.					
STPN-2021-092	Sections 3.3.15, 6.23 Appendix S	General comment- The six recommendations do not conform to the typical EA process for Cultural Heritage.	The direction for Cultural Heritage Reports for EAs also comes from the MHSTCI Ontario Heritage Tool Kit (2006), Guidelines for Preparing the Cultural Heritage Resource Component of Environmental Assessments (MHSTCI 1992), which set out guidelines used in CHRs. See Item #81 recommendation.	Please refer to the response the comment #81.	Response to Comment STPN-2021-81 is not relevant to the recommendation. Request: FMG did not address STPN's original comment and recommendation; both of which still apply.	The 1992 Guidelines for Preparing the Cultural Heritage Resource Component of Environmental Assessments was not referenced in the Cultural Heritage Report (Appendix S-5 of the draft EIS/EA) as this guideline was superseded by the Ontario Heritage Tool Kit. Instead, the following guidelines were used in the preparation of the report: Canadian Environmental Assessment Agency's Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act; MCM Infosheet #5; and, CHP S&Gs.	EIS Section 6.23.1.2.
STPN-2021-093	Sections 3.3.15, 6.23 Appendix S	Recommendation 2 only recommends an inventory of built heritage resources within the PDA. However, given that Indigenous networks can connect to the PDA, an inventory of resources should be included for the LSA in order to assess impacts of the project.	The Cultural Heritage Report should include resources in the LSA. We recommend adding sources within the LSA.	The area of assessment is being expanded to support the EA.	FMG fully addressed STPN's original comment.		EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.
STPN-2021-094	Cultural Heritage Research Report: Built Heritage and Cultural Heritage Landscapes	It is noted on Page 16 of the Cultural Heritage Research Report that there is a discrepancy in location of EiKb-6- and additional fieldwork is required. Recommendation 3 states only to return to EiKb-4.	See Item #83 recommendation and complete a detailed inventory of all resources within the PDA and LSA. Determine the location of EiKb-6 if required.	Additional fieldwork was not proposed for EiKb-6 given its location at the far eastern end of the LSA. Registration of EiKb-6 is incomplete, and the site is listed as 'pending' in the MHSTCI database. If required, additional work on this location can be completed with the participation of Indigenous community members.	FMG fully addressed STPN's original comment.		EIS Section 6.23.1.2.
STPN-2021-095	Cultural Heritage Research Report: Built Heritage and	The ES determines that "several of the outposts camps present in or near the project area appear to be over 40 years of age however, none are expected to hold cultural heritage value or interest".	Clarification is required. The Cultural Heritage Report should be organized to clearly present past resources and those that are still present within the PDA and LSA. Generally following the MHSTCI guidelines for Cultural Heritage	FMG is aware of the outpost cabins and their owners, some of which are outfitters, and are keeping them informed about the project. Indigenous community input will be sought when cultural heritage value or interest is	FMG partially addressed STPN's original comment. FMG has clearly presented past and present cultural resources in the PDA and LSA. However, there is no Indigenous community input evident in the evaluation of resource	See the response to STPN-2021-83.	EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5,

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	Cultural Heritage Landscapes	However, Section 8 and other sections of the report state that the cabin sites may have cultural heritage value or interest.	Reports, heritage features included in the Cultural Heritage Report will be screened on a level that determines they are resources with potential cultural heritage value or interest. Cultural heritage value or interest should not be determined without Indigenous community input.	determined for the outpost camps and other cultural heritage values.	value and interest. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once the studies are completed to make updates to the draft EIS/EA so that the information provided in the final EIS/EA is adequate to inform CLFN and LSFN's understanding of likely impacts on CLFN and LSFN core responsibilities. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.		Appendix S-8 to S-11.
STPN-2021-096	Sections 3.3.15, 6.23 Appendix S	Map 7 is missing the LSA- is this the results of the field review? Difficult to align with Map 4.	Reorder maps chronologically to show the evolution of the landscapes within the PDA and LSA. Provide a "results" map in the Cultural Heritage Report that indicates past sites that are no longer extant and sites that survive today. Past sites may still have importance to Indigenous communities.	Please refer to the response the comment #83.	FMG partially addressed STPN's original comment. Request: Harding map should be included in chronological ordering.	The Harding map is presented in the chronological order as Figure 3-3 in the Cultural Heritage Report (Appendix S-5) of the draft EIS/EA.	EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.
STPN-2021-097	Sections 3.3.15, 6.23 Appendix S	Maps within the document are unclear. Is Figure 8 a cabin site within the PDA or LSA? Figure 11 shows a cabin and portage site as mapped on the 1936 Harding map, however it is unclear if the site is still extant. In general, it is unclear where are these photos were taken. Figure 9- Is this one of the four portage routes in LSA?	Provide a map of photographic locations.	Comment noted and will be considered for future reporting.	FMG did not address STPN's original comment and recommendation; both of which still apply.	Figure 11 shows a cabin and portage that is located at the outlet of Cromarty Lake to Springpole Lake, noted as 'Cabin and portage' on lower portion of Map 6 in the Cultural Heritage Research Report (Appendix S-4) of the draft EIS/EA. Figure 9 reflects the existing conditions of the Springpole Lake and Birch Lake portage, which would be similar to the portage identified on Map 6 (on the western shore of the north basin of Springpole Lake) of the Cultural Heritage Research Report (Appendix S-4) of the draft EIS/EA. For an exact location, refer to location 48 on Map 8 of the Stage 1 Archaeological Assessment (Appendix S-1 of the draft EIS/EA). This feature is located within the Project Development Area. Figure 8 of the Cultural Heritage Research	Not applicable

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						Report (Appendix S-4 of the draft EIS/EA) shows an outpost camp, which was mapped in Figure 4-1 of the Cultural Heritage Report (Appendix S-5 of the draft EIS/EA) and described as CHR3 in Table 5-1. This feature is located within the Project Development Area.	
STPN-2021-098	Cultural Heritage Research Report: Built Heritage and Cultural Heritage Landscapes	The report does not incorporate Traditional Indigenous Knowledge of the area when evaluating for potential of built heritage resources and cultural heritage landscapes.	We recommend that FMG provide the Communities with the CHRR for review and ensure the Communities are involved in the fieldwork program in 2021, as well asl in the preparation of all future Cultural Heritage reporting.	Efforts were made to on-board Environmental Monitors to participate in the field work in 2021. We hope for increased participation in 2022 and beyond. FMG has provided a copy of the Stage 1 Archaeological Assessment for review and comment and funding for the technical review of this report. FMG is working with the Springpole Environment Committee to incorporate comments into future programs and provide opportunity for community members to participate in fieldwork.	FMG partially addressed STPN's original comment as Indigenous Knowledge has not been incorporated. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once the studies are completed to make updates to the draft EIS/EA so that the information provided in the final EIS/EA is adequate to inform CLFN and LSFN's understanding of likely impacts on CLFN and LSFN core responsibilities. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	See the response to STPN-2021-83.	EIS Section 6.23.1.2.
STPN-2021-099	2021 Terms of Reference Comments and Responses	The ToR states that: "Although two reports are noted in the MHSTCI database, one report is unavailable for an unspecified reason.". As per the STPN response, a detailed explanation as to why one of the Stage 2 reports contained in the MTCS database is unavailable for "an unspecified reason" was not provided in the ToR responses.	We recommend FMG provide a response as to why one report is unavailable. Based on the Stage 1AA report prepared by Northwest Archaeological Assessments, one Stage 1 report (P041-158-2011) is not available because the licensee did not submit a revised report to the MHSTCI. Please clarify the discrepancy between the missing reports. Is this a typo that should read Stage 1 is missing? There is also no record at the MHSTCI of the report for P307-0019-2011 being registered with the Ministry. Confirm previous assessments and if the reports have been accepted into the MHSTCI Public Register of Reports.	Information on the status of the reports is confidential MHSTCI information and includes personal third party information. We infer the existence of P041-158-2011 from reference in the later Stage 2 report and conversations with MHSTCI staff.	FMG fully addressed STPN's original comment.		Not applicable
STPN-2021-100	Sections 3.3.15, 6.23 Appendix S	Unclear in the workplan the study area of assessment for the existing conditions	We recommend that the PDA and LSA should be examined. See Item # 83 recommendation in previous chart.	Please refer to the response the comment #83.	FMG fully addressed STPN's original comment.		Not applicable

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		survey for potential cultural heritage resources.					
STPN-2021-101	Sections 3.3.15, 6.23 Appendix S	The workplan recommends a Cultural Heritage Evaluation Report.	See Item #83 recommendation in previous chart to ensure the reporting meetings the requirements typically included in a Cultural Heritage Report.	Please refer to the response the comment #83.	FMG partially addressed STPN's original comment. FMG has addressed most of the requirements indicated for the CHER; however, there is an absence of Indigenous Knowledge and/or its application in the report. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once the studies are completed to make updates to the draft EIS/EA so that the information provided in the final EIS/EA is adequate to inform CLFN and LSFN's understanding of likely impacts on CLFN and LSFN core responsibilities. Request: CLFN and LSFN requests that FGM integrate Indigenous Knowledge into the CHER. CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	See the response to STPN-2021-83.	EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.
STPN-2021-102	Sections 3.3.15, 6.23 Appendix S	The workplan recommends a Cultural Heritage Evaluation Report. It states that "a second report, a Cultural Heritage Evaluation Report (CHER), draws on the CHRR to evaluate the cultural heritage value or interest of heritage resources within the LSA."	See Item #83 recommendation in first chart to ensure the reporting meets the requirements for a Cultural Heritage Report. The Cultural Heritage Report needs to explain what locations were surveyed, what were the results, and how many extant built heritage resources and cultural heritage landscapes remain. The cultural heritage resources identified could be evaluated in the Cultural Heritage Report, but generally a CHER is recommended as the next step.	Please refer to the response the comment #83.	FMG fully addressed STPN's original comment.		EIS Section 6.23.1.2, Figure 6.23.2, Appendix S-5, Appendix S-8 to S-11.
STPN-2021-103	Section 4.4.4 Appendix K	The Phase 1 identified eight (8) lithologies. However, only six (6) were listed in section 2.5. The later section (4.4.1) lists 11 lithologies.	We recommend FMG clarify the number of lithologies and provide detail where the information is missing.	Agreed. A review and update of the geochemistry is being included in the draft EIS/EA. This update will include test results from ongoing geochemical analysis.	FMG fully addressed STPN's original comment.		Appendix K (all).
STPN-2021-104	Section 4.4.4 Appendix K	Average Crustal Abundance is used to assess contaminants of concern when reviewing a potential mine. The report does not provide enough detail on this issue. For	We recommend FMG include the reference document and methods applied to determine the metals that had elevated concentrations, compared to ACA (i.e., enrichment factor).	The ongoing work will include comparisons to 10 times crustal abundance screening values (Price 1997) and clear descriptions regarding the methodologies and processes used to	FMG partially addressed STPN's original comment. The ARD testing method is provided and the use of 10x crystal abundance values by price is mentioned. However, FMG did not	The use of ten times crustal abundance values to compare to multi-element ICP results is a common approach for the initial screening of metals data to identify	Appendix K-1

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		example, how were the sample results compared to average crustal abundance (ACA) (Ronov & Yaroshevsky, price 1997), or normal trace element concentrations in selected rock types (appendix 3, Price 1997)?		assess the ML/ARD characteristics of the samples.	provide information regarding why these values were used for comparison and metal concentrations were not compared to rock lithologies but to mine rock samples and zones. Request: Please provide an explanation as to why 10x crustal abundance was used for comparison of ARD results and compare rock type/lithologies chemistry to create analogues for various rock types and categorize them into the different zones for mining.	samples that may potentially leach anomalous metal concentrations. The ten times crustal abundance values are compared to the samples on a rock type basis within Appendix K-1 (Section 4.4.). • Table 4-6 provides a summary of the screening for key parameters including a summary for all samples, mine rock, and ore-grade material, a summary by zone, and a summary by lithology broken into both mine rock and ore-grade materials. • Screening results for individual samples are provided in Table B-6 of Appendix B and a screening summary by material type, zone, and rock type including all analyzed parameters.	
STPN-2021-105	Section 4.4.4 Appendix K	The report identifies 64% of non-Potentially Acid Generating (PAG) rock and 36% PAG were identified in Phase 1. The percent of PAG and non-PAG has not been established for waste rock versus ore. Since waste rock and ore have different geochemical properties and will be stored in different areas, it may not be appropriate to group together.	We recommend FMG clarify the statement and provide %PAG and %non-PAG for waste rock and ore separately.	The ongoing work will include updated information on ARD classification for the tested samples, ARD classification information for mine rock and ore-grade samples.	FMG fully addressed STPN's original comment.		Appendix K (all).
STPN-2021-106	Sections 4.4.4, 4.6.5 Appendix K	The objectives of the study and report are too generic.	We recommend FMG provide more details on objectives and scope of work (e.g. data gap analysis, Phase 2 geochemical tests to refine results etc.).	The 2021 technical workplan provided an outline of the objectives and scope of work to be carried out to supplement the information available for geochemical analysis. The reporting will include clear descriptions of the scope and objective of the baseline geochemistry program.	FMG did not address STPN's original comment and recommendation still applies. Request:: Please provide site specific details in the scopes of work and ongoing geochemical studies. Currently, statements are generic/blanket statements and provide no information regarding the site or gaps in the data.	The original comment is in reference to a report that was finalized in the past. The objectives and rationale for baseline geochemical characterization work presented in the current Project documents is clearly outlined therein and the reviewer is referring to Appendix K of the draft EIS/EA which included: • K-1 Static Geochemical Testing Baseline Report • K-2 Kinetic Geochemical Testing Baseline Report • K-3 Static Geochemical Characterization of Overburden and the Fish Habitat • Development Area Memo • K-4 Mine Site Water Quality Estimate for Mine Operations and Closure Updated reports and memoranda will be appended to the final EIS/EA.	Appendix K (all).

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STPN-2021-107	Appendix K	The rationale for sampling methods is not clear. making the assessment of the baseline difficult. For example, have sampling frequencies/distributions of each lithology in each zone been reviewed/assessed during the data-gap assessment?	We recommend FMG provide a more detailed discussion on Phase 1 data gap analysis, include sampling frequencies/spatial distribution. A map showing sampling locations will be helpful. Price (1997) provided recommendations on sampling frequencies based on volume of excavated rocks.	Agreed.	FMG did not address STPN's original comment and recommendation still applies. One figure was provided in K-1 but provided little to no information. Request:: Please provide a detailed map (with an underlying image for reference) with the location of samples. Additionally, CLFN and LSFN requests that FMG provide the rationale and additional details for additional samples collected based on lithology, ore vs mined rock, zone and tonnage etc. as requested in the original comment with respect to practices outlined in Chapter 8 of Price 2009 Reference: Price, William A. 2009. Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials. Smithers, BC: CANMET – Mining and Mineral Sciences Laboratories.	Section 3.4 and Table 3-1 of the Appendix K-1 summarize the sample selection for the baseline study. Samples were selected based on available geochemical and geological information, spatial distribution among the geologic zones as well as distribution at depth, and to be representative of key Project lithologies and alteration types. Spatial distribution, geochemistry, and geology of previously collected samples was considered and these samples were incorporated into the baseline report. A sample map with underlying imagery will be included in the final EIS/EA. Cross-sections will also be provided in the final EIS/EA to provide clarity on sample coverage. A summary table indicating tonnage information and the number of samples is provided below, including ML/ARD test samples and analogue ABA samples. As part of the ongoing baseline work, ABA analogue relationships were developed to supplement the ML/ARD test data. The ABA analogue relationships were based on ABA test results and multi-element ICP sulphur and calcium data. These analogue relationships showed good performance to estimate ARD characteristics of the mine rock samples and can be used to expand the ARD assessment. The number of samples are sufficient per MEND (2009) guidance at this stage of the Project. Additional sampling and testing is proposed as part of the Feasibility Study. [TABLE]	Appendix K (all).
STPN-2021-108	Appendix K	Geochemical characterization aims to identify the distribution and variability of key geochemical properties. Is there a map showing the portage zone, main zone and extension zone, as well as the predicted	We recommend FMG provide map showing the zones and predicted excavated volume. This information should be discussed with table 4.1 to assess if sampling frequencies in	The forthcoming report will provide clear discussion on the ML/ARD characteristics of the test samples from within each geologic zone, along with detailed information on	FMG did not address STPN's original comment and recommendation still applies. Request:	Table 4.1 is from an report with historic data from the Project. A sample map with underlying imagery will be included in the final EIS/EA as discussed in STPN 2021-107.	Appendix K (all).

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		volume of rocks that will be excavated in each zone?	each zone/lithologies are meaningful within the overall geochemical program.	sampling frequency and drill hole locations for the various zones of the deposit.	Please provide a detailed maps / images and the tonnages/volumes requested.	The Portage Zone, East Extension Zone and Camp Zone are geologic zones that describe the mineralized zones of the deposit. These zones do not directly correlate with the mine plan and mine rock tonnages associated with each zone have not been defined in detail. However, based on the pit shells developed for the Prefeasibility Study, rock associated with the Portage Zone is estimated to represent approximately >95% of the pit volume, with the Camp and East Extension Zone representing a combined total of <5% of the pit volume. The number of samples of mine rock and ore collected for each zone is presented below. Additional ML/ARD testing is proposed as part of the Feasibility Study, including samples from all zones. [TABLE]	
STPN-2021-109	Section 4.4.4 Appendix K	The rationale for sampling methods is not clear, making the assessment of the baseline difficult. For example, what is the rationale for the selection of subset of ten (10) samples on Shake Flask Extraction (SFE), Net Acid Generation (NAG) and mineralogy tests? Were these samples collected based on their static results? Did these ten (10) samples cover all major lithologies across three zones and fill up the data gaps?	We recommend FMG provide more detail/ rationale/ professional judgement on the selection of subset ten (10) samples out of a total of 443 samples.	Approximately 100 additional short-term leaching tests, covering a range of sample types, were included in the recent Wood geochemistry program and are included in draft EIS/EA.	FMG partially addressed STPN's original comment. Additional samples have been collected and tested but the information given as to why samples were selected is very general. Data is included in tables but there is no rationale given for selections other than general statement to represent samples. Request: Please provide a rationale and details regarding why the additional samples were collected and selected, including details as to where they are proportionate to the lithology, zones, ore vs mine rock, NAG, PAG, etc.	Table 4-7 of Appendix K-1 provides details on the proportion of samples tested by short-term leaching tests including the number of mine rock samples, ore-grade samples, distribution by zone, and distribution by rock type. A total of 109 samples were evaluated by the SFE test. The samples were carefully selected to include a range of materials and ensure good coverage of multiple selection criteria including: • Rock type, mine rock and ore, and geologic zone. • PAG and NAG samples with a range of sulphur and solid phase metal content, to evaluate geochemical controls on SFE leachate characteristics. Additional information is provided in the tables below regarding the samples tested by the SFE test. [TABLE] [TABLE]	Appendix K (all).

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STPN-2021-110	Appendix K	The map of sampling locations (Phase 2) isn't included in the report, making assessment of the distribution and variability of geochemical source terms difficult.	We recommend FMG provide sampling location map, together with the Phase 1 sampling locations for major lithologies.	Agreed and this is included in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation still applies. Request: Please provide a detailed maps / images as requested.	A sample map with underlying imagery will be included in the final EIS/EA. To provide clarity on sample coverage, cross-sections will also be provided in the final EIS/EA	Appendix K (all).
STPN-2021-111	Section 4.4.4 Appendix K	The rationale for sampling methods is not clear making the assessment of the geochemical source terms difficult. For example, have the overburden samples /lake sediment (if it will be excavated) been collected and characterized? There is a proposed surficial soil stockpile south of the Tailings management pond.	We recommend FMG confirm if additional sampling for overburden and lake sediment are required to satisfy EA requirements	Agreed. The 2021 program included the collection of a range of overburden materials (including soils) representing material that will be stripped as part of future mine development. Soil / overburden samples were collected from around the planned locations for the mine rock and tailings management facility, open pits, plant site, ore stockpiles, and fish quarry. Several samples of lakebed sediment were also collected for testing.	FMG fully addressed STPN's original comment. Request: While the original comment has been addressed, it should be noted that no samples were collected from surficial soil stockpile areas.	The surficial soil stockpile area represents a location where soil will be stockpiled. Stripping of this area is not anticipated based on current design information. Additional samples will be collected from areas to be stripped as part of the Feasibility Study. To date the overburden (soil) and lake sediment has been adequately characterized for the current stage of the Project. These results will be included in the final EIS/EA.	Appendix K (all).
STPN-2021-112	Section 4.4.4 Appendix K	Phase 1 identified eight (8) lithologies. Table 4-1 lists 11 lithologies.	We recommend FMG clarify type of lithologies throughout the report.	Please see response to comment #103.	FMG fully addressed STPN's original comment. Request: The comment has been addressed. However, it is recommended that the lithologies be identified in a single section making it easier for the reader/reviewer.	Lithology is discussed in one section, Section 2.2 of Appendix K-1.	Appendix K (all).
STPN-2021-113	Section 4.4.4 Appendix K	Figure 5.2. lists paste pH results for 8 lithologies. However, Table 4.1 identified 11 lithologies.	We recommend FMG clarify type of lithologies throughout the report. Check all related figures and tables.	Please see response to comment #103.	FMG fully addressed STPN's original comment. Request: The comment has been addressed. However, it is recommended that the lithologies be identified in a single section making it easier for the reader/reviewer.	Please see response to STPN-2021-112.	Appendix K (all).
STPN-2021-114	Section 4.4.4 Appendix K	Figure 5.5, What are "Morin Samples"? New category other than ore, waste rock and pulp?	We recommend FMG clarify on waste/ore/pulp/morin categories before result sections.	Please see response to comment #103.	FMG fully addressed STPN's original comment. Request: Note: Morin and pulp have been removed as categories. Categories include overburden & lakebed sediments, mine rock, ore-grade materials, tailings.	Noted. Categories 'Morin' and 'pulp' were from a previous geochemical report for the Project and are not relevant to the geochemical interpretation of the data. The associated samples have been included in the dataset and are captured in the information presented.	Appendix K (all).
STPN-2021-115	Section 4.4.4 Appendix K	Information required for the assessment of the baseline doesn't appear to be complete. Methods used to classify PAG and Non-PAG needs to be further assessed. Using the current method may underestimate the	We recommend FMG consider on-going weathering process into data interpretation.	Agreed and this is included in the draft EIS/EA	FMG partially addressed STPN's original comment. However, comments in the report are general/blanket statements and do not take into consideration the differences between weathered and unweathered samples	The original comment is referencing an previously finalized report for the Project. In-situ weathering of archived samples is a well-known process that can influence sample characteristics. The potential for	Appendix K (all).

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		proportion of PAG material. Although using total Sulphide tends to overestimate acid potential (AP), it is a conservative approach. The use of sulphide-sulphur does not consider the portion of sulphide that has been oxidized during the storage/sampling preparation. The comparison of sulphide species between "fresh drilled sample" vs "weathered sample" indicates the on-going sulphide oxidation, especially when sulphide content is high. The little amount of gypsum and absence of barite also suggested the AP from sulphate minerals is negligible. Most of the sulphate-sulphur in samples are likely from the oxidation of sulphide.			and the potential geochemical differences. Weather is not just dependent on age of the core but exposure of the core or sample to the elements. Request: Please provide information about how weathering of a sample may affect the results of the geochemical analysis and what that means when using this information for mine development. Please also include any notes that were made on the weathering conditions of the core/samples and how results compared to core/samples which were not weathered.	this to have occurred for the Springpole samples was evaluated in the baseline study and is discussed in Appendix K-1. In-situ weathering processes can primarily affect the sulphur speciation (i.e., increasing sulphate sulphur due to sulphide oxidation) and neutralization potential content (i.e., decreasing NP due to sulphide oxidation) of the samples. As discussed in detail in Appendix K-1 (Section 4.1.2, and 4.1.4), sulphate sulphur concentrations were low and often at or near the analytical detection limit. No major differences in sulphate sulphur content were observed between core of varying ages, or among the samples overall, suggesting that in-situ weathering was limited. Similarly, no major difference in the NP content was observed among samples based on core age. Overall, there is no geochemical evidence to indicate that some of the core is 'weathered' vs 'unweathered'. In-situ weathering processes have not affected the sample characteristics and therefore this process has no implications for the analysis and its use to support mine development.	
STPN-2021-116	Section 4.4.4 Appendix K	A total 443 samples were analyzed for acid-base accounting (ABA) test (Table 5.2). However, only 291 samples were present in lab report (appendix III).	We recommend FMG provide the full analytical reports and clarify the number of samples.	Please see response to comment #103.	FMG partially addressed STPN's original comment. However, the overburden numbers provided in the main text do not correspond to those provided in the appendix. Appendix references are also incorrect. Sections K-3 is the appendix for overburden and not K-4 as stated in 4.4.4. Request: Please verify the accuracy of the overburden numbers provided in both the main text and appendix materials and correct appendix references.	Sample numbers in Section 4.4.4 will be updated to reflect the correct number of overburden samples (n=36, as outlined in Appendix K-3).	Appendix K (all).
STPN-2021-117	Appendix K	Information required for the assessment of the baseline doesn't appear to be complete. Please clarify the statement "The TIC, Carbon NP, and Sobek NP results a likely	We recommend FMG clarify/revise the text.	Agreed and this is included in the draft EIS/EA	FMG fully addressed STPN's original comment.		Appendix K (all).

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		presence of some net-neutral siderite or non-carbonate NP contribution in these AND samples". It is not clear how this conclusion was made without corrected Sobek NP data. Same comments applied to BX, CON, felsic intrusive, MSED etc. samples.					
STPN-2021-118	Appendix K	The interpretation of the results does not appear to be correct. In Table 5.5 (waste rock category), some ARD class result (mean) are not consistent with SNPR interpretation.	We recommend FMG revise the calculations in Table 5.5 and please show your work	Agreed and this is included in the draft EIS/EA. A review and update of the geochemistry is being included in the draft EIS/EA. This update will include test results from ongoing geochemical analysis.	FMG did not address STPN's original comments. Table 5.5 appears to be absent; it is unclear if this is an oversight or if the table numeration has changed. Request: Please clarify table numeration. If Table 5.5 has been omitted, please include; if it has been renumbered, please clarify.	The report that included Table 5.5 represents a previously finalized geochemical report for the Project and therefore revised calculations are not provided as the referenced report is outdated. Samples collected as part of previous programs and the updated baseline program are provided as a combined dataset in Appendix K-1. The objective of Table 5.5 was to summarize the static testing results. Updated static testing results summaries are provided in Tables 4-1 to 4-5 and Tables B-1 to B-5 of Appendix K-1.	Appendix K (all).
STPN-2021-119	Appendix K	Information required for the assessment of the baseline doesn't appear to be complete. The interpretation needs to be clarified for each lithology, and their acid generating and element leaching characteristics. For example, it is not clear how PAG/non-PAG status was assigned to each lithology based on statistical summary results. Is there a "cut-off" percentage used to rank "PAG" and "non-PAG"? For instance (on page 77), it stated that "The Ore MSED can be considered as PAG…."	We recommend FMG clarify how PAG vs. non-PAG status was assigned based on statistical summary results. We recommend more clear statement like "Using an NP/AP ratio of 2 to differentiate PAG) and non-PAG material, results indicate that more than half of the xx samples (xx% of samples tested) classify as PAG, and 40% of tested samples classify as non-PAG.	Agreed and this is included in the draft EIS/EA. A review and update of the geochemistry is being included in the draft EIS/EA. This update will include test results from ongoing geochemical analysis.	FMG fully addressed STPN's original comment. Request: Review of data show "uncertain" samples are categorized as PAG which is correct but little to no text indicates that this is how it is grouped. Please include text to indicate that samples identified as "uncertain" are grouped as PAG.	In the updated Baseline geochemical report, Section 3.5 provides additional details on the categorization as PAG or NAG, outlining that an NPR threshold value of 2 was used to separate NAG and PAG material for the purposes of the baseline report. The NPR threshold of 2 is an industry standard and accepted value as outlined in MEND (2009). Of the 42% samples with NPR <2 (n=370 samples), 27% had NPR values between 1 and 2 (n=100 samples). Similar results were observed when ARD potential was based on CarbNPR. Appendix K-1 will be updated in the final EIS/EA to include a sentence describing the proportion of samples that have an uncertain ARD potential (NPR 1-2). Site specific NPR can only be determined via kinetic testing. To date, the Project continues to use NPR <2 as a threshold for separating PAG and NAG materials.	Appendix K (all).

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STPN-2021-120	Appendix K	Information required for the assessment of the baseline doesn't appear to be complete. How are elevated metals in ore/waste rock samples correlated with sulphide minerals? This is important to understand the source of metals.	Correlations between enriched metals and sulphur or sulphide content are recommended.	The draft EIS/EA includes information on trends for metal and sulphide content as applicable.	FMG partially addressed original STPN's comment. The paragraphs in K–1, Section 4.3 touch on the recommended topic and mention the Portage, East Extension and Camp zones; however, the information provided is very high level and little detail is provided Request: Please explain in greater detail and improve the description of correlation to sulphur, sulphide, metals. And lithologies.	Several paragraphs are provided in Appendix K-1 discussing this topic, including trends between key metals and the sulphide content of the samples, along with information on sulphide mineralogy that may be influencing these trends. Several figures are also provided therein. The ML/ARD characteristics of the samples do not appear to be lithologically controlled, and mine rock is not planned to be segregated based on lithology. As such a detailed discussion of the relationship between metals, sulphur and lithologic groups is not relevant to mine rock management. The information provided in Appendix K-1 is adequate for the purposes of the EIS/EA.	Appendix K (all).
STPN-2021-121	Geochemical Characterization Program Update for the Springpole Gold Project	Information required for the assessment of the baseline doesn't appear to be complete. On Page 28, it stated that tailings sample for cyanide destruction was submitted to SGS laboratory. However, no cyanide species were analyzed or presented in the report. Cyanide and ammonia are main environmental concerns as the gold will be recovered separately from other metals using a cyanide leach circuit.	We recommend FMG confirm the test has been conducted on cyanide destruct (CND) residues from the metallurgical test program.	Metallurgical tailings and other tailings products that will be tested during the 2021 program will be subject to CND as part of the metallurgical testwork. The tailings geochemical testing program includes a range of static and kinetic tests to assess the ML/ARD potential of the tailings and other tailings products that will be generated, along with supernatant testing to estimate process water quality. The results will be used to support water quality estimates and overall ML/ARD risks and opportunities for tailings disposal for the project assessed in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation still applies. Request: Please provide testing results and incorporate them into the materials.	Tailings static and kinetic testing results will be incorporated into the final EIS/EA. This includes results for tailings subject to CND.	Appendix K (all).
STPN-2021-122	Geochemical Characterization Program Update for the Springpole Gold Project	Information required for the assessment of the baseline doesn't appear to be complete. What are the physical properties of the tailings? (e.g., residue water content after thickening/filtered; tailings porewater geochemistry, and grain size distribution etc.)	We recommend FMG provide the physical properties of the tailings.	A detailed description of the tailings physical properties is not typically provided in a baseline geochemistry report. Physical testing of the tailings is part of geotechnical test work for the project. Please see response to comment #133 for additional information.	FMG did not address STPN's original comment and recommendation still applies. Request: Please provide the information requested. Environmental mine submissions at this stage usually provide details regarding the tailings physical and chemical properties, especially since a new mining method and processing method is not proposed.		Appendix K (all).
STPN-2021-123	Appendix K	Information required for the assessment of the baseline doesn't appear to be complete. The method applied in Figure 5.43 making it is difficult to characterize the geochemical	We recommend changing the plot to NAGph4.5 versus NPR (GARD guidance). Samples with conflicting ABA and NAG results will be plotted in the "uncertain" quadrants.	Agreed and this is included in the draft EIS/EA. A review and update of the geochemistry is being included in the draft EIS/EA. This update will include test results from ongoing geochemical analysis.	FMG fully addressed STPN's original comment. Request:: K-1 – Section 4.2 with Figures 4-9 and 4-10 – plotting NAG pH and NPR with samples are	NAG pH testing was completed on a representative subset of 85 samples. The data shown in Figures 4-9 and 4-10 represent the complete set of NAG pH data.	Appendix K (all).

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		properties (i.e., identify which samples have conflicting geochemical test results).			only a sub-set of samples had this testing completed. Please present full data set in the plots once completed.		
STPN-2021-124	Appendix K	The rationale for sampling selection is not clear, making the assessment of the baseline and data gap difficult. For example, 8 out of 10 samples were collected in portage zone., and only 2 samples were selected from other two zones. Will more samples be collected in main and east extension zone in 2021?	We recommend FMG provide further information on sample coverage and selection rationale.	Agreed. The draft EIS/EA includes a map of sampling locations and information on sampling frequency for the overall sample set, mine rock and ore samples, and project rock types.	FMG fully addressed STPN's original comment.		Appendix K (all).
STPN-2021-125	Appendix K	Table 5.20. ARD status and type (waste rock, ore, pulp) of each sample were not shown. It is difficult to link the static test results with their mineralogy.	We recommend FMG provide ARD status, type (waste rock, ore, pulp) and weathering condition for each sample.	Agreed and this is included in the draft EIS/EA. A review and update of the geochemistry is being included in the draft EIS/EA. This update will include test results from ongoing geochemical analysis.	FMG partially addressed STPN's original comment. Sample types were classified and shown with results, but no information is provided regarding the weathering condition of the samples Request: Please provide information regarding the degree of weathering for the samples.	Please see STPN-2021-115.	Appendix K (all).
STPN-2021-126	Appendix K	Information required for the assessment of the baseline doesn't appear to be complete. Spatial variability and uncertainty in geochemical properties (i.e., mineralogy, ARD/ML) in waste rock, ore and pulp should be discussed. For instance, some lithologies (Conglomerate and Felsic-intrusive etc.) only have limited samples, and geochemical data indicated wide range of sulphide content and neutralization potential.	We recommend FMG provide discussion on spatial variability and uncertainty of geochemical properties of waste rock, ore and pulp.	It is noted that the lithologies specified as having a high level of uncertainty represent very low tonnage units for the project. Since the preliminary baseline report was prepared, the project geological model has been updated and rock types have been reclassified more accurately.	FMG partially addressed STPN's original comment. The samples were regrouped and data about them is provided but there is little discission or description of spatial variability or relationships to tonnage. In K-1, rock types have been classified into broader categories, but there is no mention of tonnage and percentage of what might make up the ore and mine rock. There is reference to a group lithologies that are grouped as "others" and are said to represent a small portion of the dataset. In K-2, mine rock humidity cells represent higher sulphide and metal content materials and are considered conservative Request: Please provide information regarding spatial variability and tonnage.	Please refer to the responses provided for STPN-2021-107 and STPN-2021-108. Spatial variability and its implications for the ML/ARD potential of the samples is discussed throughout Appendix K-1. Specifically, the various geologic zones of the deposit (Portage, Camp, and East Extension) were considered as individual sample groups for the baseline assessment, owing to their unique geological characteristics, which influences their ML/ARD potential. Results presented in Section 4 of Appendix K-1 include detailed discussion on a zone-by-zone basis. Sections 5.1 and 5.2 additionally summarize results as they relate to Project geologic zones. Additional information is provided in STPN 2021-107 and -108 regarding tonnages for each zone. As outlined in Section 2.2 (Appendix K-1), key project lithologies across all Project Zones included andesite, tuff, and metasediments, trachyte, volcanic breccia, and porphyry. Other lithologies are	Appendix K (all).

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						interpreted to make up <1% of the Project rock based on available data.	
STPN-2021-127	Appendix K	Grain size of material is a key factor to control the reaction rate and future assessment of the effects of the mine. Fine material usually has a larger surface area. Have grain size distribution tests been conducted for these selected ten (10) rock samples?	We recommend providing grain size distribution tests for the selected samples.	Agreed. The draft EIS/EA includes an update on the grain size information for the humidity cell tests.	FMG did not address STPN's original comment and recommendation still applies. In the K-2 methods section, it is mentioned that grain size analyses were done but there is no data or discussion in the report to support this claim. Request: Please provide the results of the grain size analysis.	Particle size data were obtained for all humidity cells and were used to present results on a surface area-normalized basis. Particle size data will be included in the final EIS/EA.	Appendix K (all).
STPN-2021-128	Appendix K	Information required for the assessment of the baseline doesn't appear to be complete. What is the primary objective of Humidity Cell Test (HCT)? Did the selected samples meet the objectives?	Static test results should be reviewed to understand the uncertainties of PAG/non-PAG of each lithology. The objectives and limitations of kinetic method used should be acknowledged so that it is clear what information will be delivered from the tests conducted.	Agreed. All data is undergoing full review as part of the draft EIS/EA process to understand uncertainties.	FMG did not address STPN's original comment and recommendation still applies. The materials note that the drill core used does not represent the mine rock as they have elevated sulphur and metal contents relative to the static testing and are considered the conservative case. Wood states that they have initiated a comprehensive kinetic testing program including additional cells but no information regarding those cells is provided. A revised program for leach barrels Is proposed for 2022 however there is no information on whether this has been completed. Request:: Please provide the information requested and include any new information from the full review referred to in FMG's response.	A supplemental humidity cell program was initiated in late 2021, utilizing samples with more representative sulphide and metal contents relative to the overall Project dataset. These tests continue to operate, and results will be provided in the final EIS/EA. A revised field leach barrel program was initiated in 2022. Additional information will be included in the final EIS/EA.	Appendix K (all).
STPN-2021-129	Sections 4.4.4, 4.6.5 Appendix K	Table 5.22. The "UN" is not defined in static test.	We recommend FMG revise the "UN" or define it in static result section.	Agreed and this is included in the draft EIS/EA. A review and update of the geochemistry is being included in the draft EIS/EA. This update will include test results from ongoing geochemical analysis.	Section and table referred to the recommendation was not provided. Reviewers were unable to confirm the original STPN's comment. Request: Please provide section and table referenced in the original comment.	There is no Table 5.22 in the referenced report, and it is assumed that the reviewer is referring to Table 5.21. The referenced document represents an outdated geochemical report for the Project. An updated table outlining depletion time calculations and ARD potential is provided in Table 6-1 of Appendix K-2. Depletion time calculations for the expanded humidity cell program initiated in 2021 will be included as part of the final EIS/EA.	Appendix K (all).

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STPN-2021-130	2021 Geochemical Characterization Program Technical Workplan	All the excavated materials need to be characterized, as per EA/EIA requirement. Will both waste rock and ore samples be collected from archived drill cores?	We recommend FMG describe the sample selection methodology. Rock sampling frequency and distribution should be focused on lithologies that have been identified with high geochemical uncertainty.	The 2021 program included the collection of drill core samples representing waste rock and ore-grade materials. The sample selection approach was based on currently available mine planning and geologic information, with the overall objective of obtaining good geospatial coverage of the rock within the future open pit volume from the available archived drill core. The distribution of samples from previous studies was also considered when selecting samples for the 2021 program. Information regarding sample selection and a summary of the number of samples representing waste rock, ore-grade materials, and the various project lithologies will be provided in the forthcoming update to the Geochemistry Baseline.	FMG did not address STPN's original comment and recommendation still applies.	Section 3.4 of the Appendix K-1 describes the sampling selection methodology. A summary of the samples included in the baseline report is available in Table 3-1 of that document. Both waste rock and ore-grade samples were collected. A summary of the collected samples and the specific testwork completed is provided in Table 3-2 of Appendix K-1.	Appendix K (all).
STPN-2021-131	Section 4.4.4 Appendix K	All the excavated materials need to be characterized, All the excavated materials need to be characterized, as per EA/EIA requirement. Will topsoil samples be collected? Will lakebed sediment in pit lake be excavated and stored on-site?	We recommend FMG confirm all types of disturbed soils and sediment will be characterized.	The 2021 program included the collection of a range of overburden materials (including soils) representing material that will be stripped as part of future mine development. Soil / overburden samples were collected from around the planned locations for the CDF, open pits, plant site, ore stockpiles, and future fish habitat development area. Several samples of lakebed sediment were also collected for testing.	FMG partially addressed STPN's original comment. However, there is no mention of soil samples being collected, only overburden, lake sediments, and fish habitat. Request: Please address if any soil samples been collected and tested or are they part of the overburden sampling.	Samples of soil (i.e., overburden) and lake sediment have been collected for baseline characterization purposes. Samples were tested by static methods, including ABA analysis, multi-element ICP analysis, and short-term leaching tests. Results from both programs will be included in the final EIS/EA.	Appendix K (all).
STPN-2021-132	Section 4.6.5 Appendix K	Cyanide and ammonia are main environmental concerns as the gold will be recovered separately from other metals using a cyanide leach circuit. Will cyanide destruction be included in metallurgical test?	We recommend FMG confirm the test has been conducted on cyanide destruct (CND) residues from the metallurgical test program. Decant test (aging test), tailings porewater (post filtration) test should also be considered to develop the tailings source term and support proposed tailings disposal plan.	Metallurgical tailings and other tailings products being tested during the 2021 program will be subject to CND as part of the metallurgical testwork. The tailings geochemical testing program includes a range of static and kinetic tests to assess the ML/ARD potential of the tailings and other tailings products that will be generated, along with supernatant testing to estimate process water quality. The results will be used to support water quality estimates and overall ML/ARD risks and opportunities for tailings disposal for the project presented in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation still applies.	Data for the tailings static and kinetic testing program will be included in the final EIS/EA. This included flotation tailings and sulphide concentrate tailings subject to cyanide destruction. Tailings supernatant samples were also tested.	Appendix K (all).
STPN-2021-133	2021 Geochemical Characterization Program Technical Workplan	Information required for the assessment of the baseline doesn't appear to be complete. Will tailings physical properties be tested? This information will be used to support the waste management strategies and Goldsim models.	We recommend FMG tailings physical properties (grain size distribution, settling test, density etc.) be included in testing program.	Physical testing of the tailings is undertaken as part of geotechnical testwork for the project.	FMG did not address STPN's original comment and recommendation still applies.		Appendix K (all).

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STPN-2021-134	Appendix N-2	Will geochemical reactions be coupled/included with Goldsim Model? How uncertainty of source term will be addressed in the Goldsim model?	We recommend FMG provide more detail on Goldsim modelling development approach.	Water quality estimates are presented in the draft EIS/EA as mass balance estimates in GoldSim. The model is based on the average annual monthly water balance and includes all mine features. Site water quality is then estimated for a number of locations (i.e., ponds or drainages) in the model, and results provided for mine operations and closure conditions. Uncertainties in model source terms and geochemical inputs are typically addressed by using the model to evaluate several scenarios represented by different source terms, such that a range of potential outcomes are estimated in the model. Mass balance results are considered with and without geochemical equilibration to further evaluate model uncertainties and sensitivities.	FMG fully addressed STPN's original comment.		EIS Section 6.6.5
STPN-2021-135	Appendix N-2	What parameters will be modeled in Goldsim Model? Do they meet the Ontario water quality guidelines and MDMER?	We recommend parameters regulated in applicable Ontario water quality guidelines and MDMER be included in model.	Water quality estimates include parameters listed in the Ontario Provincial Water Quality Objectives and MDMER, including sulphate.	FMG partially addressed STPN's original comment. Some parameters are modelled but not all in the MDMER. Request: Please provide additional information regarding parameters such as nitrate/ammonia, chloride, and magnesium, and TSS part of MDMER which are not addressed in the report.	As previously indicated water quality estimates include parameters listed in the Ontario Provincial Water Quality Objectives (PWQO) and MDMER, including sulphate. These do not include nitrate/ammonia chloride, magnesium and TSS. In Ontario, mining operations must adhere to stringent regulatory requirements and environmental standards governing water quality, including TSS levels. FMG is committed to environmental protection and has strategically integrated comprehensive water management mitigation strategies for TSS into the Project's design, ensuring proactive measures to safeguard water quality and minimize the potential for environmental impact. All other parameters with water quality guidelines for the protection of aquatic life are modelled, please refer to Appendix N-2 for additional details.	Appendix N-2
STPN-2021-136	Section 6.5 Appendix L-2	Neither baseline reports (Wood or FracFlow) present geologic cross-sections through the study area (3-D structural geology model images are noted). This would help the reader interpret the	It would benefit the non-technical readers of the baseline reports to include geologic sections through the study area showing the proposed open pit extents.	Detailed 3D geological modelling of the site bedrock geology is included in the draft EIS/EA for the Project.	FMG partially addressed STPN's original comment. Cross sections are provided in the text and appendix, but they do not address the original recommendation.	Hydrostratigraphic sections showing proposed open pit extents and relevant geologic units are under development as part of updated baseline hydrogeology and modelling report, for the final EIS/EA.	EIS Section 6.5.1.2, Figure 6.5-6, Appendix L-1,

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		geologic units that will be mined both horizontally and vertically.			Request: Please provide cross sections that clearly identify zones, pit areas etc. as requested.		Appendix L-2 Section 5.1.2.
STPN-2021-137	Hydrogeology Baseline Report	The baseline reports (Wood and FracFlow) are focused on the proposed mine site. It is understood that an extension to the existing southern all-weather road will be constructed as part of the mine development project as will a power line. Will a separate hydrogeological study be conducted to support this aspect of the project?	We recommend a separate hydrogeological study be conducted to support the expansion of the all-weather road aspect of the project.	The access road will be generally surficial in terms of construction, with limited interaction with groundwater. The access road is expected to be constructed from overburden aggregate sources, and not anticipated to pose a groundwater quality risk. As such, groundwater interactions are not a factor, and the road is planned to follow all regulatory requirements for construction and operation.	FMG partially addressed STPN's original comment. Road is not anticipated to cause issues with the groundwater since it will be constructed on surface. CLFN and LSFN are very concerned about impacts of constructing the road and other activities beyond the mine site (e.g. aggregate sources, transmission line) on groundwater. The interaction between groundwater and fish and aquatic resources is integral to this assessment. Request: Please indicate whether aggregate sources have been or will be tested prior to use for the road to ensure that they are not mineralized or have ARD issues that could cause issues to the surface water and the groundwater.) CLFN and LSFN concerns regarding impacts on groundwater warrants additional survey work along the road and powerline. (PGL and FLG)	The proposed aggregate sources will be tested prior to use for the construction of the mine access road. The sources identified in the draft EIS/EA are sand and gravel type material similar to that used in forestry road operations in the area and not anticipated to have material ARD potential. The development of the proposed sand and gravel aggregate sources is not planned to be excavated below the water table, and as a result there is no effect pathway on groundwater from this activity. The construction of the mine access road, airstrip and the transmission line is planned to occur during frozen conditions, be above the water table, and will occur within a small area for a very short period of time and will be effectively managed with standard best practices, such as limiting the active construction area to the extent possible, and having erosion and sediment control and spill contingency plans. As a result, there are no effect pathways on groundwater.	EIS Section 6.5.1.2.
STPN-2021-138	Section 4.10.1.3	It is unclear if the project planning has progressed to the point of identifying a future potable water source for the mining operations.	We recommend that the reports assess baseline conditions of potential potable water sources.	The potable water source for the mine is expected to be from a surface water source, which has been characterised in the baseline surface water report.	FMG fully addressed STPN's original comment.		EIS Section 5.12
STPN-2021-139	Hydrogeology Baseline Report	Information required for the assessment of the baseline regulatory compliance doesn't appear to be complete. There is no reference of any of the monitoring wells being installed as per O.Reg. 903. Were well records filed with the MECP?	We recommend FMG provide the Geotechnical Factual Report so the boreholes can be reviewed.	Water well records were created for newly constructed monitoring wells and will be provided in the draft EIS/EA.	FMG partially addressed STPN's original comment. L-1 – Geotech report is mentioned in the Hydrogeological report and there are borehole (BH) logs showing the monitoring wells provided; however, it is unclear if all wells were accounted for or not. Request: FMG made the commitment to provide borehole logs and monitoring well details, but no report has been provided to date. Please provide all BH logs and monitoring well details.	An updated compilation of site borehole logs and monitoring well installation details are in production and will be included in the Baseline Hydrogeology Report, appended to the final EIS/EA.	EIS Section 6.5.1.2, Appendix L-1 Appendix A.

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STPN-2021-140	Hydrogeology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. The deep groundwater system is not fully characterized.	We recommend that long term monitoring and additional monitoring wells be added within the deep groundwater system.	An investigation program is currently underway at site to provide additional hydrogeological characterization of the deep bedrock flow system. This investigation program includes drilling and packer testing of additional deep bedrock boreholes; and multi-level vibrating wire piezometer (VWP) installations (equipped with data loggers to allow for ongoing water level monitoring) in five deeper bedrock boreholes. However, generally speaking, the deep groundwater system is not a large contributor of either flow into the open pit or a pathway for seepage, as the fracture networks at depths have very limited connectivity and neither transport nor store significant quantities of groundwater. This is further discussed in the draft EIS/EA.	FMG partially addressed STPN's original comment. However, no 2021 data or BH logs are provided Request: Commitment but no report provided to date. Please provide report to satisfy comments.	Additional hydrogeological characterization activities are in production and will be described in the Baseline Hydrogeology Report, appended to the final EIS/EA.	EIS Section 6.5.1.2, Appendix L-1 Section 5.2.2.
STPN-2021-141	Appendix L-1	Information required for the assessment of the baseline doesn't appear to be complete. It is stated that inferred hydraulic conductivity values are plotted in Figures 5-6 and 5-7. It is unclear how the values are calculated.	We recommend FMG confirm that values calculated from packer test results are included on the plot.	Data shown in Table 5.5 and plotted on Figures 5-6 and 5-7 is obtained from packer testing results obtained during the summer-winter 2020 geotechnical program. This testing is summarized in Section 4.3 and Table 4.4 of FracFlow (2021a) which is included as Appendix A of the Wood Hydrogeology Baseline Report.	FMG fully addressed STPN's original comment.		Appendix L-1
STPN-2021-142	Hydrogeology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. Uncertainty with the depth(s) samples were collected at for the Hazen analysis. Test pit logs are required to evaluate sample collection depth.	We recommend FMG provide complete set of test pit/ borehole logs.	Analysis of hydraulic conductivity using the Hazen Method provided by FracFlow (2020; 2021a) are only considered screening-level estimates (primarily due to the relatively high proportions of fines in samples) and, as such, have not been included in the main body of the hydrogeology baseline report.	FMG partially addressed STPN's original comment. However, some BH logs have not been provided in L-1. Request: Please provide a complete set of borehole logs and test pit logs.	An updated compilation of site borehole logs and test pits is in production and will be included in the Baseline Hydrogeology Report, appended to the final EIS/EA.	EIS Section 6.5.1.2, Appendix L-1 Appendix A.
STPN-2021-143	Hydrogeology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. Section states that the Hazen method was used to estimate hydraulic conductivity values for the shallow bedrock. It is unclear how this can be calculated.	We recommend FMG provide a methodology.	Hydraulic conductivity estimates of shallow bedrock are presented in FracFlow 2021a but were not estimated using the Hazen method. Hydraulic conductivity estimates from shallow bedrock boreholes were based on results from falling/rising head testing.	FMG did not address STPN's original comment and recommendation still applies. Hydraulic conductivities values of the overburden and bedrock were estimated by the Hazen method and shown in Table 2.1 (Appendix L) and by falling head tests in the monitoring wells. 2020 falling head tests were conducted in 12 boreholes and 21 test pits using and analyzed using the Bouwer and Rice method 2021. Request: Please provide details regarding the methodology of the Hazen test as requested from Appendix L.	Estimates of soil hydraulic conductivity made using the Hazen method and shown in Appendix A (Table 2.1) to the baseline hydrogeology report for the draft EIS/EA, are considered screening-level estimates and are not relied on or used in the main body of the baseline hydrogeology report (Appendix L-1 of the draft EIS/EA). Similarly, falling head tests conducted in standpipes 21 test pits (shown in Appendix A (Table 2.2) to the baseline hydrogeology report for the draft EIS/EA) are considered screening level estimates and are not relied on or used in the main baseline hydrogeology report (Appendix L-1 of the	EIS Section 6.5.1.2, Appendix L-1 Section 5.2, Appendix L-2 Section 3.2.

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						draft EIS/EA). As estimates made using both of these methodologies are considered screening level only and are not carried forward into the more recent studies, details of these methodology are not required here. Hydraulic conductivity estimates obtained through falling head testing of the 12 piezometer installations provided in Appendix A (Table 2.3) to the baseline hydrogeology report of the draft EIS/EA, are reliable and are carried forward in the main baseline hydrogeology report (Appendix L-1 of the draft EIS/EA). The data will be discussed in further detail in the updated baseline and hydrogeological modeling reporting currently in production and will be appended to the final EIS/EA.	
STPN-2021-144	Hydrogeology Baseline Report	Hydraulic conductivity testing in monitoring wells appear to reflect reported native material(s) but cannot be confirmed.	We recommend FMG provide hydraulic conductivity analysis graphs and present curve matching in an appendix.	Hydraulic conductivity estimates were obtained from falling head tests conducted in monitoring wells which were installed within boreholes advanced by drill rig into the native materials. Hydraulic conductivity estimates were made using Bouwer Rice method however curve matching plots of the falling head test data are not available. Additional slug testing is planned.	FMG did not address STPN's original comment and recommendation still applies. Request:: Please provide curve matching plots for the existing and additional slug tests.	Curve matching for hydraulic tests in site monitoring wells (and packer tests where relevant) is in production and will be provided in the updated baseline hydrogeology report, appended to the final EIS/EA.	EIS Section 6.5.1.2, Appendix L-1 Section 5.2.
STPN-2021-145	Hydrogeology Baseline Report	Groundwater level monitoring should be continued and capture seasonal trends.	We recommend FMG consider installing dataloggers to representative monitoring wells to collect seasonal groundwater level data.	A field program is currently underway at site to drill bedrock boreholes and install vibrating wire piezometers equipped with data loggers to monitor seasonal trends of groundwater levels.	FMG did not address STPN's original comment and recommendation still applies. Water levels are important to CLFN and LSFN. In the context of historical and ongoing cumulative impacts on surface water and groundwater from dams and other developments, it is critical that water levels are well understood. As highlighted by one LSFN member in recent interviews, "I think about what the level quality and quantity will be like when I'm a grandfather, that's what got me a little worried... I was thinking about the repercussions what if something bad were to happen to the water or if the water receded to a certain point and not come back". 11 11 L07. 2023. Transcripts of November 16, 2023 Interview	Additional hydrogeological characterization activities are in production and will be described in the updated baseline hydrogeological report appended to the final EIS/EA.	EIS Section 6.5.1.2, Appendix L-1.

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ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Lac Seul First Nation Request: FMG indicated in their November 3, 2023 memo that these boreholes have been completed, but no data or information has been provided. Please provide the report and data pertaining to this work program.		
STPN-2021-146	Hydrogeology Baseline Report	Section notes that the water quality results were not compared to Ontario Water Quality Guidelines values "as suggested by other members of the project team".	We recommend that during the water management planning and impact assessment stages of the project, results should be compared to the relevant water quality standard(s) to understand the water treatment requirements and develop a dewatering effluent discharge plan.	The Provincial Water Quality Objectives (PWQO's) represent a desirable level of water quality for surface waters which is protective of all forms of aquatic life. PWQOs are only applied to the groundwater in specific instances where groundwater is discharged to surface waters. Groundwater monitored in the baseline hydrogeology report was used to ascertain the movement of groundwater flow at the Project site. As a result, PWQO are not the relevant water quality standard in this case.	FMG did not address STPN's original comment and recommendation still applies. Request: Please compare results to a guideline or objective for review purposes only with a caveat that these are not remediation or proposed expectations for water quality and are for comparison purposes only.		EIS Section 6.6.1.2, 6.6.5 and Table 6.6.5
STPN-2021-147	Hydrogeology Baseline Report	Section raises concerns about the presence and effect of drilling fluids within the deep boreholes. Resulting geochemical results should be considered within the context of this potential issue.	We recommend FMG adjust field sampling methodology as required to ensure collection of representative samples.	Groundwater sampling activities at site for geochemical work will consider the potential interference from drilling fluids from historical exploration drilling activities, however most areas where groundwater chemistry are required are away from the open pit area where there are very few historical exploration holes, and as such groundwater samples from these locations are not expected to be impacted by drilling fluids.	FMG did not address STPN's original comment and recommendation still applies. Request: Please provide the method(s) and details of how samples will be collected and analyzed to reduce or ensure that drilling fluids and materials are not present in the sample.		Appendix N-1, Section 2
STPN-2021-148	Hydrogeology Baseline Report	Pumping test section does not mention the analysis of individual zones of the potential influence on the dewatering strategy of the lake and groundwater system.	We recommend that the dewatering section for shallow bedrock be included, and volumes estimated.	In the absence of interval-specific static hydraulic heads for SPW20-001, interval-specific flows likely cannot reliably be determined. As such, the results from testing presented in this section of FracFlow 2021 are likely insufficient for the determination of the depth of inflow zones for open pit. The results of this test are representative of the bulk properties of the rock over the entire length of the test interval. It is generally anticipated, however, that based on the distribution of hydraulic conductivities and proximity to recharge sources (i.e. largely the lakes) inflows to the pit will be greatest in the shallower bedrock (i.e., at the overburden/bedrock contact), and will	FMG did not address STPN's original comment and recommendation still applies. Request: Please provide additional information in the dewatering section including inflow volumes.	Estimation of groundwater inflows to the open pit is being conducted utilizing a calibrated 3D numerical model which has been developed for the mine site of the Project. Groundwater inflow rates to the open pit will be provided as part of the updated hydrogeology modelling report, currently in production and will be appended to the final EIS/EA. This will include an analysis of the sensitivity of inflows with changes in parameters for the bedrock layers which includes the shallow bedrock being modelled.	EIS Section 6.5.1.2, Appendix L-2 Sections 6, 7.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
				decrease with depth as bedrock permeability generally decreases.			
STPN-2021-149	Hydrogeology Baseline Report	Based on the objectives of the pumping tests, no discussion on the pumping test results compared to the objectives was found.	We recommend FMG provide a section summarizing the pumping test results compared to objectives and next steps based on data gaps.	The value in the data presented in Section 6.0 of FracFlow 2021 lies in the determination of the average/bulk properties of rock over the full length of the test interval. The overall resulting hydraulic conductivity from the test well was approximately 2.5×10-7 m/s (based on the Theis solution), suggesting, overall, that the rock is relatively tight at this location. Based on the location of this testing (i.e., situated between Birch Lake and the northern portion of the planned open pit), this provides insight into the potential interaction between the pit and Birch Lake.	FMG partially addressed STPN's original comment. L-1 Section 5.2.6 - 2.5 x 10-7 m/s from the pumping test was considered to be leaky and was noted that other wells were hydraulically connected due to the water elevations measured within them during pumping. Request: Please provide additional information regarding the pumping test results and any gaps that were identified.	A discussion of interpretations of the SPW20-001 pumping test will be provided in the updated baseline hydrogeology report, currently in production and will be appended to the final EIS/EA. This will include a discussion of the potential effects of bedrock hydrostratigraphuy and potential hydraulic boundaries in addition to general interpretations.	EIS Section 6.5.1.2, Appendix L-1 Section 5.2.2.
STPN-2021-150	Hydrogeology Baseline Report	There are significant borehole logs missing or the detail in the logs are minimal or absent.	We recommend FMG provide complete borehole and piezometer logs.	Additional borehole logs have been provided with this response as an attachment.	FMG partially addressed STPN's original comment. The response from FMG states that the logs are provided in an attachment, but there are many more boreholes noted on the figures than what were provided. No attachment provided Request: Please provide additional borehole and piezometer logs that are missing from the set.	An updated compilation of site borehole logs, monitoring well installation details, and vibrating wire piezometer installation details is in production and will be provided in the updated baseline hydrogeology report, appended to the final EIS/EA.	EIS Section 6.5.1.2, Appendix L-1 Appendix A.
STPN-2021-151	Appendices L-2, N-2	Groundwater Quality Sampling parameters are missing and only a list of standard parameters is provided.	We recommend FMG compare groundwater quality samples to Ontario Water Quality Guidelines and potential dewatering discharge standards for construction.	Dewatering requirements are being presented in the draft EIS/EA. Contact water management and effluent discharge does consider the PWQOs.	FMG partially addressed STPN's original comment. L-2 There is no quality for groundwater presented in the appendices. N-1, N-2 and N-3 – These sections compare concentrations and predicted concentrations with respect to guidelines. Request: Please compare results to a guideline or objective for review purposes only with a caveat that these are not remediation or proposed expectations for water quality and are for comparison purposes only.		EIS Sections 6.5., Table 6.5-1.
STPN-2021-152	2021 Sound and Vibration Baseline Report	To assist the reader in understanding the results of the report a Summary section should explicitly conclude the findings about the existing acoustical environment based on the baseline noise and vibration monitoring.	Recommend adding a conclusive summary regarding the existing acoustical environment, such as "the measurement results indicate that the existing acoustical environment of the Project area represents a typical pristine area	Comment noted.	FMG fully addressed STPN's original comment.		Appendix H-1 and H-2

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
			without any industrial noise and vibration sources presence in the area".				
STPN-2021-153	Appendix H	Table 2-1 provides information for two monitoring locations. To assist the use in understanding the conditions some descriptions about the existing environment at each location should be included.	We recommend FMG include descriptions of the existing environmental conditions for each monitoring location in this Section.	Descriptions of the existing environment of the monitoring locations are included in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. Section 2.0 of the Baseline Reports (Appendix H) and Section 6.3.1 of the draft EIS/EA does not provide a description of the two monitoring locations as requested. Request: CLFN and LSFN requests that FMG provide a description of the environmental conditions at the two monitoring locations to provide context for these locations in relation to the study area, in relation to the proposed Project, and in relation to influence on the monitoring equipment, e.g., sound and vibration exposure.	Agreed. Additional text is being added to the Sound and Vibration Baseline Reports to describe the environmental conditions at the monitoring locations. For the leaves off monitoring (April 2021), monitoring location SP1 was located adjacent to a frozen, snow covered lake and (primarily coniferous) trees, as shown in Photo 3-1. SP1 was located within the proposed Project footprint. Monitoring location SP2 was located approximately 20 m inland from Springpole Lake and was surrounded by (primarily coniferous) trees as shown in Photo 3-2. SP2 was located approximately 1.5 km south of the Project. Existing noise levels at both monitoring locations were primarily influenced by the natural environment (e.g., wind-induced noise, including rustling leaves). There were no substantial existing sources of vibration. For the leaves on monitoring (June 2021), SP1 and SP2 were located in the same general areas as for the leaves off monitoring. Monitoring location SP1 was located adjacent to Birch Lake and trees, as shown in Photo 3-1. SP1 was located 500 m north of the Project. Monitoring location SP2 was located adjacent to Springpole Lake and was surrounded by trees as shown in Photo 3-2. SP2 was located approximately 1.5 km south of the Project. Existing noise levels at both monitoring locations were primarily influenced by the natural environment (e.g., wind-induced noise, including waves and rustling leaves). There were no substantial existing sources of vibration.	Appendix H-1 and H-2, Section 3
STPN-2021-154	Appendix H	Photo 2-1 shows that SP-1 is located near the water, however, sound propagation could get influence by the water surface if the microphone is close to the water.	We recommend FMG include a discussion/description for the proximity of the monitor/microphone to the water and rationale for the selection.	The selection of the exact monitoring location was constrained by rights to access, available transportation and accessibility conditions during the field work (as have been identified in Section 2.0 of the report).	FMG did not address STPN's original comment and recommendation; both of which still apply. Section 2.0 of the Baseline Reports (Appendix H) and Section 6.3.1 of the draft EIS/EA does not provide a description of the two monitoring locations (e.g., proximity of location to water) as requested. Section 2.0 of	See response to STPN-2021-153.Note that in areas with an absence of key noise sources, the influence of natural features (e.g., water, trees) on sound propagation is expected to be immaterial.	Appendix H-1 and H-2, Section 3

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					the Baseline Reports (Appendix H) provides a rationale similar to what has been provided in their response to this comment. Request: CLFN and LSFN requests that FMG provide a description of the environmental conditions at the two monitoring locations to provide context for these locations in relation to the study area, in relation to the proposed Project, and in relation to influence on the monitoring equipment, e.g., sound and vibration exposure.		
STPN-2021-155	Appendix H	Photo 2-2 shows that SP-2 is located within a treed area, however, sound propagation could get shielding by the surrounding trees.	We recommend FMG include a discussion/description for the location of the monitor and rationale for the selection.	The selection of the exact monitoring location was also constrained by rights to access, available transportation and accessibility conditions during the field work (as have been identified in Section 2.0 of the report).	FMG did not address STPN's original comment and recommendation; both of which still apply. Section 2.0 of the Baseline Reports (Appendix H) and Section 6.3.1 of the draft EIS/EA does not provide a description of the two monitoring locations (e.g., proximity of location to water) as requested. Section 2.0 of the Baseline Reports (Appendix H) provides a rationale similar to what has been provided in their response to this comment. Request: CLFN and LSFN requests that FMG provide a description of the environmental conditions at the two monitoring locations to provide context for these locations in relation to the study area, in relation to the proposed Project, and in relation to influence on the monitoring equipment, e.g., sound and vibration exposure.	See response to STPN-2021-153 and STPN-2021-154	Appendix H-1 and H-2, Section 3
STPN-2021-156	Appendix H	Photo 2-1 and Photo 2-2 don't include details (clearly showing the terminal) for the vibration monitoring terminals.	We recommend FMG include photos showing details of the vibration monitoring terminals.	Noted. Photos will be obtained.	FMG did not address STPN's original comment and recommendation; both of which still apply. Photos provided do not clearly show details of the vibration monitoring terminals. Request: CLFN and LSFN requests that FMG provide photos which clearly show the details of the vibration monitoring terminals.	The photos in Section 3 of the baseline reports appended to the draft EIS/EA (Attachment STPN-2021-165) show both the sound and vibration monitoring terminals, and the details of the vibration monitoring terminals are described in Section 3.3.	Appendix H-1 and H-2, Section 3
STPN-2021-157	Section 6.3 Appendix H	Summary of noise regulations and criteria are not included.	We recommend a separate section to summarize applicable noise and vibration regulations and criteria for the project: – MECP NPC-300 – MECP NPC-119 – MECP NPC-207 – Health Canada	Applicable noise and vibration limits were not discussed in the baseline report as the focus of the report was to provide information on the existing conditions. Discussions of noise and vibration limits are included in the draft EIS/EA. Seismic activities have not been identified as of	FMG fully addressed STPN's original comment.		Appendix H-1 and H-2, Section 3

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
			We recommend a discussion of seismic activities in areas where seismic is a potential concern.	potential concern in the project area because the Project is located within a low seismic hazard zone.			
STPN-2021-158	Sections 3.3.4, 6.3 Appendix H	Information required for the assessment of the baseline doesn't appear to be complete. Details of the location of the meteorological station are not included.	We recommend FMG include the description of location (UTM coordinates) and setup (height of wind sensor) for the station.	The weather data used for the assessment was obtained from the meteorological station at the Springpole camp site.	FMG did not address STPN's original comment and recommendation; both of which still apply. Location and setup details of the meteorological station are not included in the Sections referred to. Request: CLFN and LSFN requests that FMG provide location and setup details of the meteorological station.	The meteorological station is located at 548877 m Easting, 5694163 m Northing (UTM NAD83, Zone 15N). The wind sensor is located at a height of 10 m above grade.	Appendix H-1 and H-2, Section 3
STPN-2021-159	Sections 3.3.4, 6.3 Appendix H	Same comments as for Photo 2-1 and Photo 2-2.	We recommend FMG include photos showing details of the vibration monitoring terminals.	Noted. Photos will be obtained.	FMG did not address STPN's original comment and recommendation; both of which still apply. Photos do not clearly show details of the vibration monitoring terminals. Request: CLFN and LSFN requests that FMG include photo(s) which clearly show details of the vibration monitoring terminals.	See response to STPN-2021-156.	Appendix H-1 and H-2, Section 3
STPN-2021-160	Section 6.3.1	Sound level differences between the weekday and weekend have not been captured. Health Canada Guidance of Noise Section 6.2.1 suggests the baseline report provides the information about the differences between the weekday and weekend baseline noise levels.	Recommend including some discussions for the noise level differences between the weekday and weekend.	Discussions of the noise level differences between weekdays and the weekend will be included in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. No discussion of differences between weekday and weekend noise levels are provided. Request: CLFN and LSFN requests that FMG provide a discussion of differences between weekday and weekend noise levels.	Due to the remote nature of the monitoring locations and minimal anthropogenic noise sources, noticeable differences between the weekday and weekend noise levels are not expected.	Appendix H-1 and H-2
STPN-2021-161	4.1.1 Hourly Sound Levels	Table 2-1 (Table 4-1) summarizes LASmin, LAeq, and LASmax for daytime and nighttime during the monitoring period. A summary of the highest and lowest average LAeq sound levels should be included.	Recommend including a table summarizing the highest and lowest average LAeq sound levels and the time and date when they occurred.	Such a table is included in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. No table summarizing the highest and lowest average LAeq sound levels and the time and date when they occurred is found in the draft EIS/EA. Request: CLFN and LSFN requests that FMG provide a table summarizing the highest and lowest average LAeq sound levels, as well as the dates and times they occurred.	Table 5-1 in the Sound and Vibration Baseline Report shows the minimum and average hourly LAeq measured over the daytime, evening and nighttime periods. The hourly LAeqs for the entire monitoring periods, including date and times, are provided in Appendix B of the Sound and Vibration Baseline Reports that were appended to the draft EIS/EA.	Appendix H-1 and H-2
STPN-2021-162	2021 Sound and Vibration	Table 4-3 shows that Sunday April 18 had the highest sound levels at both NMT1 and NMT2. Are there any observation or	Recommend including more discussions to explain the findings.	The higher sound levels on Sunday April 18 could be attributed to the wind condition (shown in Figure C-1 and Figure C-2). The	FMG did not address STPN's original comment and recommendation; both of which still apply. Note – different dates for the sound and	There are two separate Sound and Vibration Baseline Reports that were appended to the draft EIS/EA; one which	Appendix H-1 and H-2

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ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
	Baseline Report	discussions to explain this? And the table also shows the sound levels at NMT2 are higher than NMT1.Are there any observation or discussions to explain this?		different sound levels at NMT1 and NMT2 may be attributed to, in general, the difference in the natural surroundings (e.g. sounds from leaves ruffling was more noticeable near NMT2 than NMT1 during the field work).	vibration monitoring are now presented as compared to the previous draft EIS/EA reviewed. Previous monitoring results are not incorporated to make a complete data record. The draft EIS/EA does not explain the findings including such things as differences between days, differences between the two monitoring locations, and source of sound. Request: CLFN and LSFN requests that FMG provide a discussion of sound level findings and include discussion of all findings (i.e., including April and June data).	summarizes the April monitoring (Appendix H-1) and one which summarizes the June monitoring (Appendix H-2). All collected baseline data are included in Appendix C and D of these reports. Noise monitoring was carried out remotely for up to one week, and therefore the specific sources of noise throughout the monitoring periods were not exactly known. In general, noise levels during the leaves on program were higher than those measured during the leaves off program. It is expected that noise generated by waves in the nearby lakes for the leaves on program were higher than during the leaves off program, during which the water was frozen and SP2 was located further from Springpole Lake. It is also expected that wildlife were more active during the leaves on monitoring period. Through each monitoring program, day to day variations in measured noise level were expected to be primarily caused by varying meteorological conditions such as wind speed and the natural environment (e.g., wildlife). The different sound levels at SP1 and SP2 may be attributed to, in general, the difference in the natural surroundings (e.g., sounds from leaves rustling was more noticeable near SP2 than SP1 during the field work).	
STPN-2021-163	Sections 3.3.4, 6.3 Appendix H	What is the purpose of the sound level statistical analysis? Figure 4.2 to 4.4 show boxplots for the sound levels, (e.g. boxplots at each hour for a 24-hour period), however, the report does not have detailed discussion or conclusion for the statistical analysis.	Recommend including more discussions for the findings from the statistical analysis.	The purpose of the statistical analysis was to provide a more comprehensive presentation of the measured data. The boxplots were intended to supplement the tabular summary by showing the distribution of the daily/hourly records and providing visualizations of the data characteristics (e.g. range of variation, general comparison of the sound levels in terms of NMT1 vs. NMT2, daytime vs. nighttime). The results of the statistical review have been	FMG did not address STPN's original comment and recommendation; both of which still apply. Note – different dates for the sound and vibration monitoring are now presented, as compared to the previous draft EIS/EA reviewed. Previous monitoring results are not incorporated to make a complete data record. The draft EIS/EA does not explain the findings including such things as differences between days, differences between the two monitoring locations, and source of sound.	See response to STPN-2021-162.The noise data will only be summarized in tables and chart format and the boxplots showing the noise data will be removed from the updated baseline reports.	Appendix H-1 and H-2

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
				briefly discussed in the baseline report(s). Additional discussion is included in the draft EIS/EA.	Request: CLFN and LSFN requests that FMG provide a discussion of sound level findings and include discussion of all findings (i.e., April and June data.).		
STPN-2021-164	Sections 3.3.4, 6.3 Appendix H	Figure 4.6 to 4.9 show boxplots for the vibration levels PPV and RMS, (e.g. boxplots at each hour for a 24-hour period). What is the purpose of this analysis? The report does not have a detailed discussion or conclusion for these statistical analyses.	Recommend including more discussions for the findings from the statistical analysis.	The purpose of the statistical analysis was to provide a more comprehensive presentation of the large amount of data collected. The boxplots were intended to supplement the tabular summary by showing the distribution of the 1-second records within each hour and providing visualizations of the data characteristics (e.g. range of variation, general comparison of the daytime and nighttime vibration levels). The results of the statistical review have been briefly discussed in the baseline report(s). Additional discussion is included in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. The draft EIS/EA does not explain the findings including such things as differences between days, differences between the two monitoring locations, and source of vibration. Request: CLFN and LSFN requests that FMG provide a discussion of sound level findings.	Information on the differences between the monitoring locations and the source of vibration (when applicable) were provided in the Sound and Vibration Baseline Reports appended to the draft EIS/EA and will be provided in the updated Sound and Vibration Baseline Reports in production for the final EIS/EA. Generally, vibration levels are very low; when there was a clear increase in vibration levels, the expected cause was provided (e.g., wildlife).	Appendix H-1 and H-2
STPN-2021-165	2021 Sound and Vibration Baseline Report	Two figures showing the measured sound levels LASmin, and LASmax together with LAeq along the time of the full monitoring period at each location should be included. These sound level figures may show more direct visual changes of the sound levels along the time than the boxplots.	We recommend FMG include LASmin and LASmax in two figures showing the sound levels along with time (hour and date).	The requested figures are included in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. Figures providing LASmin, LASmax, and LAeq for the full monitoring period (i.e., all days monitored in April and June) at each location are not included. Request: CLFN and LSFN requests that FMG provides figures presenting LASmin, LASmax, and LAeq for the full monitoring period (i.e., all days monitored in April and June) at each location, as well as discussion and interpretation of the findings.	This information is currently provided in Appendix C of the Sound and Vibration Baseline Reports that were appended to the draft EIS/EA. The tables provide the LASmin, LASmax and LAeq for the full monitoring period, and the figures show the hourly LAeq for the full monitoring period. Figures showing the LASmin and LASmax are provided as Attachment STPN-2021-165.	Appendix H-1 and H-2
STPN-2021-166	Hydrology Baseline Report	Climate normals are provided for 1981-2010, which is the most recent Canadian Climate Normals published by Environment and Climate Change Canada (ECCC). However, this period may not reflect existing conditions given climate change. This is supported by the Hydrology Program – Factual Report (Section 3.2) in Appendix B. Figure C10 in the factual report suggests an increasing trend in precipitation at the Red Lake Climate station.	Recommend that new climate normals are calculated and presented as baseline for the most recent 30-year period (1991-2020) following ECCC methods to better reflect baseline conditions.	The baseline conditions will be updated when ECCC issues updated Climate Normals. These are typically issued at the completion of each decade.	FMG fully addressed STPN's original comment		Appendix M-1

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
STPN-2021-167	Hydrology Baseline Report	Discrepancies were noted between precipitation recorded at Casummit Lake and Springpole Station meteorological sites located near the project site and the more distant ECCC climate stations. While potential issues were identified for the Casummit Lake and Springpole stations that could lead to inaccurate precipitation records, it is notable that precipitation at these stations was significantly lower than at the ECCC stations in years with data, 2012 (at both sites) and in 2020 (at Springpole Station only). This suggests that the ECCC climate station data may not be representative of local conditions near the project site. This fact was also noted in Ausenco 2020 report, which suggested that a microclimate may be present in the project area. It is understood that monitoring will continue at the Springpole Station to confirm local precipitation patterns.	Recommend that FMG commit to revising the baseline characterization of precipitation once enough data are collected from the Springpole Station. Revisions should include evaluation of the representativeness of the ECCC weather station data for use in the EIS based on the results from the Springpole Station, and whether the baseline will need to consider regional and local conditions. Further, the evaluation should consider recent trends in precipitation patterns observed at the ECCC stations and the Casummit and Springpole stations, and their implications for establishing baseline conditions in the project area.	The Project will continue to collect site specific data from the Springpole weather station and build a climate database as the Project progresses. As the database is developed, findings will be compared to other data sets, such as the Environment and Climate Change Canada (ECCC) climate stations. While this database is being developed, the assessment is using the dependable, long-term data sets from ECCC. This is a common approach for the purpose of environmental assessment as the onsite database is continued to be developed.	FMG fully addressed STPN's original comment Request: Despite FMG addressing this comment, CLFN and LSFN requests that FMG please convene a meeting(s) with MECP to review thresholds that will be used to understand potential health effects and to develop a sample plan, including sampling method, sampling station(s) and location(s), and duration (i.e., spatial and temporal coverage) that will be implemented to develop a thresholds framework. See Requests STPN-2021-6 and STPN-2021-11. This comment applies to the extent that the project will be a source for mercury and/or to the extent that project, residual, and/or cumulative effects on water quality can be better predicted and perhaps more importantly mitigation, monitoring, and thresholds frameworks will be improved.	Mercury is not proposed to be used in the process for gold mining at the Springpole Gold Project, and the Project will not be a source of mercury. Baseline water quality monitoring in the Project waterbodies from 2012 though 2022 indicate that mercury levels are consistently below analytical detection limits and are always less than the Canadian Water Quality Guidelines for the Protection of Aquatic Life for mercury (<0.000026 mg/L). A summary of key metals in host rock and ore is presented in Section 4.3 of Appendix K-1 (Static Geochemical Testing Baseline Report) of the draft EIS/EA. Solid phase mercury concentrations in the project rock are low. Specifically, mercury concentrations were below qualitative threshold values (10 times crustal abundance) in 98% of the mine rock samples and 94% of the ore-grade samples. The potential for mercury leaching from the rock is also low for most materials based on the results of leaching tests (Appendix K-1) and humidity cell tests (Appendix K-2). A summary of inorganic contaminants of potential concern in soil can be found in Section 3.4.3.2 of Appendix R (Human and Ecological Health Risk Assessment Model Report) of the draft EIS/EA. The maximum concentration of mercury in the collected soil samples did not exceed federal or provincial guideline values. The predictive models developed to support the EIS/EA which use the baseline data described above indicate that mercury levels remain below threshold criteria for surface water quality and human health and the Project is not a source of mercury.	Appendix M-1, Section 3.1

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
						A preliminary surface water sampling program will be included in the final EIS/EA, and further developed during the permitting phase. FMG will continue to engage and consult with CLFN and LSFN through the permitting phase as further details are developed. The permitting phase program is expected to include further details on methods, locations and duration, along with monitoring and reporting requirements based on discussions with regulatory agencies. The purpose of the surface water program will be to monitor compliance against regulatory permits, and validate the predictions in the final EIS/EA.	
STPN-2021-168	Hydrology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. The years covered by the normals are not presented in these tables.	We recommend FMG reference the years covered by the normals in the tables.	The most recent set of ECCC Climate Normals have been utilized in the baseline report. As noted in the report, the Climate Normals are based on data from 1981 to 2010.	FMG did not address STPN's original comment and recommendation still applies. According to Appendix M-1 – Hydrology Baseline, the Climate Normals data is still only for 1981 to 2010. Request: Climate Normals to 2020 have been published by ECCC. Please update as requested in the original comment.	The updated Baseline Hydrology Report is in production and will be appended to the final EIS/EA and will include the Climate Normals available to date. The 1991-2020 Climate Normals have not yet been published for regional or local climate stations in the vicinity of the Project.	Appendix M-1, Section 3.3
STPN-2021-169	Hydrology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. The years for which the data are shown are not provided.	We recommend FMG reference the years (period of record) used for the figure.	The most recent set of ECCC Climate Normals have been utilized in the baseline report. As noted in the report, the Climate Normals are based on data from 1981 to 2010.	FMG did not address STPN's original comment and recommendation still applies. According to Appendix M-1 – Hydrology Baseline, the Climate Normals data is still only for 1981 to 2010. Request: Climate Normals to 2020 have been published by ECCC. Please update as requested in the original comment.	The updated Baseline Hydrology Report is in production and will be appended to the final EIS/EA and includes the Climate Normals available to date. The 1991-2020 Climate Normals have not yet been published for regional or local climate stations in the vicinity of the Project.	Appendix M-1, Section 3.3
STPN-2021-170	Sections 3.3.1, 3.3.6 Appendix M	Evaporation data from recently available ECCC stations was discounted because the values were higher than that from the Hydrological Atlas of Canada for the project area. The atlas, however, was published in 1978 and the data are old. It is plausible that evapotranspiration has changed since publication of the atlas. Given the old data from the atlas and the lack of evaporation data from near the project area, the	We recommend that assessment of evaporation should be revisited to address issues of old data and the lack of data near the project area with newly collected data from the weather station installed in 2020. This is important because evaporation is a key part of the hydrologic system and will be needed for future assessments of water quantity including modelling efforts.	The Project will continue to collect site specific data from the Springpole weather station and build a climate database as the Project progresses into construction and so forth. As the database is developed, findings will be compared to other data sets, such as the Environment and Climate Change Canada (ECCC) climate stations and the Hydrological Atlas of Canada. While this database is being developed, FMG is	FMG did not address STPN's original comment and recommendation still applies. FMG's response does not address the content or the intent of the original comment. Site specific evaporation data was calculated in 2019 but then discounted because it didn't agree with the 1978 publication. The commitment of FMG to continue to collect site specific data and compare it with ECCC and the Hydrological Atlas of Canada doesn't address	Monthly lake evaporation is calculated using monthly temperature values obtained from Red Lake Climate Normals and the Hamon equation. The lake evaporation rates calculated with the Hamon equation support the estimates provided by the Hydrologic Atlas of Canada, as it generated a similar average annual lake evaporation (460 mm). This will be described in the updated Baseline Hydrology Report that is in production	Appendix M-2, Section 5.1

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
		baseline evaporation presented is not well supported.		using the dependable, long-term data sets from ECCC. This is a common approach for the purpose of environmental assessment as the onsite database is continued to be developed.	STPN's original concern that FMG isn't considering the possibility that evaporation may be increasing and the more recent data may be correct. Comparing data with the Hydrological Atlas is not an effective exercise if the Atlas is no longer accurate Request: The original STPN comment still applies.	and will be appended to the final EIS/EA. The Hamon equation has been applied in the water balance model for the final EIS/EA to evaluate the impacts of changing temperatures on evaporation on final closure conditions. Pan evaporation data has been collected by FMG at the Springpole Station for the summer of 2022. Data for May to September will be presented in the updated Baseline Hydrology Report which will be appended to the final EIS/EA. The total measured pan evaporation during this period was determined to be 398.6 mm, and is not representative of a complete year. Pan evaporation is typically higher than lake evaporation.	
STPN-2021-171	Hydrology Baseline Report	The rating curve developed from the 2011/2012 data for the Springpole Lake inlet is described as 'preliminary' and we note that the 2020 manual measurements fall outside of the +/-15% error of the curve. Will the rating curve be revised with more recent data collected for the site? Will winter flows be considered?	We recommend FMG clarify whether a new rating curve will be developed for the Springpole Lake inlet and other level logger stations using more recent data and winter data.	The current and ongoing hydrometric monitoring program will continue to develop rating curves for the Springpole Lake inlet, outlet, and other ongoing monitoring sites. A winter measurement will be attempted this upcoming winter if conditions are safe to do so.	FMG addressed STPN's original comment, however new data not provided. Request: Please provide the updated analysis with the 2021/2022 data (and 2023 data if available), including the revised rating curve(s).	The updated analysis will be provided in the updated Baseline Hydrology Report that is in production and will be appended to the final EIS/EA	Appendix M-1, Section 4.4.2
STPN-2021-172	Hydrology Baseline Report	Flow monitoring programs in 2011/2012 and 2020 only included data collection during the open water season. Winter flows will be monitored in 2021 with plans to continue this monitoring in 2022. This data should be used to validate pro-rating of flows during the winter season.	We recommend FMG confirm that ongoing/planned monitoring of winter flow measurements from the local study area will be used to verify/validate pro-rating of flows during the winter months in the Environmental Impact Statement.	Winter measurement are planned to be undertaken in the coming year to verify/validate pro-rating of flows.	FMG addressed STPN's original comment, new data not provided. Request: Please provide the updated analysis with the 2021/2022 data (and 2023 data if available).	Monitoring data from February 2022 and 2023, as well as the updated analyses will be provided in the updated Baseline Hydrology Report that is in production and will be appended to the final EIS/EA.	Appendix M-1, Section 4.4.2
STPN-2021-173	Hydrology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. Hydrological conditions are only described for Springpole Lake inlet and outlet, but monitoring data exist and were evaluated for several other flow/level monitoring stations including minor contributary flow stations (e.g., Figure 4.8 in the FracFlow 2021 Factual Report). A summary of flow conditions for the smaller tributaries and other lake sites with existing data (including comparisons to pro-rated flows where appropriate, as was done for Springpole	Recommend that the baseline characterization summarize flow conditions for sites other than Springpole Lake inlet and outlet. The FracFlow 2021 Factual Report contains information for these sites and is included in the appendices, but a clear summary of the results noting information gaps should be included in the main body of the report.	The inclusion of data from the other monitoring sites (collected by FracFlow at the smaller tributaries during year 2020) will not improve the analysis. The collection of accurate flow monitoring data can be more challenging in smaller tributaries,	FMG did not address STPN's original comment and recommendation still applies. Request:: Please provide a summary of the results from the FracFlow 2021 factual report in the main body of the Hydrology Baseline Report for completeness and comparison.	A summary of all historical and ongoing hydrometric monitoring stations, including those monitored by FracFlow and DST, will be provided in the updated Baseline Hydrology Baseline Report that is in production and will be appended to the final EIS/EA. The monitoring data collected by FracFlow and DST will be included in the updated Baseline Hydrology Report wherever data collection is ongoing and where it may be compared to a developing data set. The locations include smaller tributaries to Springpole Lake (F11-HS2	Appendix M-1, Section 4.4.2

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
		Lake), would be useful in the main body of the report.				and F13), in addition to the inlet and outlet of Springpole Lake.	
STPN-2021-174	Appendix W	The baseline report considers information collected up to the date of report production. A considerable amount of meteorological and hydrological data collection is planned for 2021 and 2022. It is understood that the newly collected data will be evaluated as part of the EIS/EA to inform the effects assessment. The baseline report, however, does not clearly identify data gaps as a rationale for the planned monitoring programs.	We recommend FMG provide a summary of data gaps and the rationale for the selection of monitoring sites provided in the 2021 Hydrology Technical Workplan. Please provide comment on the adequacy of these sites (numbers, locations, water body types) to spatially characterize hydrology, in particular, for smaller tributaries within the project area.	Baseline monitoring continues throughout the EA process and the 2022 field program will be developed to address areas where further data collection might be helpful. This will be carried out for all monitoring stations, including those on smaller tributaries within the Project area. The program will be informed by the 2021 field program, which was carried out to address data gaps in previous baseline data. The Technical Work Plan include rationale for the field program and a visual display of the sampling locations.	FMG partially addressed STPN's original comment. A data gap analysis is an important exercise to ensure data collection plans will address uncertainty and fill the data gaps. Appendix W only states the 2022 work program is to "collect baseline". It doesn't provide a rationale on "the adequacy of these sites (numbers, locations, water body types) to spatially characterize hydrology, in particular, for smaller tributaries within the project area", nor does the hydrology baseline report or the 2022 Work Plans identify data gaps or provide a rationale for the current and planned monitoring sites. Assuming the 2022 work programs proceeded as planned, the data needed to address STPN's original request exists. Request: Please update the Baseline Hydrology Report to present and analyze these data and to provide the rationale and data gap analysis for the current baseline monitoring program (see the Work Plan for the 2022 Surface Water Quality which provides a table with a "summary rationale" for each location – this is basically what is needed for hydrology monitoring program.	The hydrometric monitoring program was developed primarily on the understanding of the potential impacts from the Project, site reconnaissance and observations, and input received through engagement and consultation. An initial gap analyses and site reconnaissance informed the 2021 monitoring work. Although considerations were made to carry forward existing stations, the focus was on the need to establish a monitoring program that aligned with the Project and environmental assessment requirements. Stations were established at key locations, including smaller tributaries to Springpole Lake, and where quality data could be collected, in line with Water Survey of Canda Guidelines. The monitoring program has further developed since 2021. A comprehensive list of historic and current monitoring locations will be provided in the updated Baseline Hydrology Baseline Report that is in production and will be appended to the final EIS/EA. Rationale for each of the monitoring locations, as well as the adequacy of the monitoring program to characterize the Project area is included in Attachment STPN-2021-174.	Appendix M-1, Section 4.4.2
STPN-2021-175	Sections 3.3.7, 3.3.8 Appendices M, N	Table 2-2 provides a summary of the water quality monitoring locations and the number of sampling events in each year. The number of sampling events in each year differs by location, but in general, the sites have been monitored between one and three times per year in recent years (i.e., since 2015). This suggests that there is little data available in recent years to assess seasonal variation at any one site. Several water quality parameters (e.g., total	Recommend that future monitoring include enough events at each site to document seasonal variability.	The baseline water quality report adequately documents the spatial and temporal variability of surface water quality of the waterbodies that have the potential to be affected by Project. The dataset is quite extensive when compared to other projects at the EA stage. The characterization of existing conditions within the local area habitat type is well documented and sufficient to support the environmental assessment. Water quality sampling will continue throughout the EA process.	FMG fully addressed STPN's original comment. Request:: Assuming the 2022 workplans proceeded as proposed (Appendix W), these data were collected. Recommend the Surface Water Quality Baseline Report, Cumulative (2011-2020) be updated with 2021/22 data (and 2023 if available).	The baseline surface water quality report is in production and with data through to the end of 2022 and will be appended to the final EIS/EA.	Appendix N-1,Section 3

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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		suspended solids, phosphorus) vary naturally between seasons therefore it is important to capture this variability in the baseline condition.					
STPN-2021-176	Hydrology Baseline Report	The monitoring sites focus on lake sites and include few stations on tributaries and small lakes/ponds draining to the large lakes. Small tributaries and ponds can have very different water quality than large lakes, and they also may be more susceptible to potential impacts from mining activity.	Recommend that future monitoring consider a larger number of smaller tributaries and small lakes/ponds to fully characterize water quality in these potentially sensitive water bodies.	Small inland lakes and tributaries are characterized as part of the baseline aquatic studies. For surface water quality, the 2021 field program includes additional small inland lake systems that may be affected by Project development. The 2021 field program covers additional samples to be collected with the following small body lakes: L-1, L-16, L-18, and L-19.	FMG fully addressed STPN's original comment. Request:: Assuming the 2022 workplans proceeded as proposed (Appendix W), these data were collected. Recommend the Surface Water Quality Baseline Report, Cumulative (2011-2020) be updated with 2021/22 data (and 2023 if available).	The baseline surface water quality report is in production and with data through to the end of 2022 and will be appended to the final EIS/EA.	Appendix N-1,Section 3
STPN-2021-177	Hydrology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. What if any of the monitoring sites are located in areas of potential groundwater/ surface water interactions?	Recommend that future monitoring consider surface water sites in the vicinity of groundwater/surface water interactions.	The extent and scope of the baseline studies fully consider the potential interactions with related Value Components (VCs), including hydrogeology. Potential surface water-groundwater interactions is quantitatively assessed by predictive modelling in the draft EIS / EA. Section 6.0 of the "Hydrogeology Baseline Report" (May 2021) notes that the discharge of groundwater into the surface water bodies is anticipated to be low, and as a result, the groundwater and surface water interaction will likely have little impact on surface water bodies. However, if there is a material groundwater / surface water interaction, a new sampling location will be considered in future field sampling programs and incorporated into subsequent analysis.	FMG partially addressed STPN's original comment. The conceptual model presented in the Hydrogeological Modelling Report doesn't agree with FMG's statement that "that the discharge of groundwater into the surface water bodies is anticipated to be low". Figure 3.1 in the Hydrogeological Modelling Report illustrates the surface water/groundwater connections. However, we recognize that identifying specific locations of groundwater connection in large lakes is challenging and recognize that FMG is committing to monitoring if a "material groundwater/surface water interaction" is identified. Our primary remaining concern is how FMG will identify where these interactions are happening. Request: Please provide a surface water/groundwater interaction monitoring and mitigation plan that is designed to identify areas of potential groundwater/surface water interaction.	Seepage quality and quantity estimates will be provided in the final EIS, including a schematizations to illustrate potential seepage pathways. Groundwater mitigation measures have been designed for the CDF and include the siting of the CDF on highly preferred foundation conditions composed of andesite bedrock, the appropriate management of tailings and mine rock within the facility, and an engineered perimeter seepage collection system, Follow-up surface water and groundwater monitoring programs are in place for the Project and will be refined as part of the provincial permitting process, as is standard practice. However, note that the surface water quality and groundwater monitoring programs undertaken for the Project are comprehensive, spanning multiple years. The currently ongoing programs extend around the perimeter of the proposed location of the co-disposal facility and include areas where potential seepage pathways, as identified through the hydrogeological modeling that was conducted to support the environmental assessment for the Project. It is expected that these ongoing programs will form the foundation of follow-up monitoring programs.	Appendix L-2, Section 6, and Figure 4.2-1

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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STPN-2021-178	Hydrology Baseline Report	It is unclear whether the sampling locations include areas of cultural or spiritual significance to the Communities.	Recommend that surface water bodies of cultural or spiritual significance to First Nations communities be included in the selection of sites for future baseline monitoring.	The sampling locations intend to capture locations that are potentially subject to change based on the Project including those in the vicinity of infrastructure and treated effluent discharge. During the draft EIS/EA, review, potential effects will be evaluated which will further inform the need for future monitoring locations and community input is welcome. Additional areas of interest to the communities outside of the predicted mine influence can be sampled through TK/TLRU studies and we would be pleased to receive a proposal in this regard.	FMG did not address STPN's original comment and recommendation still applies. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies.	The baseline surface water quality and groundwater monitoring programs undertaken for the Project are comprehensive, spanning multiple years and covering all surface water bodies potentially affected by the Project and more. Surface water sampling extends X km downstream as previously requested from comments on earlier surface water monitoring plans. As noted in the 2022 Surface Water Quality and Hydrogeological Technical Workplans (Appendix W of the draft EIS/EA), the surface water quality and groundwater monitoring programs have incorporated feedback received from Indigenous communities. FMG is interested in working together to establish a monitoring committee with CLFN and LSFN for all phases of the mine.	EIS Section 6.6.2.3
STPN-2021-179	Section 3.3.8 Appendix N-1	The surface water quality monitoring sites were selected to "coincide with sampling locations for baseline surface water hydrology as well as fish and fish habitat programs". It would be useful to provide which sites coincide with these other programs, either on Table 2-2 or on Figure 2-1. Similarly, showing the position of groundwater monitoring in relation to surface water monitoring sites would help to give a whole picture of the baseline monitoring.	Recommend that locations for hydrology, aquatic habitat and groundwater monitoring sites be added as a figure in the report to illustrate the location of these sites in relation to the surface water quality monitoring sites.	A figure(s) showing the sampling sites is included in the draft EIS/EA.	FMG partially addressed STPN's original comment. Section 3 of the main EIS report provides maps of groundwater sampling locations (Figure 3.3-10), Surface Water Quality and Aquatic Resources (Figure 3.3-12) and Aquatic Sampling Locations (3.3-14). However, the original comment requested groundwater quality, surface water quality, hydrology (hydrometric stations) and aquatic habitat monitoring locations be provided on a single map in order to understand the relative locations of each monitoring point. Request: Please provide the requested figure.	The requested figure is included as Attachment STPN-2021-179, and will be provided in the final EIS/EA.	Appendix N-1, Section 3
STPN-2021-180	Sections 3.3.8, 6.6 to 6.9 Appendix N-1	Information required for the assessment of the baseline doesn't appear to be complete. The methods state that "Basic descriptive trend and summary statistics" were calculated. No analysis of trends was provided.	Recommend including a discussion or analysis in trends over time to note changes in any of the water quality parameters over the period monitored.	The baseline water quality report adequately documents the spatial and temporal variability of surface water quality of the waterbodies that have the potential to be affected by Project. The characterization of existing conditions within the local area is more than sufficient to support the environmental assessment. As such, no further analyses is proposed at this time. Trends in surface water quality and the effects to surface waters are quantitively assessed by	FMG partially addressed STPN's original comment. Surface water quality is summarized in Appendix N-2 – Surface water quality modelling report (Appendix A of this report), and time series were provided in Appendix N-1 Water Quality Baseline Report (Appendix C of this report); however, assessment or analysis of changes over time were not provided for any surface water parameters. Request:	The requested analyses will be provided in the final EIS/EA.	Appendix N-1, Section 3

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				predictive modelling, and included in the draft EIS/EA.	Please provide a summary of any temporal trends in the data.		
STPN-2021-181	Hydrology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. Wood notes that lab pH values are used to characterize baseline because field pH was missing for several study locations. pH can change during transport of the samples to the lab. Comparison of field and lab pH can therefore be used to assess issues related to sample integrity.	Recommend that field and lab pH be provided in Table 3.1 for comparison, and that field pH, where available, be used in the calculation of summary statistics.	Field pH was not added to Table 3.1 because of missing data points, as described in Section 2.0 of the baseline water quality report. Several other methods were used to assess sampling integrity, as noted in section 2.4, and includes a discussion of the QA/QC results. Further Appendix B includes the QA/QC sample results, as well as a comparison of duplicate results.	FMG partially addressed STPN's original comment. While FMG didn't strictly address the original comment, we agree sample integrity is best evaluated through other methods. However, going forward, field pH should always be collected during monitoring programs as pH is increasingly being used to evaluate toxicity of various metal parameters. Request: Commit to collecting field pH at all water monitoring events.	Yes. Field pH is monitored at all ongoing surface water quality baseline monitoring locations; these data will be included in the updated baseline water quality report in progress and will be appended to the final EIS/EA.	Appendix N-1, Section 3
STPN-2021-182	Sections 3.3.8, 6.6 to 6.9 Appendix N-1	The Provincial Water Quality Objectives (PWQO) or interim PWQO (PWQOi) are used to assess the analytical results. The Canadian Water Quality Guidelines (CWQG) are used if there is no PWQO or PWQOi. It is practice to also consider the CWQGs for federal lands.	Recommend that the PWQO and the CWQGs be considered in the evaluation of surface water quality data.	The evaluation of surface water quality considered both PWQO and CWQGs. Appendix D presents comparison of the water quality results to both PWQO/interim PWQO and CWQG.	FMG partially addressed STPN's original comment. Appendix N-1 of the Surface Water Quality Baseline Report compares data to both PWQO and CWQG Request: Please add a summary to Section 2.3.4 of the Surface Water Quality Baseline Report outlining exceedances of the PWQO and all CWQGs (not just when a PWQO is absent).	The final EIS/EA must use a consistent set of Water Quality Guidelines for the Protection of Aquatic Life (WQG PAL) as per the latest guidance from the Ministry of the Environment, Conservation and Parks (MECP). Recent MECP guidance necessitates the utilization of the most current WQG PAL sourced from either the Provincial Water Quality Guideline (PWQO / interim PWQO), Canadian Water Quality Guidelines (CWQG), or Federal Water Quality Guidelines (FWQG). This approach ensures alignment with the evolving regulatory landscape and reflects the commitment to adhere to the most up-to-date standards in safeguarding aquatic ecosystems	EIS Section 6.6.5
STPN-2021-183	Hydrology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. Is there a process for identifying outliers in the data?	Recommend that a process for identifying potential data outliers be included in future assessments of baseline data.	No outliers were removed from the data unless a QA/QC issue was identified by the lab or sampling program. For the sampling data collected between 2011 and 2020, this only included mercury and Cr (VI) results for 2012, which is further discussed in Section 2.4.1	FMG fully addressed STPN's original comment.		Appendix M-1
STPN-2021-184	Hydrology Baseline Report	In the third paragraph, it is noted that "…water is at its maximum density at 4°C and becomes less dens as it gets warmer". This is correct, but water also becomes less dense at temperatures cooler than 4°C.	We recommend revising this sentence to note that water becomes less dense at temperatures above and below 4°C.	Comment noted. Future descriptions will re-phrase.	FMG fully addressed STPN original comment.		Appendix M-1
STPN-2021-185	Hydrology Baseline Report	In the third paragraph, it states that "…a boundary layer known as the thermocline (metalimnion) develops…" The boundary layer is called the metalimnion in this context. The thermocline is the area within	Recommend revising sentence to more accurately define metalimnion and thermocline as these terms are not interchangeable.	Comment noted. Future descriptions will re-phrase.	FMG fully addressed STPN's original comment.		Appendix M-1

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		the metalimnion with the greatest rate of temperature decline with depth.					
STPN-2021-186	Appendix N-1	Birch Lake field profiles were only taken to a depth of 11 m, but the lake is much deeper. Profiles therefore are not sufficient to characterize the full water column.	Recommend that water quality profiles be taken to extend to the maximum lake depth to fully the characterize water column.	Additional characterization of Birch Lake water column has been undertaken in the 2021 field program.	FMG fully addressed STPN's original comment. Request:: We recommend that Section 3.1.1 of the Surface Water Quality Baseline Report, Cumulative (2011-2020) be updated with 2021/22 data (and 2023 if available).	The updated baseline water quality report in production incorporates new data collected as part of the ongoing baseline monitoring programs (2011 through 2022), and will be appended to the final EIS/EA.	Appendix N-1, Section 3
STPN-2021-187	Hydrology Baseline Report	Several parameters had values that exceeded PWQO or CWQG. These exceedances were attributed to elevated total suspended solids in the samples and were considered to reflect natural variability. It would be useful to include the TSS values in this section to support the argument. Also, is there evidence for similarly high TSS levels at other nearby sites at the same time, or do the instances of high TSS occur during certain seasons?	Recommend that additional detail be provided to support the conclusion that values exceeding guidelines represent natural variation and not sample contamination.	Comment noted. Appendix D of the baseline water quality report includes specific samples with exceedances as well as the associated TSS values. Appendix B includes the laboratory QA/QC results.	FMG partially addressed STPN's original comment. These results are included in Appendix N. Request: Please add a summary this Section of the Surface Water Quality Baseline Report summarizing those exceedances of the PWQO and all CWQGs attributed to TSS/TDS, along with the TSS/TDS value and a commentary on any seasonal trends.	The requested discussion will be included in the final EIS/EA. To summarize here, 915 samples have been collected between 2011 and 2022 as part of baseline environmental work for the Project. Overall, results indicate that surface water quality of monitored waterbodies are typical of oligotrophic lakes in northwestern Ontario, including low concentrations of nutrients and anions, low turbidity, and saturated to near- saturated dissolved oxygen concentrations. The pH levels of Birch Lake, Springpole Lake, Seagrave Lake, small area lakes and regional monitoring stations are circumneutral; low frequency slightly alkaline to alkaline pH values are associated with summer sampling of surface (epilimnion) waters, wherein elevated pH values are likely driven by photosynthesis and generally warmer water quality conditions. There are no other consistent seasonal trends or inter-annual trends for other monitored parameters. Levels of TSS and TDS are generally low for all the sampled waterbodies. Similarly, concentrations of most total and dissolved metals are low, consistently below Water Quality Guidelines for the Protection of Aquatic Life (WQG PAL). There were a few occasions where measured baseline concentrations are outside the range established by WQG PAL. Parameters outside the range established by WQG PAL included pH, total phosphorus; total iron,	Appendix N-1, Section 3

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						and total copper. These exceedances occur less than 2% of observations, are generally associated with elevated TSS levels (total phosphorus, total iron) and are considered representative of the natural heterogeneity of these lake systems.	
STPN-2021-188	Hydrology Baseline Report	It is noted that water chemistry at SW-15 located nearshore in Springpole Lake near the inlets from several tributaries is more variable than other locations in the lake and is "likely more influenced by runoff and rainfall events". This argument is valid and also supports the need for additional sampling of smaller tributaries to characterize these sensitive receivers.	Recommend that future monitoring consider a larger number of smaller tributaries and small lakes/ponds to fully characterize water quality in these potentially sensitive water bodies.	The 2021 field program includes additional water quality sample locations to be collected in the following small lakes and ponds, including L-1, L-16, L-18, and L-19.	FMG fully addressed STPN's original comment. Request:: We recommend that Section 3.0 of the Surface Water Quality Baseline Report, Cumulative (2011-2020) be updated with 2021/22 data (and 2023 if available), including data for the newly added locations.	The updated water quality report in production is being updated to incorporate new data collected as part of the ongoing baseline monitoring programs (2011 through 2022), including the newly added monitoring locations based on past comments received, and will be appended to the final EIS/EA.	Appendix N-1, Section 3
STPN-2021-189	Hydrology Baseline Report	Information required for the assessment of the baseline doesn't appear to be complete. The report says that "A total of 11 small lake (<20 ha) within the project claim area were sampled between 2012 and 2020". Data are only provided for three of these sites.	We recommend FMG provide the data for all 11 small lakes.	Incidental monitoring was completed in 11 small lakes and tributaries in the baseline water quality study area between 2012 and 2020; these data are presented in the Aquatic Resources Baseline Study. Section 3.4 of the Surface Water Quality Baseline Report presents limnological and water quality characterization for the three lakes including the full suite of water quality parameters.	FMG partially addressed STPN's original comment. Field water quality parameters are presented in Appendix A of the 2019-2020 Aquatic Resources Assessment, but there is not mention of water samples, or lab analyses. Request: If the field data is what is referred to as "incidental monitoring", please provide these data in the Surface Water Quality Baseline Report to compare with other monitoring locations. If water samples were submitted for lab analysis, please provide these results in the Surface Water Quality Baseline Report.	The incidental water quality monitoring data collected as part of the Aquatics Resources Assessment (baseline study) is being included in the updated baseline water quality report in progress that will be appended to the final EIS/EA.	Appendix N-1, Section 3
STPN-2021-190	Hydrology Baseline Report	The CWQG for mercury is exceeded for average, 75th percentile and max values for several of the sampling sites, but not highlighted in the tables. The data has also been averaged, making it difficult to clearly understand. The scatterplots for the same data in Appendix C show that the exceedances occurred primarily in the earlier sampling events (2012) but not in recent years, with no explanation why that was the case. Detection limits are missing.	We recommend FMG highlight the mercury exceedance in the data tables and update the related text with an evaluation of why mercury levels were high in 2012 but not in recent years. Additionally, for all criteria, add a map providing the location and year where results exceeded criteria. Laboratory detection limits should be provided for all parameters to show that the detection limits are low enough for evaluation against the water quality criteria.	Total and dissolved concentrations of mercury have been monitored as part of the baseline program since 2011, with ultra-low detection total mercury and methylmercury added to the baseline monitoring program in 2021.Table 2-3 of the report provides the detection limits for all water quality parameters through 2020. Section 2.4 of the water quality baseline report includes a discussion of the observed mercury concentrations. It concludes that these results are likely due to contamination through lab handling and lab error. This conclusion is further substantiated by the results of subsequent baseline water quality sampling programs collected between 2015 and 2020 which do not show elevated mercury concentrations, as noted in Section 3.0 of the	FMG partially addressed STPN's original comment. The rationale for mercury exceedances has been provided. The requested map providing the location and year of all parameter exceedances as well as laboratory detection limit has not been provided. CLFN and LSFN are extremely concerned about proposed project effects on water quality and is very interested in reviewing updated EIS/EA materials on this subject. Request: Please provide the requested figure.	It is important to clarify that there are no mercury exceedances in baseline surface water quality. The referenced mercury result is a validated lab error, which occurred during the historical baseline program. Baseline monitoring from 2012 though 2022 indicate that mercury levels are consistently below analytical detection limits and are always less than the CCME guideline for mercury (<26 ng/L). An ultra-low trace total mercury and methyl mercury program has also been ongoing at site since 2020, with detection limits of as low as 0.02 ng/L. It is also important to note that predictive models developed to support the draft EA/EIS indicate that mercury levels remain	Appendix N-1, Section 3

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				report. The determination of laboratory error causing contamination of these samples is further substantiated by recent results of the 2021 baseline sampling programs. All total mercury concentrations monitored are below the 0.000026 mg/L (the Canadian water quality guideline for the protection of aquatic life). Thus, total mercury results for the 2011 to 2013 sampling events are not considered representative of baseline conditions of the Project area waterbodies and will not be considered further in the draft EIS/EA.		below threshold criteria for surface water quality and human health and the Project is not a source of mercury (Appendix K-4, Appendix N-2).	
STPN-2021-191	Hydrology Baseline Report	The summary does not discuss data limitations or data gaps that need to be filled with additional monitoring as the basis for the 2021 water quality monitoring program.	We recommend FMG provide a summary of data gaps and the rationale for the selection of monitoring sites provided in the 2021 Surface Water Quality Monitoring Workplan. Please provide comment on the adequacy of these sites (numbers, locations, water body types) to spatially and temporally (i.e., seasonality) characterize water quality, in particular, for smaller sensitive lakes and tributaries within the project area.	The baseline water quality report adequately documents the spatial and temporal variability of surface water quality in the local area, and is more than sufficient to support the baseline study. Table 2-1 of the report presents the site rationale, and Table 2-2 presents the period of record and sampling frequency by monitoring location. Seasonality of water quality results can be inferred from the time series graphs presented in Appendix C. Water quality monitoring will remain ongoing throughout the EA process.	FMG partially addressed STPN's original comment. Most of the data is present, however seasonal water quality trends have not been provided. It is not sufficient to ask the reviewer to "infer" results from graphs in an Appendix. Seasonal variability may have implications for the assessment of impacts. FMG should evaluate the seasonality, consider the implications, and provide a summary in Section 4. CLFN and LSFN are concerned with the gaps in the FMG draft EIS/EA as it pertains to impacts to water. Recent interviews with LSFN members highlighted the importance of protecting water "for our future generations" and underlined the importance of "thinking things through before making a decision".12 Other interviews with Cat Lake members were more specific about changes to their ongoing use of water in Zionz and Springpole Lake and others nearby, with one interviewee noting that if the Project went ahead, "I wouldn't collect [the water]" in that area. 13 It is imperative these comments are considered carefully and time is provided to CLFN and LSFN to review updated information from FMG on water as soon as it becomes available. 12 L05. 2023. Transcripts of November 15, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Lac Seul First Nation. 13 C05 and C08. 2023. Transcripts of November 20 and 21, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Cat Lake First Nation	The baseline monitoring program has been ongoing since 2011 and is designed to be extensive and appropriate to inform the EIS/EA, encompassing a comprehensive network of sites strategically selected to capture spatial and temporal variations in water quality. More than 40 water quality stations have been monitored as part of the baseline program, with over 900 water quality samples have been collected. The monitoring program includes an extensive number of sites distributed across various water body types, including smaller sensitive lakes and tributaries, to ensure representative sampling. These sites are carefully chosen to cover different ecological zones, flow regimes, and potential sources of interaction with the Project. Furthermore, the program accounts for seasonal variations by conducting sampling throughout the year, often monthly, capturing fluctuations in water quality associated with different hydrological conditions and climatic patterns. This approach allows to obtain a comprehensive understanding of baseline conditions to help assess potential impacts associated with the Project. Overall, the monitoring sites to characterize water quality spatially and	Appendix N-1, Section 3

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
					Request: Please provide a description of "the adequacy of these sites (numbers, locations, water body types) to spatially and temporally (i.e., seasonality) characterize water quality, in particular, for smaller sensitive lakes and tributaries within the project area."	temporally within the area is more than adequate and we remain committed to transparency and environmental stewardship, and welcomes further discussion and collaboration.	
STPN-2021-192	Hydrology Baseline Report	Site ID not provided for the table of data.	We recommend FMG add the site ID for the data provided.	The data specific to this comment was collected from Birch Lake.	FMG fully addressed STPN's original comment. Request: We recommend that these changes be made in Appendix E.	Appendix E was a factual report documenting hydrologic conditions between 2011 and 2012. This report has been superseded by the updated Baseline Hydrology Report which includes more recent data and analysis. The relevant data from the 2011/2012 program is also being incorporated into the updated Baseline Hydrology Report, which is in production and will be appended to the final EIS/EA.	Appendix M-1
STPN-2021-193	Hydrology Baseline Report	Dates are not provided for the water column profiles for Springpole Lake.	We recommend FMG add dates to the figure.	The water column profiles for Springpole Lake were completed in 2011.	FMG fully addressed STPN's original comment. Request: We recommend that this figure be revised with updated dates.	Appendix E was a factual report documenting hydrologic conditions between 2011 and 2012. This report has been superseded by the updated Baseline Hydrology Report which includes more recent data and analysis. The relevant data from the 2011/2012 program is also being incorporated into the updated Baseline Hydrology Report, which is in production and will be appended to the final EIS/EA.	Appendix M-1
STPN-2021-194	Terrestrial, Wetlands, and Wildlife Executive Summary	It is unclear if the Project footprint Study Area considers the construction access and infrastructure (i.e., laydown areas).	We recommend that you clarify if construction access and infrastructure was included in the PSA project footprint features.	The study areas for the current 2021 baseline investigations included the potential areas for infrastructure and construction access.	FMG fully addressed STPN's original comment (see Section 6.1.2 of the EIS/EA and Appendix P).		Not applicable
STPN-2021-195	Terrestrial, Wetlands, and Wildlife Executive Summary	Information required for the assessment of the baseline doesn't appear to be complete. Why is there a significant discrepancy in the number of plant species that were identified (50 species identified in 2011; 89 species identified in 2012; and 131 species identified in 2019)? Were there differing numbers of survey locations from year to year?	We recommend that you briefly clarify why the number of plant species identified changed so much (i.e., the number of survey points per year or number of communities per year).	The number of sample plots for plants, vegetation communities and wetlands has increased in 2021 and 2022.	FMG fully addressed STPN's original comment. The number of vegetation plots surveyed per year, and the location of these plots, is stated in Appendix P-1 (Section 2.1). Request: CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies (summarized in Comment STPN-2021-1), to identify priority species for sampling and measures to protect sufficient quantity and quality in preferred harvesting areas for CLFN and LSFN.	Non-confidential traditional knowledge studies that have been shared with FMG to date have highlighted the importance of specific species to Indigenous Communities and have been used to inform the selection and assessment of valued components used in the environmental assessment. We share the same goal of protecting harvesting areas and promoting traditional land use and community well-being and would be please to work together going forward.	Appendix P-1

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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STPN-2021-196	Terrestrial, Wetlands, and Wildlife Executive Summary	Information required for the assessment of the baseline doesn't appear to be complete. Why are there more plant species identified during the wetland studies than there were in the targeted plants studies? Were wetland communities treated differently then the vegetation surveys?	We recommend FMG clarify methods used to identify plant species/ select transect locations for both the Targeted plant studies and the Wetland Studies.	The number of sample plots for plants, vegetation communities and wetlands was increased in the 2021 technical workplans.	FMG has partially addressed STPN's original comment. The methodology for wetland and vegetation baseline studies are described in Section 2.1 of Appendix P-1. Further rationale is required as to why Ontario Wetland Evaluation System (OWES) evaluations were not completed for wetlands surveyed in 2019. It cannot be assumed that because the 18 wetlands surveyed in 2012 did not meet the criteria for Provincially Significant Wetland (PSW) that the 48 wetlands surveyed in 2019 would also not meet the criteria for PSW (see p. 11 of Appendix P-1). It is not specified if Indigenous Knowledge and use were considered as part of the 2012 studies. If Indigenous communities were not involved in this work, there may be a data gap that is being extrapolated to these other areas where evaluation has been deemed unnecessary by the proponent. It is understood that additional wetland evaluation work to identify and confirm the provincial status of wetlands that may be directly impacted by the Project was included in the 2022 Terrestrial Technical Workplan. It is critical for CLFN and LSFN communities to be involved in the wetland evaluation processes. Indigenous Knowledge and cultural values could result in a wetland being designated as significant, while a lack of Indigenous involvement in the evaluation process could result in a wetland being designated as non-significant simply due to an information gap. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. Request: CLFN and LSFN requests that FMG further describe the rationale not to conduct OWES evaluations on the wetlands surveyed in 2019.	Since 2020, wetlands identified in the baseline investigation area have been evaluated using a wetland functions assessment adapted from OWES (Ontario Wetland Evaluation System). The methods and results are provided in baseline terrestrial report that will be appended to the final EIS/EA. The data included in Appendix P-1 of the draft EIS/EA is historical and was not used to inform more recent investigations conducted after 2020. The final EIS/EA will refer to the data Appendix P-1 as historical/ incidental/ supplemental information. The methodology used to characterize wetlands in 2022 is described in Attachment STPN-2021-196.	Appendix P-1.

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					Additionally, CLFN and LSFN requests that FMG describe the methodology used in 2022. CLFN and LSFN requests that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies (summarized in Comment STPN-2021-1).		
STPN-2021-197	Terrestrial, Wetlands, and Wildlife Executive Summary	Section states that a Common Nighthawk stick nets was found. I assume this was a mistake and that it was just an incidental record of a ground nest?	We recommend you clarify the wording in this section.	Acknowledged. The observation is clarified in the draft EIS/EA.	FMG fully addressed STPN's original comment in Section 6.16.1.4 and Appendix P.		Not applicable
STPN-2021-198	Sections 3.3.11, 6.12, 6.17 Appendix P	Information required for the assessment of the baseline doesn't appear to be complete. Were home ranges of species considered? Is the Local Areas of Investigation (LAI) representative of the Project Area of Investigation (PSI)? I.e., are the same sort of communities present and in the same representation?	We recommend you clarify if home ranges were considered and explain if the LAI is representative of the PSI. We recommend reviewing the new IAAC tailored impact statement guidelines for guidance on how to determine this. This is particularly important for analyzing the breeding bird data.	The Northwinds baseline report used a standard area for each scale of assessment (LAI and PSI). The scales used would be appropriate for many species other than wide ranging or rare species. The PSA and LSA habitat summaries (in section 2.0 of the baseline report) do specify relative amounts of each general habitat category but does not specify how differences within a category were determined for "wildlife" or "ungulates", nor does it clearly define how habitat amount was determined for "wildlife" or "ungulates". Nor does it specify what species were used for "wildlife" habitat calculation. The draft EIS/EA includes appropriate temporal and spatial boundaries for representative wildlife VCs for the environmental assessment using existing baseline datasets and ongoing field surveys.	FMG fully addressed STPN's original comment (see Sections 1.1 and 2 of Appendix P-1).		Not applicable
STPN-2021-199	Sections 3.3.10. 6.11 Appendix P	Information required for the assessment of the baseline doesn't appear to be complete. Why was Forest Ecosystem Classification (FEC) used instead of boreal Ecological Land Classification (ELC)?	We recommend FMG provide rationale for using FEC classification.	From 2012 to 2020, the Forest Ecosystem Classification (FEC) was used to have a standardized approach to quantifying vegetation communities. In 2021, the used of the Boreal Ecological Land Classification (ELC) was implemented to quantify and map vegetation.	FMG fully addressed STPN's original comment in Section 4.4 of Appendix P-3.		Not applicable
STPN-2021-200	Appendix P	Information required for the assessment of the baseline doesn't appear to be complete. How was it determined that 23 sites were representative? What statistical analyses were used?	We recommend you provide statistical rationale to clarify why only 23 vegetation plots were assessed.	A statistical power analysis has been conducted by Wood to determine the number of vegetation plots needed to support the baseline assessment.	FMG partially addressed original STPN's comment. Details of the power analysis are provided in Section 4.2.1 of Appendix P-3. However, the power analysis does not support the conclusion that survey effort has been sufficient to support baseline assessment.	A comprehensive multi-season baseline assessment has been undertaken for bird communities including 392 point count stations and more than 3,400 Autonomous Recording Unit (ARU) days (from 95 ARU stations used the previous year). Non-	Appendix P-1.

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					Results of the power analysis indicate that a sampling effort approximately three times greater than the current sampling effort would be required to detect all species present. Request: CLFN and LSFN requests that FMG include a discussion of how sampling effort was determined to be sufficient in light of the results of the power analysis. As noted in comment #1, CLFN and LSFN requests that sampling locations and approach be reconsidered once the Traditional Knowledge and Use Study is provided to FMG.	confidential Traditional knowledge that is shared with FMG is appreciated and will be considered on an on-going basis through all phases of the mine.	
STPN-2021-201	Appendix P	Information required for the assessment of the baseline doesn't appear to be complete. How were the field plots identified? Were sites selected randomly, or randomly stratified?	We recommend you clarify how the 75 field plots were selected for the 2012 study and how the 90 field plots were selected for the 2019 study.	Digital Forest Resource Inventory (FRI) data for Trout Lake Forest was used to categorize the study area by ecosite. The total area of each ecosite was determined and field plots were assigned to ecosites based on a combination of access as well as their overall ranking (i.e. if an ecosite covered 20 percent of the study area, then approximately 20 percent of the field plots would be placed in that ecosite).	FMG partially addressed STPN's original comment. FMG has provided details about how field plots were selected in 2011 and 2019. However, it is still unclear why field plots were located along transects in 2012. This differs from the methodology used in 2011 and 2019 and this inconsistency may limit how the results can be compared and interpreted. Request: CLFN and LSFN requests that FMG provide clarification for why field plots were located along transects in 2012.	The data included in Appendix P-1 of the draft EIS/EA is historical and was not used to inform more recent investigations conducted after 2020. The information provided from previous studies was only used to understand previous findings. The final EIS/EA will refer to the data Appendix P-1 as historical/ incidental/ supplemental information. The methods and results from terrestrial studies completed since 2020 are in production and will be provided in baseline terrestrial report that will be appended to the final EIS/EA. Site Selection: The available Forest Resources Inventory (FRI) data were used to inform site selection. However, FRI data were not available for all portions of the regional study area at the time of study design. In September 2023, updated 2021 FRI was provided by the Ministry of Natural Resources and Forestry (MNRF). The new FRI increases coverage and updates the ecosites, as well as disturbances. Vegetation sites were selected in the project development area, along the mine access road and transmission line	Appendix P-1.

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						alternatives, and in representative habitats within 1, 5 and 10 kilometre (km) buffers. Representative habitats included documented existing disturbances (i.e., forest fire, recent linear disturbance, and forestry activity). In the field, surveyors targeted these predetermined locations and refined exact locations based on helicopter access (i.e., ability to land and exit safely as dictated by pilots) and site conditions. Additional plots were added or targeted if underrepresented or unique communities were discovered. Breeding bird survey sites were selected using a randomized approach stratified across habitats in ArcMAP. Randomly generated points were removed from areas of landowner limitations, unsafe access, and remote access (i.e., helicopter access was limited). Vegetation Surveys: In 2021 and 2022, vegetation community surveys were completed throughout the RSA. In 2021, targeted surveys were conducted during the third field visit (August 26 to September 7, 2021) and in 2022, targeted surveys were conducted each survey period, in the following locations: Wetlands expected to be directly impacted by a proposed component of the Project (i.e., focused around the local and regional study areas); and Other sites as required to achieve adequate coverage of all major vegetation communities in the local and regional study areas. Vegetation baseline studies describe the existing conditions of the flora and vegetation communities in the study area. Vegetation communities inform wildlife habitat delineation, and therefore, the	

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						larger wildlife habitat regional study areas was applied during field surveys. Vegetation survey plots were targeted to achieve sufficient coverage of all major vegetation communities with a focus on the Preliminary Project Boundary. Vegetation community types were classified using the Ontario Ecological Land Classification protocols of the Ecosites of Ontario Operational Draft manual (Ecological Land Classification Working Group 2009) for Boreal ecosites. Within each vegetation community assessed, the following information was recorded: A complete list of all plant species observed, including the relative abundance of each species; A listing of the dominant plant species in the vegetation layers of the community (canopy, sub-canopy, understory, and ground layer); A general classification of the site into broad habitat categories (e.g., forest, fen, marsh); and Other relevant information as applicable. Vegetation sampling identified the dominant vegetation species composition at each survey location, and the location was assigned a Boreal ecosite code (and not a vegetation or substrate code). Generally, FRI boundaries were not altered at this scale as the area is very homogenous and there are few hard lines between communities. Additionally, components such as vegetation cover, substrate, and moisture occur in a gradient (Ecological Land Classification Working Group 2009); therefore, altering boundaries was deemed unnecessary. Boundaries are instead used to understand	

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						where the sampled site fits in relation to other sampled sites and to characterize the various communities in the investigation area likely to be affected. Field sampling was also used to inform the extent of wetlands potentially affected by Project activities. Wetlands are considered according to their size, type, description of their function (e.g., ecological, hydrological, wildlife, socioeconomic), and species composition. The terminology used to define vegetation layers, understanding that some layers may not be present within a vegetation community sampled, are as follows: Canopy: consists of tall vegetation that reaches the light first, typically composed of tall trees (in a forest community). Sub-canopy: includes vegetation growing just under the canopy, vegetation that receives filtered sunlight, typically composed of trees and tall shrubs (in a forest community). Understory: includes vegetation growing below the sub-canopy, typically composed of both tall and low-growing shrubs (in a forest community). Ground layer: consists of the vegetation that is closest to and covers the ground, typically composed of herbaceous vegetation. By defining the Boreal ecosite, the presence of rare, sensitive, and/or important vegetation communities and/or species can be identified. ELC communities were cross-referenced with provincially significant vegetation communities as identified in the Significant Wildlife Habitat Technical Guide (OMNR 2000). In total, 318 vegetation community surveys were completed throughout the regional study	

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						area in 2021 and 270 were completed in 2022.	
STPN-2021-202	Appendix P-3	Information required for the assessment of the baseline doesn't appear to be complete. What percentage of the LAI was actually surveyed? It seems that the majority, if not all the surveys, were completed within the Project Study Area.	We recommend you provide more details about the areas in the LSI that Migratory Bird surveys were completed on.	Avian breeding point count surveys from 2011 – 2020 were largely focussed on habitats within the Project Area. The survey locations were distributed to represent the range of habitat categories found throughout the Project Area. Forest fires near the Project have influenced survey locations for some years (including 2011 and more recently in 2021). In 2021, the breeding bird surveys were expanded to occur within the proposed mine site development area and included a 10 km buffer from the mine site development area. The information will be included in the draft EIS/EA.	FMG fully addressed STPN's original comment in Appendix P-3. In 2021 breeding bird surveys were expanded throughout the Local and Regional Study Areas (see Figure 3.3-18 of the EIS).		Not applicable
STPN-2021-203	Baseline Terrestrial Biology Summary Report	Not conducting surveys during the second period will underrepresent late breeding species.	We recommend discussing how you plan to address late breeding species with the missing data.	For surveys conducted in 2018 and 2019, one round of migratory bird point-count surveys was conducted. As a result, it will not be possible to directly compare across all years of data collection with respect to abundance and species diversity indices, particularly for insectivorous species and later migrants. However, the ARU data collected in 2018 and 2019 may provide supplementary information for indirect comparisons.	FMG partially addressed STPN's original comment. Per Section 3.3.11.1 of the EIS, two rounds of surveys were completed in 2012 and 2021 while one round of surveys was completed in 2011, 2018 and 2019. It is understood additional avian surveys were planned for 2022 as outlined in the 2022 Terrestrial Technical Workplan. Water birds are integral to Spring hunting season and part of cultural regeneration for Residential School survivors: "when I finally got out of school and I...went [hunting] with my dad… Spring hunt is when...we do gillnet fishing, and ducks, and geese – waterfowl…. my father stepped in and said, "I'll teach you". And he taught me the way of life of my land. And I respected the ...land that I've always had. And that became spiritual for me." Request: CLFN and LSFN will review the final EIS/EA when this new information is available. Wild rice is present in the area and many CLFN band members have hunted waterfowl in the Project Area. Surveys need to be done throughout the open water season. Monitoring and surveys of wild rice type, locations and density is required.	FMG would be interested to understand with more precision where wild rice may be found in the Project footprint. In 2022 information was collected on traditional plants to inform the human and ecological health assessment baseline. If there are areas of wild rice harvest in the Project footprint we would be interested in providing an opportunity to collect wild rice from the area prior to construction and will continue to support traditional land use activities through all phases of the Project. The baseline terrestrial report is in production and includes the waterfowl surveys methods and results, which will be appended as part of the final EIS/EA.	Appendix P-1.

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					Band members report a decline in wild rice since the Project has started. Human activity at the Project Area has resulted in less waterfowl near the project Area.		
STPN-2021-204	Baseline Terrestrial Biology Summary Report	Information required for the assessment of the baseline doesn't appear to be complete. How were small mammal trap areas selected?	We recommend FMG provide methodology for small mammal site selection.	The Project area was stratified by habitat type and survey work was concentrated in those areas most likely to be used by small mammals, typically areas disturbed by skidders and exploration equipment. Traps were generally placed at 50 m intervals along two parallel lines, at least 100 m apart through typical small mammal habitat.	FMG fully addressed STPN's original comment in Appendix P-1.		Not applicable
STPN-2021-205	Appendix P-3	Information required for the assessment of the baseline doesn't appear to be complete. When were the Autonomous Recording Units deployed and during what time frame did, they record? What were the modifications to the bat monitoring protocol from the Guidelines for Wind Power Projects that were employed?	We recommend that you provide the methodology used for the bat monitoring survey.	A modified version of the bat monitoring protocol from the Guidelines for Wind Power Projects (MNRF 2011) was employed to conduct bat surveys in 2011. Ultrasonic Autonomous Recording Units (ARUs) were installed primarily to survey ecosites known to represent potential Little Brown Myotis and Northern Myotis maternal roosting habitat, but also included a variety of habitat types suitable for bat foraging and commuting corridors. These included open water, forests, treelines, scrub and grasslands with an abundant supply and diversity of invertebrate prey. ARUs were installed roughly 2 m from the ground to facilitate detection of individuals that might fly high over the survey areas. Species identification was conducted through an analysis of sonograms from recordings using Song Scope and Kaleidoscope software (Wildlife Acoustics). ARUs were deployed at six locations in 2011, a further six locations in 2018, and 14 locations in 2019.	FMG partially addressed STPN's original comment. FMG has provided date ranges that the Autonomous Recording Units (ARUs) were recording, but more information is necessary to determine if each detector was deployed for a minimum of ten nights under suitable weather conditions. FMG has not described the deviations from the "Guidelines for Wind Power Projects" (MNRF 2011). Request: CLFN and LSFN requests that FMG provide a description of the deviations made from the bat monitoring protocol in "Guidelines for Wind Power Projects" (MNRF 2011). Additionally, CLFN and LSFN requests that FMG provides the dates that each bat detector was deployed in each location and confirm recordings were for a minimum of 10 nights of suitable weather.	The baseline terrestrial report is in production and will include a detailed description of the methods, noting that the methods were adapted from the Bats and Bat Habitats: Guidelines for Wind Power Projects (OMNR 2011) and the more recent guidelines for southern Ontario (OMNRF 2017b). The word 'adapted' is used since the protocols were developed for southern Ontario and required some modification to incorporate the additional logistical complexity that comes with studying in remote northern areas. These modifications aimed to maximize understanding of bat distribution across the baseline investigation area. This included the following: 1) Surveys were not limited to Forest Resources Inventory ecosites listed in the protocols, but also included abundant ecosites not listed by protocols. 2) When possible, surveys were conducted for longer than the prescribed 10-night minimum. It should be noted, however, that the guidelines allow for a cessation of surveys at a site once the maternity roost is confirmed. Although some stations did not record for 10 nights of suitable weather, SAR bats were detected at all sites except for one monitored for more than 10 suitable weather nights.	Appendix P-1.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
STPN-2021-206	Sections 3.3.10. 6.13 Appendix P	Information required for the assessment of the baseline doesn't appear to be complete. Why were Woodland Caribou not considered under the migratory score for special features in the wetland evaluations?	We recommend FMG provide rationale for not including Woodland Caribou in the special features score.	All wetland evaluations undertaken to date are being reviewed in consideration of new baseline data, and are discussed in the draft EIS/EA.	FMG did not address STPN's original comment and recommendation; both of which still apply. We are aware of new studies on caribou have started since publication of this draft EIS/EA and have not been provided with the study results. Recent interviews with CLFN and LSFN highlighted the importance of water and caribou. "...he's concerned about the long term impacts that will go, like the water...system goes down this way he's describing. And it's gonna impact down river and the use of the land here in this area and the water. It might not show up right away he says, it might be years down the line" and several interviewees highlighted caribour sightings and hunting.(Reference: C21 22, November 2023), 14 14 C05, C21, and C22. 2023. Transcripts of November 20 and 22, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Cat Lake First Nation and L17 2023. Transcripts of November 16, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Lac Seul First Nation Request: CLFN and LSFN requests that FMG indicates why Woodland Caribou were not considered under the migratory score for special features in the wetland evaluation for wetland ID "wld-Q" (see Appendix B of Appendix P-1). CLFN and LSFN request that FMG share all new information on caribou studies with STPN as soon as possible.	The data included in Appendix P-1 of the draft EIS/EA is historical and was not used to inform more recent investigations conducted after 2020. The information provided from previous studies was only used to understand previous findings. The final EIS/EA will refer to the data in Appendix P-1 as historical/ incidental/ supplemental information. The methods and results from terrestrial studies completed since 2020 are in production and will be provided in baseline terrestrial report that will be appended as part of the final EIS/EA. It should be noted that Caribou and SAR habitat was considered in wetland screenings in the baseline terrestrial report. A workshop with CLFN and LSFN to thoroughly discuss the Caribou studies and assessments has been proposed by FMG and we would be happy to schedule this in July. A high – level summary of ungulate surveys is below. Additional detail will be provided in baseline terrestrial report. The caribou survey results as well as all species at risk (SAR) have been included in the latest wetland assessments presented in the baseline terrestrial report and final EIS/EA. Large mammal surveys, including aerial surveys, Caribou collaring, Caribou calving area surveys, and Moose aquatic feeding area surveys, were completed to describe abundance, distribution, and life stages of ungulates, their habitat, and their predators that are found or are likely to be found in the regional study area. Aerial Surveys: The proposed Project is situated in the	Appendix P-1.

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						northwest corner of the Churchill Caribou Range and directly adjacent to the Kinloch and Berens Caribou Ranges. The aerial survey design was informed by considering all available information on historical Caribou occurrence and habitat in the region. This included provincial data and consultation with the Ministry of the Environment, Conservation and Parks to provide review and input as to the proposed survey area extent and survey transect design. The aerial transects occurred between February 27 to March 7, 2021, February 24 to March 6, 2022, and January 26 to February 6, 2023, during daylight and good to fair weather conditions. Calf recruitment, population structure and distribution field observations were collected in accordance with provincial and federal protocols for monitoring Caribou, including the Ministry of Natural Resources and Forestry (MNRF) integrated range management methods (MNRF 2014b) and the federal Boreal Caribou Action Plan committee and Ontario Moose Aerial Observation Manual (Oswald 1997) (Appendix A; Buckland et al. 2001; Gasaway et al. 1986; Le Moullec et al. 2017; MECP 2021a; MNRF 2014c,e; Thomas et al. 2010) and the extensive experience of the senior Caribou biologists on the team. Observed Caribou and Moose encountered during the survey involved classification with respect to sex and age categories using physical attributes and behaviour (within group association). Number of calves, number of adult females, number of adult males, and number of unclassified individuals were recorded. Sign (e.g., number of track sets, beaver lodges) and observations of wolf, Wolverine, and other furbearers, including Otter, Beaver, and Marten were	

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						opportunistically recorded. Data Analysis: Population demography analyses and trend models were initiated for Caribou, and modelled abundance trend analysis over time will be completed as new data are acquired from subsequent surveys required by permit conditions. Population performance metrics include: Population structure (age, adult sex ratio); Population state (abundance/density, structure, viability) and vital rates (population growth, recruitment and/or mortality); Mortality risk (wolf and Moose distribution relative to Caribou); and Fidelity to and distribution of winter ranges. In addition, spatial observations of Caribou, Moose, and Wolves were used to construct kernel density estimators in ArcMap or R, which are estimates of the probability of use on the landscape and can be used to identify core wintering areas for Caribou, Moose, and Wolves. Kernel density estimators are widely applied in ecology, using locations to generate probabilities of occurrence across a landscape based on recorded locations. Kernel density estimators analysis results were used to develop maps depicting the odds of finding a Caribou, Moose, or wolf in a given location within the aerial survey regional study area. Caribou Collaring: The aerial reconnaissance survey was initiated on January 26, 2023 (and continued into the capture/collaring	

ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
						phase) to locate Caribou groups for subsequent capture and collar deployment (February 3 to 6). Caribou capture and collar deployment complied with the ESA-B permit (# NR-B-005-21) conditions and associated approved wildlife animal care committee protocol (#23-484). A total of 50 Telonics GPS satellite iridium collars (model TGW-4670 4) equipped with a CR-5A collar release mechanism were deployed on adult female Caribou. Collars were deployed in the Churchill (n=19), Kinloch (n=15) and Berens (n=16) ranges (Figure 2–11). Hair (for cortisol analysis), blood (for pregnancy testing) and fecal samples (for future assessment of pathogen load and potential genotyping analyses) were collected from each collared Caribou. No Caribou were injured by the capture or handling efforts. There were no capture mortalities (neither during capture nor myopathies within three days of capture). Bighorn Helicopters Inc. conducted all captures. Caribou within 50 km of the Project site were priorities for capture and targeted collar deployment. However, animals up to 100 km from the Project site were selected based on Caribou distribution during the capture/collaring portion of the survey program. The collars are programed to collect six GPS location fixes per day over a four-year period before programmed collar release. The collars have a mortality sensor to investigate the cause of death, should that occur during the four-year study period.	
STPN-2021-207	Sections 3.3.11. 6.12, 6.16 Appendix P	Information required for the assessment of the baseline doesn't appear to be complete. Were Eastern Whip-poor-will surveys completed at the location where the Common Nighthawk was found?	We recommend FMG confirm if EWPW surveys were completed at the site where Common Nighthawk was found.	Through ARU's and listening surveys, both Eastern Whip-poor-will (EWPW) and Common Nighthawk would be detected if both occurred at the crepuscular bird survey stations. This information will be included in the draft EIS/EA.	FMG fully addressed STPN's original comment. As per Section 6.16.1.1 of the EIS, an ARU was deployed in the same location Common Nighthawk was documented.		Appendix P-1
STPN-2021-208	Sections 3.3.11. 6.12 Appendix P	Information required for the assessment of the baseline doesn't appear to be complete. If there is a moose management issue this would be important to know as part of this	We recommend you provide references and explain if there is a history of moose management issues in the area. And/ or how will additional surveys in 2021 further investigate these issues?	Moose surveys have been expanded in study area through aerial surveys and will include an assessment of any impacts to Moose habitat. Continuously collected standardized data will aid in the assessment of abundance and	FMG did not address STPN's original comment. The recommendation still applies. Section 3.3.2.2.1 of Appendix P-1 states that "no bull moose were seen during the ungulate survey [in 2011], which would normally mean that	Moose will continue to be included as part of the large mammal monitoring program for the Project. This program measures the distribution and abundance of Caribou, Moose and Wolves.	Appendix P-1.

Table C-3.1: First Mining Gold Responses to the Shared Territory Protocol Nations / Cat Lake and Lac Seul First Nations Comments on the Baseline Study Reports

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		study as the removal of habitat would likely worsen the issue.		distribution trends of Moose in the study area. This information will be included in the draft EIS/EA	there could be a moose management issue resulting in a skewed sex ratio, however, such a small area was surveyed that population demographic conclusions would be irrelevant." Moose is critical for the health and cultural well-being of CLFN and LSFN. Members have observed declines in populations have been observed in the territory, with harvesting occurring within the project-affected area. One CLFN member observed, "typically moose like to habitat the islands, right? So they go to island to do their calving and all that during the summer for predatory reasons, right? So, what she's noticed that – she thinks that it's the decline is contributed by the amount of activity, the helicopter activity in the activity in the area. Because when they're there, they're just constant activity with the helicopter. And then plus there's people being dropped off to check on islands"(Reference C11 21, November 2023). 15 15 C11. 2023. Transcripts of November 21, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Cat Lake First Nation. Request: CLFN and LSFN requests that FMG provide references to explain if there is a history of moose management issues in the area and how the surveys (including the 2021 surveys) further investigated this issue. CLFN band members understand moose move away from mining and human activity but are there any studies done or can a study be done as to what impact large open pit mines have on a moose population in the boreal forest.	Moose are attracted to early succession forest cover with deciduous browse. The current survey area has extensive forestry disturbance and regenerating wildfire disturbance which provide an abundance of moose browse and adjacent areas of thermal and hiding cover. The winter aerial surveys undertaken to date (2021 to 2024, inclusive) cover a substantially larger region and reveal that moose are distributed as expected throughout the survey area with association to early succession forest cover. Population density of moose appears stable within the surveyed area capacity for large ungulates such as moose. The moose population density within the survey area falls within the lower part of the expected abundance range for boreal shield habitat.	
STPN-2021-209	Baseline Terrestrial Biology Summary Report	Information required for the assessment of the baseline doesn't appear to be complete. What is different about the 2013 and 2020 surveys that allowed you to make population ratio estimates compared to 2011?	We recommend you explain why population estimates were not made in 2011 but were in 2013 and 2020.	The data available in 2011 was not sufficient to provide estimates and therefore further data was collected in subsequent years.	FMG fully addressed STPN's original comment.		Not applicable

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ID	Reference	Initial Comments & Rationale (2021)	Proposed Action / Solution (2021)	FMG Response	CLFN / LSFN Response (2024)	FMG Response	Where Addressed
STPN-2021-210	Appendix P-3	Information needed for the assessment of baseline information is not complete. Recent communication with Canadian Wildlife Services has identified that there are projects in northwestern Ontario that have identified Tri-coloured bat. https://academic.oup.com/jmammal/article/100/1/249/5299174	We recommend FMG review additional information and confirm that Tri- coloured bat is in fact out of range of the project area.	The scale and detail of the baseline bat assessments, including Tri-coloured bat, for the Project have been substantially increased in 2021.	FMG partially addressed STPN's original comment. Appendix P-3 states that "there were several analyzed recordings that suggested the presence of Tri-colored bat in 2018 and 2019. However, the Project falls well outside of the describe range of this species. As with the case of Northern Myotis and Little Brown Myotis, Eastern Red Bat calls are similar enough to those of Tri-colored Bat that the analytical software may confuse them (pers. Comm. Wildlife Acoustics). 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." Additionally, Tri-coloured Bat was not detected in 2021 within and around the project area despite greatly increasing survey effort (see Section 6.15.1 of the EIS and Appendix P-1). However, Appendix P-1 also states that published results from Layng et al. (2019) have led to speculation that Tri-colored Bat may occur further west than originally thought, and tri-coloured bat has been detected in Northern Ontario. Thus, taking a conservative approach, one cannot rule out the possibility the calls in 2018 and 2019 were tri-coloured bat, based on known distribution alone. Request: CLFN and LSFN requests that FMG provide more details of the rationale for concluding that the tri-coloured bat observations were erroneous as there are conflicting statements in the draft EIS/EA.	While Appendix P-1 notes that Tricolored Bat were recorded, a description of the manual vetting of auto-classification is not provided. It is true that classification software can confuse Eastern Red Bat and Tricolored Bat calls. However, all calls classified as either species in 2021 to 2023 were manually verified by a bat expert/specialist. In the unlikely event that there was uncertainty as to whether it could be a Tricolored Bat, it would have been conservatively classified as "possible Tricolored Bat" and presented as such. Conclusions on the extended distribution of the Tricolored Bat by Layng et al (2019) are based on 5 of over 7,000 bat recordings, and all five recordings gave different results when subjected to two different classifiers. While it is stated that it was manually confirmed for one of the five recordings as Tricolored Bat, this recording occurred well east of the regional study area. Additionally, capture surveys would be required to verify the presence of the species before any confirmation can be made. Over 312,000 bat recordings spanning three maternity were obtained, including one Spring emergence, and two swarming/mating seasons within the local and regional study areas. No Tricolored Bat was identified in either survey period, which provides strong evidence that this species does not occur in the regional study area.	Appendix P-1.
STPN-2021-211	Appendix P-3	Information needed for the assessment of baseline information is not complete. Were these areas (abandoned mine shaft and a cluster of rock waste sites associated with the former McIntyre Mine) surveyed during the swarming period to confirm use?	We recommend FMG confirm if these areas will be surveyed in 2021.	Hibernacula swarming surveys were completed from August to September 2021.	FMG fully addressed STPN's original comment in Appendix P-3 and Section 3.3.11.1 of the draft EIS/EA. Potential hibernacula at the McIntyre Mine were surveyed.		Appendix P-1
STPN-2021-212	Sections 3.3.11. 6.12, 6.13 Appendix P	Information needed for the assessment of baseline information is not complete. Would it be possible to see the Ungulate Study Areas overlain on the maps with the	We recommend that you overlay the Ungulate Study Area with the aerial survey maps once the final study areas for the VECs have been selected.	The baseline investigation areas, as well as the wildlife (including ungulates) local study area for the purposes of the effects assessment are included in the draft EIS/EA.	FMG partially addressed STPN's original comment. While the aerial survey maps and the local study area maps are provided, they are not overlayed.	The aerial survey area is within the ungulate study area (Large Mammals [considered under the Wildlife and Wildlife Habitat VC]). The figure will be provided in	Appendix P (all).

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		aerial survey block to be able to see how much of the overall study area was surveyed?			It is understood the winter aerial survey from 2021 was planned to be repeated in 2022 with modification to the geographic extent based on the proposed Regional Study Area for Caribou and discussions with the Ministry of the Environment, Conservation and Parks (MECP), as outlined in the 2022 Terrestrial Technical Workplan. It is not clear whether or not CLFN and LSFN members participated in this survey. Request: CLFN and LSFN requests that FMG overlay the Ungulate Study Area with the aerial survey maps and indicate presence of CLFN and LSFN members in these surveys, as it is expected that CLFN and LSFN harvesters are invited to participate.	the baseline terrestrial report in production that will be appended as part of the final EIS/EA.A copy is provided as Attachment STPN-2021-212.	
STPN-2021-213	Section 8.0	The report does not have a description of the climate in the region.	We recommend an assessment of the current effects of climate change on climatic hazards such as ice storms, heavy winds and wildfire frequency.	The report adequately categorizes the climate in the region as it pertains to surface water hydrology. An assessment of the effects of the environment is included in the draft EIS/EA.	FMG fully addressed STPN's original comment.		Appendix P-1
STPN-2021-214	Section 8.0	The baseline report considers climate change through rainfall and temperature. However, other hazards modified by climate change may affect other components of the project beside surface water including hazards such as heavy rainfall, snow accumulation, blowing snow, freeze-thaw, winter rain on snow, heat wave, and drought.	AECOM recommend to identify the climatic hazards that may need to be considered in the project design and effects assessment and select the most relevant climate indicators for these hazards such as heavy rainfall, snow accumulation, blowing snow, freeze-thaw, winter rain on snow, heat wave, and drought.	These climate indicators are not anticipated to effect surface water quantity under normal conditions. However, an assessment of the effects of the environment is included in the draft EIS/EA. Further, these parameters will be considered during the detail Project design phase.	FMG fully addressed STPN's original comment. Request:: Climate change has dramatically affected the Cat Lake people and they reserve the right to spend more time reviewing what FMG has incorporated into the EIS. The Cat Lake people are very skeptical that FMG can predict further climate change as no one else seems to be able to.	FMG appreciates the comment made by the CLFN and LSFN, and will include a more detailed Climate Change Risk Assessment Report in the final EIS/EA submission. The assessment anticipates future climatic conditions for the Project region, and how climate change related disruptions or impacts may affect the Project. The future climate projections for the Project location are based on information available from readily accessible climate data portals and literature. Potential climate-infrastructure interactions are evaluated using a risk-based approach for relevant climatic hazards related to temperature, precipitation and extreme weather events. Relevant mitigation measures and continuous improvement techniques are applied to the Project to reduce climate related risks.	EIS Section 8, and Appendix I-3

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STPN-2021-215	Section 8.7	The climate change analysis uses old data that is not reflective of current weather events and patterns.	Recommend that new climate normals are calculated and presented as baseline for the most recent 30-year period (1991-2020).	Acknowledged. An evaluation of climate change on site precipitation and temperature is included in the draft EIS/EA.	FMG partially addressed STPN's original comment. Section 8.7 provides the commentary on climate change; however, the supporting climate normal data isn't up to date. Request: Climate Normals to 2020 have been published by ECCC. Please update as requested in the original comment.	The Climate Normals available to date are being included in the updated Baseline Hydrology Report, that is currently in production and will be appended to the final EIS/EA. The 1991-2020 Climate Normals have not yet been published for regional or local climate stations in the vicinity of the Project.	Appendix M-1
STPN-2021-216	Section 8.7	The intermediate future scenario presented in the table doesn't match the one presented in section 4.4.10 (2021-2023 vs 2021-2030).	We recommend FMG confirm the time period of the intermediate future scenario.	Impacts to site precipitation for the Project as a result of climate change is characterized in the draft EIS / EA.	FMG did not address STPN's original comment. The recommendation still applies.	The climate change assumptions applied to the water balance modeling will be provided in the Mine Site Water Balance Report and Receiver Water Balance Report, both currently in production and which will be appended to the final EIS/EA, respectively. The water balance modelling conservatively assumed a high carbon climate change scenario (RCP 8.5) as published by Climate Atlas of Canada (Prairie Climate Centre 2019), in which annual precipitation and temperatures are expected to increase.	Appendix M-2, Section 5.1.5
STPN-2021-217	Section 8.7	The intermediate future scenario presented in the table doesn't match the one presented in section 4.4.10 (2021-2023 vs 2021-2030).	We recommend FMG confirm the time period of the intermediate future scenario.	Impacts to site temperature for the Project as a result of climate change is characterized in the draft EIS / EA.	FMG did not address STPN's original comment. The recommendation still applies.	The climate change assumptions applied to the water balance modeling will be provided in the Mine Site Water Balance Report and the Receiver Water Balance Report, both which are currently in production and will be appended to the final EIS/EA, respectively.	Appendix M-2, Section 5.1.5
STPN-2021-GEN-001	Sections 2, 3, 6 Appendix W	Baseline documents and Terms of Reference do not, at this time, incorporate traditional practices and priorities of the Communities and, therefore, data relating to these priorities may not be collected during the baseline studies. If the data is not available from the baseline studies it may be difficult to consider the effects of the project on those traditional practices and Community priorities.	Communities should be prepared to identify traditional practices and Community priorities (i.e., through the Land Use Planning report) and, where priorities have not been identified in the baselines, require further consultation and approval on mitigation, monitoring, and /or compensation related to these priorities. FMG should enable the above recommendation.	First Mining Gold (FMG) agrees and has enabled this recommendation. FMG has inquired about information regarding traditional practices as they pertain to the Project be shared and discussed so that the Project can be shaped to incorporate such important information. We understand that the Springpole Environment Committee (SEC) is currently reviewing what information to share with FMG and how to share it. We look forward to the information which we understand is on track to be received in November 2021. FMG also appreciates that the Land Use Plan	Since FMG provided this comment, the Springpole Environment Committee was dissolved in favour of an CLFN and LSFN led Kita-ki-nan (Our Land) Process. CLFN and LSFN recognizes that FMG has partially addressed the original comment by CLFN and LSFN requesting identification of traditional practices and community priorities in the 2021 baseline studies. The updated EIS/EA does not address the original STPN comment. CLFN and LSFN are conducting an Indigenous	FMG is pleased to have received the CLFN and LSFN Indigenous Knowledge and Use and Socio-economic Studies. Information and requests will be incorporated into the final EIS/EA where applicable and as noted in the responses to the comments. A concordance table will be included in the final EIS/EA to track how and where this has been done.	EIS Sections 2, 6.1 through 6.26.

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				(LUP) is an important document, and it is being fully considered through the Environmental Assessment (EA) planning process. We suggest a meeting be scheduled where the SEC can share its views on key aspects that pertain to the Springpole Project and how best to incorporate the key elements of the LUP. The SEC has also shared with FMG a well-developed vision document outlining its goals and priorities in relation to the Project, including certain challenges that should be addressed collaboratively over the coming years and through discussions on the significant benefit opportunities associated with the Project. Regarding the baseline data collected to date, FMG has undertaken to collect extensive information across a broad spectrum of areas for the EA process. We recognize however that information collection is an ongoing process and the importance of collecting information that reflects community priorities. To that end, FMG chose to circulate all available baseline reports for review prior to an EA being available. The goal is to identify areas where additional information needs to be collected to ensure we are planning programs in 2022 and beyond. FMG will be providing 2022 data collection programs for review by the SEC and will emphasise how input has been considered in the development of these programs. FMG appreciates the technical support provided by AECOM in this regard as well. FMG also notes that in early 2021 we pursued the on-boarding of Environmental Monitors and Community Liaisons for the each of the Shared Territory Protocol (STP) Nations. While the on-boarding has been slower to realize than we would have liked we are hopeful that these roles will be filled very soon. In the interim FMG has been pleased with the establishment of the SEC and the important work it has undertaken to date. The consultation process is at an early stage and will remain on-going. We are excited by the opportunities ahead to collaborate on field data collection, environmental stewardship,	Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. The provincial Terms of Reference (ToR), however, continue to not address the original STPN comments. Request:: CLFN and LSFN request that FMG make updates to the draft EIS/EA in response to information requests in this table and any additional requests made by CLFN and LSFN in cover letter materials. Please ensure these requests are also responded to clearly in the tracking table.		

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				and significant benefit opportunities for the STP Nations.			
STPN-2021-GEN-002	Section 2	FMG has made a commitment to community consultation on the project, which provides an excellent opportunity for both the Communities and the proponent to understand priorities and work towards a shared value of the project.	Communities may want to consider how the project can provide a shared value in the short term (construction) and the long term (operational and decommissioning phases). Requiring a mechanism for Community approval of short term and long term mitigation, monitoring, and / or compensation will give the Communities a process to provide input on project and not just hear about them through consultation. FMG should enable the above recommendation.	FMG fully agrees with the comment and recommendation. In the even shorter term, FMG is committed to share the value derived from the current level of exploration associated with our work in the region. To this end, and following up on discussions from 2017, FMG has provided a draft exploration agreement for discussion. This agreement proposes to include financial consideration related to past exploration work carried out by FMG. We are also further exploring current goods and services required for the camp to identify opportunities for the STP Nations to participate. FMG also proposed a process funding agreement for the Environmental Assessment (EA) process and discussions related to opportunities to share in the value of the Project. This was unfortunately not advanced, and we have been working towards an interim funding agreement instead. FMG looks forward to receiving clarification on the process and timing for having in depth discussions about the Project value and how the communities may want to participate in sharing in the value. FMG believes there are many different opportunities throughout all phases of the Project and believes sustainable development can be achieved that extends beyond the life of a mine. Examples include leveraging the Project for regional infrastructure including a road to Cat Lake, contracting opportunities, training and employment opportunities etc. FMG has received the well-developed vision document from the SEC and we look forward to an opportunity to discuss the communities goals and visions further to find synergies and partnerships.	FMG presents a description of consultation opportunities provided to Indigenous communities, including scoping meetings, engagement in baseline studies, the STPN Environment Committee (SEC), engagement in TK/TLU studies, community meetings, and efforts at communications. A summary of comments submitted by Indigenous communities and responses from FMG is presented in Section 2.6, including as it pertains to other subjects in the draft EIS/EA (e.g. alternatives, baseline studies, project description, and VC selection). Specific comments provided by each individual Nation is summarized in tables in Section 2.9. CLFN and LSFN are conducting an Indigenous Knowledge and Use Study and Socio-economic Study, as part of the Kita-ki-nan process. CLFN and LSFN are interested in sharing non-confidential portions of these studies with FMG once available. Concerns have been raised by CLFN and LSFN regarding the challenging relationship with FMG. Request: CLFN and LSFN request that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies. It is requested that FMG work with CLFN and LSFN in an open and honest manner and to meaningfully consider these comments and the forthcoming studies in the EIS/EA and all of its dealings.	FMG has provided numerous opportunities and capacity support for community engagement and consultation and will continue to provide opportunities through all phases of the Project. FMG is pleased to have received the CLFN and LSFN Indigenous Knowledge and Use and Socio-economic Studies and they will be reviewed and considered in the final EIS/EA. FMG has proposed a series of meetings to discuss these comments and responses with CLFN and LSFN to ensure they are understood.	EIS Sections 2, 6.1 through 6.26.
STPN-2021-GEN-003	Appendices D, O-3	For Communities to properly discuss and understand the project effects the use of local names for water courses and species should be incorporated into the reports. Additionally, terminology within the reports should be simplified allow the public to	FMG should update the existing reports and add to the future reports local common names for subject areas (e.g., landforms, plants, fish etc.) and terminology.	FMG would be pleased to incorporate local names into consultation materials where available and appropriate to the scope. Executive summaries/Factsheets of the baseline reports were prepared and provided to facilitate community members	FMG partially addressed the original STPN comment. Anishinaabe names of watercourses and species have only been included in Appendix O-3 for fish species. Anishinaabe names were not used in consultation materials provided to CLFN and LSFN (see Appendix D)	FMG has continued data collection for the Project. A substantial data set has been compiled across all disciplines that exceeds any other EA to date in Ontario. FMG is pleased to have received the CLFN	Not applicable

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		understand the methods and results of the studies.		understanding. Where possible FMG would ask that the SEC provide names of local common names and terminology that would be useful to incorporate.	and were excluded from other reports in the draft EIS/EA documents and appendices. Terminology in the reports has not been adjusted to a general audience and is still highly technical. It is acknowledged, however, that the FMG web portal includes a summary document of the EIS/EA in both English and Ojibwe, videos describing the Project and several studies, and fact sheets. This information will need to be updated with new information once available. Request: CLFN and LSFN request that FMG prioritize further data collection and analysis prior to finalizing the EIS/EA with consideration of ongoing CLFN and LSFN studies. CLFN and LSFN request that FMG update names of watercourses and species throughout the EIS/EA with the local names, particularly in sections 6.2.1 and 6.23. CLFN also requests that the final EIS/EA report submitted to the Agency be translated so information is accessible to all CLFN community members. Further, any future CLFN or LSFN specific materials shared by FMG aimed at the general community (historic materials included in Appendix D-2) should also include Plain English and Ojibwe summaries for community audiences. CLFN and LSFN request that FMG update existing materials on the FMG web portal with new information when finalizing the EIS/EA.	and LSFN Indigenous Knowledge and Use and Socio-economic Studies and they will be reviewed and considered in the final EIS/EA. FMG would be pleased to incorporate local names into consultation materials where available and appropriate to the scope; however, FMG kindly asks that CLFN and LSFN provide the local names that would be useful to incorporate. While it is not feasible to translate the final EA, it will include a plain language summary of the final EIS/EA that will be translated to Ojibwe for community audiences. FMG continues to update the Springpole website with new information relevant to the Project and EA process, including monthly Community Bulletins and quarterly Newsletters. The final EIS/EA will be uploaded when finalized anticipated at the end of September.	
STPN-2021-GEN-004	Appendix R	During discussions with the technical specialists from Wood it was noted that mercury levels in local fish species are high and the predicted source of the mercury is deposition from coal power generation or other combustion over time. This statement has not been confirmed with data or references and requires further supporting	levels of mercury in soils and sediment are elevated there is a potential to mobilise the mercury when the ground is disturbed and drainage patterns altered, which would be worsened by increased erosion and storm events due to climate change. While mercury investigations are occurring in fish tissues, the baseline mercury levels in soil, sediment, and	The Project is located in a remote part of Northwest Ontario with no local source of mercury present. In these cases, particularly for northern lake, mercury occurs in fish tissue as a result of long-range global atmospheric transport from locations far removed from the site (Durnford et al. 20210; ECCC 2013; Moon and Zoh 2012; USEPA). Mercury is not	FMG partially addressed STPN's original comment. FMG has provided data in Appendix R — Human and Ecological Health Risk Assessment (HEHRA) for mercury sampling in water, sediment, soil, country foods, fish etc. However, the HHERA identified that for "high consumers", which are people who eat a lot of country food and fish (as defined by Health	Section 4.3.2.1 of Human and Ecological Risk Assessment Report (HEHRA; Appendix R to the draft EIS/EA) provides a Rationale for Selection of country Foods species and Ingestion Rates considered in the HEHRA. For the purposes of the HEHRA, preferred country foods and ingestion rates by members of Indigenous communities in	EIS Section 6.24, Appendix R.

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		information from Wood or FMG. It is also unclear how the mercury in the local environment is being affected by increased erosion and storm events caused by climate change. The mercury is predicted to be throughout the soil, land, flora and fauna, all of which are expected to be disturbed in the development, operation, and decommissioning of the mine. AECOM has noted that if levels of mercury in soils and sediment are elevated there is a potential to mobilise the mercury when the ground is disturbed and drainage patterns altered, which would be worsened by increased erosion and storm events due to climate change. While mercury investigations are occurring in fish tissues, the baseline mercury levels in soil, sediment, and terrestrial species are not consistently being assessed. To understand the effects of soil, sediment, and water disturbances on the local air shed, watershed, fish, game, and plants it is important to understand the baseline conditions so that predictive modelling can occur.	terrestrial species are not consistently being assessed. To understand the effects of soil, sediment, and water disturbances on the local air shed, watershed, fish, game, and plants it is important to understand the baseline conditions so that predictive modelling can occur.	proposed to be used in the process for gold mining at the Springpole Gold Project. More than 250 surface waters samples were collected in the Springpole Lake area during the period between 2011 and 2020, and included analysis for mercury. After reviewing the sampling results, it was determined that there have been no exceedances of mercury in the waterbodies that were sampled, when comparing to Provincial Water Quality Objectives (see response to comment #190 for further information). The Province of Ontario has a program in place to monitoring fish tissue levels in sportfish. The Ministry of the Environment, Conservation and Parks (MECP) Sportfish Consumption guidelines rely on fish tissue sampling for waterbodies throughout Ontario. Where fish tissue samples are found to be elevated above human consumption guidelines, advisories are implemented for specific lakes and fish species. In Ontario, and in particular Northern Ontario, it is not uncommon for upper trophic levels species in the aquatic environment (often fish) to have levels of mercury above guidelines values. The fish tissue sampling results for the Springpole Lake area are comparable to other areas of Northern Ontario. As part of the ongoing environmental baseline work for the Springpole Gold Project, mercury will continue to be sampled in surface waters. In addition, samples of soil, sediment and country foods including Labrador Tea, Blueberry, Raspberry, Cattail, Pondweed and Sweet Flag [Rat root/Weekay]) have been collected for analysis which includes mercury, and will be used in the human and ecological health risk assessment (HEHRA) modelling work for the Project. The results of the surface water, soil, sediment and country food sampling, as well as the HEHRA modelling work, are being presented in the draft EIS/EA.	Canada), there is a risk of mercury and methylmercury exposure for sensitive receptors, particularly toddlers and women of child-bearing age. CLFN and LSFN acknowledges that FMG has collected further baseline data related to country foods in 2022 as part of their supplemental baseline data work, since publication of the 2022 EIS/EA, including as it relates to berries, small mammals, and soil chemistry. The HEHRA revision request here also applies to this new information. There are numerous species of plants and wildlife that are central to CLFN and LSFN way of life. In recent interviews, stewardship and management of rice was highlighted several times, including practices that are undertaken to take care of the rice in the area. Other valued species and habitat and corresponding activities also overlap with the proposed project, including areas used to fish, camp, hunt, travel, and other activities to be discussed in the community-led studies. For example, one CLFN member noted that when they are on Springpole or Birch Lake, they are mostly hunting "moose… and beaver. Fish. Ducks and all those". (C12 22, November 2023) CLFN members have observed significantly less wild rice since mining exploration activities commenced. Wildlife is not attracted to the human activity at the site. L08. 2023. Transcripts of November 15, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Lac Seul First Nation. C12. 2023. Transcripts of November 22, 2023 Interview from the Kita-ki-nan Traditional Land Use Study. Firelight Research Inc. for the Cat Lake First Nation. Request: The HEHRA should be revised to evaluate potential risk to Indigenous consumers of	the region were selected based on a comparative analysis from several sources including Traditional Land and Resource Use studies and land use plans available at the time of writing (PFN 2006; CLFN SFN 2011; ArrowBlade 2014; Know History 2021) and other regional studies including the First Nations Food, Nutrition and Environment Studies (FNFNES): for Ontario (Chan et all, 2014 and 2019). The adult "heavy consumer" and "average consumer" consumption rates selected for the purposes of the HEHRA were based on consumption rates reported by indigenous communities in the Boreal Sheild Ecozone 1 region. This rationale will be updated in the HEHRA for the final EIS/EA to consider applicable information from Traditional Land Use and Resource studies that have become available since the draft EIS/EA (Firelight Research Inc., 2024a; Firelight Research Inc., 2024b; Slate Falls, 2024). The draft EIS/EA includes measures to mitigate erosion and sedimentation in Section 6.6.3, 6.7.3, 6.8.3 and 6.9.3. These measures will be applied throughout the site during construction and operation. The details on their application will be addressed in an erosion and sediment control (ESC) plan that will be implemented for construction areas and will be updated for operations. The ESC plan will be prepared during permitting prior to the construction phase as it needs to be informed by detailed engineering of site infrastructure and construction execution plans which can only be developed following the EA process. We agree with the intent to minimize site erosion and protect surface water from sedimentation, which are also compliance requirements. The ESC plan will provide further details on location and timing of measures to minimize slope length and	

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				In addition, in preparation for construction activities associated with the Project, a sediment and erosion control plan will be developed, implemented and monitored for effectiveness in managing sediment entry into adjacent waterbodies. References: Durnford, D., A. Dastoor, D. Figueras-Nieto, and A. Ryjkov. 2010. Long range transport of mercury to the Arctic and across Canada. Atmospheric Chemistry and Physics. Environment and Climate Change Canada. 2013. Mercury: Atmospheric Transport (found at: https://www.canada.ca/en/environment-climate-change/services/pollutants/mercury-environment/about/atmospheric-transport.html), accessed October 20, 2021. Moon-Kyung Kim and Kyung-Duk Zoh. 2012. Fate and Transport of Mercury in Environmental Media and Human Exposure. Journal of Preventative Medicine & Public Health, 45: 335-343. United States Environmental Protection Agency. Basic Information about Mercury (found at: https://www.epa.gov/mercury/basic-information-about-mercury), accessed October 20, 2021.	country foods and fish, recognizing that the Health Canada definition of "high consumer" may not be indicative of existing or desired consumption rates of Indigenous harvester. Also see response to comment STPN-2021-190 on water quality sampling. CLFN and LSFN request that draft sediment and control measures are presented in the final EIS/EA so CLFN and LSFN can support development and approval of these measures prior to development of management plans.	grade, ditching and diversion berms, contact water management ponds, use of natural vegetation buffers and runoff controls. FMG proposes to establish a joint forum for CLFN, LSFN and FMG to work together to advance details and implement Project environmental management plans following the EA process. We would like to discuss this further with the communities.	