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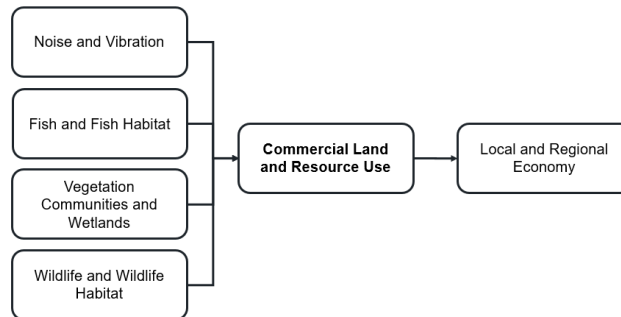
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6.17 Commercial Land and Resource Use

Commercial land and resource use was selected as a valued component (VC) because there are commercial activities in the region which use land and resources such as forestry and mineral exploration activities, outfitter facilities, traplines and bait harvesting areas.

In the absence of mitigation, the assessment of potential changes in commercial land and resource use are directly linked to other VCs, and is informed by the following sections:

- Noise and Vibration (Section 6.3):** the assessment of the potential effects in noise and vibration include changes in sensory disturbances during construction and operation of the Project that may affect commercial land and resource use activities, specifically trapping and outfitting.
- Fish and Fish Habitat (Section 6.10):** the assessment of potential effects in fish and fish habitat includes changes in the quantity and quality of aquatic resources during construction and operation of the Project that may affect commercial land and resource use activities, specifically bait harvesting.
- Vegetation Communities and Wetlands (Sections 6.11):** the assessment of potential effects in vegetation communities and wetlands includes changes in the quantity and quality of existing plant communities (including wetland ecologies) during construction and operation of the Project that may affect commercial land and resource use activities, specifically forestry.
- Wildlife and Wildlife Habitat (Section 6.12):** the assessment of potential effects in wildlife and wildlife habitat includes changes in the quantity and quality of wildlife resources during construction and operation of the Project that may affect commercial land and resource use activities, specifically trapping.



In addition, the assessment of potential changes in commercial land and resource use are also directly linked to other VCs, and informs the analysis of the following sections:

- Local and Regional Economy (Section 6.19):** the assessment of potential effects in the local and regional economy is informed by the changes in commercial land and resource use during construction, and operation of the Project as this may affect forestry, mineral exploration, outfitting, traplines and bait harvesting areas activities.

The assessment of the potential changes to commercial land and resource use from the Project are compared to relevant provincial and federal criteria (Section 6.17.1.4) and existing conditions (Section 6.17.2). The socioeconomic technical support documentation is included in Appendix Q, which includes the baseline socioeconomic report (Appendix Q-1).

Apart from commercial land and resource use, Indigenous traditional land and resource use is its own VC and is considered in Section 6.21.

6.17.1 Assessment Approach

The approach to the assessment of potential changes in commercial land and resource use includes a description of the relevant regulatory and policy setting, a description of the input obtained through consultation specific to this VC, the identification of criteria and indicators along with the associated rationale, a description of the spatial and temporal boundaries used for this VC along with a description of the attributes used to determine the significance of any residual, adverse effects. The assessment of potential effects is supported by a description of the existing conditions for the VC (Section 6.17.2), the identification and description of applicable pathways of potential effects on the VC (Section 6.17.3) and a description of applicable mitigation measures for the VC (Section 6.17.4). An outline of the analytical methodology conducted for the assessment and the key assumptions and/or conservative approach is found in Section 6.17.5. With the application of mitigation measures to the potential effects on the VC, the residual effects are then characterized in Section 6.17.6 and the significance of the residual effects is determined in Section 6.17.7.

6.17.1.1 Regulatory and Policy Setting

The effects assessment for commercial land and resource use has been prepared in accordance with the requirements of the federal Environmental Impact Statement (EIS) Guidelines (Appendix B-1) and the provincial approved Amended Terms of Reference (ToR; Appendix B-3). Concordance tables, indicating where EIS Guidelines and ToR requirements have been addressed, are provided in Appendix B-2 and B-5, respectively. Government policies, objectives, standards or guidelines most relevant to the VC are summarized below.

Provincial

The activities considered in this assessment are undertaken within the regulatory and legal framework governing commercial use of Crown land and resources. Relevant Ontario provincial legislation is described below.

The *Public Lands Act* controls the management, sale and disposition of public, or Crown, lands and forests. Under the Act, land use planning areas may be designated, and regulations can be established to control activities within a planning area. The Act provides for the right to use roads on public land except for private forest roads. Work permits may be issued under the *Public Lands Act*, when undertaking certain activities on Crown land and shorelands.

The *Far North Act, 2011* is a land use planning process which determines the most appropriate use of land and water in the Far North of Ontario. The land use plan will identify which lands will be dedicated for protection and which lands are open for potential economic development for forestry, tourism, mining or renewable energy. As part of the process, Indigenous communities and a planning team from the Ministry of Natural Resources (MNR) develop a Terms of Reference that set out the objectives and process to develop the land use plan. The Cat Lake – Slate Falls Community Land Use Plan (CLFN, SFN and MNR 2011) developed a land use plan under the Far North Act, which establishes the goals and objectives for planning to address cultural, social, environment and economic interests within the planning area.

The *Crown Forest Sustainability Act* sets the responsibility for management of forests in Ontario. Forests are divided into Forest Management Units which are managed through the development and implementation of a Forest Management Plan that outlines the long-term management and harvesting with the management unit. Harvesting by individual forestry companies occurs under a Sustainable Forest License which are renewable every five years.

In Ontario, the *Mining Act* (as amended by the *Building More Mines Act*) governs and regulates mineral prospecting and exploration, mine development and mine closure and rehabilitation. The Act encourages governed and regulated activities be conducted in ways that minimize the effects on human health and environment and recognize and affirm Indigenous and treaty rights. In 2017, Ontario passed the *Aggregate Resources and Mining Modernization Act, 2017*, which implemented an online registration system of mining claims and a Mining Lands Administration System. The *Mining Act* also describes the activities or decisions for which an environmental assessment would be required and the required public and Indigenous consultation.

The *Aggregate Resources Act* regulates the extraction of aggregate resources within designated areas and provides a mechanism to permit the operation of extraction activities. Private companies, municipalities and provincial agencies can obtain an aggregate licence for extractive activities.

Two elements of the *Fish and Wildlife Conservation Act* are relevant to commercial land and resource use: trapping and bait harvesting.

- The trapping of furbearing animals is managed through regulations and policies to regulate harvests and maintain healthy populations. Trappers must complete a 40-hour mandatory training program, obtain a licence (renewed yearly) and trap only during open season on their registered traplines or private property with written permission. Trappers are assigned specific trapping areas and given the exclusive rights to that area, known as a Trapline Area. Each trapper must manage the furbearing resources on a long-term, sustainable basis to meet assigned quotas. Indigenous trappers may harvest animals at any time of the year as part of their Treaty rights for sustenance and ceremonial purposes.
- Bait Harvesting Areas (BHA) are blocks of land which are assigned to single commercial bait harvester. The holder of a bait harvesting license is authorized to take, transport, buy and sell bait while meeting Ontario fishing regulations. The means of taking bait may be specified on each individual license and the harvester must record their harvest and / or maintain receipt of bait and submit an annual report.

The Project overlaps the following local resource management units:

- Trout Lake and Lac Seul Forest Management Units (FMUs);
- Trapline Areas (Table 6.17-1); and
- Bait Harvesting Areas (Table 6.17-2).

In addition to the resource management plans described above, the Project lies within the Sioux Lookout General Use Area (G2515), which is 1,415,209 hectares under Ontario's Living Legacy Land Use Strategy. Land uses applicable to the area include mining, forestry, cottaging, tourism. In general, the Crown land is actively used for recreation, fishing, hunting and fur harvesting as well as by major industries such as mining, forestry and resource-based tourism. The area contains a significant resource-based tourism industry from road accessible main base lodges to more remote outfitter camps. This area contains lakes that are designated for lake trout management and part of the area is subject to the Range Management Policy in Support of Woodland Conservation Authority.

A key component of the *Growth Plan for Northern Ontario* (see Section 6.19.1.1, MNDFM 2023) is the *Ontario Mineral Development Strategy* (MNDFM 2015). The 10-year *Mineral Development Plan* has the following key strategic priorities for the mining industry:

- be competitive and innovative;
- be safe and environmentally responsible;
- be efficiently and effectively regulated; and
- provide growth and prosperity for future generations.

Ontario's *Critical Minerals Strategy* (MNDMNRF 2022) was published in 2022. Critical minerals are ones that have specific industrial, technological or strategic applications for which there are few substitutes. Ontario produces critical minerals including nickel and cobalt and has advanced lithium and graphite mineral development projects. Other critical minerals that have been produced or are being developed include barite, chromite, fluorspar, magnesium, molybdenum, niobium, phosphate and tungsten. Ontario's list of critical minerals also includes tellurium which is contained within the Springpole Project deposit and studies are underway to evaluate its potential recovery. In addition, First Mining Gold (FMG) holds over 70,000 hectares of mineral claims around the Project and hosts various critical minerals.

The pillars of the *Critical Minerals Strategy* are:

- Enhancing geoscience information and supporting critical minerals exploration including access to business support programs and promoting provincial and federal tax credits for exploration companies;
- Growing domestic processing and creating resilient local supply chains including growing domestic production, and creating resilient supply chains;
- Improving Ontario's regulatory framework, strengthening regulatory competitiveness and coordination, and encouraging mineral recovery from mining waste;
- Investing in innovation, research and development and fostering collaboration;
- Building economic development opportunities with Indigenous partners, sharing benefits from resource development, enhancing capacity and supporting Indigenous businesses; and
- Growing labour supply and developing a skilled labour force including enhancing training pathways.

6.17.1.2 Influence of Consultation with Indigenous communities, Government and the Public

Consultation has been ongoing for several years prior to and throughout the environmental assessment process, and will continue with Indigenous communities, government and the public through the life of the Project. Section 2.0 provides more detail on the consultation process. The Record of Consultation (Appendix D) includes detailed comments received, and responses provided, during the development of the final Environmental Impact Statement / Environmental Assessment (EIS/EA).

Feedback received through consultation has been addressed through direct responses (in writing and follow up meetings) and incorporated into the final EIS/EA, as appropriate. Key comments that influenced the assessment for the commercial land and resource use VC between the draft and final EIS/EA is provided below.

Outfitters

The Ministry of Citizenship and Multiculturalism (MCM) commented that the proximity of the proposed road and transmission corridors to existing outfitter camps should be considered in the assessment. Section 4.19 of the final EIS/EA includes an assessment of the mine access road alternative routes and

Section 4.25 includes an assessment of the transmission line alternative routes, which both include consideration for tourism and recreational opportunities such as outfitters. The preferred routes for the mine access road and the transmission line corridor have no outfitter camps in the Project Development Area and this has been updated in Section 6.17.2.4.

MCM suggested working with local outfitters to minimize access-related impacts from the Project. FMG has consulted with outfitters in the area (as described in Section 2) and will continue communications throughout the Project.

FMG has undertaken efforts to contact and share information with outfitters in the area of the mine site and in several cases, for a variety of reasons, outfitters expressed interest in selling their business, which FMG supported through purchase arrangements.

An outfitter located outside the transmission line route commented on potential increased access to a lake of interest due to the transmission line route. FMG has met with and responded to the outfitter clarifying that the natural topography and landscape will be impassable preventing uncontrolled access, similar to other remote hydro corridors in northern Ontario. FMG noted that if that is not the case, FMG will work with the outfitter and regulatory agencies to install mitigation measures, including natural barriers to prevent uncontrolled access to the lake of interest.

There are no outfitters within the Local Study Area (LSA), with the closest outfitter to the mine site being 9 km away, and the transmission line being nearly 2 km away.

Notifications to Land Users

MNR noted that the trapline licence holders, holders of BHAs and outfitters within the very broad Regional Study Area (RSA) should be notified of the Project even if there no potential effects on their operations. As described in Section 2, FMG has sent out multiple letters notifying of the draft EIS/EA to trapline holders, bait harvesting areas holders, outfitters and license holders for bear management areas and invited comments and questions on the Project.

Traplines

FMG has worked with the Head Trapper and license holder of the closest trapline to the Project (SL197) to answer questions and address their concerns and interests towards supporting their ongoing and future activities. The licence holder (SL197) has submitted a letter of support to the Impact Assessment Agency of Canada (IAAC) and the Ministry of the Environment, Conservation and Parks (MECP) for the Project. As described above, FMG has notified all trapline license holders in the RSA of the Project and invited input on the draft EIS/EA and additional effort has been made to get in contact those that the mine site overlaps with. Discussions occurred with the licence holder of SL191 and Slate Falls Nation (SFN) regarding the proposed transmission line route (Alternative 3) in the draft EIS/EA and concerns were raised regarding the route crossing directly through the trapline area along with potential benefit opportunities associated with the transmission line passing more closely to the community. Mishkeegogamang Ojibway Nation also shared information on cultural values in the area. Considering this feedback and the request from SFN, the transmission line route has been revised to follow the existing E1C line (Alternative 1). Alternative 3 remains as a potential contingency should SFN change views. To date, no other trapline license holders in the RSA have raised questions or concerns about the Project. It is understood that traplines SL192 and SL196 are vacant and SL194 is currently inactive.

Bait Harvesters

BHA licence holder RL0085 did not have concerns regarding the interaction between the Project and this BHA but did inquire about potential interactions between the Project and a Land Use Permit on Springpole Lake that the license holder had acquired. FMG has worked with the BHA licence holder, and the Land Use Permit has since been voluntarily deactivated.

Forestry Companies

FMG has been in working with local forestry companies to find synergies in activities in the area around the Project. This includes cooperation with Dryden Fibre on maintenance and use of the Wenasaga Road which helps minimize potential effects by utilizing existing transportation infrastructure as opposed to creating new corridors. FMG has been and will continue dialogue with the Sustainable Forest License (SFL) holders regarding coordination on caribou habitat restoration and other conservation opportunities.

6.17.1.3 Spatial and Temporal Boundaries

The PDA is defined as the footprint of the Project including the mine site area, mine site access road and the transmission line corridor, as well as a buffer in order to allow for flexibility for design optimizations during Project permitting. The buffer includes approximately 250 metres (m) around the mine site area. The buffer for the transmission line is included within the 40 m wide corridor and within the 30 m wide corridor for the mine access road. Where the mine access road and transmission line are aligned together, the buffer is included within a 60 m wide corridor.

The spatial boundaries used for the assessment of commercial land and resources are shown in Figure 6.17-1 and defined as follows:

- **LSA:** the LSA for commercial land and resource use is based on the combined LSAs for the surface water systems and wildlife. The LSA for surface water systems is appropriate for activities such as bait harvesting as this occurs in the Birch Lake watershed waterbodies. The wildlife LSA is suitable for land use activities such as forestry, trapping, and resource development (mineral and aggregate) as it encompasses the vegetation LSA that is appropriate for forestry as well as the broader area for wildlife.
- **RSA:** the commercial land and resource use RSA is also based on the RSAs for surface water systems and portions of the wildlife RSA. The portions of the wildlife RSA include the quaternary watersheds that are overprinted by the PDA, and an area for the eastern portion of the RSA within 10 km of the PDA. The 10 km represents a typical home range for most wildlife species that may be harvested for trapping and outfitting such as Red Fox, Beaver or Black Bear.

The temporal boundaries for the assessment of commercial land and resources are defined as:

- **Construction Phase:** Years -3 to -1, representing the construction period for the Project.
- **Operations Phase:** Years 1 to 10, with the first year potentially representing a partial year as the Project transitions from construction into operations. Mining of the ore from the open pit will end in Year 10, at which time the pit will begin refilling with water.; and
- **Decommissioning and Closure Phase:**
 - Active Closure: Years 11 to 15, when final decommissioning and the majority of active reclamation activities are carried out; and

- Post-Closure: Years 16+, corresponding to the post-closure monitoring period and when the filled open pit basin will be reconnected to Springpole Lake.

Effects on this VC are assessed for each Project phase (i.e., construction, operations and closure).

6.17.1.4 Criteria and Indicators

Commercial land and resource use has the potential to be impacted by the Project both directly (e.g., loss of forestry resources) and indirectly (e.g., increased access to forestry resources). In undertaking the assessment of effects on commercial land and resource use, the following criteria were used:

- Change in forestry resources;
- Change in trapping ability and experience;
- Change in commercial bait harvesting;
- Change in outfitter camps and experience;
- Change in aggregate resources; and,
- Change in access to mineral claims.

The specific criteria, measurable indicators and the rationale for the selection of criteria are described in Table 6.17-4. To support the effects assessment, indicators are assessed using professional judgement and experience.

6.17.1.5 Description of Residual Effect Attributes

The residual effects for commercial land and resource use are characterized in terms of the following attributes:

- Magnitude;
- Geographic Extent;
- Duration;
- Frequency; and
- Reversibility.

These attributes along with the rankings are further described in Table 6.17-5.

In addition, the residual effects for commercial land and resource use are characterized according to the socio-economic context within which the VC is found. This is a qualitative measure of the sensitivity and/or resilience of the VC to potential change. The following ranking is applicable:

- **Level I:** The VC may or may not be sensitive but is capable of supporting the predicted change with typical mitigation measures.
- **Level II:** The VC is sensitive and requires special measures to support the predicted change.
- **Level III:** The VC is sensitive and unable to support the predicted change even with special measures.

As noted in Section 6.1, a residual environmental effect is defined as significant if both of the following criteria are satisfied:

- A Level II or III rating is attained for all of the attributes involving magnitude, extent, duration and reversibility; and,
- A Level II or III rating is attained for socio-economic context.

Conversely, if a Level I rating is achieved for any of the attributes involving magnitude, extent, duration, frequency or reversibility or, if a Level I rating is achieved for socio-economic context (where applicable), then the effect is considered to be not significant.

In the event there is a significant adverse effect, the likelihood of occurrence is further described.

6.17.2 Existing Conditions

A description of the baseline conditions is presented below to characterize the existing conditions for commercial land and resource use and is based on several years of study that has resulted in a comprehensive dataset for this stage of project planning. The existing conditions are used to support the assessment of potential effects from the Project on commercial land and resource use and will support long-term monitoring for the Project. Further baseline information on commercial land and resource use can be found in the technical support documentation (Appendix Q) and includes the results of the baseline socioeconomic study.

6.17.2.1 Forestry

MNR divides forests into FMUs through its forest management planning process. Each FMU is managed by an individual forestry company under a SFL which is renewable every five years. There are two FMUs overlapping the PDA (Figure 6.17-2).

The Trout Lake FMU overlaps the PDA (including the mine site, access road and transmission line), LSA and RSA and has a total area of approximately 1,031,300 hectares (ha), although the PDA is not in the active forest management block (Domtar Forestry 2022; MNRF 2021). The managing agent for this FMU is Dryden Fibre Canada, who is responsible for all renewal and maintenance activities to maintain a sustainable forest. The current Trout Lake Forestry Management Plan (FMP) covers a ten-year period from 2021 to 2031 (Domtar 2021). There are harvesting operations in place on the Trout Lake Forest which are conducted through the SFL. The majority of the conifer timber produced from the Trout Lake Forest is delivered to the INTERFOR sawmill located in Ear Falls along with the Dryden Fibre Canada pulp mill in Dryden. Hardwood produced from the Trout Lake Forest is also delivered to the Weyerhaeuser Timberstand laminated strand lumber facility in Kenora, Ontario.

Over a period of 35 years, a primary forestry road network has been developed that provides access to the southern and eastern portions of the Trout Lake Forest, with additional access to the northern portion under development. Included in the forestry road network is the Wenasaga Road, which provides access from near Ear Falls, through the Trout Lake Forest, across the Birch River approximately 18-km east of the Project site. The planned mine access road will connect to the Wenasaga Road as it is the only road infrastructure within proximity of the Project. There are no Indigenous communities located within the Trout Lake Forest; however, Cat Lake First Nation (CLFN), Lac Seul First Nation, Pikangikum First Nation, SFN and Wabauskang First Nation are within proximity and are consulted on forest management related activities by SFL process.

The Lac Seul FMU overlaps the transmission line portion of the PDA, and the managing agent is Obishikokaang Resources Corporation. This FMU comprises a total area of 793,050 ha, and a Forest Management Plan for this FMU and will be in effect from April 1, 2024 to March 31, 2034 (MNRF 2023).

A small portion of the Whitefeather FMU overlaps with the northern portion of the RSA and is well outside the PDA and not affected by the Project. The total area comprised within the SFL is 822,580 ha (MNRF 2018). The Whitefeather Forest 2022 to 2032 FMP (MNRF 2022) outlines the activities planned for this period including timber harvesting, road construction and silviculture. The outer boundary of the Whitefeather Forest was created using the 'Keeping the Land' Land Use Strategy (Pikangikum First Nation 2006).

6.17.2.2 Trapping

MNR uses a variety of management tools to regulate harvests and maintain healthy populations of furbearing animals. The Ontario Fur Managers Federation issues a detailed summary of Ontario fur management regulations, in plain language, along with standards for traps and snares and open season schedules (Ontario Fur Managers Federation 2021a,b). The guide publishes the seasons for each species which is presented in Appendix Q-1.

A total of eight trapline areas are overlapped by the PDA which include both terrestrial and aquatic habitat. Three traplines are overlapped by the mine site area and mine access road of the PDA. The amount of overlap is 0.9% of trapline area SL194, 4.4% of SL197 and 2.3% of SL200 as indicated in Table 6.17-1 and illustrated in Figure 6.17-3. The transmission line portion of the PDA overlaps with 0.1% to 0.9% of five trapline areas. As noted in Section 6.17.1.2, FMG has worked with the Head Trapper and license holder of the closest trapline to the Project (SL197) to answer questions and to address their concerns and interests. The licence holder (SL197) has submitted a letter of support to IAAC and MECP for the Project. FMG has notified all trapline license holders in the RSA of the Project and invited input on the draft EIS/EA and additional effort has been made to get in contact those that the mine site overlaps with. Discussions occurred with the licence holder of SL191 and SFN regarding the proposed transmission line route as described in Section 6.17.1.2. To date, no other trapline license holders in the RSA have raised questions or concerns about the Project. It is understood that traplines SL192 and SL196 are vacant and SL194 is currently inactive.

6.17.2.3 Commercial Bait Harvesting

In Ontario, harvesting or selling bait or leeches for commercial purposes requires a license. MNR restricts the harvest and sale to 48 species (MNRF 2018). BHAs vary in size and are assigned using a block system, with one harvester assigned per BHA (MNRF 2018). The BHAs include both terrestrial and aquatic habitats and do not represent the area of potential habitat for baitfish.

As shown in Figure 6.17-4, there are nine BHAs overlapped by the PDA as indicated in Table 6.17-2. The PDA overlaps with approximately 6.3% of BHA RL0098. The remaining BHAs have less than 1% overlap with the PDA.

6.17.2.4 Outfitters

There are no outfitters in the PDA. FMG has undertaken efforts to contact and share information with outfitters in the area of the mine site and in several cases, for a variety of reasons, outfitters expressed interest in selling their business, which FMG supported through purchase arrangements. There are no outfitters in the LSA, with the closest outfitter camps to the mine site being, 9 km to the west, and 10 km to the south and the closest to the transmission line corridor being nearly 2 km away. There are approximately 16 outfitters with lodges or outfitter camps in the RSA (Table 6.17-3 and Figure 6.17-5).

6.17.2.5 Aggregate Resources

The Project will require aggregate for the construction of the Project, much of which will be provided from sources within the mine site area. There may however be a need for supplemental sources of aggregate for concrete, the construction of the mine access road, and other applications.

As shown in Figure 6.17-6, there are no recorded active aggregate quarries or pits within the PDA or LSA. There is one active aggregate pit within the RSA, located just north of Root Lake approximately 67.6 km from the Project site that is owned by the Bamaji Lake Economic Development Corporation. No information is available on the material produced or status of the operation (MNRF n.d).

Based on air photo interpretation and shallow test pits, there are several potential aggregate sources in the PDA and immediate area. Two potential sources of aggregate for the Project have been identified in the PDA, one north of the southeast arm of Springpole Lake and the other located off Wenasaga Road, adjacent to the proposed transmission line. These local aggregate resources may be developed for Project purposes such as road construction, if required, potentially negating the need to transport aggregate from existing commercial operations.

6.17.2.6 Mineral Claims and Exploration

FMG holds over 70,000 ha in the Birch-Uchi Greenstone Belt and is the largest single mineral claim holder in the region. There is a concentration of active mineral claims to the north and west of the mine site (Figure 6.17-7) within the RSA and extending southwesterly toward Ear Falls and Red Lake. There is another concentration of active mineral claims within the eastern portion of the RSA, east of SFN; and a concentration of claims north of the existing E1C transmission line between SFN and the Wenasaga Road which overlaps with the transmission line portion of the PDA.

Outside of FMG's exploration properties, the closest mineral exploration projects are the Hasaga Project and Red Lake Operation (JDS Energy & Mining 2019; Evolution Mining 2021) at Red Lake, both located west of the RSA.

6.17.2.7 Traditional Knowledge

As part of the Project, all eight Indigenous communities were contacted to participate in the EA process, and to provide Traditional Knowledge and Traditional Land and Resource Use (TK/TLRU) information. To date, six Indigenous communities, CLFN, Lac Seul First Nation, Mishkeegogamang Ojibway Nation, SFN, Wabauskang First Nation and the Northwestern Ontario Métis Community, have provided Traditional Knowledge and Traditional Land and Resource Use information. Specific Traditional Knowledge and Traditional Land and Resource Use information relevant to commercial land and resources was not identified, however Indigenous commercial land and resource use is described in Section 6.21 and 6.26.

6.17.3 Identification of Pathways to Potential Effects

As a first step in the assessment process, it is important to identify Project activities that may result in pathways to potential effects on commercial land and resource use. These potential effects may be direct, indirect and/or positive effects, where applicable. Table 6.17-6 includes the potential interactions of the Project with commercial land and resource use, prior to the application of the mitigation measures. The professional judgement of technical experts experienced with mining projects in Ontario and Canada as well as input from Indigenous communities, government agencies and the public informed the identification of those interactions that are likely to result in a pathway to a potential effect due to a measurable change on commercial land and resource use. These pathways to potential effects are further described below for



each phase of the Project, along with the rationale for those interactions excluded from further assessment. Section 6.17.4 and Table 6.17-7 provide a description of the mitigation measures applied to these pathways to potential effects during all phases of the Project. The residual effects, after the application of the mitigation measures, are then described and further evaluated in Section 6.17.6, using the criteria and indicators identified in Section 6.17.1.4.

Construction Phase

The construction phase of the Project is expected to occur over a three-year period and will include preparation of the site and the construction of mine infrastructure. Prior to the application of mitigation measures, potential effects to commercial land and resource use during construction could occur due to changes in forestry resources, aggregate resources, commercial bait harvest areas, outfitter camps, and the ability to trap and the associated experience from these changes. For each of these criteria, the potential pathways have been described based on the interactions with the Project identified in Table 6.17-6.

- Without mitigation, a change in forestry resources could occur from the identified interactions through the following pathway:
 - the loss of vegetation that may include merchantable timber could lead to decreased resources for forestry companies.
- Without mitigation, a change in aggregate resources could occur from the identified interactions through the following pathway:
 - the requirement for aggregate material for construction activities could lead to increased demand of aggregate resources from other sources in the area.
- Without mitigation, a change in BHAs could occur from the identified interactions through the following pathways:
 - removal of commercial baitfish habitat in the mine site area;
 - dewatering of the pit and discharge to the downstream environment may affect baitfish habitat;
 - elevated levels of suspended solids that may be entrained into the water column as the water level is lowered may affect baitfish habitat;
 - operation of the dewatering pumps could result in the entrainment and impingement of baitfish; and
 - sensory disturbances (noise, light) from the operation of construction equipment could decrease the experience for commercial bait fishing.
- Without mitigation, a change in outfitter camps could occur from the identified interactions through the following pathways:
 - the physical presence of the Project could lead to undesirable views for outfitter camps; and
 - sensory disturbances (noise, light) from the operation of construction equipment could decrease the experience for outfitting camps.
- Without mitigation, a change in the ability to conduct trapping and the associated experience, could occur from the identified interactions through the following pathways:



- the loss and increased fragmentation of wildlife habitat may cause displacement of wildlife, decreasing the abundance of species available for trapping;
- sensory disturbances (noise, light) from the operation of construction equipment could displace wildlife, decreasing the abundance of species available for trapping;
- the physical presence of the Project and sensory disturbances could lead to undesirable experiences for trappers and potential abandonment of traplines; and
- increase in access to the area and disruption to trappers.
- Without mitigation, a change in access to mineral claims, could occur from the identified interactions through the following pathway:
 - construction of the transmission line could restrict access to mineral claims.

All other interactions during construction between the Project (Table 6.17-6) and the commercial land and resource use are not considered plausible and potential residual effects are unlikely with the implementation of mitigation.

Mitigation measures are applied to these pathways to avoid or minimize changes in forestry resources, aggregate resources, outfitter camps, commercial bait harvest areas, mineral claims and the ability to trap and the associated experience, as described in Section 6.17.4 and Table 6.17-7. An assessment of the potential residual effects, after the application of mitigation, is presented in Section 6.17.6.

Operations Phase

The operations phase is anticipated to occur over a 10-year period. Prior to the application of mitigation measures, potential effects to commercial land and resource use during operations could occur due to changes in outfitter camps, and the ability to trap and the associated experience from these changes. For each of these criteria, the potential pathways have been described based on the interactions with the Project identified in Table 6.17-6.

- Without mitigation, a change in the commercial bait harvesting could occur from the identified interactions through the following pathway:
 - sensory disturbances (noise, light) from the operation of construction equipment could decrease the experience for commercial bait fishing.
- Without mitigation, a change in outfitter camps could occur from the identified interactions through the following pathways:
 - the physical presence of the Project could lead to undesirable viewsapes for outfitter camps; and
 - sensory disturbances (noise, light) from the operations could decrease the experience for outfitting camps.
- Without mitigation, a change in the ability to conduct trapping and the associated experience could occur from the identified interactions through the following pathways:
 - sensory disturbances (noise, light) from operations could displace wildlife, decreasing the abundance of species available for trapping; and



- the physical presence of the Project and sensory disturbances could lead to undesirable experiences for trappers and potential abandonment of traplines.

All other interactions during operations between the Project (Table 6.17-6) and the commercial land and resource use are not considered plausible and potential residual effects are unlikely with the implementation of mitigation.

Mitigation measures are applied to these pathways to avoid or minimize changes in outfitter camps, commercial bait harvest areas and the ability to trap and the associated experience, as described in Section 6.17.4 and Table 6.17-7. An assessment of the potential residual effects, after the application of mitigation, is presented in Section 6.17.6.

Decommissioning and Closure Phase

The active decommissioning and closure phase is anticipated to occur over five years. Prior to the application of mitigation measures, potential effects to commercial land and resource use during decommissioning and closure could occur due to changes in outfitter camps, commercial bait harvest areas and the ability to trap and the associated experience from these changes. For each of these criteria, the potential pathways have been described based on the interactions with the Project identified in Table 6.17-6.

The final reclamation of disturbed areas includes similar activities to the construction phase and have similar potential effects, although generally at a lesser scale.

- Without mitigation, a change in the commercial bait harvesting could occur from the identified interactions through the following pathways:
 - refilling of the open pit basin using could have a potential effect on water levels of Springpole Lake and habitat used by baitfish; and
 - sensory disturbances (noise, light) from decommissioning and closure activities could decrease the experience for commercial bait fishing.
- Without mitigation, a change in outfitter camps could occur from the identified interactions through the following pathway:
 - sensory disturbances (noise, light) from decommissioning and closure activities could decrease the experience for outfitting camps.
- Without mitigation, a change in the ability to conduct trapping and the associated experience could occur from the identified interactions through the following pathway:
 - sensory disturbances (noise, light) from decommissioning and closure activities could displace wildlife, decreasing the abundance of species available for trapping; and
 - the physical presence of the Project and sensory disturbances could lead to undesirable experiences for trappers and potential abandonment of traplines.

All other interactions during operations between the Project (Table 6.17-6) and the commercial land and resource use are not considered plausible and potential residual effects are unlikely with the implementation of mitigation.

Mitigation measures are applied to these pathways to avoid or minimize changes in outfitting camps, commercial bait harvesting, and the ability to trap and the associated experience, as described in



Section 6.17.4 and Table 6.17-7. An assessment of the potential residual effects, after the application of mitigation, is presented in Section 6.17.6.

6.17.4 Mitigation Measures

Effects to commercial land and resource use can be beneficial or adverse. Mitigation measures to avoid or minimize adverse the effects of the Project or to enhance beneficial effects to commercial land and resource use, include the following:

- Limit the removal of merchantable timber and loss of wildlife habitat through:
 - Development of a compact mine site.
 - Co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible.
 - Detailed engineering will be conducted to optimize the transmission line route.
- Limit the aerial extent of the Project and overprinting of BHAs through the development of a compact mine site.
- Implement the mitigation measures for reducing sensory disturbance from noise (Section 6.3) including:
 - Building dimensions, layout and orientation will be designed to shield noise sources, where possible.
 - Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills.
 - Generator intakes and exhausts in the process plant will use silencers.
 - Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions during all phases of the Project.
 - Reversing alarms should be dimmable with white noise and/or strobe lights, but in accordance with the applicable health and safety regulations, during all phases of the Project.
 - The use of engine brakes will be prohibited.
 - Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible, during all phases of the Project
 - Check that equipment and machinery used on site is maintained in good working conditions through regular maintenance and inspection;
 - For helicopter use during transmission line construction, minimum flight altitudes will be maintained unless the helicopters are engaged in construction tasks, landing or departure.
- Implement the mitigation measures for reducing sensory disturbance due to light:
 - To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms.
 - Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards, where practical.



- Preserve a tree line as a buffer to minimize the amount of the mine site that can be seen from areas used by land users.
- A controlled access gate is proposed to control unauthorized use of the mine access road.
- Install screens or use other measures at water intakes to prevent entrainment or impingement of fish as per the DFO Code of Practice (DFO 2020).
- During construction (and other phases as applicable), implement a site-specific Erosion and Sediment Control Plan to mitigate the entry of sediment into surrounding waterbodies.
- Keeping the dewatering (discharge to the downstream environment) to within the framework 10% of instantaneous flow so that the activity is not harmful to fish and fish habitat and maintains downstream water quantity and flow within natural variation.
- Supplemental water taken from Springpole Lake to fill the open pit basin will be done in a controlled manner while maintaining lake water levels within natural variation.
- Preserving a tree line as a buffer around the mine site to diminish the amount of the mine site that can be seen. This buffer around the Project will be maintained wide enough to withstand the loss of trees, such as toppled by wind.
- Buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized.
- FMG will work with MNR and/or trapline license holders to support trapline harvesting enhancements during construction and operation phases.
- Prior to construction and throughout operations, FMG will maintain active engagement with trappers, bait harvesters and outfitters regarding Project activities.
- Prior to, and during construction, FMG will work with local forestry companies to salvage valued harvestable timber.
- Prior to the start of construction, FMG will work with mineral claim holders and regulators to accommodate access to mineral claims by claim holders and to secure permission to construct the transmission line on mineral claims held by others.

In addition to the mitigation measures to reduce potential environmental effects, FMG is committed to ongoing communication with Dryden Fibre regarding the timelines for construction and coordination with forestry activities and potential caribou habitat restoration and conservation opportunities.

The application of mitigation measures for the pathways to potential effects is illustrated in Table 6.17-7. Mitigation measures described in this section are expected to be effective for their intended purposes given their effective implementation at similar projects.

Ongoing communication with licence holders and stakeholders will be implemented to verify the accuracy of the predicted effects, assess the effectiveness of the implemented mitigation measures and may be further optimized through life of mine.

6.17.5 Analytical Methods

The assessment of potential effects on commercial land and resource use applies a quantitative comparison, using GIS analysis, of the areas of the resource use or the volume of the resources that could be affected by Project activities. Specifically, the proportions of FMUs and trapline areas that could be affected by the Project were assessed by comparing their total areas with the portions affected by the Project.

Where direct quantitative comparisons were not possible, qualitative evaluations of potential Project effects were conducted considering the relative areas of uses and the potential extent of Project effects, relying on published information, an understanding of the Project activities, information from other VCs and professional judgement.

The extent of sensory disturbances caused by the Project were assessed using the results of the Noise Modelling Report (Appendix H-3), the Light Modelling Report (Appendix J) and the Visual Effects Assessment Report (Appendix U). A visual effects assessment was conducted by qualitatively comparing the existing views from selected vantage points with future views that incorporated planned Project features generated through computer simulations (Appendix U). The results of the studies were used to assess the potential impacts at outfitter camps and the areas in which land users could experience sensory effects.

6.17.5.1 Assumptions and the Use of the Conservative Approach

The presence of nearby FMUs, BHAs, trapline areas, outfitter camps, and mineral claims demonstrate that forestry, bait harvesting, trapping, and mineral exploration activities occur within the LSA and RSA. The assessment took a conservative approach by assuming those activities were occurring in the LSA, even if primary or secondary research did not specifically identify those activities in general or within site-specific areas.

The conservative approach taken in assessing the Project effects on aspects of the environment that could affect commercial land and resource use is carried into this assessment. Those aspects include noise, light, visualization, fish and fish habitat, and wildlife and wildlife habitat.

6.17.6 Characterization of Potential Residual Effects

Potential pathways of the Project were identified (Section 6.17.3), and practicable mitigation was applied (Section 6.17.4) to minimize effects on commercial land and resource use. The assessment of potential effects on commercial land and resource use is completed to evaluate potential effects after the implementation of mitigation measures. Pathways that could be removed (i.e., the effect is avoided) by mitigation, would have no residual effect on other land and resource use. Pathways could also result in a measurable change, but this change would be sufficiently small that it would have a negligible residual effect on other land and resource use. If pathways were determined as having no residual effect or a negligible residual effect a significance determination is not completed (Section 6.17.7). Pathways that could result in changes to the environment with one or more associated indicators and have the potential to cause a greater than negligible residual effect on other land and resource use were assessed for significance.

6.17.6.1 Changes in Forestry Resources

The Project will result in the removal of potentially merchantable timber within the PDA through the clearing of the site, mine access road corridor and the transmission line corridor during the construction phase. The planned harvesting of the Trout Lake FMP and Lac Seul FMP through 2020 to 2061 in the LSA is approximately 6,000 ha, of which an estimated 1,000 ha will occur in the PDA. The northern portion of the PDA is scheduled to be harvested between 2041 and 2061. The southern portion of the PDA, including the southern portion of the transmission corridor, is scheduled to be harvested between 2021 and 2041.

The Project footprint has been designed to reduce disturbance through the development of a compact mine site, by using existing road infrastructure to the extent possible, and co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible. In addition, detailed engineering will be conducted to optimize the transmission line route, which may reduce land clearing

requirements. Prior to construction, merchantable timber will be salvaged and offered to the forestry companies managing the two affected FMUs.

In summary, with the identified key mitigation measures, the potential residual effect on forestry resources with respect to commercial land and resource use is predicted to be negligible; therefore, a determination of significance is not required.

6.17.6.2 Changes in Trapping

The construction of the Project mine site, mine access road and transmission line will result in the loss and alteration of wildlife habitat within the PDA, which can result in displacement of wildlife species and reduce the areas available for trapping. The Project footprint has been designed to reduce disturbance through the development of a compact mine site, by using existing road infrastructure to the extent possible, and co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible. In addition, detailed engineering will be conducted to optimize the transmission line route, which may reduce land clearing requirements. The mine site area of the PDA and mine access road will overlap with small portions (0.9% to 4.5%) of three trapline areas, and the transmission line will overlap with 0.1% to 0.9% of five traplines. Overall, the PDA will only affect 0.6% of the total 288,967 ha area of the eight trapline areas. Additionally, there is less than a 10% loss of furbearer habitat in the PDA, and these habitats are common throughout the area (Section 6.12.6.1).

The Project will increase ambient noise and light (at night) during construction, operations, and active closure. Sensory disturbances such as noise and light can potentially reduce the abundance of wildlife available for trapping. Examples of species potentially affected by the Project and relevant to trapping include beaver, American marten, wolf, red squirrel, and mink. Many of these species are known to be relatively tolerant of sensory disturbance associated with human and infrastructure presence (e.g., beaver). Other species, such as the American marten, display life history traits (e.g., high mobility, strong dispersal ability; Buskirk and Rugiero 1994) that provide flexibility to adapt to different types of human development.

This increase in ambient noise and light may also adversely affect trappers and reduce their use of the area and negatively alter their experience of trapping near the Project. It is recognized that noise could have an effect on the experience of individual trappers it is possible that some individuals may choose not to conduct trapping in the vicinity of the Project. Individuals may perceive and experience noise differently. For example, tolerance to noise may be higher for some individuals than others, especially when there are expectations of a quiet and peaceful wilderness experience. Additionally, sky glow could obscure faint stars for trappers on clear nights. Sensitivity levels may vary among individual resource users and the degree to which avoidance may occur is subject to individual sensitivities and choices.

Mitigation to reduce noise effects on trapping includes measures such as the use of acoustical enclosure, silencers, and the implementation of operational procedures for operating vehicles and equipment. Building dimensions, layout and orientation will also be designed to shield noise sources, where possible. Mitigation to reduce light include measures such as maintaining light sources below natural barriers, such as tree lines or artificial barriers, such as berms. In addition, light spill and glare will be minimized using shielding on stationary light sources and direct lighting downwards where practical.

Increased access to the area through the mine access road could cause disruption to trappers and increased use of the area. A controlled access gate is proposed to manage unauthorized use of the mine access road, at a location to be determined in consultation with CLFN, SFN, MNR and the forestry road owner. FMG will also work with MNR and/or trapline license holders to support trapline harvesting enhancements, similar to

trapline SL197. Prior to construction and throughout operations, FMG will maintain active engagement with trappers regarding Project activities.

The Project is predicted to have a residual effect on trappers; therefore, a determination of significance is required (Section 6.17.7.1).

6.17.6.3 Changes in Commercial Bait Harvesting

The Project will reduce the area available for commercial bait harvesting during construction and operations phases. The Project footprint overlaps nine BHAs; the portions of the BHAs that overlap with the PDA range from 0.1% to 6.3% of the individual BHAs. The most direct effect will be the removal of habitat in the mine site area of the PDA. That portion of the PDA overlaps with 6.3% of BHA RL0098. The Project footprint has been designed to reduce disturbance through the development of a compact mine site and by using existing road infrastructure to the extent possible. There will be no direct effects on bait harvesting along the mine access road and the transmission line corridors, as watercourses along the linear developments will not be removed.

To prevent entrainment or impingement of baitfish, screens or use other measures will be installed at water intakes as per the DFO Code of Practice (DFO 2020). A site-specific Erosion and Sediment Control Plan to mitigate the entry of sediment into surrounding waterbodies will also be implemented. During dewatering of the pit, discharge to the downstream environment will be within the framework 10% of instantaneous flow so that the activity is not harmful to fish and fish habitat and maintains downstream water quantity and flow within natural variation. During closure, supplemental water taken from Springpole Lake to fill the open pit basin will be done in a controlled manner while maintaining lake water levels within natural variation, subsequently limiting effects on baitfish habitat. The filling of the open pit basin with water and reconnecting it to Springpole Lake once water quality is suitable may also increase baitfish habitat.

Increased access to the area through the mine access road could cause disruption to baitfish harvesters. A controlled access gate is proposed to manage unauthorized use of the mine access road, at a location to be determined in consultation with CLFN, SFN, MNR and the forestry road owner. Prior to construction and throughout operations, FMG will maintain active engagement with baitfish harvesters regarding Project activities.

The Project is predicted to have a residual effect on commercial bait harvesters; therefore, a determination of significance is required (Section 6.17.7.2).

6.17.6.4 Changes at Outfitter Camps

During operation and closure phases, the physical presence of the mine site may cause a decline in the purchase of outfitting services offered near the site. The closest outfitter camps to the mine site being are 9 km to the west and 10 km to the south and outside the LSA; there are no outfitter camps adjacent the mine access road or the transmission line corridor. A visual effects assessment (Appendix U) completed for the Project determined the mine site will not be visible at the outfitter camps closest to the mine site. Regardless, during construction a tree line will be preserved as a buffer around the mine site, as practical, to diminish the amount of the mine site that can be seen in the immediate vicinity. This buffer around the Project will be maintained wide enough to withstand the loss of trees, such as toppled by wind. During closure, all buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized.

As discussed in Section 6.17.7.2, the Project will increase ambient noise and light (at night) during construction, operations, and active closure. Given the proximity of the outfitter camps to the mine site, and existing transmission line and with the implementation of the identified key mitigation measures and the

fact the transmission line will not create new access, the potential effect on the outfitter camps with respect to commercial land and resource use is predicted to be negligible therefore, a determination of significance is not required.

6.17.6.5 Changes in Aggregate Resources

The Project will use mine rock excavated during the development of the open pit and fish habitat development area, as well as other site excavations of rock within the PDA for Project construction. This will reduce the requirement to obtain aggregate from other areas in the PDA or further away. Supplemental aggregate may be required for special-purpose construction or for the construction of the mine access road. Potential aggregate resources suitable for local use such as road construction in the PDA have been identified. A small portion of the potentially available aggregate resources could be required by the Project. There is no anticipated need to access aggregate from existing operations outside the LSA. However, should certain quantities be required from existing operations, it would be within their existing authorizations and would result in positive business and economic benefits.

In summary, with the identified key mitigation measures, the potential effect on the aggregate resources with respect to commercial land and resource use is predicted to be negligible; therefore, a determination of significance is not required.

6.17.6.6 Changes in Access to Mineral Claims

The construction of the transmission line will overlap with mineral claims. Additionally, construction of the transmission line results in potential change in accessibility mineral exploration at several mineral claim areas. The area around the PDA includes mining claims owned by other entities, and exploration activities on these claims, may be affected by Project development. Prior to the start of construction, FMG will obtain necessary patents, claims, mining leases and/or licences of occupation as applicable. The Project may provide increased access to some mining claims and exploration activity due to increased infrastructure in the area, including the mine access road. During all phases, FMG will work with mineral claim holders and regulators to accommodate access to mineral claims by claim holders and to secure permission to construct the transmission line on mineral claims held by others.

In summary, with the identified key mitigation measures, the potential effect on the access to mineral claims with respect to commercial land and resource use is predicted to be negligible; therefore, a determination of significance is not required.

6.17.7 Significance of Residual Effects

In determining the significance of effects to commercial land and resource use, consideration was given to the combination of residual effects (i.e., access to and area available for land and resource use, wildlife abundance, and the quality of the experience). Due to the Project's remote location, land and resource use for commercial purposes is low, and only two resource user groups were identified as potentially affected: trappers, and baitfish harvesters.

There will be a minor reduction in the area available to trappers and bait harvesters; however, less than 10% of habitat for trapped species and less than 7% of BHAs will be lost. The commercial land and resource use VC is not sensitive and is capable of supporting the predicted residual effects with typical measures, and therefore the ecological and social context is considered low (Level I).

6.17.7.1 Changes to Trapping

Predicted changes to trapping from increased access, and a decrease in the area available for use, abundance of wildlife species trapped, and quality of the experience is predicted to result in an adverse residual effect on commercial land and resource use. However, the magnitude of these changes is expected to be low (Level I). There will be a minor reduction in the area available to trappers; however, these areas are small percentages of the total area of the traplines that will continue to offer trapping opportunities with support from FMG. Less than 10% of habitat for trapped species will be lost and species are relatively tolerant of sensory disturbance associated with human and infrastructure presence. It is recognized that noise could have an effect on the experience of individual trappers; however, the degree to which avoidance may occur is subject to individual sensitivities and choices.

The residual effect on trapping is limited to the LSA, resulting in a low geographic extent (Level I). The duration of the residual effect is over the long term, lasting through all phases of the Project (Level III), and the effect will occur continuously during all Project phases (Level III). The residual effects on trapping will be partially reversed (Level II) at closure due to reduced activities and due to revegetation and/or restoration of wildlife habitat within the PDA.

As a result, the adverse residual effect on commercial land and resource use due to changes in trapping is predicted to be not significant.

6.17.7.2 Changes in Bait Harvesting

Predicted changes to bait harvesting from increased access, and a decrease in the harvesting areas, and quality of the experience is predicted to result in an adverse residual effect on commercial bait harvesting. However, the magnitude of these changes is expected to be low (Level 1). There will be a minor reduction in the area available to bait harvesters; however, the loss is less than 7%. It is recognized that noise could have an effect on the experience of individual bait harvesters; however, the degree to which avoidance may occur is subject to individual sensitivities and choices. Dewatering of the open pit basin and discharge during construction, and the filling during closure will be completed while maintaining lake water levels within natural variation. Additional habitat will also be created once the dewatered basin is reconnected with the remainder of Springpole Lake.

The geographic extent of the residual effect on bait harvesting will be restricted to the mine site area of the PDA (Level I). The duration of the residual effect is over the long term, lasting throughout all phases of the Project (Level III); and the effect will occur continuously during all Project phases (Level III). The residual effect will be reversible during closure once the dewatered basin is refilled and reconnected with the remainder of Springpole Lake, restoring aquatic habitat (Level I), especially in consideration of the additional habitat created with implementation of the revised Fish Habitat and Offsetting Plan (Appendix F).

As a result, the adverse residual effect on commercial land and resource use due to changes in bait harvesting is predicted to be not significant.

6.17.8 Confidence Prediction

The prediction confidence is high based on the understanding of existing conditions and the nature of the expected interactions with Project components and activities, the mitigation measures included for commercial land and resource use.

6.17.9 References

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- Pikangikum First Nation. 2006. Keeping the Land - A Land Use Strategy.



Table 6.17-1: Trapline Areas Overlapping with PDA and LSA

Trapline Areas	Trapline Total Area (ha)	Area in the PDA (ha)	% Overlap with PDA	% Overlap with LSA
RL004	29,956	0	0	1.9%
SL186	83,998	0	0	<0.01%
SL188	39,311	33	0.1%	11.3%
SL191	107,947	119	0.1%	10.8%
SL192	30,026	84	0.3%	27.7%
SL193	36,365	44	0.1%	11.8%
SL194	11,719	80	0.7%	34.9%
SL196	11,221	12	0.1%	10.8%
SL197	20,741	930	4.5%	40.5%
SL200	31,638	725	2.3%	28.7%

Source:

NDMNRF 2019.

Table 6.17-2: Bait Harvesting Areas Overlapping with PDA and LSA

BHA Identifier	BHA Total Area (ha)	Area in the PDA (ha)	% Overlap with PDA	% Overlap with LSA
RL0073	24,289	42	0.2%	17.5%
RL0085	24,233	17	0.1%	12.9%
RL0086	24,225	215	0.9%	45.6%
RL0098	24,158	1,515	6.3%	30.2%
RL0099	24,159	11	0.05%	11.6%
SL0084	24,298	13	0.1%	8.0%
SL0085	24,295	73	0.3%	30.3%
SL0086	24,293	71	0.3%	29.4%
SL0087	24,290	71	0.3%	29.4%

Source:

MNRF 2018c.

Table 6.17-3: Outfitters in the RSA

Establishment	Description
Cat Lake Economic Development Corporation	One camp in the RSA
Clarks Resorts and Outposts (2351387 Ontario Inc.)	2351387 Ontario Inc operates out of Vermillion Bay and has three camps (including the Northern Lights Outpost) within the RSA.
Green's Fly-in Camps (Green Airways Inc)	Outfitter has six camps, with one located within the RSA. FMG acquired the Sandy Point Outpost that was previously operated in the LSA. The closest camp to the Project is Poplar Point, which is located on Birch Lake, approximately 9 km west of the Project
KaBeeLo Lodge Inc.	A central base camp and 13 fly-in camps, nine of which are in the RSA. The full-service main lodge is located 53.2 km from the Project Site and has fully equipped cabins to host hunting and fishing excursions throughout the RSA. The closest camp to the Project is located on Seagrave Lake, approximately 10 km south of the Project.
Knobby's Fly-in Camps Ltd.	Operating out of Sioux Lookout, this outfitter's main lodge is located within the RSA on Bamaji Lake and operates seven camps within the RSA.
L&M Sioux Lookout Fly-In Camps	Based in Emo, this outfitter has camps on ten lakes, two of which are in the RSA
Lac Seul Airways Ltd.	Outfitter has 12 camps, one of which is in the RSA
Latreile Lake Lodge	This outfitter has a main camp on Latreile Lake and two fly-in camps, all of which are in the RSA
LUP #1205-1008550	Outfitter has a camp on Christina Lake in the RSA.
Pickerel Arm Camps	The outfitter has a drive-in base camp on Pickerel Arm, a branch of Minnitaki Lake, and nine fly-in camps, one of which is in the RSA.
Red Pine Lodge	A fishing outfitter that offers two camp destinations within the RSA, while its main camp is in Sioux Lookout.
Shabu Wilderness Outposts Inc.	Operating out of Ear Falls, this outfitter has one camp within the RSA at Shabumeni Lake.
Sioux Air Ltd	Outfitter has one camp in the RSA.
Swain Post Camp	Operating out of Ear Falls, this outfitter has one camp within the RSA.
True North Outposts and Cabins Ltd.	Operating out of Emo, this outfitter has one camp within the RSA.
Wenasaga Outposts Ltd.	Operating out of Ear Falls, Outfitter has two camps within the RSA.



Table 6.17-4: Commercial Land and Resource Use Criteria, Indicators and Rationale

Criteria	Indicators	Rationale
Change in forestry resources	<ul style="list-style-type: none"> • Quantity of merchantable forest areas removed, in hectares (ha) 	<ul style="list-style-type: none"> • Removal of merchantable timber could have an economic effect on forestry resources.
Change to trapping ability and experience	<ul style="list-style-type: none"> • Area of traplines overlapped by PDA, LSA and RSA, in ha • Extent or scale of sensory disturbances (noise, light) • Change in access to traplines 	<ul style="list-style-type: none"> • Loss of wildlife habitat, sensory disturbance and increase in access could change trapping activities and harvesting levels with an associated economic effect on trapline holders.
Change in commercial bait harvesting	<ul style="list-style-type: none"> • Area of bait harvesting areas overlapped by the PDA, LSA and RSA • Extent or scale of sensory disturbances (noise, light) • Change in access to bait harvest areas 	<ul style="list-style-type: none"> • Loss of bait habitat, sensory disturbance and increase in access to bait harvesting areas could have an economic effect on BHA licence holders.
Change at outfitter camps	<ul style="list-style-type: none"> • Number of outfitter camps with altered viewsapes • Extent or scale of sensory disturbances (noise, light) • Change in access to outfitter camps 	<ul style="list-style-type: none"> • Altered viewsapes, sensory disturbance and increase in access at outfitter camps could change the use of those camps and outfitters' income.
Change in aggregate resources	<ul style="list-style-type: none"> • Change in commercial availability of aggregate 	<ul style="list-style-type: none"> • Use of aggregate resources could change the demand of resources for other potential users.
Change in access to mineral claims	<ul style="list-style-type: none"> • Number of mineral claims overlapped by LSA and RSA • Change in access by mineral exploration companies 	<ul style="list-style-type: none"> • Changes in the access to mineral claims could affect the value of those mineral claims.



Table 6.17-5: Significance Determination Attributes and Rankings for Commercial Land and Resource Use

Attribute	Description	Category
Magnitude	A qualitative or quantitative measure to describe the size or degree of the residual effects relative to baseline conditions	<p>Level I: Residual effects may be noticeable and/or measurable but are manageable within the capacity available.</p> <p>Level II: Residual effects are noticeable and/or measurable and represent a moderate change relative to capacity available.</p> <p>Level III: Residual effects are noticeable and/or measurable and represent a major change relative to capacity available.</p>
Geographic Extent	The spatial extent over which the residual effect will take place	<p>Level I: Effect is restricted to the LSA.</p> <p>Level II: Effect extends beyond the LSA.</p> <p>Level III: Effect extends beyond the RSA.</p>
Duration	The time period over which the residual effect will or is expected to occur	<p>Level I: Effect occurs over the short term: less than or equal to 3 years.</p> <p>Level II: Effect occurs over the medium term: more than 3 years but less than 20 years.</p> <p>Level III: Effect occurs over the long term: greater than 20 years.</p>
Frequency	The rate of occurrence of the residual effect	<p>Level I: Effect occurs once, infrequently or not at all.</p> <p>Level II: Effect occurs intermittently or with a certain degree of regularity.</p> <p>Level III: Effect occurs frequently or continuously.</p>
Reversibility	The extent to which the residual effect can be reversed	<p>Level I: Effect is fully reversible.</p> <p>Level II: Effect is partially reversible or potentially reversible with difficulty.</p> <p>Level III: Effect is not reversible.</p>



Table 6.17-6: Potential Interactions with Commercial Land and Resource Use

Project Component / Activity	Commercial Land and Resource Use
Construction Phase	
Site preparation activities for the mine site area including clearing, grubbing and bulk earthworks	Yes
Construction of the mine site access road and airstrip, including the development and operation of the aggregate resource areas	Yes
Development of temporary construction camp and staging	-
Construction of the fish habitat development area	-
Construction of the transmission line to the Project site	Yes
Construction of the onsite haul and access roads	Yes
Construction of the dikes in north basin of Springpole Lake	Yes
Construction of buildings and onsite infrastructure	Yes
Construction of the central water storage pond	-
Controlled dewatering of the open pit basin	Yes
Construction of the starter embankments for the CDF	Yes
Stripping of lake bed sediment and overburden at the open pit	-
Development of the surficial soil stockpile	-
Initiation of pit development in rock	-
Initiation of stockpiling of ore	-
Establishment and operation of water and waste, management and treatment facilities	Yes
Commissioning of the process plant	Yes
Employment and Expenditures	-
Operations Phase	
Operation of the process plant	
Operation of open pit mine	Yes
Management of overburden, mine rock, tailings and ore in designated facilities	Yes
Operation of water and waste, management and treatment facilities	Yes
Accommodations complex operations	-
Operation and maintenance of mine site infrastructure, including fuel farm	-
Progressive reclamation activities	Yes
Employment and Expenditures	-
Decommissioning and Closure Phase	
Removal of assets that can be salvaged	Yes
Demolition and recycling and/or disposal of remaining materials	Yes
Removal and disposal of demolition-related wastes in approved facilities	Yes
Reclamation of impacted areas, such as by re-grading, placement of cover, and revegetation	Yes
Filling of the open pit with water	Yes
Monitoring and maintenance	-
Employment and Expenditures	-

Note:

(-) The interaction is not expected, and no further assessment is warranted.

Table 6.17-7: Proposed Mitigation for Potential Commercial Land and Resource Use Effects

Pathways to Potential Effect / Criteria	Phase			Proposed Mitigation Measures
	Con.	Op.	Cl.	
Change in forestry resources	•	-	-	Limit the removal of merchantable timber through: <ul style="list-style-type: none"> • Development of a compact mine site. • Co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible • Detailed engineering will be conducted to optimize the transmission line route
	•	-	-	Prior to, and during construction, FMG will work with local forestry companies to salvage valued harvestable timber and offering it to the forestry companies managing the two affected FMUs.
Change to trapping ability, including the associated experience	•	-	-	Limit the loss and alteration of wildlife habitat through: <ul style="list-style-type: none"> • Development of a compact mine site. • Co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible • Detailed engineering will be conducted to optimize the transmission line route
	•	•	•	Implement the mitigation measures for reducing sensory disturbance (noise [Section 6.3], light [Appendix J] including: <ul style="list-style-type: none"> • Building dimensions, layout and orientation will be designed to shield noise sources, where possible. • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills. • Generator intakes and exhausts in the process plant will use silencers. • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions. • Reversing alarms will be dimmable with white noise and/or strobe lights, • The use of engine brakes will be prohibited. • Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible. • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms. • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practical.



Table 6.17-7: Proposed Mitigation for Potential Commercial Land and Resource Use Effects

Pathways to Potential Effect / Criteria	Phase			Proposed Mitigation Measures
	Con.	Op.	Cl.	
	•	–	–	Prior to and during construction, maintain active engagement with trappers regarding effects to commercial land and resource use, including engagement about access to resources.
	•	•	•	A controlled access gate is proposed to control unauthorized use of the mine access road.
	•	•	–	FMG will work with MNR and/or trapline license holders to support trapline harvesting enhancements during construction and operation phases.
Change in commercial bait harvesting, including the associated experience	•	–	–	Limit the aerial extent of the Project and overprinting of bait harvesting areas through the development of a compact mine site.
	•	•	•	Implement the mitigation measures for reducing sensory disturbance (noise [Section 6.3], light [Appendix J]) including: <ul style="list-style-type: none"> • Building dimensions, layout and orientation will be designed to shield noise sources, where possible. • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills. • Generator intakes and exhausts in the process plant will use silencers. • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions. • Reversing alarms will be dimmable with white noise and/or strobe lights, • The use of engine brakes will be prohibited. • Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible. • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms. • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practical.
	•	•	•	• Install screens or use other measures at water intakes to prevent entrainment or impingement of fish as per the DFO Code of Practice (DFO 2020).
	•	–	–	• Keeping the dewatering (discharge to the downstream environment) to within the framework 10% of instantaneous flow so that the activity is not harmful to fish and fish habitat and maintains downstream water quantity and flow within natural variation.



Table 6.17-7: Proposed Mitigation for Potential Commercial Land and Resource Use Effects

Pathways to Potential Effect / Criteria	Phase			Proposed Mitigation Measures
	Con.	Op.	Cl.	
	•	•	•	
	•	•	•	A controlled access gate is proposed to control unauthorized use of the mine access road.
Change at outfitter camps, including the associated experience	•	•	•	<p>Implement the mitigation measures for reducing changes in the viewscape (Appendix U), including:</p> <ul style="list-style-type: none"> • Development of a compact mine site. • Co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible. • Preserving a tree line as a buffer around the mine site to diminish the amount of the mine site that can be seen. • This buffer around the Project will be maintained wide enough to withstand the loss of trees, such as toppled by wind. • All buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized.
	•	•	•	<p>Implement the mitigation measures for reducing sensory disturbance (noise [Section 6.3], light) [Appendix J] including:</p> <ul style="list-style-type: none"> • Building dimensions, layout and orientation will be designed to shield noise sources, where possible. • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills. • Generator intakes and exhausts in the process plant will use silencers. • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions. • Reversing alarms will be dimmable with white noise and/or strobe lights, • The use of engine brakes will be prohibited. • Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible. • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms. • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practical.

Table 6.17-7: Proposed Mitigation for Potential Commercial Land and Resource Use Effects

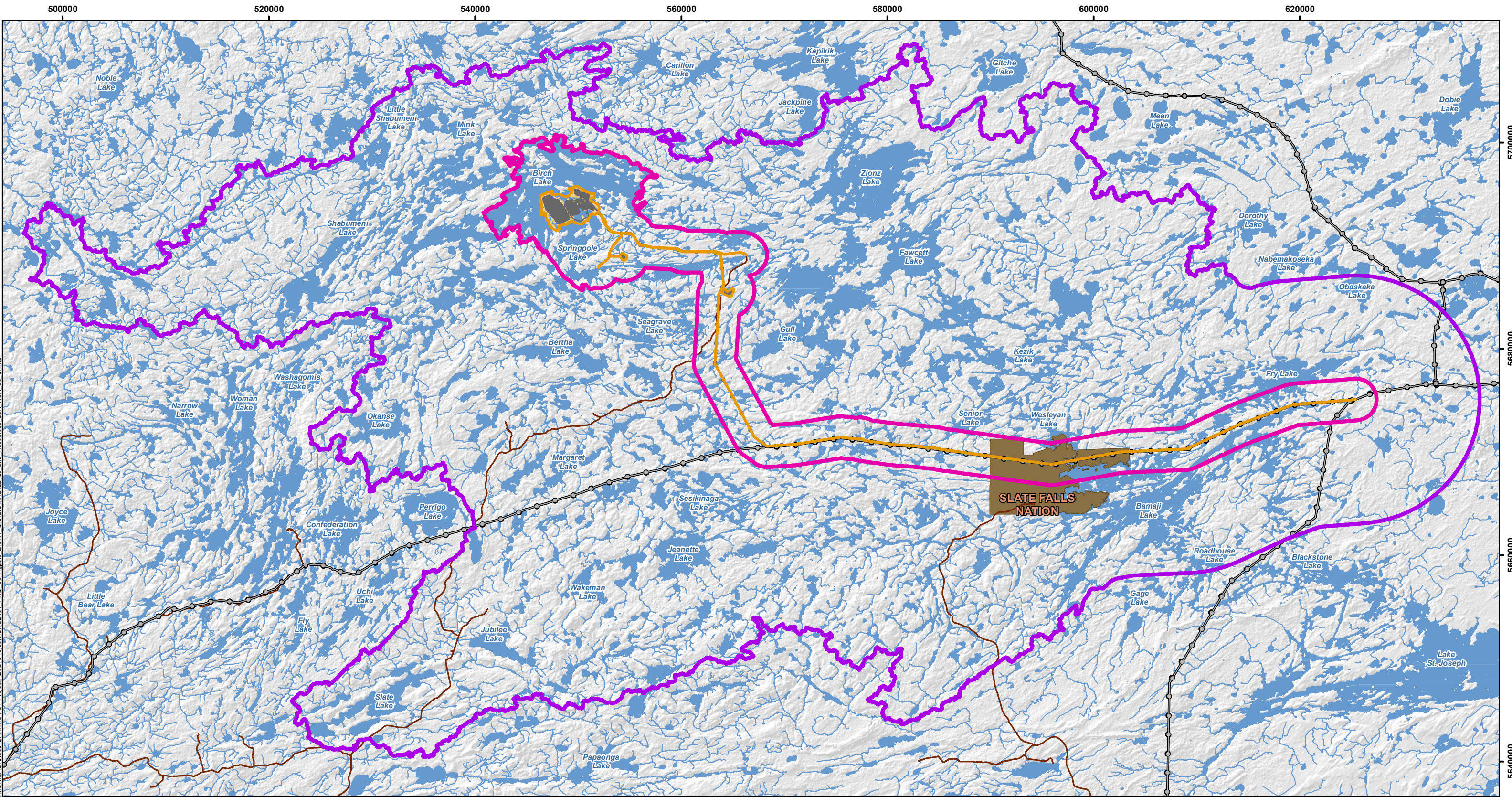
Pathways to Potential Effect / Criteria	Phase			Proposed Mitigation Measures
	Con.	Op.	Cl.	
	•	–	–	Prior to and during construction, maintain active engagement with Indigenous communities and outfitters regarding effects to commercial land and resource use, including engagement about access to resources.
	•	•	•	A controlled access gate is proposed to control unauthorized use of the mine access road.
Change in aggregate resources	•	–	–	Development of a compact mine site to limit the amount of aggregate material required for construction.
Change in access to mineral claims	•	•	•	During all phases, FMG will work with mineral claim holders and regulators to accommodate access to mineral claims by claim holders and to secure permission to construct the transmission line on mineral claims held by others.

Notes:

Con: Construction Op: Operation Cl: Closure

• Mitigation is applicable

– Mitigation is not applicable



LEGEND

- Proposed Mine Feature
- Project Development Area
- Local Study Area for Commercial Land and Resource Use
- Regional Study Area for Commercial Land and Resource Use
- First Nation Reserve
- Existing Road
- Existing Transmission Line
- Watercourse
- Waterbody

NOTES:

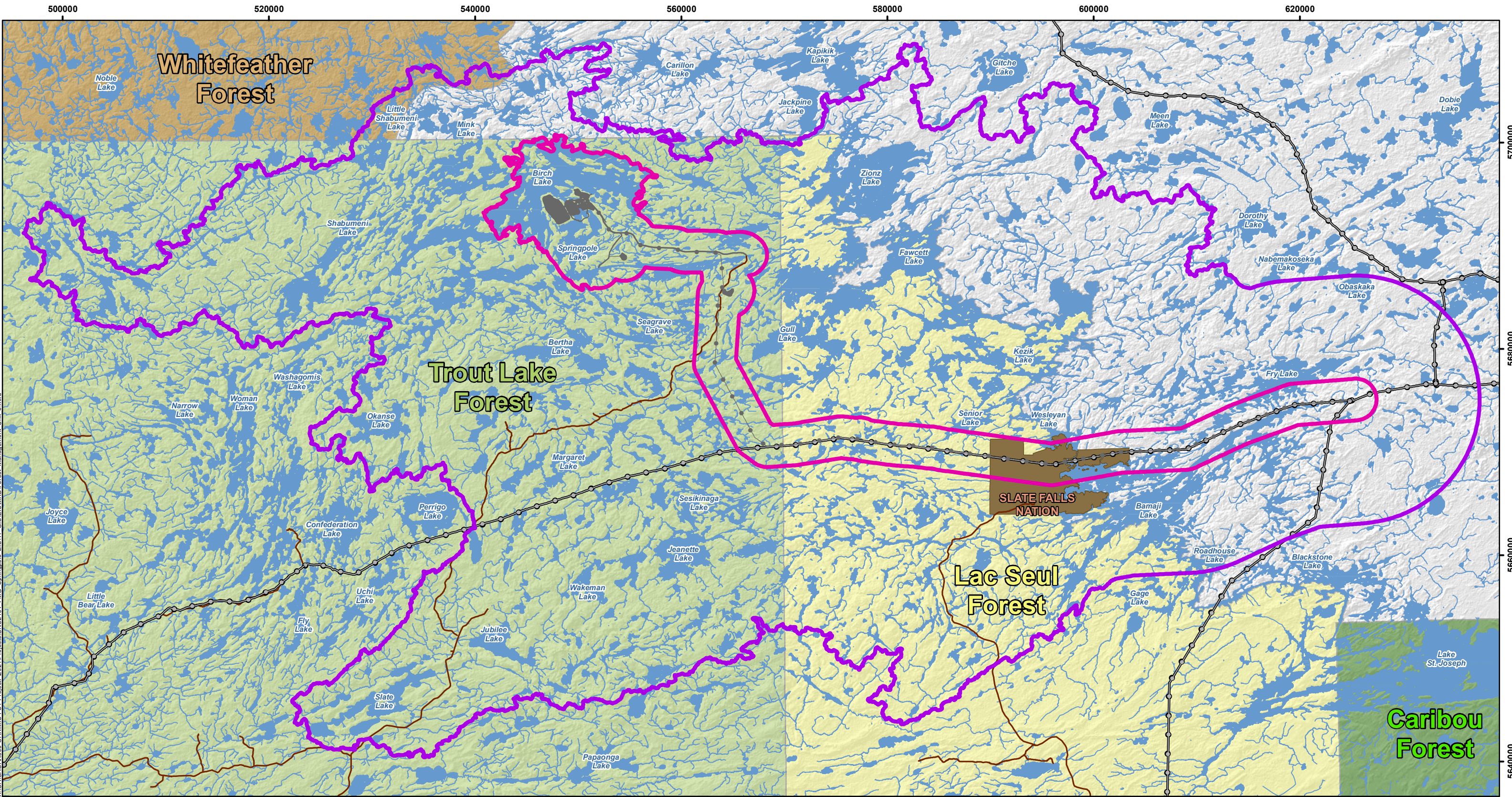
- Topographic information extracted from LIO, MNRF.
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.

Datum: NAD83
Projection: UTM Zone 15N

SPRINGPOLE GOLD PROJECT				
Local and Regional Study Areas for Commercial Land and Resource Use				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">PROJECT N°: ONS2104</td> <td style="width: 50%;">FIGURE: 6.17-1</td> </tr> <tr> <td>SCALE: 1:350,000</td> <td>DATE: October 2024</td> </tr> </table>	PROJECT N°: ONS2104	FIGURE: 6.17-1	SCALE: 1:350,000	DATE: October 2024
PROJECT N°: ONS2104	FIGURE: 6.17-1			
SCALE: 1:350,000	DATE: October 2024			



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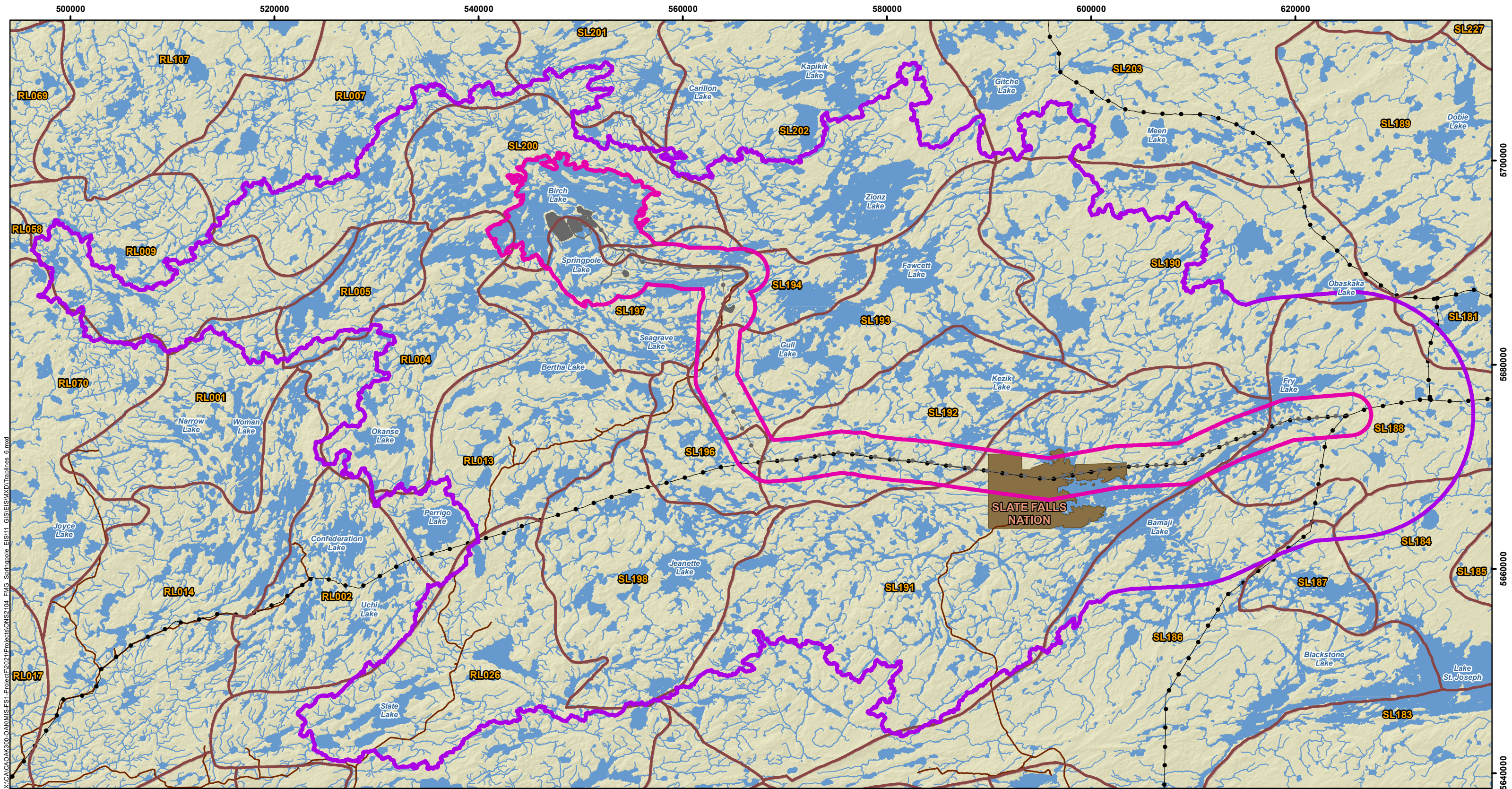
LEGEND

Proposed Mine Feature	Existing Road	Forest Management Unit (Labelled with Name)
Local Study Area for Commercial Land and Resource Use	Existing Transmission Line	Caribou Forest
Regional Study Area for Commercial Land and Resource Use	Watercourse	Lac Seul Forest
First Nation Reserve	Waterbody	Trout Lake Forest
		Whitefeather Forest

Datum: NAD83
Projection: UTM Zone 15N

NOTES:
 - Topographic information extracted from LIO, MNRF.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.

SPRINGPOLE GOLD PROJECT	
Forest Management Units	
PROJECT N°: ONS2104	FIGURE: 6.17-2
SCALE: 1:350,000	DATE: October 2024



LEGEND

- Proposed Mine Feature
- Local Study Area for Commercial Land and Resource Use
- Regional Study Area for Commercial Land and Resource Use
- Trapline Area (Labelled with ID)
- First Nation Reserve
- Existing Road
- Existing Transmission Line
- Watercourse
- Waterbody

NOTES:

- Topographic information extracted from LIO, MNRF.
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1, 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.

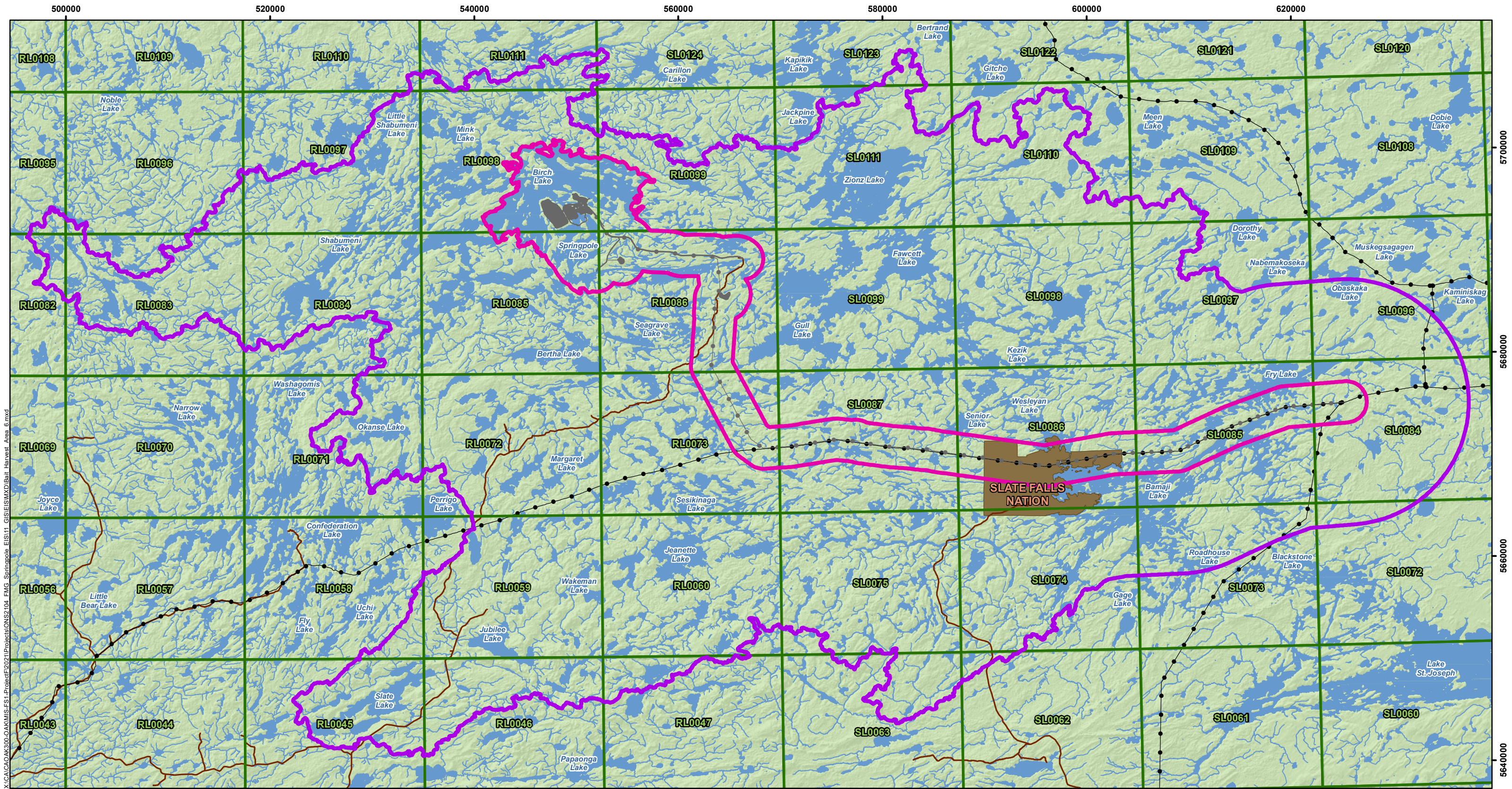
Datum: NAD83
Projection: UTM Zone 15N

SPRINGPOLE GOLD PROJECT

Trapline Areas

PROJECT N°: ONS2104	FIGURE: 6.17-3
SCALE: 1:350,000	DATE: October 2024

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LEGEND

- Proposed Mine Feature
- Local Study Area for Commercial Land and Resource Use
- Regional Study Area for Commercial Land and Resource Use
- Bait Harvest Area (Labelled with ID)
- First Nation Reserve
- Existing Road
- Existing Transmission Line
- Watercourse
- Waterbody

NOTES:

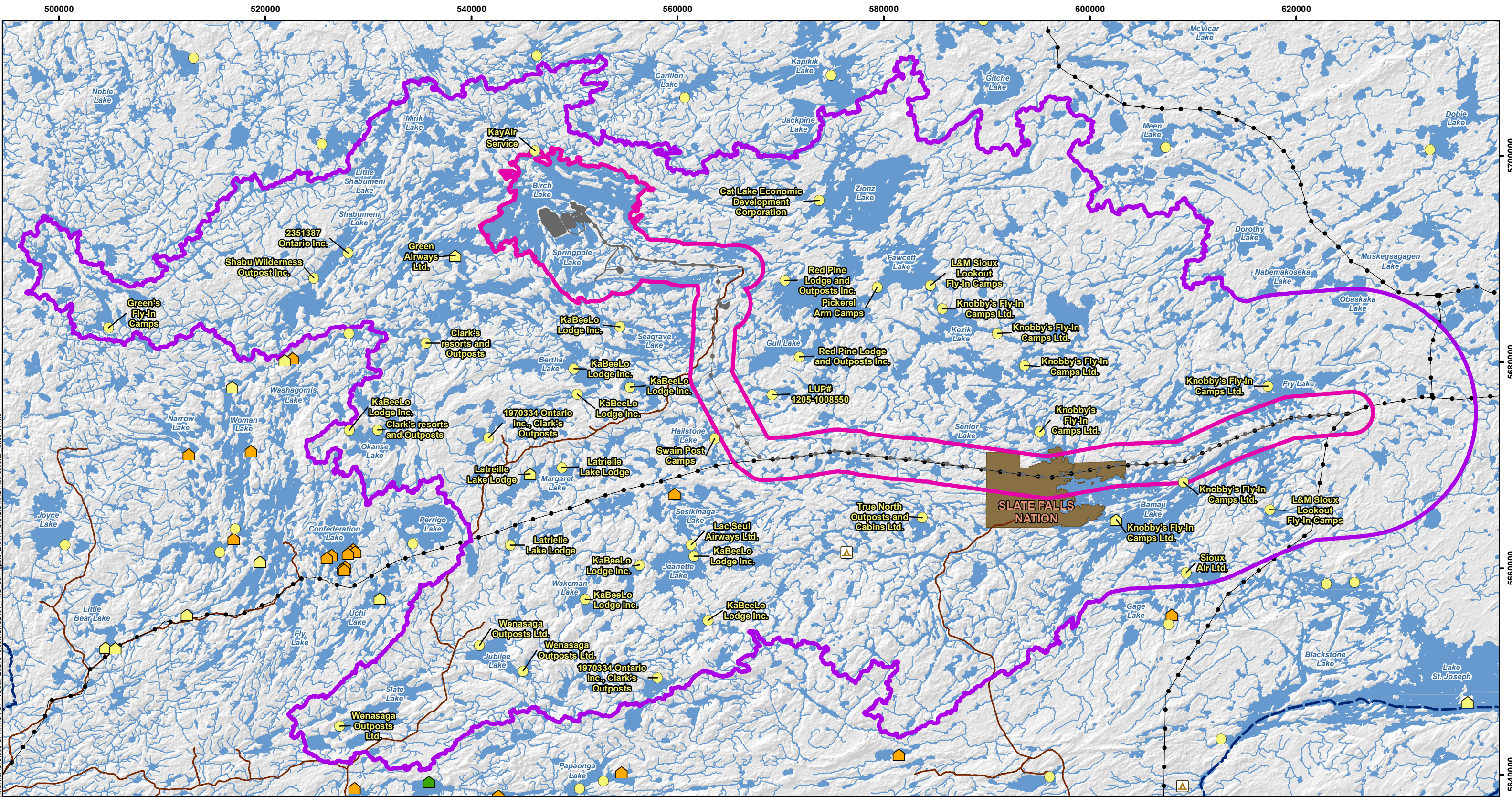
- Topographic information extracted from LIO, MNR.
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.

Datum: NAD83
Projection: UTM Zone 15N

SPRINGPOLE GOLD PROJECT				
Bait Harvest Areas				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">PROJECT N°: ONS2104</td> <td style="width: 50%;">FIGURE: 6.17-4</td> </tr> <tr> <td>SCALE: 1:350,000</td> <td>DATE: October 2024</td> </tr> </table>	PROJECT N°: ONS2104	FIGURE: 6.17-4	SCALE: 1:350,000	DATE: October 2024
PROJECT N°: ONS2104	FIGURE: 6.17-4			
SCALE: 1:350,000	DATE: October 2024			



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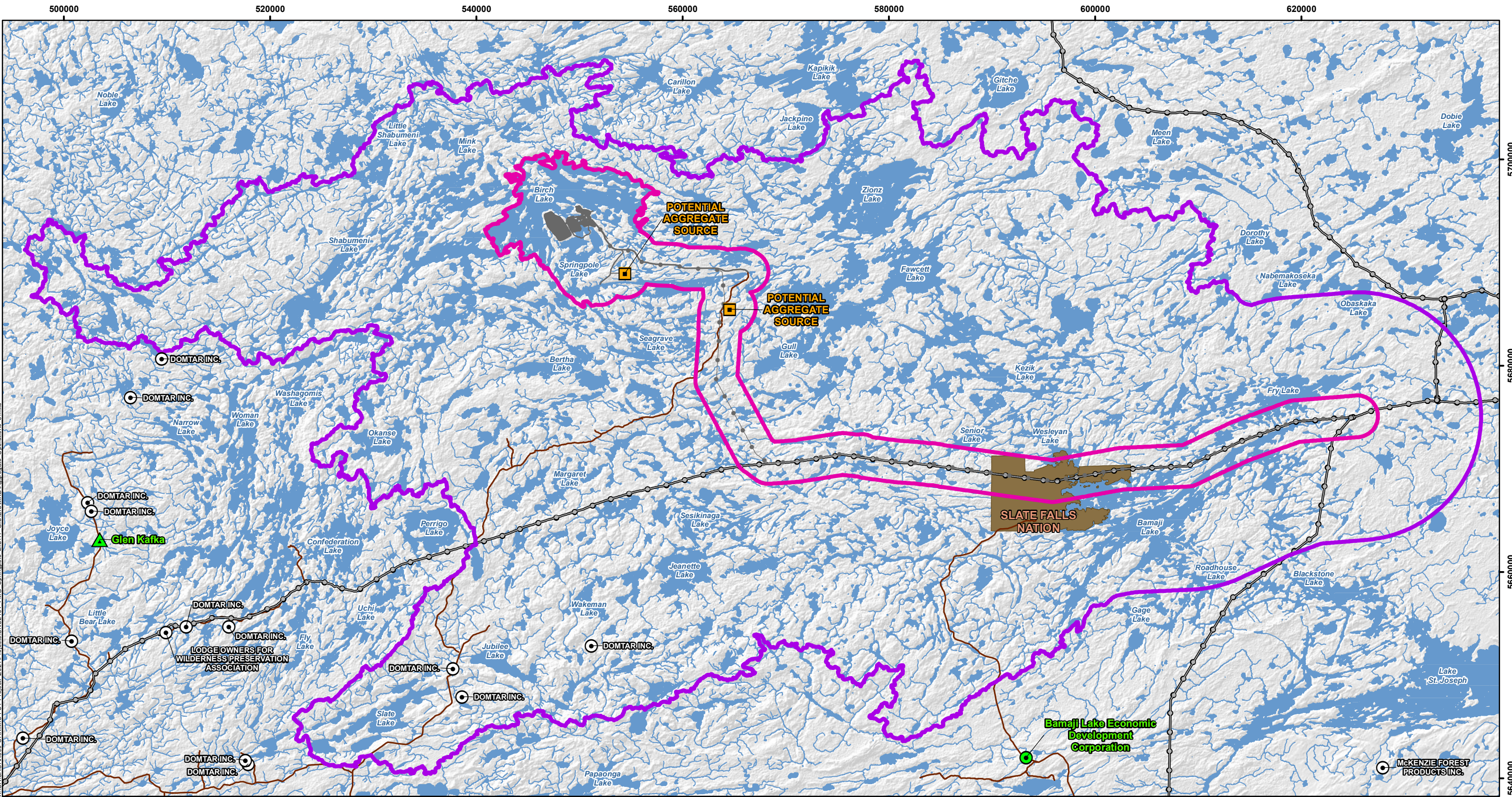
- Proposed Mine Feature
- Local Study Area for Commercial Land and Resource Use
- Regional Study Area for Commercial Land and Resource Use
- First Nation Reserve
- Existing Road
- Existing Transmission Line
- Watercourse
- Waterbody
- Cottage Site (Not Remote)
- Cottage Site (Remote)
- Main Base Lodge
- Outpost Camp
- Designated Camping Site
- Canoe Route

NOTES:
 - Topographic information extracted from LIO, MNRF.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.

SPRINGPOLE GOLD PROJECT
Tourism Establishments Areas and Outfitters
PROJECT N°: ONS2104 FIGURE: 6.17-5 SCALE: 1:350,000 DATE: October 2024



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LEGEND

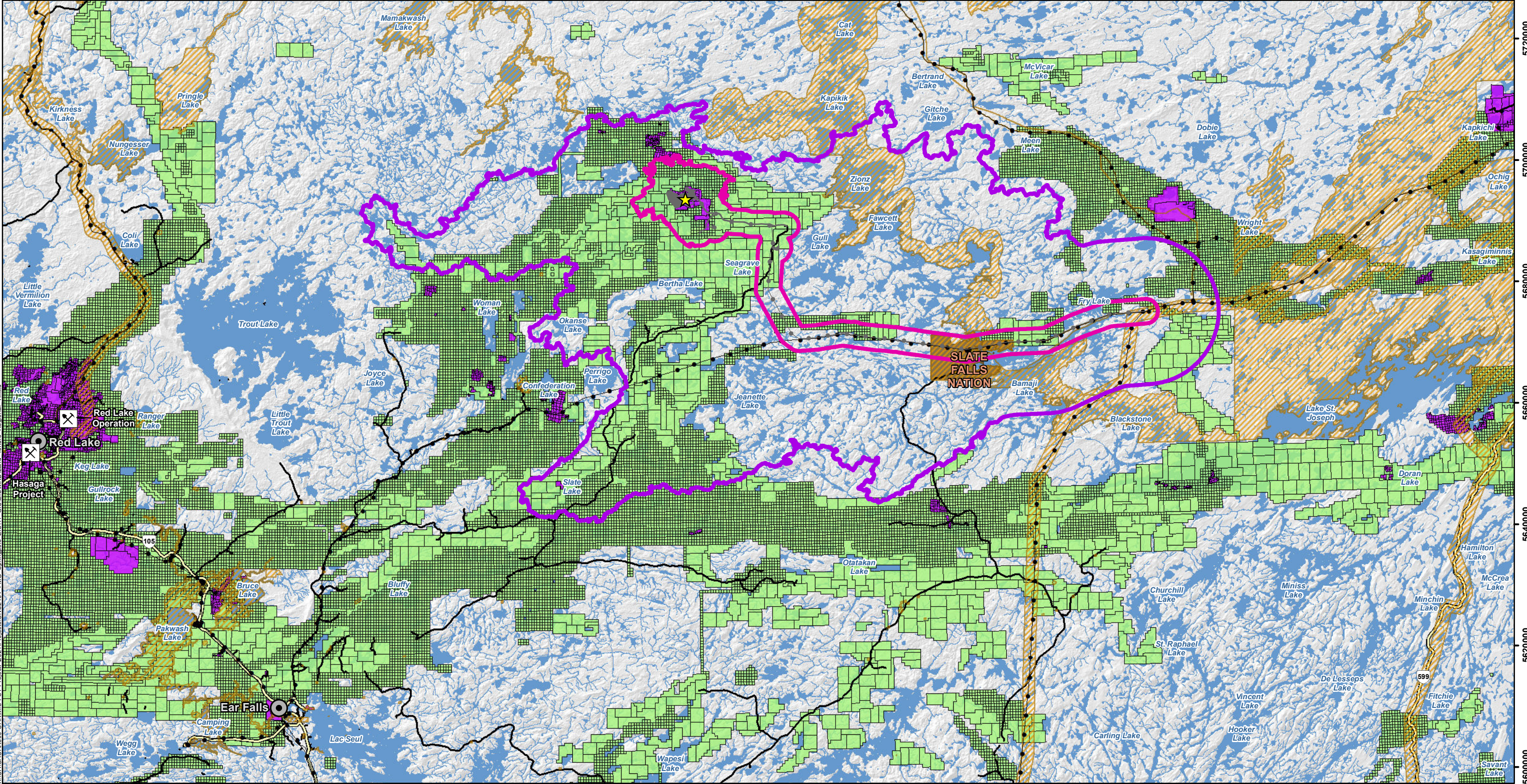
Proposed Mine Feature	Existing Transmission Line	Aggregate Operations
Local Study Area for Commercial Land and Resource Use	Watercourse	Potential Aggregate Source
Regional Study Area for Commercial Land and Resource Use	Waterbody	Active Aggregate Pit
First Nation Reserve		Active Aggregate Quarry
Existing Road		Surrendered Aggregate Pit

NOTES:
 - Topographic information extracted from LIO, MNR.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.

SPRINGPOLE GOLD PROJECT	
Aggregate Operations	
Datum: NAD83 Projection: UTM Zone 15N	
PROJECT N°: ONS2104	FIGURE: 6.17-6
SCALE: 1:350,000	DATE: October 2024

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LEGEND

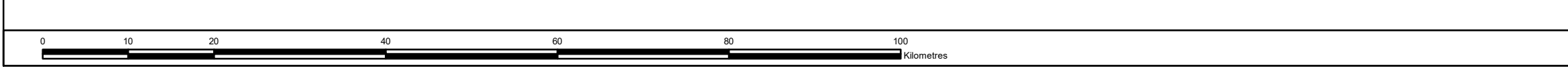
Project Location	Town	Watercourse	Land Tenure
Proposed Mine Feature	Mining Operation	Waterbody	Disposition Area of Crown Land (Active Patent, Lease or License of Occupation)
Local Study Area for Commercial Land and Resource Use	Existing Transmission Line		Active Claim Area of Crown Land (Active Staked Land)
Regional Study Area for Commercial Land and Resource Use	Existing Highway		Alienation Area of Crown Land (Active Withdrawals and Notifications)
First Nation Reserve	Existing Road		

NOTES:
 - Topographic information extracted from LIO, MNR.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.

FIRST MINING GOLD

SPRINGPOLE GOLD PROJECT

Active Mining Claims, Disposition Land and Alienation Land



Datum: NAD83
 Projection: UTM Zone 15N

PROJECT N°: ONS2104 **FIGURE: 6.17-7**

SCALE: 1:600,000 **DATE: October 2024**