From: Lalonde, Zoe (Algonquins Of Ontario) [redacted]
Sent: Thursday, March 5, 2026 11:21 AM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: Meness, Jim (Algonquins Of Ontario) [redacted]>; Algonquins of Ontario Consultation Office [redacted]>
Subject: Merrickville-Wolford Community Expansion Project (Case number EB-2025-0323)

Good morning,

We appreciate the opportunity to provide feedback on the Merrickville-Wolford Community Expansion Project proposed by Enbridge Gas Inc., (Case Number EB-2025-0323)

On behalf of the Algonquins of Ontario, I am submitting the following comments related to fisheries and aquatic habitat considerations identified during our review of the Environmental Report:

The fisheries assessment for the Project relies primarily on a desktop review and limited windshield field visits conducted in August 2023 and August 2024. While these site visits provide general context on aquatic conditions, they were completed outside of key fish spawning and early life-stage periods and are insufficient to fully characterize fish habitat function and seasonal use, particularly for sensitive life stages.

Given the ecological significance, size, and connectivity of the Rideau River and associated watercourses, additional field verification is important to confirm fish habitat presence, function, and seasonal use. Fisheries surveys should be conducted during the spring months (April to early July) to adequately characterize spawning and early life-stage habitat and to confirm the absence of any aquatic Species at Risk (SAR). These surveys would help confirm the desktop assessment and identify any sensitive spawning or juvenile rearing areas that may be present.

While anticipated construction noise and vibration levels associated with horizontal directional drilling (HDD) are not expected to result in direct injury to adult fish, there is potential for sub-lethal effects (e.g. disruption of spawning behavior, egg development, and juvenile survival). Although the proposed construction window extends from June 30 to December 31, the absence of spring and early summer field investigations creates uncertainty regarding fish breeding activity within the project area. As such, it is difficult to confidently support construction noise and vibration prior

to late August without a clearer understanding of seasonal fish use. In the absence of this information, a fisheries-specific mitigation plan should be developed and implemented.

While HDD generally poses a low risk of inadvertent drilling fluid releases, and the Environmental Report describes a general monitoring approach during construction, a detailed monitoring and contingency plan specific to fisheries protection has not been provided. In the event of a drilling fluid release, there is no clearly defined fisheries-focused response plan to prevent or minimize impacts to fish and fish habitat.

Cumulative effects are referenced in the Environmental Report; however, these effects are not assessed specifically in relation to fish or fish habitat. Given the ecological importance of the project area, additional consideration of cumulative impacts to aquatic ecosystems would strengthen the assessment.

The report also does not appear to address potential impacts to benthic communities. While HDD typically minimizes direct disturbance to the riverbed, there remains potential for sediment disturbance or increased turbidity in the event of an inadvertent release or sediment mobilization. Benthic invertebrates represent an important food source for many juvenile and adult fish species, and disturbance to these communities could indirectly affect fish populations and habitat function. Consideration of potential effects on benthic communities, and any associated mitigation measures, would help provide a more comprehensive assessment of potential aquatic impacts.

We appreciate the opportunity to provide these comments and trust they will be considered during the ongoing review and development of the project.

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