

Responses to Charles Hookimaw Comments on the Final EA/IS

Group Name	Comment ID from source	Comment Raised	Response	Internal ID
Charles Hookimaw	1	Public statements by Premier Doug Ford and the Province of Ontario have explicitly framed these access roads as enabling critical mineral development in the Ring of Fire. This signals a clear policy intent to transform a community access initiative into an industrial corridor without the Free, Prior, and Informed Consent of all affected Treaty No. 9 First Nations.	The Community Access Road is intended to improve access, foster economic development and improve the overall quality of life for the Marten Falls First Nation members. Although the Community Access Road is frequently linked to larger regional efforts such as the Ring of Fire, Marten Falls First Nation underscores that this Environmental Assessment / Impact Assessment process is focused solely on the advancement of the Community Access Road itself. We have been engaging with all potentially affected Indigenous communities since 2019. This has included consultation and engagement efforts with 23 Indigenous Communities and Tribal Councils, many of which are Treaty No. 9 First Nations. Consultation efforts with Indigenous communities have included Public Information Centres, In-community meetings, regular outreach, Indigenous-only forums, among other consultation and engagement efforts outlined in Section 11.7.2.	870
Charles Hookimaw	2	The environmental risks are equally significant. The proposed route navigates one of the most ecologically sensitive regions in the world, including vast peatlands and wetlands that play a critical role in carbon storage, water filtration, and biodiversity.	A Environmental Assessment/Impact Statement (EA/IS) was prepared to meet federal and provincial requirements. These included assessment on peatlands and wetlands, as well as mitigations measures to reduce potential impacts. Marten Falls First Nation provided a voluntary released of the	871

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			Draft EA/IS to allow Indigenous communities, interested persons and the regulators to review the draft findings, as well as to provide feedback. Carbon Storage: An assessment of peatland carbon storage is provided in Attachment C to Appendix I. The residual effects were assessed based on the results presented in Attachment C, but not carried forward to the cumulative effects assessment as the predicted effect was determined to be negligible. Floating Road Advantage on Carbon Storage and Water Filtration: The floating road construction methodology is designed primarily to minimize hydrological impacts by allowing groundwater movement through the permeable embankment and maintaining surface water drainage patterns with equalization culverts. Construction activities, including clearing vegetation and disturbing peat, will result in some release of stored carbon, making portions of the area a temporary carbon source rather than a sink. This effect is not unique to the floating road technique; any road construction in peatland environments would have similar implications. To mitigate this, the floating road approach is considered preferable because it reduces the	

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			depth of excavation and minimizes peat disturbance compared to conventional road-building methods. Additional information on the construction approach is available in Appendix W of the Final EA/IS. Biodiversity: A Preliminary Biodiversity Offset Plan has been prepared and is available in Appendix AB of the Final EA/IS. One of the objectives of the Offset Plan will be to restore and offset peatland ecosystems, to the extent feasible. The Preliminary Biodiversity Offset Plan will be finalized during detail design.	
Charles Hookimaw	3	The Ministry of the Environment, Conservation and Parks must demonstrate, with credible and transparent evidence, that: - There is sufficient and suitable aggregate material to construct and maintain a gravel road in wetland conditions without causing widespread ecological disruption;	The comment is directed at MECP. We would therefore encourage you to direct these to them, as they will be best positioned to address them. However, below we have included information relating to your comment regarding the Community Access Road aggregate materials and the floating road advantage, as well as on the assessment and mitigation measures. Aggregate Materials: Figure ES 4-1 shows the Community Access Road route and supporting infrastructure, including bedrock, sand and gravel sites. Preliminary calculations indicate that there are sufficient aggregate materials to support the construction of the Community Access Road.	872

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			Given the remote location of the Community Access Road, the Preferred Route considered proximity to bedrock, sand and gravel sites for its construction. This results in less traffic from transporting aggregate from a distance, as well as less emissions from construction vehicles. Geotechnical work expected in 2026 will collect information to better understand the volume and quality materials present. A comprehensive inventory of proposed borrow sources will be determined during detail design. Floating Road Advantage: The proposed approach for construction over peatlands will aim to keep the peat in place while promoting natural water flow. This will be accomplished by placing large rocks approximately 1 metre in diameter over the peat. This will allow the water to continue to flow in between the large rocks, in more technical terms this is described as having a permeable embankment made of quarried rock or selected granular material. The permeable embankment will be supported by heavy geogrid to prevent clogging and allow settlement. Additional information on the construction approach, advantages of a floating road and how it has been applied to comparable roads is provided in Appendix W. Assessment and Mitigation Measures:	

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			Various Technical Support Documents were prepared as part of the Final EA/IS. The technical disciplines worked with engineers to understand the different project activities during construction, operations and maintenance, including aggregate site related activities. They then identified the ones which could have an impact on their specific technical discipline, identified mitigation measures and assessed the potential for the Community Access Road to have impact on the valued component; followed by a cumulative effects assessment.	
Charles Hookimaw	4	The Ministry of the Environment, Conservation and Parks must demonstrate, with credible and transparent evidence, that: - [...] - The long-term stability of such a road, given thawing permafrost and climate change impacts, has been rigorously assessed	The comment is directed at MECP. We would therefore encourage you to direct these to them, as they will be best positioned to address them. However, below we have included information relating to your comment regarding the Community Access Road floating road construction approach, as well as on the permafrost and climate change assessments conducted. Floating Road Construction Approach Information Appendix W of the Final EA/IS includes a memorandum on the proposed peatland road and construction approach. It also includes information on a comparable road which was constructed in northern Manitoba on similar	873

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			terrain and using the same proposed floating road approach. Appendix AA of the Final EA/IS includes all of the mitigation, protection, monitoring and study commitments resulting from the Technical Support Document to be carried forward from the Final EA/IS. These include mitigation measures for the floating road to function properly and avoid or minimize environmental impacts, particularly to peatlands and groundwater. Permafrost Assessment A rigorous assessment of permafrost was conducted and is part of the Physiography, Terrain, and Soils Technical Support Document (Appendix N). A general description of the Final EA/IS methodology is included in Section 6 of the Final EA/IS; while the specific methodology used in the assessment of physiography, terrain, and soils, including permafrost is described in Section 4 of Appendix N. Appendix N describes the study scoping, existing conditions study design and methods, effects assessment, monitoring programs, future commitments, the prediction of future conditions, and data management and analysis. Appendix N includes information on permafrost existing conditions and residual effect assessment, as well as future commitments specific to permafrost.	

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			Climate Change Assessment The Final EA/IS includes a rigorous assessment of climate change, this is included in the Climate Adaptation and Resiliency Technical Support Document (Appendix Y). It includes existing conditions information, projections of future climate conditions and assessment of risks to the Community Access Road. In addition to this the report has recommended mitigation and adaptation measures aligned with provincial and federal guidance to inform engineering. A less technical summary of Appendix Y is included in Section 12 of the Final EA/IS.	
Charles Hookimaw	5	The Ministry of the Environment, Conservation and Parks must demonstrate, with credible and transparent evidence, that: - [...] - Comprehensive protections are in place for aquatic ecosystems, including the headwaters and watersheds that feed into the Fort Albany waterways	The comment is directed at MECP. We would therefore encourage you to direct these to them, as they will be best positioned to address them. However, it should be noted that Appendix AA of the Final EA/IS includes all of the mitigation, protection, monitoring and study commitments resulting from the Technical Support Document to be carried forward from the Final EA/IS. These include mitigation, protection, monitoring and study commitments relating to surface water (Appendix F), as well as fish and fish habitat (Appendix G).	874
Charles	6	The Ministry of the Environment, Conservation	The comment is directed at MECP. We would	875

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Hookimaw		and Parks must demonstrate, with credible and transparent evidence, that: - [...] - Wildlife habitats and migration patterns will not be permanently fragmented or degraded;	therefore encourage you to direct these to them, as they will be best positioned to address them. However, it should be noted that the Final EA/IS includes an assessment of the Project's potential effects on land which includes wildlife, birds and ungulates, as well as their habitats and habitat connectivity. A summary of their residual effects assessment and cumulative effects assessment can be found in Sections 9.4 and 10.3, respectively. The full technical reports are included in the Wildlife Technical Support Document (Appendix K), Birds Technical Support Document (Appendix L) and Ungulates Technical Support Document (Appendix M).	
Charles Hookimaw	7	The Ministry of the Environment, Conservation and Parks must demonstrate, with credible and transparent evidence, that: - [...] - Treaty No. 9 rights are preserved and protected and not eroded.	The comment is directed at MECP. We would therefore encourage you to direct these to them, as they will be best positioned to address them. However, below we have included information relating to your comment on Treaty No 9. The Project is located within the Treaty No. 9 boundary, and Section 5 of the Aboriginal and / or Treaty Rights and Interests Technical Support Document (Appendix O) describes the Treaty No. 9 context and associated rights. Potential impacts to Treaty No. 9 rights were assessed using a structured methodology	876

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			consistent with Impact Assessment Agency of Canada guidance and informed by Indigenous Knowledge and consultation with Indigenous communities, including Treaty No. 9 First Nations. Community-specific Aboriginal and / or Treaty Rights and Interests Impact Assessment Reports were prepared and shared confidentially with Indigenous communities.	
Charles Hookimaw	8	Experience from other northern road projects has shown that even limited infrastructure can trigger cumulative impacts, including increased industrial activity, environmental degradation, and social pressures. These lessons must be fully considered and applied here.	Section 6 of the Final EA/IS describes in plain language the methodology used to conduct the effects assessments. Specifically, Section 6.8 describes the approach for the cumulative effect assessment. As part of the cumulative effects assessment a project inclusions list was prepared, it lists all of the Projects considered including industrial activities. The Project inclusions list is included in Appendix E of the Final EA/IS. Notably, Table 10-1 of the Final EA/IS identifies projects with spatial or temporal overlap with the Community Access Road, based on publicly available sources that describe or predict specific effects for those projects. For ease of review it can also be found online along an interactive online map here The Final EA/IS and the Technical Support Documents were prepared to meet the	877

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			requirements outlined in the Terms of Reference, the Tailored Impact Statement Guidelines and the technical discipline-specific study plans. Inclusion of projects in the cumulative effects assessment (CEA) that do not meet the criteria of reasonably foreseeable is not a regulatory requirement and as such was not developed as part of the Final EA/IS. For a project to be considered reasonably foreseeable, sufficient information about the activity must have been available to make a reasonable assessment of its potential effects (i.e., in the planning / approvals / design stage). Appendix T of the Final EA/IS includes the Community Well-Being Technical Support Document. It consists of an assessment, including a cumulative effects assessment of potential impacts, both positive and negative on economy, traditional use and culture, food, water, housing, safety, community health, public health, infrastructure, services and environmental factors. Appendix T also includes mitigation measures to reduce potential negative impacts.	
Charles Hookimaw	9	Furthermore, the consultation process undertaken to date has been inadequate. Engagement methods such as livestream sessions do not constitute meaningful consultation and fall short of the standard	Consultation for the Community Access Road has been conducted in accordance with the Terms of Reference and the Tailored Impact Statement Guidelines and has been ongoing since 2019. Engagement with Indigenous	878

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		required to meet the Crown's duty to consult. Such approaches are insufficient, dismissive, and undermine the legitimacy of the Environmental Assessment process.	communities, government agencies, and the public was initiated early and continued throughout the Assessment Process to inform Project design, effects assessment, and the identification of mitigation measures. Section 11.7.2 describes the consultation and engagement undertaken with Indigenous communities. Engagement activities included a range of interactive formats, such as webinars and virtual meetings, as well as in-person meetings and provincially supported forums, which provided opportunities for Indigenous communities to engage on the Community Access Road. Details on activities that supported participation by Elders and youth are provided in Section 11.8. Additional engagement approaches included the distribution of regular newsletters, field updates, and discussion guides, along with translated plain-language summaries and fact-based materials. Consultation and engagement were further supported through targeted capacity funding programs designed to encourage meaningful participation by eligible Indigenous communities. Funding was provided to support activities such as document review, participation in meetings and workshops, logistics, internal coordination, and the preparation of community-specific input.	

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			The Record of Consultation and Engagement for Indigenous Communities, comprising Milestones 1, 2, 3, and 4, documents how input from Indigenous communities was sought, received, and considered. The reporting timeframe began with the release of the Notice of Commencement of the Environmental Assessment on October 29, 2021, and concluded with the completion of Milestone 4: Environmental Assessment / Impact Statement on September 5, 2025.	