February 26, 2026

To: Impact Assessment Agency of Canada via the Canadian Impact Assessment Registry (https://iaac-aeic.gc.ca/050/evaluations/proj/80183); and to Michael Fox, Don Parkinson, and the Webequie Supply Road Project Team via email (wsrcomments@supplyroad.ca)

Re: Comments on the Webequie Supply Road Project Environmental Assessment Report/Impact Statement

To whom it may concern,

Please consider this letter as our response to the request for public input on the Environmental Assessment Report/Impact Statement (EAR/IS) for the proposed Webequie Supply Road Project (the Project) in northwestern Ontario. We provide this response in our capacities as Wildlife Conservation Society (WCS) Canada scientists leading research and policy development related to species and ecosystems to inform conservation decisions. Relevant expertise to the Project includes expertise in biodiversity, ecological integrity, forests and peatlands, cumulative impacts, wildlife, fisheries and climate change.

Our experience participating in environmental and impact assessment in the region includes our comments recommending a Regional Assessment for the Ring of Fire area (including a recommendation that a Regional Assessment would include all potential transportation corridors)[1], commenting on the Project Description[2], draft Tailored Impact Statement Guidelines (TISG)[3] and the draft EAR/IS for the Project[4], and commenting on the related Marten Falls Community Access Road Project draft EAR/IS[5].

[1] Chetkiewicz et al. (2019). WCS Canada Comments - Formal Request for a Regional Assessment with respect to Marten Falls Community Access Road Project and Webequie Supply Road - November 2019. WCS Canada. https://library.wcs.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?EntryId=37032&PortalId=96&DownloadMethod=attachment

[2] Chetkiewicz et al. (2019). WCS Canada Comments – Webequie Supply Road Project Description – August 2019. WCS Canada. https://wcscanada.org/resources/wcs-canada-comments-webequie-supply-road-project-assessment-august-2019/

[3] Chetkiewicz et al. (2020). WCS Canada Comments – Webequie Supply Road Project: Tailored Impact Statement Guidelines and Public Participation Plan - January 2020. WCS Canada. https://wcscanada.org/resources/wcs-canada-comments-webequiesupply-road-project-tailored-impact-statement-guidelines-and-public-participation-plan-january/

[4] O'Connor et al. (2025). WCS Canada Comments – Comments on Draft Environmental Assessment/Impact Statement – Webequie Supply Road – October 2025. WCS Canada. https://wcscanada.org/resources/wcs-canada-comment-draft-environmental-assessment-impact-statement-webequie-supply-road/

[5] Palmer et al. (2025). WCS Canada Comments – Comments on Draft Environmental Assessment/Impact Statement – Marten Falls Community Access Road – June 2025. WCS Canada. https://wcscanada.org/resources/wcs-canada-comment-draft-environmental-assessment-impact-statement-marten-falls-first-nation-community-access-road-project/

WCS Canada – Ontario Northern Boreal Program
10 Cumberland St N
Thunder Bay, ON, P7A 4K9 Canada

Phone: (807) 285-9125
Email: wcscanada@wcs.org
Web: www.wcscanada.org

In these previous comments, we have consistently recommended a more integrated, forward-looking process to move beyond piecemeal project-by-project assessments. Specific to the Project, we raised concerns about impacts to vegetation, hydrology, and soils, including forests and peatlands from the Project, with related implications for long-term carbon storage and climate change. Additionally related to the Project, we have noted barriers to fish and wildlife movement created by a road located at the ecotone between the Hudson Plains and Boreal Shield ecozones and within the headwaters of intact rivers, and growth-inducing effects that are missing from the cumulative-effects analysis.

It is important to distinguish our concerns with the piecemeal project-by-project planning and assessment process from our support for Webequie First Nation's pursuit of community-led infrastructure. We recognize the right of Webequie First Nation to move forward in exercising their rights to lead on decision-making for their territory, and we applaud the community for advancing the Project to this stage. We provide our current comments given continued gaps in the provincial and federal regulatory processes for the region.

Here, we carried out a limited review of the Project EAR/IS, focused specifically on information related to our primary concern about impacts to vegetation, hydrology, and soils, including forests and peatlands from the Project. While the Project EAR/IS generally follows the TISG related to these areas of focus, at this time **our largest concern, and where we think the EAR/IS does not satisfy the requirements of the TISG, is the proponent's heavy reliance on framing the 'floating road' construction design as the mitigation solution for many of the expected technical and ecological impacts to peatlands associated with linear infrastructure, while providing insufficient evidence to show that this approach is an effective mitigation measure, or indeed, to demonstrate whether this approach is even appropriate to be framed as a mitigation measure**.

As described in the Project EAR/IS, the high water content in peatlands is one of the characteristics that contributes to its ecological value in carbon storage and climate change mitigation and in supporting biodiversity. This characteristic, however, creates a technological and logistic challenge for construction of roads or other infrastructure since the high water content makes the peat soils inherently unstable. For the development of roads in shallow peatlands, options for construction can include excavating the peat to build directly on the more stable surfaces underlying the peat. However, this is an expensive approach to road construction and can be impractical and cost prohibitive in deeper peatlands. The peatlands to be impacted by the WSR Project are of significant depth (2-4 m) and, as acknowledged and stated in the Project EAR/IS, the approach of excavating peat for road construction would not be "economically viable" in this case (Section 4.3.1.3.1).

The less expensive and more **standard practice** for constructing roads in peatlands has become to place the road on top of the peat, using gradual loading to compress the peat, until an equilibrium can be achieved between the compressed peat and the weight of the road. As noted within the Project EAR/IS, this approach is often called a 'floating road' but is a misnomer, since the road is not floating – the road is supported by the compressed peat (Section 4.3.1.3.1).

The Project EAR/IS frames the 'floating road' as a mitigation strategy to reduce the impacts of road construction in peatlands, stating that it will result in "less compression of underlying peat and thus have a lesser effect on local hydrology", "reducing the environmental effect of construction activities and haulage [...] due to the lower quantities of aggregate required" and "lower greenhouse gas emissions than an equivalent excavated road" and that "it is likely that the basic ecology of the area will not be affected to the same degree as would occur if traditional construction excavation methods were adopted" (Section 4.3.1.3.1).

However, we have two major concerns with this framing. First, the decision to use a floating road methodology is presented as dual purpose in the EAR/IS, where it is presented as both the preferred construction method for building in deep peat deposits rather than excavation, and as a method to mitigate adverse ecological impacts. However, the information presented in the Project EAR/IS states that a traditional road construction approach using excavation, as would be used in other areas with different soils, is not logistically feasible or economically viable in the peatlands where the Project is proposed. Therefore, we contend that the use of a 'floating road' should be not framed as a mitigation measure to reduce environmental impacts relative to a traditional road construction, since a traditional road construction is not a reasonable alternative. **The 'floating road' should be acknowledged as the standard and most economically viable construction approach for this landscape. The EAR/IS must then, therefore, recognize the inherent impacts associated with this 'floating road' construction methodology, and must then demonstrate efforts to avoid and minimize of impacts to soils, hydrology and the peatlands ecosystem *within* the approach of using 'floating road' construction.**

Second, while the EAR/IS references other project experience in Canada and around the world successfully using 'floating roads' as a suitable method for building roads in peatlands from an engineering perspective (Table 3-3, Section 4.3.1.3.1), there is only one outdated reference to support that the 'floating roads' are logistically feasible[6], with no additional references to reports or studies where this construction method has been successfully completed at such a large scale in Canada or elsewhere. Additionally, and critically, there are no references around the environmental impacts of 'floating roads' relative to other reasonable alternatives for road construction in peatlands, and no references around methods and approaches to reducing the environmental impacts of 'floating roads' through measures such as route selection or construction alternatives for factors such as geotextile selection, choices around fill materials, spacing and sizing of culverts, or other considerations. **The proponent must provide an up-to-date and comprehensive review of environmental impacts of 'floating roads' on peatland soils, hydrology and the peatlands ecosystems and provide evidence to support proposed approaches for how these impacts will be avoided or minimized.** For example, there are numerous studies in Alberta showing the impacts of resource roads built on peatlands with similar construction design on geogrids and geotextiles, where there are still significant hydrological impacts and the cumulative impacts to peatlands that follow.

[6] Forestry Civil Engineering and Scottish Natural Heritage. (2010). Floating Roads on Peat. https://www.roadex.org/wp-content/uploads/2014/01/FCE-SNH-Floating-Roads-on-Peat-report.pdf

Additionally, the **proponent must provide sufficient information on water management, waterbody diversions, dewatering and deposition activities, as well as sufficient description of how peatland type is being considered in the road corridor to demonstrate that impacts to hydrology are being sufficiently considered and efforts are being taken to avoid and minimize adverse environmental impacts.** The EAR/IS does not provide sufficient detail or information for many critical aspects of avoiding adverse effects, including not providing detail on the numerous small peatland ponds and pools that will be crossed, and lacking information on whether they will be filled or drained prior to installation of geogrid and geotextiles.

The Project area encompasses high ecological integrity boreal forests and peatlands that comprise globally significant carbon stores. Given the importance and extent of peatlands in the region, the sensitivity of these peatlands to changes in hydrology and compaction, and the risk for loss of carbon stores and ecological degradation with disturbance to the peatlands, **the proponent must: 1) Adequately consider how adverse effects to peatlands and hydrology will be avoided and minimized; and 2) Provide sufficient information and a sufficient evidence base to support selected approaches. The EAG/IS does not address these two critical components.**

Thank you for your consideration of these comments, and we welcome any further discussion or questions.

Sincerely,

Adam Kirkwood, PhD
Peatland Conservation Scientist

Constance O'Connor, PhD
Director, Ontario Northern Boreal Program