Wildlife Conservation Society Canada

April 10, 2026

To: Impact Assessment Agency of Canada via the Canadian Impact Assessment Registry (https://iaac-aeic.gc.ca/050/evaluations/proj/80184); and to the Marten Falls First Nation Community Access Road Project Team via email (eaisinput@martenfallsaccessroad.ca)

Re: Comments on the Marten Falls Community Access 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 Marten Falls Community Access 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, the mitigation hierarchy and biodiversity offsetting, 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 that would include all potential transportation corridors[1], commenting on the draft Tailored Impact Statement Guideline (TISG)[2], the Terms of Reference[3], the draft EAR/IS for the Project[4], and commenting on the related Webequie Supply Road Project Final EAR/IS[5].

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[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. (2020a). WCS Canada Comments – Marten Falls Community Access Road Project Tailored Impact Statement Guidelines and Public Participation Plan – January 2020. *WCS Canada*. https://library.wcs.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?EntryId=37097&PortalId=96&DownloadMet hod=attachment

[3] Chetkiewicz et al. (2020b). WCS Canada Comments – Terms of Reference for Marten Falls First Nation Community Access Road Project – December 2020. *WCS Canada*. https://library.wcs.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?EntryId=38604&PortalId=96&DownloadMethod=attachment

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

[5] Kirkwood & O'Connor (2026). WCS Canada Comments – Webequie Supply Road Project Environmental Assessment Report/Impact Statement – February 2026. *WCS Canada.* https://wcscanada.org/resources/wcs-canada-comments-webequie-supply-road-project-environmental-assessment-report-impact-statement/

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 have raised concerns about growth-inducing effects that are missing from the cumulative-effects analysis, and impacts to vegetation, hydrology, and soils, including forests, and peatlands, with related implications for long-term carbon storage and climate change. We have also identified concerns that the road is highly likely to impede fish and wildlife (especially caribou) movement, given its location in the ecotone between the Hudson Plains and Boreal Shield ecozones and within the headwaters of globally-significant intact river systems.

It is important to distinguish our concerns with the piecemeal project-by-project planning and assessment process from our support for Marten Falls First Nation's pursuit of community-led infrastructure. We recognize the right of Marten Falls First Nation to exercise decision-making authority in relation to its territory, and acknowledge the substantial work involved in bringing the Project to this stage. We provide the following comments in light of ongoing 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 concerns about growth-inducing effects that are missing from the cumulative-effects analysis and impacts to vegetation, hydrology, and soils, including forests and peatlands from the Project. We additionally provide high-level comments on the preliminary offsets plan (Appendix AB).

While the Project EAR/IS generally follows the TISG in these areas of focus, **our principal concerns at this stage, and the areas where we think the EAR/IS does not yet satisfy the requirements of the TISG, are: 1) the limited scope of the cumulative effects assessment (CEA); 2) 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 even that it is appropriately characterized as mitigation, 3) the fact that forward-looking restoration planning is not yet complete, which inhibits an appropriate determination of residual and cumulative effects; and 4) the Preliminary Biodiversity Offset Plan (Appendix AB) defers critical decisions about the selection, design, implementation, and feasibility of offsets to later stages, without yet providing a sufficient basis for concluding that offsetting is appropriate or capable of addressing the Project's residual effects.**

We discuss each of these in turn.

1. Cumulative effects assessment remains too limited in scope

We have concerns that the Project, together with other reasonably foreseeable proposed roads and industrial development it will enable in the region, is highly likely to result in irreversible negative effects on ecosystems in the region, and that these effects are not adequately captured in the EAR/IS. In our view, the list of projects included in the CEA falls short of accounting for the

Project's anticipated growth-inducing impacts[6] on the ecological integrity of forest, peatland, and aquatic ecosystems that support biodiversity, including species of conservation concern and other valued components (VCs).

The Impact Assessment Agency of Canada guidance on how to define "reasonably foreseeable" activities should not be treated as a constraint on meaningful assessment. Rather, the assessment should explore a range of plausible scenarios — including those that reflect the known intent to establish an industrial supply corridor — to adequately inform decision-making and risk management in the future.

Notably, the list of mining projects is limited to the proposed Eagle's Nest mining project and the deposits in its immediate vicinity, while excluding other activities that may reasonably be anticipated in the broader region. The CEA therefore does not adequately account for the growth-inducing effects of building an industrial access road[6], including the increased likelihood of subsequent mineral exploration and mining activities in the broader region of the current mining claim and mineral exploration footprint. Additionally, the list of included projects does not include other reasonably foreseeable activities, such as proposed hydropower projects in the Albany and Attawapiskat rivers that are explicitly identified in other documents as being made feasible by the proposed access roads[7].

Using this narrow approach, the CEA identifies that many of the impacts on VC are predicted to be "non-significant". However, a more realistic assessment of the reasonably foreseeable future developments enabled by this road would reveal significant impacts on ecological and wildlife VCs, particularly around species of conservation concern (boreal caribou, wolverine, lake sturgeon) that are underestimated with the current approach.

As the Project is the first road segment of what is functionally a region-opening industrial mining access road, the EAR/IS has the obligation to conduct a more comprehensive assessment of plausible cumulative effects and growth-inducing impacts. These must address the reality that the proposed Project could reasonably enable future development in the broader region and should be used to anticipate and manage those cumulative effects, rather than leave them effectively ignored. We recommend that the **CEA must include scenario-based analysis of future development pathways and their implications on VCs, including subsequent industrial activities likely to be induced by the Project**, rather than being limited to the current list of included projects. At minimum, **the included project list in the CEA must be expanded to include a more comprehensive list of reasonably foreseeable projects enabled by a region-opening road.**

2. The "floating road" approach is being relied on as mitigation without sufficient evidence

As described in the Project EAR/IS, the high water content in peatlands is one of the characteristics that contributes to their ecological value in carbon storage and climate change mitigation and in

[6] Johnson et al. (2019). Growth-inducing infrastructure represents transformative yet ignored keystone environmental decisions. *Conservation Letters* 13 e12696 https://conbio.onlinelibrary.wiley.com/doi/10.1111/conl.12696

[7] Ontario Power Generation (2022). Made-in-Ontario northern hydroelectric opportunities. https://www.opg.com/wp-content/uploads/2023/02/Northern-Hydro-Opportunities-Report.2022_FINAL-ua.pdf

supporting biodiversity. This characteristic, however, creates a technical and logistical 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 Project are of significant depth (2-4 m) and, where excavation of peat for road construction would not be economically viable.

The less expensive and more **standard practice** for constructing roads in peatlands is to place the road on top of the peat, using geosynthetic fabrics and gradual loading of aggregate 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 (Sections 7.2.3 and 9.3.5.3.2.1).

The Project EAR/IS frames the 'floating road' as a mitigation strategy to reduce the impacts of road construction in peatlands. However, there is a disconnect between identifying 'floating roads' as a mitigation technique, often supporting conclusions that impacts will be **not** significant, and simultaneously acknowledging the high uncertainty associated with their effects. For example, section 9.3.5.3.12.3 regarding carbon storage and flux states that there will be "minimal change to the overall carbon storage capacity of the peat within the Construction Disturbance Area, while section 9.3.5.4.4.3 regarding groundwater states that "there is high uncertainty in the magnitude of predicted effects of the "floating road" on the maintenance of peatland function". Such discrepancies within the impact statement indicate that there is insufficient evidence-based assessment across peatland related VCs in the EAR/IS.

We have two major concerns with this framing. First, the decision to use a floating road methodology is presented only as a mitigation technique to limit disturbances to peatlands, when it is, in reality, also the preferred construction method for building roads across peatlands with deep peat deposits to avoid costly and challenging excavation of peat[8]. It follows, therefore, that the use of a 'floating road' should not be 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 recognize the inherent impacts associated with this 'floating road' construction methodology, and demonstrate efforts to avoid and minimize of impacts to soils, hydrology and the peatlands ecosystem *within* 'floating road' construction.**

Second, the evidence provided is insufficient to support the framing of the "floating road" as an effective mitigation approach. While the EAR/IS references other project experience in Canada and around the world using 'floating roads' as a suitable method for building roads in peatlands from an engineering perspective (Appendix W), there is only one unpublished Canadian case study cited in

[8] Roadex Network, Roads on Peat. https://www.roadex.org/e-learning/lessons/roads-on-peat/types-of-construction/

support, with no additional references to reports or studies providing evidence or analysis to demonstrate where this construction method has been successfully completed at such a large scale in Canada or elsewhere. Additionally, and critically, there are few references regarding the environmental impacts of 'floating roads' relative to other reasonable alternatives for road construction in peatlands, and no references with effective methods and approaches to reduce 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.

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 that 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 whether the numerous small peatland ponds and pools that will be crossed will be filled or drained prior to installation of geogrid and geotextiles.

3. Incomplete restoration planning limits determination of residual and cumulative effects

There are numerous cases throughout the EAR/IS where predicted residual effects are determined "not significant" and are, as a result, not carried forward to cumulative effects assessments, even though the conclusion of non-significance relies on undefined and incomplete restoration or management plans. For example, "Some active restoration of temporary disturbances is anticipated to be carried out. Restoration approaches will be developed as part of the Vegetation Restoration Plan to be prepared during detail design" (Section 9.3.5.3.1.1). This is similarly the case for the proposed Rehabilitation Plan, Permafrost Management Plan, and Environmental Protection Plan. **Residual and cumulative effects cannot be appropriately assessed if the above plans are not sufficiently completed, which conflicts with the goals of the TISG.** Therefore, we recommend that the proponent provide additional information on the aforementioned plans, including sufficient detail on restoration measures, to allow residual and cumulative effects following restoration to be properly assessed before the EAR/IS is approved. This is especially important given the Ontario Government's compressed timelines for Ring of Fire road construction[9] where the detail design phase now nearly completely overlaps the early works and construction stages of the Project.

[9] Ontario Government (2026). Accelerated Ring of Fire Construction Timelines. https://news.ontario.ca/assets/files/20260302/43fa248a248eb508b499f31d542bb32f.pdf

4. Residual effects and the resulting implications for offsets are not sufficiently described

Our main concern with the Preliminary Biodiversity Offset Plan (Appendix AB) is that, at this stage of the Project, key questions about residual effects and their implications for offsets should already be far more resolved, particularly because offsetting is intended to follow, not substitute for, avoidance and minimization. The document identifies a range of possible offset approaches, but leaves the selection of a preferred offset package, compensation ratios, implementation mechanisms, and related matters to future planning, engagement, and regulatory processes. As a result, **offsetting is presented as part of the response to the Project's residual effects without yet establishing a sufficient basis for determining whether offsetting is feasible, appropriate, or capable of addressing those effects.**

The document does show that the mitigation hierarchy and the positioning of offsets within it are well understood at a conceptual level. It clearly identifies offsetting as the final step, to be considered only after avoidance, minimization, and reclamation or restoration, and invokes familiar principles such as equivalency, additionality, timing, duration, location, and accountability. Yet when it comes to the analysis of offsets themselves, it reads more like a package of preliminary options attached to a project for which the major residual effects are already largely fixed. Instead, cases where avoidance and minimization have been determined infeasible or insufficient to reduce negative effects should be explicitly identified, including how theses constraints may impact the determination of significance for residual effects and any limitations to potential offsetting plans.

The plan is also too willing to conclude that residual effects remain offsetable even while identifying several of the very constraints that should call for much greater caution. It concludes that residual effects can be offset through some combination of protected areas, restoration or enhancement, monitoring, and financial compensation. In our view, that conclusion is not yet adequately supported. The treatment of peatlands and boreal caribou illustrates this problem.

For peatlands, the plan acknowledges residual effects from direct loss and alteration, probable changes to groundwater and peatland function, uncertainty about the effectiveness of the "floating road" method in maintaining drainage patterns and groundwater regimes, and the long timelines required to restore functional peatland ecosystems. Yet peatland effects are still assigned only a moderate severity and ecological risk ranking, largely because peatlands are treated as common in the study area. This sits uneasily with the plan's own mitigation hierarchy logic, since high uncertainty and poor restorability should point to greater caution and stronger emphasis on avoidance and minimization, not simply be normalized within a moderate residual effects classification.

For boreal caribou, the offsetting approach similarly emphasizes habitat area, even though the more consequential effect is likely to be the road's role as a linear barrier affecting movement, intra-population connectivity, and access across the landscape. Those are not impacts that can readily be translated into broad offset concepts, particularly without a much more specific and credible account of what ecological functions are being impaired, where and to what extent barrier effects are expected, and whether any equivalent gain is realistically achievable. In such cases, a basic area calculation is insufficient for assessing offset options. **We recommend, therefore, that a more functionally specific characterization of expected barrier effects be provided, along**

with an explanation for how any proposed offset would address those effects in an ecologically meaningful way. A protected area may be valuable, but protection elsewhere, does not itself demonstrate equivalency for disrupted movement or connectivity, just as peatland protection or restoration elsewhere does not readily compensate for hydrological and functional changes in affected peatland systems.

Rather than presenting offsetting as a sufficient response in cases where the actual ecological effects have not yet been clearly defined or shown to be credibly offsetable, **the proponent should provide additional information that more candidly characterizes the residual effects that remain, the uncertainties associated with them, and the limits these place on offsetability.**

Conclusion

The Project area encompasses high ecological integrity boreal forests and peatlands that comprise globally significant carbon stores and areas of high biodiversity. Given the importance and extent of boreal forest and peatlands in the region, the sensitivity of the peatland carbon balance to changes in hydrology and compaction, and the known intent of using the Project to establish an industrial supply corridor, **the proponent must:**

1. **Enhance the cumulative effect assessment to include the reasonably foreseeable growth-inducing effects of the project outlined above;**
2. **More adequately demonstrate how adverse effects to peatlands and hydrology will be avoided and minimized within the floating road approach, based on further analysis of existing knowledge of floating roads;**
3. **Provide a stronger and more complete basis for characterizing residual effects, including by reducing reliance on incomplete restoration plans in significance determinations; and**
4. **Clearly establish the implications of residual effects for whether offsetting is feasible, appropriate, and capable of credibly addressing the Project's impacts.**

The EAR/IS does not currently address these four critical components.

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

Sincerely,

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

Adam Kirkwood, PhD
Peatland Conservation Scientist

Justina Ray, PhD
President & Senior Scientist