July 6, 2026

To: Impact Assessment Agency of Canada via the Canadian Impact Assessment Registry (https://iaac-aeic.gc.ca/050/evaluations/proj/80184)

Re: Comments on the Marten Falls Community Access Road Project Draft Impact Assessment Report

Dear Impact Assessment Agency of Canada,

Please accept our comments on the draft Impact Assessment Report for the Marten Falls Community Access Road (the Project) in northern Ontario. We thank you for the opportunity to contribute to the process in our capacity as conservation scientists with Wildlife Conservation Society (WCS) Canada with expertise in research and policy relevant to species and ecosystems to inform conservation decisions. Our comments focus on evaluating how the draft Impact Assessment Report has considered available information to characterize residual and cumulative effects and make significance determinations. In our view, there are several key deficiencies that affect the reliability of the assessment's conclusions as they relate to unresolved information gaps presented in the Project's Impact Statement.

WCS Canada has participated throughout the provincial and federal impact assessment process for the project, including recommending a Regional Assessment for the Ring of Fire area that would include all potential transportation corridors[1], and commenting on the Project Description[2], the Project Draft Tailored Impact Statement Guidelines[3], the Project Terms of Reference[4], and on the draft[5] and final[6] Environmental Assessment Report/Impact Statement (EAR/IS), as well as providing comments on the related Webequie Supply Road at various stages. Throughout the process, we have consistently requested an integrated and forward-looking process rather than project-by-project assessments that inadequately consider the connectivity of these two road projects, as well as the related Northern Road Link, in addition to subject-specific recommendations and requests.

Our previous submission to the Project's final EAR/IS identified deficiencies related to:

1. The limited scope of the cumulative effects assessment (CEA);
2. The strong reliance of a 'floating road' as the primary mitigation option for minimizing peatland disturbance with insufficient evidence;

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[1] Chetkiewicz et al. 2019. WCS Canada Formal Request for a Regional Assessment with Respect to Marten Falls Community Access Road Project and Webequie Supply Road.
[2] Chetkiewicz et al. 2019. WCS Canada Comments on the Marten Falls Community Access Road Project Description.
[3] Chetkiewicz et al. 2020. WCS Canada Comments on the Marten Falls Community Access Road Project Tailored Impact Statement Guidelines and Public Participation Plan.
[4] Chetkiewicz et al. 2020. WCS Comments on the Marten Falls Community Access Road Terms of Reference.
[5] Palmer et al. 2025. WCS Canada Comments on the Marten Falls Community Access Road Draft Environmental Assessment/Impact Statement.
[6] O'Connor et al. 2026. WCS Canada Comments on the Marten Falls Community Access Road Environmental Assessment/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

3. Incomplete restoration planning limiting the determination of residual and cumulative effects; and
4. Insufficient description of residual effects determination and how this relates to offset planning.

For this submission, we have performed a focused review of the draft Impact Assessment Report to evaluate how IAAC considered the deficiencies identified in the Project's final EAR/IS, interpreted the available evidence related to those issues, and used that evidence to support its conclusions.

At this time, our principal concern is that the draft Impact Assessment Report does not adequately explain how the deficiencies we identified in the Project's final EAR/IS were considered in IAAC's analysis or significance determinations. These omissions undermine the evidentiary basis for the assessment and raise questions about the transparency, robustness and reliability of the assessment.

Here, we discuss each of the four deficiencies.

1. The Impact Assessment Report fails to acknowledge the narrow scope of the cumulative effects analysis within the Impact Statement.

We have previously identified that the project and other reasonably foreseeable roads and industrial developments they will enable in the region are highly likely to result in irreversible negative effects on ecosystems within the region, and we have requested scenario-based analyses of future development pathways. We noted that the cumulative effects analysis (CEA) was too narrow and did not include an adequate project list or sufficiently account for the growth-inducing effects of the project and their impact on the high ecological integrity of peatlands, forests, and aquatic ecosystems in the region. We also identified that the CEA excluded other induced projects, such as hydropower projects and additional roads, that could impact species of conservation concern such as boreal caribou, wolverine, and lake sturgeon.

The draft Impact Assessment Report acknowledges that the Project will facilitate and interact with other projects, including the Northern Road Link, Webequie Supply Road, and Eagle's Nest mine and associated exploration. Additionally, Section 1.2.2.3 of the draft Impact Assessment Report identifies that electricity and water diversion, telecommunication activities, and forestry management activities were included in the CEA.

However, in our review of the draft Impact Assessment Report, we find that the deficiencies in CEA we identified in our previous comments on the Project's draft and final EAR/IS were not adequately addressed or considered during the Impact Assessment process. For example, Section 2.1.3 (Fish and Fish Habitat – Cumulative effects) identifies that "*Given that the interaction of the residual effect from the project with residual effects from* ***other projects would be limited****, IAAC does not recommend additional mitigation measures or a follow-up program related to cumulative effects"*. Further, this section identifies that impacts would primarily occur during the project construction, with the exception of increased recreational fishing. We contend that this is an example of how failure to include reasonably foreseeable projects within the CEA, such as hydropower facilities on

the Albany and Attawapiskat rivers which have been identified in other project documents, has led to the mischaracterization of residual and cumulative effects. In the example provided, hydropower facilities may likely have long-term adverse consequences on fish and fish habitat that may adversely affect fish populations, and these facilities may be explicitly enabled by the Project, yet this is not accounted for in the existing CEA. Since IAAC is not considering these within the CEA, they determine that the residual and cumulative effects in fish and fish habitat to the significant to a low extent, while we would contend that an adequate consideration of potential impacts within the CEA would likely result in a characterization of these as moderate effects, with potential adverse impacts to populations. In previous comments submitted by WCS Canada, we identified that scenario-based analyses of future development pathways must be considered to adequately assess possible impacts, yet there is no indication that such analyses have been completed. **As a result, we are concerned that the draft Impact Assessment Report does not sufficiently characterize the cumulative impacts the Project and associated future development may have on the high-integrity ecosystems of the region due to a lack of robust evidence.**

Through this narrow approach to CEA, there are several circumstances where IAAC has determined that cumulative effects would be limited, despite acknowledging that this project may enable additional infrastructure development that would increase pressures on resources and traditional activities (Section 4.3.1.3). We further contend that a more realistic assessment of induced projects and the limited feasibility of mitigation and offsetting approaches (see points 3 and 4 for further discussion) would reveal significant impacts on ecological and wildlife valued components that are not currently included within the draft Impact Assessment Report.

As the Project is the first road segment of what is functionally a region-opening industrial mining access road, the Impact Assessment Report has the obligation to consider a more robust CEA than what is included in the Project's final EAR/IS. On behalf of WCS Canada, we maintain that a more robust CEA is required to come to scientifically defensible conclusions on residual and cumulative effects from the Project and additional projects that it will enable. **We recommend that a scenario-based analysis of future development pathways, including subsequent industrial activities likely to be induced by the project is required to be completed and considered in the final Impact Assessment Report for the Project.**

2. The draft Impact Assessment report relies on the "floating roads" design as mitigation despite unresolved uncertainty regarding its effectiveness

The proposed road corridor crosses high-integrity peatlands and threatens their carbon storage and sequestration functions as well as the critical role they play in supporting the regions biodiversity. Within the Project's final EAR/IS, so-called "floating roads" are heavily relied on as a mitigation technique for building a road across water-rich peatlands while maintaining their hydrological function. In our comments on the final EAR/IS, we identified three related concerns. First, the EAR/IS provided insufficient scientific evidence that the "floating road" design would maintain peatland hydrology and ecological function. Second, the design is also the technically and economically preferred method of road construction in peatlands with deep peat deposits and therefore should not, without further evidence, be treated as sufficient mitigation in and of itself,

but rather, the proponent should be required to demonstrate how mitigation will be applied given this preferred approach. Third, the EAR/IS acknowledged substantial uncertainty regarding effects on peatland function while nevertheless concluding that effects would **not be significant.**

The draft Impact Assessment Report suitably acknowledges the importance of peatlands as culturally important ecosystems for traditional harvesting practices, and through consultation with First Nations identifies that they are important for supporting healthy aquatic ecosystems and sensitive to disturbance and probable sources of contaminants if disturbed. Despite these acknowledgements, the draft Impact Assessment Report does not provide additional details on the "floating road" approach and makes several conclusions that effects would either be not significant, or significant to a low extent due to the mitigation of impacts to peatlands via the "floating road" design and equalization culverts.

Overall, we call into question the conclusions of the draft Impact Assessment Report as they relate to the determination of residual effects and significance given there is inadequate evidence that the "floating road" will effectively mitigate changes to peatland hydrology that affects vegetation composition, greenhouse gas emissions and removals, and mobilization of contaminants like mercury. We maintain that there is insufficient evidence considered on the efficacy of the "floating road" approach and that the lack of evidence from a comparable Canadian project involving a road of similar length and extent through deep peatlands undermines the conclusions of the draft Impact Assessment Report.

It is important that these evidentiary deficiencies are resolved in the final Impact Assessment Report. Assuming, without robust evidence, that the "floating road" will prevent or sufficiently mitigate hydrological changes risks mischaracterizing the Project's effects on peatlands. First, the "floating road" design does not eliminate hydrological effects. Water impoundment on the upstream side of the road could increase methane emissions and promote methylmercury production and transport to aquatic ecosystems, where it can bioaccumulate and biomagnify through food webs. Second, on the downstream side of the road where peatland drying becomes likely, carbon dioxide production will likely be significantly increased from pre-disturbance levels, and peatlands may exhibit higher levels of fire risk. As such, we recommend that the residual effects be characterized as significant to a moderate extent.

We request that the final version of the Impact Assessment Report provides an independent and evidence-based evaluation of the effectiveness of the proposed floating road design and equalization culverts in maintaining peatland hydrology and ecological function. If the available evidence is insufficient to demonstrate that significant hydrological and ecological effects will be avoided or minimized, IAAC revise its residual-effects and significance determinations to reflect that uncertainty and require enforceable monitoring thresholds, adaptive management triggers, and corrective measures.

3. The uncertainty regarding residual effects and the effectiveness of proposed mitigation measures precludes a robust assessment of the Projects contributions to sustainability.

In the draft Impact Assessment Report, IAAC acknowledges uncertainty regarding potential adverse federal effects and regarding the effectiveness of recommended mitigation measures and yet reaches a conclusion of net positive contribution to sustainability to a low extent despite the uncertainty. However, we contend that the uncertainty regarding potential adverse federal effects and uncertainty regarding the effectiveness of recommended mitigation measures precludes a robust assessment. In previous WCS comments we have noted that **the restoration and management plans within the Impact Statement are incomplete** (e.g., the Vegetation Restoration Plan, Rehabilitation Plan, Permafrost Management Plan, and Environmental Protection Plan presented in the Impact Statement are all incomplete). We previously recommended 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. Here, we maintain that position. **We recommend that IAAC require the proponent to provide sufficient detail on proposed restoration and management plans to enable an assessment of residual effects and an assessment of the likely effectiveness of proposed mitigation measures.**

4. The offsetting approach described in the Impact Assessment is inadequate, and in places contrary to the principles of the mitigation hierarchy.

In our previous comments on the Impact Statement, we outlined our concern that key questions about residual effects and their implications for offsets remained unresolved within the Impact Statement, which is particularly troubling given that offsetting is intended to follow, not substitute for, avoidance and minimization. That previous document identified a range of possible offset approaches, but left 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 was presented as part of the response to the Project's residual effects without yet clearly establishing what the residual effects are likely to be (see our comments, above, about the lack of detail on the proposed restoration plans), and **without establishing a sufficient basis for determining whether offsetting is feasible, appropriate, or capable of addressing those effects**.

In the Impact Assessment, there are several cases where IAAC accepts that mitigation measures will be sufficient to address adverse effects or accepts that offsetting approaches will be acceptable despite the continued lack of an evidentiary basis. For example, in Section 2.1.1.1 (Assessment of Effects – Degradation and loss of fish habitat), IAAC's view is "*that the mitigation measures proposed by the proponent to address adverse changes in water quality, hydrology and fish passage would be appropriate*", despite the proponent acknowledging that fish habitat will be degraded or lost (i.e., acknowledging that avoidance of adverse effects will not be possible despite following regulatory and permitting requirements for minimization), and despite DFO noting that, "*because the local environment is largely undisturbed and ecologically intact, there may be challenges in finding suitable locations within the same reach or watershed to offset degradation or loss of fish habitat, potentially making offsetting difficult.*" Rather than requiring a robust assessment of likely adverse effects and feasible offsetting measures, in order to assess the

appropriateness of the offsetting plan, IAAC simply notes that complementary measures like data collection, scientific research, and public education activities could be used to offset effects to fish habitat. While the Fisheries Act allows scientific research on maintaining or enhancing the conservation and protection of fish and fish habitat to be considered as an offsetting measure, this applies in circumstances where options for restoring degraded fish habitat are limited. We contend that scientific data collection, on its own, should not be considered acceptable for offsetting. Specific to this situation, we contend that data collection, scientific research, and public education activities should not be accepted as an adequate offsetting approach without first requiring sufficient details on: 1) the expected residual effects, 2) the restoration and habitat rehabilitation options, and 3) the feasibility of any offsetting or habitat enhancement. **We recommend that IAAC require the proponent to provide sufficient details on the proposed offsetting plan such that an assessment can be made on whether the offsetting approach adequately considers avoidance, minimization, and restoration, and on whether remaining proposed offsetting approaches will be effective.**

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