

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Tolko Industries Ltd.  
**PROPOSAL NAME:** Dickstone South Road  
**CLASS OF DEVELOPMENT:** 2  
**TYPE OF DEVELOPMENT:** Forestry – Main and Secondary Haul Roads  
**CLIENT FILE NO.:** 3094.70

### **OVERVIEW:**

The Environment Act Proposal was dated March 10, 2008 and received on March 14, 2008. The advertisement of the Proposal read as follows:

“Tolko Industries Ltd. has submitted an Environment Act Proposal to Manitoba Conservation for the construction of an all weather road through Grass River Provincial Park from PTH 39 through Township 65, Range 22W and Township 66, Range 22W, as an alteration to Environment Act Licence No. 2302 E R in association with the 1997-2009 Forest Management Plan. The project includes the construction of a single lane clear span bridge over the Grass River. The purpose of the project is to provide economical delivery of harvested wood from the existing Loonhead Lake/Wheadon River operating areas.”

The Proposal was advertised in the Snow Lake Underground Press on Thursday, April 3, 2008, in the The Pas Opasquia Times, the Thompson Nickel Belt News and the Flin Flon Northern Visions Gazette on Friday, April 4, 2008, and the Winnipeg Free Press on Saturday, April 5, 2008. Copies of the Proposal were filed in the following Public Registries: 123 Main Street (Winnipeg, Manitoba), Manitoba Eco-Network, Millennium Public Library, Thompson Public Library, MKO (Thompson), Flin Flon Public Library and The Pas Public Library. It was distributed to the “Forestry” Technical Advisory Committee (TAC) for comment on March 26, 2008. All comments were requested by April 28, 2008.

### **PUBLIC RESPONSE**

#### **Letters of concern:**

Chris Chell, Vice President, Snow Lake Sno-Drifters:

In response to Tolko Industries Dickstone South Road proposal, we the SNOW LAKE SNO-DRIFTERS SNOWMOBILE CLUB have few issues with this proposal.

1. proximity to designated route,
2. bridges that they haven't applied for that will connect them to their road they bought from HBM&S a year ago, as they will be needing to cross more waterways as they move farther north,

3. how the fish spawning area will be affected at the proposed bridge site,
4. how the area will be "off limits" to local sportsman,
5. Tolko's non-willingness to open up land that will not be used anymore because of this new proposed route,
6. proper signage to ensure the safety of our snowmobile riders at junctions and crossings,
7. and lastly the state that they leave the area in after they have harvested the area.

Disposition:

Additional information is needed to address several of these concerns.

C. Lauterer and D. Lauterer

We oppose construction of an all weather road through the Grass River Provincial Park from PTH 39 that includes a clear span bridge over the Grass River. This will have a negative effect on the Grass River, which has been a canoe route that has been used for hundreds of years, and would have an environmental impact on the tranquility and wildlife of this historic navel route.

The Grass River Provincial Park should be kept as a wilderness park for future generations to enjoy.

Tolko has three other options to haul wood out.

Disposition:

These comments will be considered in conjunction with the following response.

E-mail form letter response – 259 responses (list attached)

The wild and natural Manitoba that everyone in this province cherishes is a legacy that we must preserve for future generations. Our provincial parks should be a tool to preserve this province, securing natural areas from industrial development such as logging, mining, and hydro development.

Please do not allow Grass River Provincial Park to be bisected by a new bridge and logging road (Tolko's Dickstone South Road, file 3094.70). Protect the threatened woodland caribou that make this park their home by stopping any further industrial development in this park. Please begin a public process that will result in legislated permanent protection for this park and all provincial parks.

Disposition:

These comments address a policy issue respecting park land use. This policy issue will be reviewed by the Department. (See Discussion and Analysis sections of this summary.)

Western Canada Wilderness Committee:

The Wilderness Committee is a citizen group, the largest citizen-funded and member-based wilderness protection group in the country, with over 30,000 members and 40,000 additional supporters. There are over 5,000 members and supporters in Manitoba, and the number continues to grow. The Wilderness Committee office in Manitoba represents our members and supporters, and our comments should be considered as coming from these concerned citizens.

We are filing our comments based on the approval by branch staff of an extension in the deadline. Please place our comments in the public registry file for this proposal. Please also note that our comments on the proposal are not exhaustive and do not constitute a complete review of the proposal. The absence of comments on any given section of the proposal should not be construed as a confirmation of its comprehensiveness.

This application asks for permission to put industrial developments in areas that are closed to development inside a provincial park and in the habitat of a species listed under the Endangered Species Act, so a private corporation can make more money. One of the key points this application does not address is why this project is a good idea for Manitobans. Clearly it is not a beneficial project for people in this province. The one benefit this licensing application holds for Manitobans is that it brings many past transgressions regarding species at risk, forestry licenses, and protected areas into a public review process, which provides an opportunity for the Manitoba government to address these lingering problems.

In this application, the 1984 Grass River Provincial Park Master Plan is continually referenced. The Grass River Master Plan is over two decades old. Since its release there have been tremendous developments in protected areas, provincial parks, species at risk legislation, and public consultations.

*Grass River Management Succeeded by Legislation, is Now Obsolete*

After the Grass River Provincial Park Master Plan was released in 1984, The Provincial Park Lands Act was created in 1987, followed by the Provincial Parks Act of 1993, with substantial regulations added again in 1997. Closed zones were established in Grass River Park subsequent to the development of the Master Plan of 1984. Similarly, the Manitoba Endangered Species Act and the federal Species At Risk Act were created after 1984. All of this legislation succeeds the Master Plan of 1984, making the Master Plan

obsolete.

*Manitoba Government Behind on Protecting Natural Areas in Manitoba*

In 1990, the Manitoba government committed to protecting areas in each natural region in Manitoba from industrial activity, to preserve our natural areas. This commitment has been renewed by the current government several times since then, along with the a commitment to establish new protected areas in policy, budget, and throne speeches.

In 2007, 1,500 scientists from around the world called for the protection of at least 50% of the remaining intact boreal forest. Grass River Provincial Park should be part of an action for increased boreal protected area in Manitoba.

To allow the park to be split with this road is a reversal of the Manitoba government's commitment to increase protected areas in this province.

*Adequate Protected Area Missing from Tolko's FMLA #2*

Tolko's Forest Management License Area (FMLA #2) was, and still remains, the largest public forest tenure ever awarded in Canada. It is also the only FMLA in Manitoba with no large blocks of fully and permanently protected forest. More development in intact wild areas in Tolko's FMLA, like this road bisecting Grass River Park, can not be allowed. Further, large sections of Tolko's FMLA must be removed from their forest license and turned into fully and permanently protected areas. These steps should be taken prior to any approvals for all-weather roads, or steps to open previously closed forest lands inside the Grass River Park.

*Forestry Roads*

It is not clear who is going to pay for this all-weather road. The forestry industry is struggling economically across Canada. Does Tolko have the funds to build this road? Are there arrangements for public subsidy to the company to build this road?

*Parks Act – Intent*

The intent of the Act is that any significant change in land use inside a Manitoba provincial park requires public consultation. The pattern and standards for these steps has been used with repetition over the last ten years, and is available to all branches of Manitoba Conservation. This application under the Environment Act in effect allows a significant change in land use inside Grass River Park, and therefore should be decided through notification to all parties, with details made public.

*Woodland Caribou Management Plan Missing*

The boreal woodland caribou is listed provincially and federally under endangered species legislation. The Naosap herd of woodland caribou, according to the 2005 Manitoba's Conservation and Recovery Strategy for Boreal Woodland Caribou (released in 2006), is one of the most at-risk herds

in Manitoba. To date there is no Recovery Strategy for this herd, as required under SARA, in the hands of the public, stakeholders, or those affected by this current application. According to the Recovery Strategy, this herd uses Grass River Provincial Park and the surrounding area as habitat. Therefore, no application for development (roads, bridges, increased logging) in this area should even be considered unless a peer-reviewed, comprehensive explanation of the current status of this herd is presented first. No such information is included in Tolko's application. It appears that Manitoba's caribou plan is to log their habitat first, and then see how the caribou manage.

*Caribou Management Plan for Forest To Be Logged is Missing*

The forest Tolko is planning on accessing with this proposed road is considered the last primary intact forest left for the local woodland caribou herds. A similar peer-reviewed, comprehensive report on the status of the herds using this forest should be presented before access roads can be reviewed. Full information as to the fibre to be accessed by building this road must be included in any appropriate package for public review. In late 2006, the Wilderness Committee made repeated calls to the Environmental Licensing branch of the Manitoba government, asking for an explanation of how Tolko's clearcut logging activities were affecting the woodland caribou populations in the area. No answer or information was forthcoming, then or since.

*Appeals Lost by Tolko – Roads*

We would strongly suggest that Manitoba Conservation approvals staff review the full file for Tolko's environmental license. This exercise (which ideally would be part of the steps prior to a decision whether to begin the review under the Act for proposals) would show that Tolko sought and was refused permanent all-weather road licensing. Each stage of appeal was refused. The specific information as to whether this application includes road corridor that was previous refused on appeal by the Manitoba government must be included in the public information available regarding this proposal under the Act.

*Manitobans Have Said No to More Industrial Activity in Parks*

The majority of Manitobans who responded to a recent Manitoba Conservation request for public stated that they wanted industrial activity to stop in provincial parks. In January 2006, the government release a public comment summary regarding increasing the protected area of another park, Nopiming Provincial Park. This summary stated overwhelmingly that Manitobans wanted industrial activity out of provincial parks.

Since 2007, the Manitoba government has received 10,000 letters from people of this province, hand delivered to Premier Doer's office, asking that

industrial activity in provincial parks be stopped.

*Lack of Adequate Public Comment Notification*

Tolko has been holding public meetings on short notice in small communities far from the reach of the majority of Manitobans. The Wilderness Committee has expressed to Tolko in the past that they would like public meetings in Winnipeg, so more Manitobans can take part in this process. The Wilderness Committee has also repeatedly been left with no notice of upcoming events by Tolko, even when we specifically call and request dates and times of meetings weeks in advance. The meetings listed in the appendix of this application are not adequate to provide a fair and representative number of Manitobans opportunity for public comment.

*No tenure guaranteed*

Tolko's current long-term forest management agreement and environmental license expires at the end of 2009. According to the timeline provided with this road building license application, the road will not be completed and operational until 2010. The road should wait until there is a full public process for Tolko's license, forest management plan, and operating plans – including a decision as to whether it should continue. Instead we have a bad faith effort to significantly change the company's existing, soon to end license before it ends. Until a public process for Tolko's new license for portions of FMLA #2 is completed, this application to build a road is not necessary and should not proceed.

*All-weather logging roads*

It is widely understood that roads are the first step in the desecration of a natural area. This is evidenced in government forestry policy, where logging roads are access- controlled by locked gates. The Wilderness Committee feels that no more all-weather roads should be built for logging anywhere in Manitoba. Given the precedent this application represents in terms of logging roads in Manitoba, clarity on Manitoba Conservation policy regarding all-weather roads must be available also.

*Overharvesting*

Roads in Manitoba access more than enough forest already. Opening up more intact primary forests is not necessary, and not beneficial to Manitobans. The only access any forest in Manitoba should receive for logging is winter trails. If there are not enough forests that are already accessed by roads remaining to be logged, then logging has likely been done at an unsustainable rate. Logging mills will have to adapt to operate using less fibre from wood than they are currently harvesting, rather than opening up new areas of primary wilderness for industrial development.

*Previous CEC Recommendation Against Further Development in Provincial*

## *Parks*

In 1992, The Clean Environment Commission, in its first-ever review of forestry and provincial parks, succinctly recommended that commercial wood fibre harvesting activity in all provincial parks be phased out. Following that recommendation, an access road for commercial wood fibre harvest should not be built across a provincial park.

### *Comment on Climate Change Mitigation is Missing*

Detailed information about how climate change may affect this project is missing. Also the affect of the proposal, and connected activities, on Manitoba's climate (carbon sequestration and inventory, emissions) is also missing. Recent renewed commitments for proposals of this sort to include information regarding climate impacts and effects should immediately be fulfilled in this application.

### *Forestry Resource Activity Committee (FRAC)*

This license application references Tolko's FRAC. Logging corporations are required by their licensing agreements to have stakeholder meetings. Currently the logging corporations run these meetings, and the scope of the actions which result from these meetings is limited or non-existent. The Manitoba government is abrogating their responsibility to manage public lands by allowing corporate interests to run stakeholder meetings. The Manitoba government must begin running any stakeholder meeting. Stakeholder advisory committees on public lands can not be run by corporations. Additionally, the terms of reference for stakeholder meetings must hold corporations to follow through with recommendations tabled.

In summary, this application to bisect a closed section of a provincial park with an all- weather road has no merit. Nowhere in the application was any reasonable rationale given, explaining how this project benefits the people of Manitoba. This project will benefit a very few owners of a private mill operating in a public forest, to the detriment of that public forest. Further, the explanation of how this project will impact the area is very sparse, and the mitigation strategy is nearly non-existent, consisting mostly of a locked gate keeping people out, mentioning that the road will be decommissioned after 20 years, and that the operators in the area will be told to be careful. This empty explanation of the impacts of such a project is what one would expect to see in 1984, not in 2008, when it is understood that the fragile interrelationships of nature are necessary for our well-being, and must be preserved whenever possible. The Manitoba public, government recommendations, public policy, and scientific recommendations are already against a project like this.

It is the recommendation of the Wilderness Committee that this license application be rejected. The Wilderness Committee also requests that Manitoba Conservation, now that they are reviewing Tolko's activities in

northwest Manitoba, take the following eight steps:

- a) Remove Grass River Provincial Park from Tolko's FML.
  - b) Fully and permanently protect all of Grass River Provincial Park from industrial activity including logging, mining, and hydro development.
  - c) The number of large, fully and permanently protected areas in the region that is currently Tolko's FML must quickly increase.
  - d) Expediently release a peer-reviewed management plan with a detailed, delineated core and/or critical habitat map for woodland caribou in Tolko's FML
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- e) Begin a moratorium on any industrial development in Tolko's FML until said caribou management plan is released.
  - f) Establish full and permanent protection for woodland caribou habitat after the management plan is released.
  - g) Manitoba Conservation is to take over and run a regularly scheduled stakeholders meeting for each Forest Management License in Manitoba, with a mandate requiring Manitoba Conservation to act upon concerns voiced during such meetings.
  - h) Manitoba Conservation begin a public process with the end goal of expediently ending industrial activity in provincial parks.

Thank you for the opportunity to provide public comments. We trust that these comments will be reviewed completely. We look forward to hearing how these recommendations are implemented.

**Disposition:**

Most of these comments address policy matters that will be reviewed by the Department. (See Discussion and Analysis sections of this summary.) Several comments address forest harvest activities that are beyond the scope of this assessment.

**Manitoba Wildlands:**

The March 2008 Environment Act Proposal from Tolko Industries Ltd. regarding Dickstone South Road seeks permission for the creation of an all-weather road in boreal forest areas within a provincial park. The proposal raises some significant questions and concerns that are not answered in the material submitted as part of the proposed license alteration. As a result, we urge Manitoba Conservation to require additional information from the proponent and with another round of public review, based on information provided by the proponent. We are including here suggestions and questions that need to be answered.

Please place our comments in the public registry file for this proposal.

**Rationale for Logging Road as All-Weather Road**

Forestry roads are not usually built as permanent all-weather roads. The fact that Tolko is applying for what is essentially a license alteration to build an all-weather road raises some important questions that require a public response from the proponent prior to a licensing decision. First, why is this logging road proposed as an all-weather road? For what reason is all-season access required? Aside from logging, what else will this road be used for? Does it assist Manitoba Hydro in its transmission or generation station development intentions? What is the decommissioning plan for this road? If decommissioning is not planned for the foreseeable future, this road should be very carefully considered through a transparent and public process.

Is the location of this proposed road similar to or the same as the all-weather road proposed by Tolko and rejected as part of the previous environmental licensing review? If so, the rationale for refusal to license the previous all-weather road must be part of this licensing and decision-making process. It is the responsibility of the Environmental Assessment and Licensing Branch to be aware of the whole set of circumstances connected to an environment license. In this case the previous refusal of permanent all weather roads, and refusal of Tolko's appeals were due to concern regarding woodland caribou, among other species.

#### **Impacts of an All-Weather Road on a Listed Species — Woodland Caribou**

According to maps included in the 1984 Grass River Provincial Park Management Plan, Tolko's proposed all-weather road will affect winter habitat areas of the Naosap Woodland Caribou herd, a herd that is considered to be at high risk by Manitoba Conservation. According to 'Manitoba's Conservation and Recovery Strategy for Boreal Woodland Caribou', this herd uses Grass River Provincial Park and the surrounding area as habitat (both calving and wintering). Given the formal status of woodland caribou under Manitoba's Endangered Species Act, the proponent must be required to provide details regarding potential impacts on the Naosap Woodland Caribou Herd with respect to this proposed road AND the associated logging activity that it will facilitate. How is this proposal in keeping with the Government of Manitoba commitment to woodland caribou recovery? How can Manitoba Conservation contemplate licensing this all-weather road when there is no Recovery Action Plan in place for the Naosap Herd (or any woodland caribou herd in Manitoba), despite three years having elapsed since the release of the 2005 Conservation and Recovery Strategy for Boreal Woodland Caribou? Is it part of Manitoba's 'plan' to allow road building and logging in woodland caribou habitat before a Recovery Action Plan is in place?

Assessment of the logging that will be enabled by this road, and the impacts on woodland caribou are essential elements for decision making on this Environment Act proposal. We suggest that Tolko's operating plans and assertions regarding woodland caribou in its long term forest management plan — the basis for its current environment license — must be reviewed in relation to this road proposal.

As woodland caribou are also listed under the Federal Species At Risk Act, what are

the implications for Manitoba and the proponents of this decision in terms of obligations under SARA? All of the above questions require responses from either Tolko Industries and/or Manitoba Conservation, where appropriate, prior to any decisions regarding licensing for this proposed project.

Finally, which other species or listed species may be affected by Tolko's proposed all-weather road? Manitoba Conservation should require the proponent to do its homework on these matters. What kind of effects will the proposed road and logging activities have on Reed Lake?

### **Immediate Need for an All-Weather Road / Expiration of Tolko's 2009 Agreement and Environmental Licence**

According to the timeline provided with this road building license application, the proposed all-weather road will not be completed and operational until 2010. Tolko's current long term forest management agreement and environmental license expires at the end of 2009. Why does this proposed road require licensing now? What is the justification for proceeding with this project as a separate proposal under the Act that mandates a license amendment? , The proposal is better included as part of the full assessment of Tolko's new long-term plan? A cynic might wonder whether Tolko wishes to secure approval for aspects of its plans for 2010 and beyond because it would rather not fully address the very significant issues associated with building road through wintering habitat of a species listed under Manitoba's Endangered Species legislation.

Is Manitoba Conservation prepared to set a precedent for what could be perceived as a "back door" way to license aspects of a future long term forest management plan so that it does not have to address these issues in what will be a full public review process? Is this a way for companies to accomplish staged licensing — a practice that the Manitoba Government has made repeated commitments to end? These are very important questions with implications for future development proposals in Manitoba. Project justification and the context for this road within Tolko's overall forestry plans are key aspects of the project that should be addressed by the proponent, and placed before the public again.

### **Roads and Logging in an Area of a Provincial Park that is 'Closed to Logging'**

Tolko's proposed all-weather road will bisect areas of intact boreal forest that have been closed to logging inside Grass River Provincial Park. If an area has been closed to logging, it is reasonable to make the assumption that the reasons for doing so include enabling the area to remain intact, to facilitate its continued function as wildlife habitat, and to ensure that ecosystem structure and functions are perpetuated. One might also even assume that if an area is closed to logging, activities that facilitate logging — such as a logging road, not to mention a permanent all-weather road — would also be prohibited. Apparently the proponent thinks otherwise. Is Manitoba prepared to re-open an area that has been closed to logging for decades and act contrary to public statements it has made in support of maintaining and expanding existing natural areas. Is Manitoba prepared to act

contrary to public statements concerning the "protection of natural areas inside and outside of provincial parks" (September 4, 1999 letter from the Manitoba NDP [http://manitobawildlands.org/dots/Sept\\_4\\_Letter\\_page\\_1.3PG?](http://manitobawildlands.org/dots/Sept_4_Letter_page_1.3PG?))

The stated purpose of the proposed all-weather road to "provide economical delivery of harvested wood from the existing Loonhead Lake/Wheadon River operating areas", which is essentially about deriving additional economic benefits that would flow exclusively to a private company. Given this objective, we would like to know how this project will be of benefit to Manitobans? How do the potential benefits of Tolko's proposed all-weather road compare to the benefits for Manitobans if the area remains closed to logging and available for woodland caribou, or indeed if the area were to become formally protected? We suggest that it is long over due to consider the benefits of intact boreal forest areas closed to logging, rather than making dated assumptions about the benefits of opening such areas to logging and road building.

### **Protection of Lands Within Provincial Parks**

The network of protected areas in the natural region within which Grass River Provincial Park is situated is far from complete. This is one of the reasons that this proposal is cause for such concern. The Manitoba government has repeatedly committed to establishing protected areas in the province's forest regions in advance of forestry licensing (please refer to commitments made by the Manitoba NDP as part of responses to Manitoba Wildlands' election surveys in 1999, 2003, and 2007 [http://manitobawildlands.org/govern\\_elections.htm](http://manitobawildlands.org/govern_elections.htm)). Unfortunately, to date, very little progress has been made. This proposal, however, represents an opportunity. Since there is little evidence of urgency for Tolko's proposed road, initial work to identify potential protected areas elsewhere within Tolko's FML should precede licensing. More specifically, there is an opportunity here to identify and protect lands within Grass River Provincial Park before any decisions about this road or opening closed areas for logging. The design of protected areas within Grass River Provincial Park should be based on maximizing protection of the Naosap woodland caribou herd and their calving and winter habitat, which are outlined in the Park Management Plan referenced in Tolko's proposal.

This proposal is an opportunity for the government and Manitoba Conservation to act on its many commitments to protect the boreal forests in Manitoba. It is also an opportunity to apply climate change impacts and impacts on climate change to a proposal in a park, in a boreal region in our province. Sadly, instead we are reviewing yet another proposal without any climate change standards.

In closing, a licensing decision of such a substantial nature that will affect lands within a Provincial Park — an area that belongs to all Manitobans — should not be made solely on the basis of the proposal for the road itself. Rather, this decision should be made in relation to the impacts of that road (and the logging activity it will facilitate) on the Provincial Park as a whole and its habitat and species.

We appreciate the opportunity to comment on this proposal and we trust that our

comments will be carefully considered and addressed. It is our strongly held conviction that this proposal should not go ahead, and that Manitoba Conservation must require considerably more justification from the proponent.

**Disposition:**

Most of these comments address policy matters that will be reviewed by the Department. (See Discussion and Analysis sections of this summary.) Several comments address forest harvest activities that are beyond the scope of this assessment.

**Letters of Support:**

Ward Perchuk, Chairman, Forest Industry Association of Manitoba (FIAM):

The Forest Industry Association of Manitoba (FIAM) supports Tolko's plan to construct an all weather road through the Grass River Provincial Park.

Employment in Manitoba's forest industry now exceeds 9,000 jobs. As the largest forest products company in the Province, Tolko generates many of the jobs mentioned above. The proposed road will help control escalating costs and therefore protect employment in The Pas area.

The perception by some that the construction of a road through the park will in some way degrade the park is simply incorrect. It is the intention of Manitoba Conservation to control fire within the Park. Whenever man alters an ecosystem (i.e. control fire), it then becomes necessary to actively manage the land base. The road proposed by Tolko will be valuable to Manitoba Conservation for their future forest management efforts.

In closing, the economic and forest management benefits clearly justify the construction of the road.

Michael F. Petryk, Petryk Forest Products, Ltd.

This letter is in support of Tolko Industries' proposal for the construction of an all weather road through the Grass River Provincial Park from PTH-39.

My company Petryk Forest Products Limited is a third generation family logging and sawmill operation. I am a long term quota holder in management unit # 60-Grass River Provincial Park.

This road would provide our company with a long term sustainable timber supply which is vital to our future operation.

Town of Snow Lake

The Town of Snow Lake would like to express its support for the above-noted application by Tolko Industries Ltd.

The current road system used by Tolko bypasses Snow Lake and presents safety concerns for our community.

The current system is not conducive to meeting oncoming traffic and passing safely. Workers traveling to work at the mine sites have had near-accidents, especially on the blind curves, with lumber trucks traveling in the opposite direction. With the prospect of development of further mine sites on this route, traffic volume can only increase.

Tolko's proposal will go a long way to improving the safety of our residents with the removal of the large truck traffic.

Tony Brew, Owner, Wekusko Falls Lodge

I support Tolko's intentions as it cuts down on the logging truck traffic by my lodge, the lodge is situated within 85 feet of PTH392, this past fall there were hundreds of loads of logs being hauled 24-7 past the lodge, with the approval of the all weather road, would resolve this noise problem and also the safety factor by diverting the truck traffic directly onto PTH39. I thank you for your consideration regarding this matter.

Rick Bobby, Woodlands Manager, Spruce Products Limited

Spruce Products Limited is in support of the proposal by Tolko Industries Ltd. for the construction of an all weather road through Grass River Provincial Park as identified in the "Notice of Environment Act Proposal" issued by Manitoba Conservation.

The Grass River Provincial Park Management Plan established in 1984 does recognize the park's value for commercial resources and the need to accommodate the use of these resources. The proposed access route was actually indicated in the plan development in 1984. The plan acknowledges that the forestry access road/utility corridor is an accepted use for areas of the park.

This route will not lessen future recreational use or unduly compromise the park's primary purposes. The park plan indicates that this allocated corridor provides a mechanism to limit crossing of the Grass River to a single location to access forest resources to the north.

The economic viability of this route is extremely important in the delivery of the timber resource. Other options are not at all viable.

Public consultations show a preference for this route.

Mitigation measures have been established for any potential environmental impacts related to this development.

Tolko employs an Environmental Management System that has been certified to the ISO 14001 standard in managing company woodlands operations. This includes standard operating procedures and operating guidelines to ensure compliance with all Provincial and Federal regulations during the development of the access corridor and water crossing.

The Company has proven stewardship on a previous Grass River crossing in the Nelson River Forest Section. This crossing is still in use and has had no detrimental effect to the natural environment or the value of the Grass River system as a recreational waterway since it was established.

John L. Knowles, President and CEO, Wildcat Exploration Ltd.

We wish to table our comments regarding the proposal by Tolko Industries Ltd for the Dickstone South Road (File: 3094.70). Wildcat Exploration Ltd. is a Manitoba head-quartered minerals exploration company that has made significant investment on its mineral claims in the Reed Lake (west) area of Manitoba, and the subject road would traverse our mineral claims for a distance of 10 kms.

We have reviewed the various options proposed by Tolko and we respectfully propose that you approve the Preferred Option, as outlined in the Tolko submission.

Our reasons are as follows:

1. **HYDROCARBON REDUCTION** - The proposed route will minimize the amount of hydrocarbon emissions from access/construction as compared to the longer alternate routes. The alternatives would detract from the objective of encouraging development while meeting Kyoto protocols.
2. **FOREST FIRE CONTROL** - The North-South path of the road is strategically aligned for the creation of a firebreak for fire fighting access.
  - The eastward migration of the pine beetle will at some point make its impact on the boreal forest of Manitoba. The dead forest that is left from their activity creates a hazard for forest fires on a scale as yet unmeasured. Prevailing winds in this part of Manitoba suggest that if a major fire outbreak did occur in the area, the Town of Snow Lake and the Reed Lake recreational area could suffer serious economic setbacks.
3. **TAXPAYER BENEFITS AT NO COST** - The road would be created with funds from private industry (Tolko), and would be available to serve its greater strategic function in an uncertain future.
  - Reduction in cost to the provincial treasury for the mobilizing of fire suppression activities, if required, is an economic benefit shared by every

Manitoban. The creation of the road is like an insurance policy without having to pay the premiums.

4. REDUCTION OF ENVIRONMENTAL FOOTPRINT and INCREASED WORKER SAFETY - The proposed road is adjacent to recent successful mineral exploration discoveries.
- Additional exploration activity can be conducted in a manner that minimizes the environmental footprint and allows access to the multiple sites that are currently active from a central access road as opposed to separate individual access trails.
  - Additional hydrocarbon savings will be realized as many of the areas require the use of helicopter assisted and/or fixed wing float equipped air support for access.
  - Worker safety will be enhanced by having access to emergency evacuation via road instead of waiting on air support (weather permitting)
  - Overhead noise pollution will also be reduced with the elimination of the need for air support services.

Tolko's proposal of the Preferred Option for the Dickstone All Weather Road has our company's support and, with the forest fire season approaching, we highly recommend that the plan be expedited as soon as is practicable.

E-mail form letter response – 29 responses (list attached)

The wild and natural Manitoba that everyone in this province cherishes is a legacy that we must preserve for future generations. Our provincial parks should be a tool to preserve this province, securing natural areas from industrial development such as logging, mining, and hydro development.

Please allow Grass River Provincial Park to be bisected by a new bridge and logging road (Tolko's Dickstone South Road, file 3094.70).

**COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:**

**Manitoba Conservation - Sustainable Resource and Policy Management Branch**  
No Concerns.

**Manitoba Conservation - Parks and Natural Areas**

**BACKGROUND**

**1984 Park Management Plan:** As the Environment Act Proposal Form indicates, the December 1984 *Grass River Provincial Park Management Plan* made allowance for a possible forestry access road and crossing of the Grass River generally in the applied-for area. The Management Plan also made clear that one of the primary purposes of Grass River Provincial Park is to “*protect and preserve significant woodland caribou herds*”. In addition, the Plan states the park will: “*accommodate*

*commercial use of resources where this does not lessen future recreational use or unduly compromise the Park's primary purposes".*

The Management Plan divided the park into four zones indicating permitted and prohibited land use activities. Commercial forestry activities are permitted in about 40% of the park, only in areas shown as Commercial Resource/Recreation Zone. The applied-for forestry access road corridor indicated in the Park Management Plan included recognition that it would have to cross other park zones where forestry activities are otherwise prohibited. The Management Plan zoning allowed mining activities in areas of the park zoned closed to forestry.

**Additional Considerations:** Since the Management Plan was approved more than 23 years ago, additional legislative and regulatory changes have occurred that need to be considered in assessing a proposal such as the Dickstone South road. These include:

- Supreme Court decisions relating to Aboriginal and Treaty rights and the need to consult.
- Passage of a new *Provincial Parks Act* in 1993.
- Listing of woodland caribou as "Threatened" under both the federal *Species at Risk Act* in June 2003 and under the *Manitoba Endangered Species Act* in June 2006.

***Supreme Court Decisions:*** Since 1990, the Supreme Court of Canada has outlined a requirement that Governments conduct formal consultations with First Nations when considering decisions that may infringe on Treaty and Aboriginal rights. The proposed Dickstone South Road project requires such consultations. It is unclear to Parks and Natural Areas Branch when these consultations will be completed and whether the results are needed before the project can be licensed. In particular, the implications of Aboriginal and Treaty use of any road that is built - and administration of its use, as and if appropriate - would need to be addressed in the formal consultations. The results could affect project licensing

***1993 Provincial Parks Act:*** The 1984 Grass River Provincial Park Management Plan was established under the 1972 *Provincial Park Lands Act*. In 1993 a new *Provincial Parks Act* was passed. Following an extensive public consultation process between 1993 and 1997, the new Act was proclaimed into force in August 3, 1996, and the new park system was implemented February 28, 1997.

The new Act laid out a more detailed land use designation system that differs from that in the previous Act. The 1993 *Provincial Parks Act* calls for the establishment of a "***park system plan***" which "*shall set out the proposed boundaries, classifications and land use categories of provincial parks and may contain any other information that the minister considers appropriate.* Some land use categories prohibit "*logging, mining or the development of oil, petroleum, natural gas or hydro-electric power*", whereas other land use categories do not. The Act also calls for the development of a *management plan* for each park. The Act requires public

consultation before a park can be established or before any park boundaries can be changed.

***Applying the Provincial Parks Act to Grass River Provincial Park:*** Honouring existing resource and other commitments as much as possible was one of the principles used during the public consultations to develop the park system plan. The existing 1984 *Grass River Provincial Park Management Plan* was used to consult on the specific role of Grass River Provincial Park in the new park system plan. The results of the consultations were used to draft the entry for Grass River Provincial Park in the document “*A System Plan for Manitoba’s Provincial Parks*”. The key requirements of the entry are provided in the following paragraphs. How they apply to the Tolko application is discussed separately as appropriate in the last portion of this memo.

***Park Classification:*** Grass River Provincial Park is classified as a “*natural park*”, a park where “*the main purpose of the designation is both to preserve areas of a natural region and to accommodate a diversity of recreational opportunities and resource uses*”.

***Park Purpose:*** The purpose of Grass River Provincial Park is “*to preserve areas that are representative of the Churchill River Upland portion of the Precambrian Boreal Forest Natural Region, and the Mid-Boreal portion of the Manitoba Lowlands Natural Region; and accommodate a diversity of recreational opportunities and resource uses.*” To achieve this, *the park will:*

- *Preserve woodland caribou habitat and the high water quality of the Grass River;*
- *Promote canoeing, camping and fishing opportunities, and permit related services and facilities;*
- *Promote public appreciation and education of the cultural and natural history of the Grass River; and*
- *Accommodate commercial resource uses such as forestry and mining, where such activities do not compromise the other park purposes.”*

***Park Land Use Categories:*** Because of the extensive commitment to mining in the park Grass River Provincial Park could not be given large extensive protected land use categories. Only about 1% of the park area, comprised of two sites totalling 2895 ha, is assigned a “backcountry” land use category. In such areas, *mining or the development of oil, petroleum, natural gas or hydro-electric power*” are prohibited. One site protects a unique permafrost feature, and the other protects woodland caribou calving islands in Wedge Lake.

About 24% of the park (53,410 ha) is assigned a “*recreational development category*”. The Act specifies the main purpose of such areas is: “*to accommodate recreational development*”. The system plan entry for Grass River Provincial Park further specifies that the portion of the park assigned this category

- “*Promotes recreational canoeing opportunities on the Grass River system.*”

- *Accommodates recreational developments such as campgrounds and group camps, lodges, interpretive sites and trails*
- *Permits existing and future mining development, including the possibility of an all-season river crossing while recognising the recreational values of the park.”*

The remaining 75% of the park (171,625 ha) is assigned a “*resource management category.*” The Act specifies the main purpose of such areas is “*to permit commercial resource development or extraction in a manner that does not compromise the main purpose of the park classification*”. The system plan entry for Grass River Provincial Park further specifies that the portion of the park assigned this category

- *“Permits commercial resource opportunities including mining, forestry and wild rice harvesting.*
- *Preserves woodland caribou habitat and string bogs. Approximately two-thirds of this LUC is closed to forestry.”*

Overall, the new park system plan entry has reconfirmed the general principles and most specifics of the 1984 Management Plan - including the restriction of forestry to about 40% of the park and the possibility of a resource road crossing the Grass River - while reinforcing the primary importance of preserving woodland caribou habitat. As such the management plan continues to broadly guide park management and development except where the system plan explicitly states otherwise. In particular, the park system plan map designates boundaries for the two small protected areas given a backcountry category that differ from those in the management plan.

### **COMMENTS ON TOLKO APPLICATION**

The following comments are provided on Tolko’s Dickstone South Road application and related materials circulated for review. Comments consist of points of clarification regarding a Tolko conclusion or requests for additional information. The various items are referred to by page number and section number or paragraph in the application.

#### **Points of Clarification Regarding a Tolko Conclusion**

*Page 7, section 2.5.1, first paragraph* (also referred to on *Page 21, bullet a*): The application refers to the 1984 management plan having “*made allowance for the future requirement for construction of an access/utility corridor through the park to access timber and other resources north of the park*”. At the time the management plan was developed, the allowance for a utility corridor was primarily for a transmission line to serve the then-operating Spruce Point Mine at Reed Lake and secondarily for access to timber in a large area in the north part of the park given a Commercial Resource/ Recreation Zone. The management plan did not address access to harvest other areas north of and outside the park.

When the Management Plan was developed the railway across the north end of the park was still in operation. It is likely that it was viewed as access to haul

out harvest wood outside the park and possibly from the Commercial Resource/Recreation Zone inside the north end of the park. The railway was closed in the late 1980s, abandoned and eventually sold. The Spruce Point mine closed in 1992. Since at least 1990, the Department's position has been that the rail bed would not be converted for vehicular traffic in the park. Nevertheless, the possibility of converting it into a road has been raised several times, and Tolko has shown it as a road in numerous Annual Operating Plans since at least the late 1990s.

In 2004 and 2005 Foran Mining Corporation, applied-for and received approval to upgrade the short portion of the rail bed it had acquired in the park to connect to Snow Lake and its Dickstone Mine Project north of the Park. Tolko has subsequently acquired the rail bed. The Dickstone Road South proposal that Tolko has applied-for would connect to this section of the abandoned rail bed.

Given that most of the north portion of the park is closed to forest harvest, the Branch would consider a proposal to convert any other sections of the former rail bed to a road to be a major amendment of the management plan that needs to be evaluated in a similar public fashion as that used to develop the original park management plan.

*Page 11, Section 2.5.6:* The Branch is uncertain that the consultations Tolko conducted reflect all aspects of its application or presented all options.

#### **Requests for Additional Information or Clarification**

*Page 7: Section 2.5.2 item c:* The Branch requests clarification if the preference for the selected route is actually support for the route rather than opposition to hauling through the community Snow Lake.

*Page 8, Alternate Route Option 2:* Examination of the photos indicates this appears to be a shorter span.

*Page 11, Section 2.5.5, bullets:* The second bullet refers to avoiding the "vault door", and the last bullet indicates that determining the status of two archaeological sites be left until after the road is built. Their status should be determined beforehand, so any needed mitigation is implemented, rather than having possibly significant sites destroyed.

*Page 12, Section 2.6, fifth paragraph:* The Branch requires a detailed proposal on how the gates will be built and operated. Aspects that need to be addressed are how the road can be used and who can use it.

*Page 12, Section 2.6, sixth and seventh paragraphs:* The Branch requires details of the proposed bridge crossing. The affected area also involves a portage. The river is a recreational canoe route that may also be used by kayakers. The bridge design needs to indicate how such public recreational uses will be maintained. The access

route to the crossing needs to be built in such a way as to prevent unauthorized water access.

*Page 15, second last paragraph:* As indicated above, the bridge crossing site is located in an area used as a portage around some rapids. The application needs to address how this portage will be affected and maintained.

*Page 17, section on wildlife particularly caribou:* Given the primary importance for woodland caribou habitat preservation in the 1997 Grass River system plan entry and reinforced by the subsequent designation of woodland caribou boreal populations as a “threatened species” under both federal and provincial legislation, in 2003 and 2006 respectively, the Branch requires more details on what access controls will be put in place. In other areas of Manitoba where forest harvest is actively being evaluated in woodland caribou habitat, a detailed woodland caribou management plan has been developed by all involved stakeholders. Such a plan incorporates details on access controls and related aspects. Such plans are the responsibility of government, but Tolko should provide more detail on how it proposes to minimize impacts on caribou. The Branch requests a detailed program for mitigating impacts on caribou habitat, rather than recommendations of a thesis study.

*Page 17, last bullet:* More detail is requested on decommissioning. In particular, the application should address decommissioning of the entire road bed not just the access points and bridge. Other approaches to be considered include removal of other drainage crossings, scarification of the road bed, planting of trees, and other action that would speed up complete closure and regeneration of the road bed.

*Page 19, third bullet of mitigation measures:* Implications of Treaty and Aboriginal use of the road for hunting, fishing and other traditional pursuits are needed. Government is required to carry out these consultations, and the input is needed in developing a road use and management plan.

*Page 19, last bullet:* Many other options do not involve travel through Snow Lake.

## **CONCLUSIONS AND RECOMMENDATIONS**

The Branch opposes the Dickstone South All-weather Road Project in Grass River Provincial Park as proposed. The Branch prefers a road option that avoids crossing the park. At a minimum, the Branch recommends that the application be deferred until additional information is provided.

As indicated in the BACKGROUND section at the start of this memo, the possibility of a proposed road is acknowledged in both the 1984 Grass River Provincial Park Management Plan and reconfirmed in the 1997 park system plan entry for Grass River Provincial Park. However, in both documents approval of the road proposal is subject to the requirements of meeting the primary objectives for the park. In particular, protection of woodland caribou habitat is a primary park purpose and

forestry activities are permitted if they do not compromise the other park purposes. Much information has been gathered about woodland caribou in the past several years, but these have yet to be integrated into a detailed working plan that evaluates all aspects of the proposals including access to the north portion of the park. The corridor envisioned by the 1984 planning team may not be the best route to ensure sustained caribou survival in the park. Controls on use and activity on the road need to be developed beforehand.

In addition to caribou, the Branch considers that government needs to conclude consultations on implications of the project for Treaty and Aboriginal rights before the project can proceed. Such consultations need to include how any new road would be used by people exercising their Treaty and Aboriginal rights so that such use can be incorporated into the road access and management plan. Licensing and building the road before these consultations are concluded could be seen as infringing on rights and could lead to legal challenges.

### **REQUIRED LICENSE CONDITIONS IF PROJECT PROCEEDS**

Should the road be licensed and proceed without the requested delay or additional information, the Branch, as a minimum, requires the following aspects be made part of any Environment Act license that is issued. All violations of these conditions must be enforced and subject to the harshest penalties including rescinding of the license.

*Gate Entry Points:* The road is to be gated and made inaccessible to unauthorized use. In particular, the location of gates, rocks, dykes or other appropriate barriers at both terminals of the road are to be built in such a way that they cannot be easily circumvented by the cutting of a few trees or by someone with an ATV or a 4x4 vehicle. The gate may only be open when trucks are hauling logs. At such times the gate must be staffed continually, and only authorized users will be allowed to pass through. The Branch must be involved in determining who should be authorized. No copies of keys or other means of unlocking gates shall be distributed to anyone other than those approved to staff the gate. Authorized users will have to contact Tolko to arrange to have access to the road in the company of a designated gate staff person

*Access from PTH 39:* The portion of the access road from PTH 39 to the bridge crossing must be designed with one or more curves so that there is no clear line of sight from PTH 39 to the bridge.

*Crossing of the Grass River:* The proposed bridge across the Grass River must be designed in such a way and have sufficient clearance to allow recreational canoeists and other water travellers such as kayakers to pass under it safely, even during high water conditions, and maintaining as much as possible their enjoyment and expected experience of travelling along the Grass River. The existing portage near the proposed crossing must be accommodated and maintained.

Additional Mitigative Measure: The Management Plan envisioned only one crossing of the Grass River by a road and utility corridor. If Tolko receives a license for this Dickstone Road south project, the Branch requests that as mitigation the existing trestles crossing the northern part of the park be completely decommissioned by removal and cleaning up of the existing trestles and their remains.

*Woodland Caribou:* Woodland caribou populations and movements shall continue to be actively monitored during the operation of the road. If road operations are found to have a negative effect on caribou habitat and populations, use of the road shall cease so that suitable mitigative measures can be developed and implemented.

Disposition:

Several of these comments address policy matters that will be reviewed by the Department. (See Discussion and Analysis sections of this summary.) Several other comments require additional information from the proponent.

### **Manitoba Conservation - Northwest Region**

Please excuse the delay in providing these comments from the Northwest Region's IRMT in response to Tolko's Environment Act Licence proposal for the Dickstone South Road. The IRMT comments are as follows:

- It was noted in the Region's comments in November 2007 in response to the information submitted by Tolko Industries Ltd to Environmental Assessment and Licencing Branch at that time that this was not an easy or simple request to review. We found the same to be true for the Environment Act Licence proposal, perhaps largely because much of the information was the same.
- The Region noted that this proposal differs in one significant aspect compared to the information submitted by Tolko in November 2007. In the former, reference was made to the road being use to facilitate the harvest of several of the Claw Lake cutblocks that are located in the Grass River Provincial Park (which fall in the Commercial Resource / Recreation Zone in the Management Plan). However there is no reference to that in this proposal. This is not surprising in that Tolko's interest is the Dickstone South Road itself and not the cutblocks, as the volume of wood is relatively small (compared to the Loon Lake/Wheadon River to the north) and these blocks would be allocated to quota holders who may or may not sell the wood to Tolko (these operators also run their own sawmills). This complicates the evaluation of this proposal, as the cutting of these blocks is no longer a consideration in terms of this proposal but undoubtedly this will come up in one or two years time. And simply saying this area is off-limits to future logging activity may not be possible as it factors into the AAC calculation for FMU 60.
- Obviously, if everything was equal between the preferred and alternative route options shown in the proposal, the Region would be opposed to approving the

Dickstone South Road so as to maintain the relatively pristine nature of the Grass River Provincial Park in this area. If that were the case the Region would be recommending the use of Alternative Route Option 4 or 5, as the required road/rail system already exists. Alternative Route Option 2 also avoids the Park and would incorporate existing (Limestone Road) and proposed Dickstone North/Norris road) roads and the rail system. Alternative Option 3 would use the existing Chisel Lake rail bed but requires the reconstruction of two bridges across the Grass River. The Region considers Alternative Route Option 1 as being the least favourable of the preferred and alternative route options for reasons related to woodland caribou. However from the economic standpoint not everything is equal, as indicated in the proposal, with the estimated costs for the alternative route options being anywhere from \$17.0 to \$36.1 million higher than for the Dickstone South Road over the projected lifetime (note we have not considered the Alternative Route Option 1 estimate here as this is seen as the least preferred route).

- The Dickstone South Road, if approved, will create a “footprint” on the land within the Park of up to 845 ha in the form of a linear corridor 16.9 km in length and up to 50 m wide (maximum right of way width) and a bridge crossing over the Grass River as well as an unknown number and sized borrow pits. It is projected that the road will be required for 20 years, after which the bridge will be removed and the road decommissioned. This in itself will have a direct environmental effect on the landscape for well beyond the 20 years.
- Another possible environmental effect may result from the unexpected or inadvertent disruption of the natural drainage patterns that may flow across the proposed road location. It doesn't appear that Tolko expects this to be a problem and as a result has focused on the Grass River crossing in the EAL proposal. However as this will not be an “engineered” road, there is a possibility that this will occur at some locations along the road, and timely remedial work will be required.
- Perhaps the greatest effect of this road and the one most difficult to mitigate for relates to the access it will create. Experience has shown that access control will be difficult to implement and maintain and that other users will want to access the road for a number of activities. That being the case, if the road is approved the Region is recommending several measures/conditions be given consideration and those to be put in place be done in a manner so that they can be enforced as a condition of Tolko's Environment Act Licence (recognizing that they can then only be changed through a further amendment of the Licence). The reasons for this is that the Region strongly suspects that other potential users (for activities such as mineral exploration or recreational resource use) will seek the approval of Tolko to use this road, and in the case of commercial activities the company may see this as an opportunity to offset some of the construction costs. The measures/conditions the Region is recommending be given consideration include:

- The requirement for the access off Highway 39 to be done in a manner so as the road's profile where it intersects the highway is not highly visible e.g. not at right angles.
- The requirement that this road only be approved for Tolko's use and only for the purpose of haul trucks operating between the Loon/Wheadon operating area and Highway 39.
- The requirement to erect and maintain gates year round at both ends of the road to prevent the passage of vehicular traffic.
- The requirement to prohibit use of the road by ATVs (as there is a concern that boats will be hauled in and left at the Grass River crossing). This would need to be done through legislation as gates will not be effective.
- The requirement that these gates be kept closed and locked at all times throughout the year and only required Tolko staff and Conservation will be provided keys for the locks.
- The requirement that that on-site gate attendant be employed at the road's junction with Highway 39 to open/close the gate when the truck haul is taking place. This will reduce the number of persons requiring keys (which has been a problem in the past)
- The requirement that there be no temporary or all-weather access roads or trails be developed off the all-weather road, except those that may be required in association with road construction and maintenance e.g. a borrow pit.
- The requirement that all borrow pits associated with this road within the Park be restricted to the Commercial Resource / Recreation Zone and that they be designed to minimize their environmental and aesthetic impact and that the design be approved by Manitoba Conservation.
- The requirement that, if Conservation decides the need for, Tolko will develop and maintain a portage at the location of the Grass River bridge crossing.

Tolko acknowledges that a Forest Road Development Plan (FRDP) will be developed for the road in consultation with the Northwest Region IRMT and a number of the measures/conditions noted above would normally be included in that. However a FRDP does not have any real legal basis so an option here may be to make an approved and signed FRDP the condition of the EA Licence. The downside in doing this without notifying Tolko of the specific conditions if and at the time the amendment is approved is that Tolko will believe the Region is independently adding conditions after the fact.

- Comments respecting woodland caribou will be provided in a separate memo in response to several questions posed by Mr. Bruce Webb.

Disposition:

These comments can be addressed through licence conditions.

**Manitoba Conservation - Environmental Services** No concerns.

**Manitoba Culture, Heritage, Tourism and Sport - Historic Resources**

The Historic Resources Branch has no concerns with regard to this project's potential to impact heritage resources.

If at any time however, significant heritage resources are recorded in association with these lands during development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the affects of development on the heritage resources.

Disposition:

These comments can be addressed through a licence condition.

**Manitoba Agriculture, Food and Rural Initiatives - Land Use Planning and Policy Knowledge Centre** No concerns.

**Manitoba Infrastructure and Transportation**

The proposed all-weather road will be connected to Provincial Trunk Highway 39 (PTH 39). PTh 39 is a Limited Access Highway under the jurisdiction of the Highway Traffic Board. For information and reference, provided herewith is the regulation which may affect the proposal.

*Statutory Regulations*

PTH 39 is a Limited Access Highways under the jurisdiction of the Highway Traffic Board. Under The Highways Protection Act, any new, modified or relocated access to this highway or its service road (including the change in use of an existing driveway) requires a permit from the Highway Traffic Board. A permit is also required from the Highway Traffic Board for any change in the use of the land or the buildings, or to place, construct or alter any structures within 38.1 m (125 ft) from the edge of the right-of-way of PTH 39.

In addition, a permit is required from the Department of Manitoba Infrastructure and Transportation for any planting placed within 15.2 m (50 ft) from the edge of the right-of- ways of this highway.

Disposition:

This information was provided to the proponent.

### **Science, Technology, Energy and Mines - Mines Branch**

Mines Branch has reviewed the proposal and has no concerns. Please note, however, that the proposal is affected by valid mining claims issued under the authority of The Mines and Minerals Act (see faxed sketch). By copy of this e-mail, we are advising our holders (Wildcat Exploration Ltd. & W.S. Ferreira Ltd.) of your proposal. The disposition holders may contact you direct with any comments or concerns they may have.

Disposition:

This information was provided to the proponent.

### **Manitoba Water Stewardship**

- The Department strongly emphasizes the recreational and fishery values the Grass River system provides. Furthermore, in 1981, the Clean Environment Commission designated the Upper Grass River and Upper Burntwood River watersheds as “High Water Quality” surface waters (watersheds 5TA and 5TE, as shown on the current Manitoba Water Stewardship “Basins and Watersheds of Manitoba” map).
- A “High Quality Water” designation means:
  - Development should not preclude any use presently possible in these or downstream waters;
  - Development will not result in exceedences of water quality standards, objectives, and guidelines, and all life stages of all residents organisms will be protected at all times (Manitoba Surface Water Quality Standards, Objectives, and Guidelines 2002).
- When development is justified, incorporation of the best available treatment technologies is expected to minimize risk of unanticipated impacts. The following measures are recommended to ensure that water quality is protected and to avoid any possible conflict with the “High Water Quality” designation of the Upper Grass River and Upper Burntwood River watersheds:
  - Use holding tanks for sewage and grey water at field camps or any other staff housing area within these watersheds. Holding tank wastewater should be disposed at an approved wastewater treatment lagoon system;
  - A policy of only using soaps, shampoos, detergents and other cleaning products that are phosphate-free or that have 0.5 % or less phosphorus content are used in camps or housing facilities within these watersheds;
  - If fertilization is used when re-establishing vegetation on exposed and excavated areas due to road construction, only the basic recommended amount of nitrogen and phosphorus needed to establish a healthy growth should be used to reduce leaching of excess nutrients to surface waters. No more fertilizer than requirements for a single season should be applied

in a given year. The use of slow release formulations are also alternatives that should be considered;

- Maximum buffers along watercourses and water bodies for water quality protection and protection of fish resources established by forest practices guidelines need to be used. Buffer sizes should be increased above these maximums for areas known or thought to be more sensitive such as steep slopes. Any reductions of buffer sizes from recommended widths in forest practices guidelines need to be carefully considered and rationales documented by the IRMT.
- The proponent should establish a water quality monitoring program at the proposed bridge location on the Grass River and consult with Manitoba Water Stewardship on study design requirements. This monitoring program would start prior to bridge use and occur for approximately three years of use or until Manitoba Water Stewardship determines there are no significant impacts to the Grass River.
- Inform the proponent that water quality monitoring programs may be needed at other locations in the forest management unit if issues are identified during operations.
- The Department prefers Alternative Route 1 as there would be less of an ecological imprint by upgrading the existing infrastructure.
- The proponent's Environment Act Proposal identifies briefly the other routes and logistics for not accepting them (primarily economic), it focuses on the proponent's preferred route which involves the construction of a single lane clear span bridge over the river. This route is far more accessible to the public given the proximity of the river to PTH 39. This has the potential to increase fishing pressure and introduce non-native fish species as well as alter hydraulic conditions (drainage patterns, increase in runoff immediately following harvest, etc.). It will also alter the aesthetics and backcountry experience that this park is known for.
- The proponent's Environment Act Proposal repeatedly referred to a Park Management Plan that is over 20 years of age, throughout this document, as prior acknowledgement for the potential to build a road in the future. Since this Park Management Plan was established, the Department has observed the effect of initiating access to remote waters.
- The Department recognizes the economic advantages this proposed route provides the proponent. However, this development should not degrade the quality and quantity of natural resources.

Disposition:

Several of these comments can be addressed as licence conditions.

### **Canadian Environmental Assessment Agency**

We are not able to determine whether the application of the *Canadian Environmental Assessment Act* would be required for this project. We will continue to participate in the environmental assessment review process with respect to the bridge crossing, until this is confirmed.

- Indian and Northern Affairs Canada (INAC): No S.5 trigger under the *Canadian Environmental Assessment Act*.
- Department of Fisheries and Oceans (DFO): No trigger at this point. DFO has a Manitoba Operational Statement for Clear Span Bridges.
- Transport Canada (TC): Additional information has been requested from the proponent regarding the bridge crossing to determine whether TC will have a trigger under the *Canadian Environmental Assessment Act*. (CEAA advised the proponent of this request.)
- Environment Canada (EC): Comments were previously provided on December 14, 2007. EC does not have any additional comment to provide on the amendment.
- Natural Resources Canada (NRCan): No responsibility under Section 5 of the *Canadian Environmental Assessment Act*.

### **DISCUSSION:**

Prior to requesting additional information from the proponent, policy issues raised by public and TAC comments on the Proposal were discussed by representatives of the Environmental Assessment and Licensing, Forestry, and Parks and Natural Areas branches of the Department. Setting aside broad policy issues respecting resource use in provincial parks, the discussion focused on this specific project in Grass River Provincial Park. The background provided in the TAC comments from the Parks and Natural Areas Branch was reviewed, and it was agreed that additional information on caribou use of the project area was needed from the Wildlife and Ecosystem Protection Branch and the Northeast Region. (Neither of these branches had initially provided TAC comments on the project.)

### **ADDITIONAL INFORMATION RESPECTING CARIBOU (Manitoba Conservation):**

EAL Branch contacted both branches with questions concerning caribou habitat, the effect of the project on caribou habitat and use, and the effect of the project on the purpose of the park. The Wildlife and Ecosystem Protection Branch deferred comment to the Northeast Region, which provided the following comments:

When reviewing the material submitted by Tolko in November 2007, the focus of the Region's comments were on mitigating the potential effects of the harvesting cut

blocks in the Claw Lake operating area. In its EAL proposal Tolko has dropped all reference to harvesting the Claw Lake blocks within the Grass River Provincial Park. That being the case the scope of the Region's review as it relates to impacts of the EAL proposal on woodland caribou within the Grass River Provincial Park has been reduced correspondingly. With that introduction here are the answers prepared by Northwest Regional Wildlife Manager Kent Whaley provided in response to your questions of May 27, 2008 concerning woodland caribou:

*Q. Have woodland caribou used the area of the proposed road in the past?*

A. Telemetry relocation data from two studies (Reed Lake 1975-83; and Naosap 1996-2005) conducted by MC confirm use of the area by woodland caribou. Anecdotal track and animal sightings also confirm year around occurrence of individual or small groups of caribou. Available data are insufficient to accurately estimate numbers of animals using the area in proximity to the proposed road location.

*Q. Do woodland caribou continue to use the area?*

A. There currently is no ongoing monitoring of caribou in this area however it is assumed that caribou use in the area has remained similar in frequency and extent as indicated in previous studies referenced.

*Q. Would caribou reoccupy the area if not there presently?*

A. N/A

*Q. What effects will the road have on caribou?*

A. Telemetry data from the referenced studies, particularly Naosap, indicate woodland caribou readily cross all manmade linear features within their range, including PTH 39, hydro transmission lines, railways and forestry roads. Potential affects on caribou associated with linear features include loss of minor amounts of habitat (relative to the range size), disturbance associated with vehicular and ATV/ snowmobile traffic, mortality from collisions with vehicles, legal/ illegal hunting mortality, increased mortality from wolves. Such affects arising from the proposed road would be additive to those associated with all other linear features currently within the range. Whether cumulative affects of all linear features contributes to stress or mortality that is significant to the stability of these populations is unknown at the present time. Scientific literature documents caribou persistence on man altered landscapes where forest developments are directed away from critical caribou habitats.

*Q. Will the road compromise the purpose of the park?*

A. In respect to caribou, it is unlikely that the proposed road will itself, compromise the persistence of caribou populations within GRPP. Mitigation in the form of design specifications (width, route), controlled public access (gating), seasonal haul restrictions and final decommissioning will offset impacts to caribou to some extent.

Respecting possible "showstoppers" associated with the proposed harvest within the Loonhead Lake/ Wheadon River area; there will be need to consider some caribou mitigation measures for the Claw Lake operating area just north of the Park.

However for the majority of the Loonhead Lake/Wheadon River area approved in the recent amendment to Tolko, the department currently has minimal to no data on caribou numbers, distribution and movements. As a result comments on this topic could only be offered after some caribou reconnaissance monitoring has been completed; in the absence of this harvesting operations will continue to be approved using standard procedures.

It should be noted that caribou are distributed throughout Tolko's FMLA in mature conifer forested habitat and that all forest developments (forest harvesting, mining, transmission lines etc.) may to some extent affect caribou. Data collection for this species is intended to identify the core use areas and other critical habitats used by this specie and direct development in ways these habitats are protected and continue to support regional herds while at the same time allowing development to occur.

Finally I am not aware of any previous request by Tolko and its subsequent denial initially and on further appeal by the department for a road at this location.

**ADDITIONAL INFORMATION (Proponent):**

Pending resolution of policy matters associated with the project, the Environmental Assessment and Licensing Branch requested additional information on July 8, 2008 from the Proponent concerning access control and the proposed Grass River bridge. A response dated July 18, 2008 was received on July 23, 2008. This information is sufficient to allow several public and TAC concerns to be addressed through licence conditions.

**ANALYSIS:**

There are no overriding technical issues associated with this project that would preclude the issuance of an Environment Act Licence with appropriate conditions. Conditions to mitigate the effects of the project have been suggested by TAC members. With these conditions in place, it is unlikely that caribou habitat and use would be significantly affected. Other resource and park use could be similarly protected.

With respect to policy issues, as discussed in TAC comments from the Parks and Natural Areas Branch, present policy governing land use in provincial parks allows for resource use activities "... in a manner that does not compromise the main purpose of the park classification." The preservation of woodland caribou habitat is fundamental to Grass River Provincial Park, but technical advice has been provided that indicates that this purpose is unlikely to be compromised with appropriate mitigation. At a project level, the proposed road does not conflict with park land use policy.

Broader policy concerns have been brought forward concerning how this project facilitates forestry operations outside of the park, and more importantly, how this project is related to other stated policies regarding protected areas, particularly inside provincial parks. These issues, although outside of the scope of the environmental assessment of this project, require consideration at a policy level above the individual branches of the Department involved in the assessment of the project.

#### **UPDATE: Winter 2008/2009**

In November, 2008, Manitoba announced a ban on new logging in most provincial parks, and a phasing out of existing logging. This announcement applied to Grass River Provincial Park. The announcement was developed in consultation with the major forestry companies, including Tolko. The Environmental Assessment and Licensing Branch was advised by the Parks and Natural Areas Branch that the Dickstone South Road project was not affected by the announced ban on logging, and that the environmental assessment and licensing process for the project could continue.

The Northwest Region of Manitoba Conservation initiated a consultation process pursuant to Section 35 of the Constitution Act in the early winter of 2008 to determine whether the Dickstone South Road project had any effect on Aboriginal resource use in the area, and what accommodation measures might be appropriate if resource use would be affected. The consultation process concluded in mid March, 2009. Matters discussed during the process can be addressed through Environment Act Licence conditions.

#### **PUBLIC HEARING:**

No requests were received for a public hearing on the project. Technical issues surrounding the project are sufficiently understood and the policy issues have already been addressed, primarily in the logging ban in provincial parks and related matters.

A public hearing is not recommended for the project.

#### **RECOMMENDATION:**

Following consideration of public and TAC comments on the project, additional information from Manitoba Conservation and the Proponent, discussions with the Northwest Region, Forestry Branch and Parks and Natural Areas Branch, and the outcome of Section 35 consultations conducted by the Northwest Region, it is recommended that an Environment Act Licence be issued for the project. A draft licence is attached for TAC review and comment. Administration of the licence should be assigned to the Northwest Region, with technical assistance to be provided by Environmental Assessment and Licensing upon request.

PREPARED BY:

Elise Dagdick / Bruce Webb

Environmental Assessment and Licensing Branch

May 9 – June 3, 2008 Updated July 22, 2008 and March 19, 2009

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## Form Letters Expressing Concerns

No.	Name	Date of Letter	City
1	Diane Pullen	May 12, 2008	Mississauga ON L5N 8A7
2	Marjorie Kobayashi	May 12, 2008	Winnipeg MB R3M 3P3
3	Jason Orchyk	May 12, 2008	Winnipeg MB R3J 2T6
4	Scott Bias	May 12, 2008	Winnipeg MB R3R 3L9
5	Andrea Fristensky	May 12, 2008	Winnipeg MB R3T 1B4
6	Andre Lacabanne	May 11, 2008	Winnipeg MB R3T 3E9
7	Di Ingram	May 11, 2008	Brandon MB R7C 1A3
8	Mary Lacabanne	May 11, 2008	Winnipeg MB R3T 3E9
9	Eldon Schmitz	May 11, 2008	Carberry MB R0K 0H0
10	James Burr	May 11, 2008	Brandon MB R7B 3J3
11	Fred Goods	May 11, 2008	Brandon MB R7B 1W6
12	Tracey Wright	May 11, 2008	Brandon MB R2H 0W1
13	John Shearer	May 11, 2008	Winnipeg MB R2M 4N2
14	Lisbeth Savard	May 12, 2008	Winnipeg MB R2H 2X7
15	Mary LeMaitre	May 11, 2008	Winnipeg MB R3B 2Y5
16	Corey Bialek	May 11, 2008	Winnipeg MB R3T 3S7
17	Cara Brown	May 11, 2008	Winnipeg MB R3N 0V8
18	Victor Simpson	May 11, 2008	Portage la Prairie MB R1N 3C5
19	Alexis Simpson	May 11, 2008	Portage la Prairie MB R1N 0M9
20	Kathy May Simpson	May 11, 2008	Portage la Prairie MB R1N 3C5
21	Terry Boettcher	May 11, 2008	Winnipeg MB R3R 1C2
22	Deborah Judith	May 11, 2008	Winnipeg MB R3G 2C2
23	Bernadette Carlson	May 11, 2008	Winnipeg MB R2G 2R8
24	Tom Pearce	May 11, 2008	Winnipeg MB R3M 2N3
25	Leslie Taylor	May 11, 2008	Winnipeg MB R3T 4H3
26	Pat Jorgensen	May 11, 2008	Winnipeg MB R2H 1B4
27	Sandy Schirmeister	May 10, 2008	Winnipeg MB R2E 0G4
28	Jennifer Wilson	May 10, 2008	Winnipeg MB R3J 2H2
29	Vic Pople	May 10, 2008	Portage la Prairie MB R1N 2K4
30	Lynne Mellow	May 10, 2008	Winnipeg MB R2K 0T3
31	Sarah McEwen	May 10, 2008	Winnipeg MB R2K 0T3
32	Jasmine Dexter	May 10, 2008	Winnipeg MB R3G 2J4
33	Bea Cherniack	May 10, 2008	Winnipeg MB R3T 0C3
34	Jason Dawe	May 10, 2008	Winnipeg MB R3J 2J9
35	Hugh Burton	May 12, 2008	Canmore AB T1W 2R5
36	Bruce & Barb Sewart	May 10, 2008	Winnipeg MB R3J 0B1
37	Diane DeBattista	May 10, 2008	Winnipeg MB R2N 4H9
38	Jim Nickels	May 10, 2008	Winnipeg MB R3T 3G9
39	Dylan Jones-Drewniak	May 10, 2008	Winnipeg MB R3M 0S8
40	Hutzi Nickels	May 10, 2008	Winnipeg MB R3T 3G9
41	Marjolaine Axford	May 10, 2008	Winnipeg MB R3T 2L7
42	Carol J. A. Hill	May 10, 2008	Winnipeg MB R3M 0P7
43	Walter Eugene Swayze	May 10, 2008	Winnipeg MB R3T 0E3

44	Christian Bazin	May 10, 2008	Winnipeg MB R2N 2W1
45	Gisile Bazin	May 10, 2008	Winnipeg MB R2N 2W1
46	Patrick Buat	May 10, 2008	Winnipeg MB R2M 0S6
47	Gail Brown	May 10, 2008	Winnipeg MB R2M 0S6
48	Jessica Adelman	May 10, 2008	Winnipeg MB R3M 2J9
49	Lorna Cameron	May 10, 2008	Winnipeg MB R3T 0K8
50	Gwen Cave	May 10, 2008	Winnipeg MB R3G 2S1
51	Jennifer Johnsen	May 10, 2008	Winnipeg MB R3R 0X6
52	David R Bryce	May 10, 2008	Winnipeg MB R3K 0P8
53	Chris Potrebka	May 10, 2008	Winnipeg MB R3J 3G3
54	Denise Pancoe	May 10, 2008	Winnipeg MB R2J 2Y2
55	Andrew Molnar	May 9, 2008	Winnipeg MB R2C 3M1
56	Stephen Grant	May 10, 2008	Winnipeg MB R2K 2V9
57	Joy Stewart	May 10, 2008	Winnipeg MB R2W 3Z1
58	Jeffery Cottes	May 10, 2008	Winnipeg MB R2W 0G2
59	Sylvie Schmitt	May 9, 2008	Winnipeg MB R2H 1N5
60	Philip Geisel	May 10, 2008	Winnipeg MB R3T 3L4
61	Gary & Bonita Cobb	May 10, 2008	Winnipeg MB R3L 1S3
62	Fenella Temmerman	May 10, 2008	Winnipeg MB R3M 0P7
63	Bruce Little	May 10, 2008	Winnipeg MB R3G 2V6
64	Stephen Grimmer	May 10, 2008	Winnipeg MB R3T 4A8
65	Marts Luinenburg	May 10, 2008	Headingley MB R4H 1G2
66	Dawn Teasdale	May 10, 2008	Winnipeg MB R3G 2K8
67	Amber Rusnak	May 9, 2008	Winnipeg MB R2G 3Z1
68	Marjorie E. Larson	May 9, 2008	Winnipeg MB R3N 0V1
69	Margerit Roge	May 9, 2008	Winnipeg MB R3R 3R7
70	Valerie Dorwar	May 9, 2008	Winnipeg MB R3R 2H4
71	Theodor Melnyk	May 9, 2008	Pinawa MB R0E 1L0
72	Marc DeGagne	May 9, 2008	Winnipeg MB R3T 3Y7
73	Lee Treilhard	May 9, 2008	Winnipeg MB R2K 0E9
74	Karl Heymann	May 9, 2008	Winnipeg MB R2K 0P3
75	Nick Neufeld	May 9, 2008	Winnipeg MB R3P 0S8
76	Sherry Bailey	May 9, 2008	Winnipeg MB R3L 1P4
77	Adrian Ashcroft	May 9, 2008	Winnipeg MB R2N 1S7
78	Marla Simcoff	May 9, 2008	Winnipeg MB R3M 3Y
79	Russ Popp	May 9, 2008	Winnipeg MB R2C 1V3
80	Scott Nystrom	May 9, 2008	Oakbank MB R0E 1J1
81	Pat Popp	May 9, 2008	Winnipeg MB R2C 1V3
82	Clay Baumung	May 9, 2008	Brandon MB R7B 2S7
83	Sharleen Jacques	May 9, 2008	Winnipeg MB R3L 0Y2
84	Delores Christoff	May 9, 2008	Manitou MB R0G 1G0
85	Robin Bryan	May 9, 2008	Winnipeg MB R3G 0Z1
86	Linda J. Watson	May 9, 2008	Winnipeg MB R3M 1N5
87	Garry Christoff	May 9, 2008	Manitou MB R0G 1G0
88	Chantal Phaneuf	May 9, 2008	Winnipeg MB R2H 2G4
89	Tammy Kauf	May 9, 2008	Winnipeg MB R2J 4C8

90	Neil Pennie	May 9, 2008	Winnipeg MB R2K 1Y3
91	Maureen Ferley	May 9, 2008	Winnipeg MB R2J 2Z3
92	Delores F. Christoff	May 9, 2008	Manitou MB R0G 1G0
93	James A Antoine	May 9, 2008	Winnipeg MB R2G 0Y6
94	Garry E Christoff	May 9, 2008	Manitou MB R0G 1G0
95	Robert Rutkowski	May 9, 2008	Topeka KS 66605
96	Andrew Clare	May 9, 2008	Winnipeg MB R2M 0V2
97	Paul Puzio	May 9, 2008	Winnipeg MB R2V4V9
98	Matthew Morison	May 9, 2008	Winnipeg MB R3G 0Z8
99	Letty Last	May 9, 2008	Winnipeg MB R3C 3X5
100	Tyrrell Mendis	May 9, 2008	Winnipeg MB R3G 3C2
101	Karen Hammarstrand	May 9, 2008	Winnipeg MB R2K 0V8
102	Ray Knispe	May 9, 2008	Winnipeg MB R3T 0C8
103	Bronwyn Turnbull-Innis	May 9, 2008	Winnipeg MB R3M 2R6
104	Dave Taylor	May 9, 2008	Winnipeg MB R3T 1K4
105	Micah Simcoff	May 9, 2008	Winnipeg MB R3M 2J9
106	Anne McGillivray	May 9, 2008	Winnipeg MB R3M 0M8
107	Ian Band	May 9, 2008	Winnipeg MB R3I 0H1
108	Brenda Eamer	May 12, 2008	Brandon MB R7A 3E9
109	Myron Pasaluko	May 12, 2008	Winnipeg MB R2G 2T2
110	Ken Dunsmore	May 12, 2008	Winnipeg MB R3T 2W8
111	Jeff McColl	May 12, 2008	Milton ON L9T 1E1
112	Susan Lindsay	May 12, 2008	Winnipeg MB R3M 1N2
113	Kate Edwards	May 12, 2008	St. Francois Xavier MB R4L 1A1
114	Dennis Connelly	May 12, 2008	Winnipeg MB R2J 0N3
115	Carole E. Gauthier	May 12, 2008	Winnipeg MB R2W 0W8
116	Sally Hubble	May 12, 2008	Winnipeg MB R3T 0E6
117	Filmer Hubble	May 12, 2008	Winnipeg MB R3T 0E6
118	Lorraine Leo de Jong	May 12, 2008	Winnipeg MB R2H 1W6
119	Cheryl Winger	May 12, 2008	Brandon MB R7A 1R3
120	Rick Penner	May 12, 2008	Winnipeg MB R3G 2S1
121	Les McCann	May 12, 2008	Headingley MB R4H 1A6
122	Geoffrey Senichenko	May 12, 2008	Vancouver BC V6R 1T2
123	Marie Simon	May 12, 2008	Edmonton AB T5W 2S7
124	Harv Dueck	May 12, 2008	Winnipeg MB R2M 2P2
125	Chris Martin	May 12, 2008	Winnipeg MB R2V 0S8
126	John Pelletier	May 12, 2008	Winnipeg MB R2J 1T2
127	Mireille Roy	May 12, 2008	Winnipeg MB R3M 2K7
128	Michael Mowat	May 12, 2008	Winnipeg MB R3R 2S3
129	Robert Orosz	May 12, 2008	Cambridge ON N1R 5S2
130	Peter Hudson	May 12, 2008	Winnipeg MB R3N 0P8
131	Kevin Miller	May 12, 2008	Winnipeg MB R2C 4C6
132	Eric Reder	May 12, 2008	Winnipeg MB R2H 2R5
133	Billy Granger	May 12, 2008	Winnipeg MB R3L 1W6
134	Jeannine Sorin	May 12, 2008	Winnipeg MB R2H 0B6
135	Angela Chotka	May 12, 2008	Winnipeg MB R3G 1J9

136	Robert Ashley Mills	May 12, 2008	Winnipeg MB R3L 0N5
137	Rene Vielfaure	May 12, 2008	Winnipeg MB R3M 3L9
138	Amy Dick	May 12, 2008	Winnipeg MB R3M 1G3
139	Beverley Cann	May 12, 2008	Winnipeg MB R3J 2N8
140	Sara Wiebe	May 12, 2008	Winnipeg MB R3G 2H6
141	Amanda Leuschen	May 12, 2008	Winnipeg MB R3C 4J5
142	Sharon Muldrew	May 12, 2008	Winnipeg MB R3G 1R8
143	Nathan Gerbrandt	May 12, 2008	Winnipeg MB R3G 2A3
144	Clark Greenfield	May 12, 2008	Winnipeg MB R3M 2M9
145	Jodi Munn	May 12, 2008	Winnipeg MB R3G 1Z7
146	John Speer	May 12, 2008	Winnipeg MB R2C 2Z2
147	D. Donovan Wiebe	May 12, 2008	Winnipeg MB R3G 2H6
148	Robert Butler	May 12, 2008	Winnipeg MB R2W 1B5
149	Michael Isaac	May 12, 2008	Winnipeg MB R3G 1J3
150	Greg Muench	May 12, 2008	Winnipeg MB R2H 2X7
151	Lynne Fernandez	May 12, 2008	Winnipeg MB R3T 3N3
152	Paul Reder	May 12, 2008	Winnipeg MB R0E 1A0
153	Jessica Mary Benoit	May 12, 2008	Winnipeg MB R3M 1N8
154	Bruce Shefrin	May 12, 2008	Winnipeg MB R3M 3L9
155	Garrett LeBlanc	May 12, 2008	Burnaby BC V5E 2R8
156	Danielle Rioux	May 12, 2008	St. Laurent MB R0C 2S0
157	Alex Rothney	May 12, 2008	Winnipeg MB R3G 1X4
158	Manning W. Hobday	May 12, 2008	Winnipeg MB R3R 1H3
159	John Toone	May 12, 2008	Winnipeg MB R3L 1J7
160	Diane Combot	May 13, 2008	Winnipeg MB R3G 2Z5
161	David Konefall	May 13, 2008	Winnipeg MB R3M 1G6
162	Sylvie Kathler	May 13, 2008	Winnipeg MB R2M 2K2
163	Karl Steininger	May 13, 2008	Winnipeg MB R3N 1A5
164	Greg Enns	May 13, 2008	Winnipeg MB R3M 1V3
165	Beverly Anne Rawluk	May 13, 2008	Winnipeg MB R3X 2E6
166	Carl Enns	May 13, 2008	Winnipeg MB R3T 0E9
167	Leonard MacWilliam	May 13, 2008	Winnipeg MB R3J 2N8
168	Christine Mader	May 13, 2008	Winnipeg MB R3T 3K5
169	Iona Pople	May 13, 2008	Portage la Prairie MB R1N 2K4
170	Janice Clark	May 13, 2008	Winnipeg MB R3G 2A2
171	Sheila Corrigan	May 13, 2008	Winnipeg MB R3G 3W5
172	Laura Willmek	May 13, 2008	Winnipeg MB R2H 2V3
173	James Soko	May 13, 2008	Winnipeg MB R2N 1T7
174	Joanne Katz	May 13, 2008	Winnipeg MB R3N 0V9
175	Dr. Shannon Dixon	May 13, 2008	Winnipeg MB R2M 0T6
176	Casey Dixon	May 13, 2008	Winnipeg MB R2M 0T6
177	Melanie Mill	May 13, 2008	Winnipeg MB R3M 1G1
178	Lindsay Schubert	May 13, 2008	Winnipeg MB R3N 1A5
179	Armando Suba	May 13, 2008	Winnipeg MB R3C 1X3
180	Josh Drury	May 13, 2008	Winnipeg MB R3M 1C6
181	Tim O'Toole	May 13, 2008	Winnipeg MB R3X 1P6

182	Jason Allan	May 13, 2008	Winnipeg MB R4A 1C5
183	Lori Grant	May 13, 2008	Winnipeg MB R2K 1Y7
184	Stewart McEwen	May 13, 2008	Winnipeg MB R2K 0T3
185	Michelle Becker	May 13, 2008	Winnipeg MB R2M 0A2
186	Stephen Kirk	May 13, 2008	Winnipeg MB R3G 1W2
187	Kevin Desjarlais	May 13, 2008	Winnipeg MB R3C 1Y6
188	Laura George	May 13, 2008	Winnipeg MB R2J 0C8
189	Kelly Quigley	May 14, 2008	Winnipeg MB R2J 0N1
190	Emily Rivers	May 14, 2008	Winnipeg MB R2H 1Y5
191	Mike Kazina	May 14, 2008	Winnipeg MB R2K 4A2
192	Joan Rachel Roberts	May 14, 2008	Winnipeg MB R3M 1B4
193	Kim Laura Shotton	May 14, 2008	Winnipeg MB R3G 1K9
194	Corbett Draper	May 14, 2008	Winnipeg MB R3N 0K4
195	Deanna Kazina	May 13, 2008	Winnipeg MB R3L 2G9
196	Fiona Maureen Muldrew	May 14, 2008	Winnipeg MB R3G 1N7
197	Richard Moody	May 14, 2008	Winnipeg MB R3G 2T2
198	Laura Kazina	May 14, 2008	Winnipeg MB R3L 0k9
199	Ryan Germain	May 14, 2008	Winnipeg MB R3L 2G9
200	Darlene Dunn	May 14, 2008	Winnipeg MB R3G 1C5
201	Kiersten Nord	May 14, 2008	Winnipeg MB R3G 1K9
202	Kathryn MacKenzie	May 14, 2008	Winnipeg MB R3B 2S6
203	Paloma Corrin	May 13, 2008	Winnipeg MB R2V 3W7
204	Larry Powell	May 13, 2008	Roblin MB R0L 1P0
205	Dayton Powell	May 13, 2008	Winnipeg MB R3G 2P3
206	Patrick May	May 13, 2008	Winnipeg MB R3B 2W5
207	Nancy Eberhard	May 13, 2008	Winnipeg MB R3P 1N5
208	Michelle Becker	May 13, 2008	Winnipeg MB R2M 0A2
209	Kate Kehler	May 14, 2008	Winnipeg MB R3G 2S1
210	Stanley G. Enns	May 14, 2008	Winnipeg MB R3Y 1P1
211	Lisa D Squair	May 14, 2008	Winnipeg MB R3G 2S1
212	Megan Wegert	May 14, 2008	Winnipeg MB R3K 0L8
213	Joanne Clark	May 14, 2008	Winnipeg MB R3J 2L3
214	Natalija Subotincic	May 14, 2008	Winnipeg MB R2M 3Z3
215	Curtis Wiebe	May 14, 2008	Winnipeg MB R3C 1Y9
216	Suzanne Bremault	May 14, 2008	Winnipeg MB R3G 1N9
217	Pauline Nembhard	May 14, 2008	Winnipeg MB R2N 1G4
218	Joe Dokuchie	May 14, 2008	Winnipeg MB R3G 2K8
219	Keith Schinkel	May 14, 2008	Winnipeg MB R2J 2A3
220	Dianne Ross	May 14, 2008	Winnipeg MB R3L 0T4
221	Kendall Thiessen	May 14, 2008	Winnipeg MB R3B 2T8
222	Natalie Lukowycz	May 14, 2008	Winnipeg MB R3L 0L5
223	Glenn Duncan	May 14, 2008	Winnipeg MB R3G 1K2
224	Noreen Duncan	May 14, 2008	Winnipeg MB R3G 1K2
225	Michael McIsaac	May 14, 2008	Winnipeg MB R3M 1K1
226	Katharina Nuss	May 14, 2008	Winnipeg MB R3G 1P1
227	Nicole Lahaie	May 14, 2008	Winnipeg MB R3C

228	Dianne Scoles	May 14, 2008	Winnipeg MB R3G 1R6
229	Allison Peters	May 14, 2008	Winnipeg MB R3C 2A6
230	Cory Storm	May 14, 2008	Winnipeg MB R2G 4E8
231	Alon Weinberg	May 14, 2008	Winnipeg MB R3C 1X6
232	Co Lam	May 14, 2008	Winnipeg MB R2R 2W5
233	Bernadette Sabourin	May 14, 2008	Winnipeg MB R2H 1T1
234	Summer Hansell	May 14, 2008	Winnipeg MB R3E 2J1
235	Kathryn Funk	May 14, 2008	Winnipeg MB R3L 1T7
236	Andrew Majewski	May 14, 2008	Winnipeg MB R3L 1T7
237	Jeffrey Thiessen	May 14, 2008	Winnipeg MB R3G 1P1
238	Paul Morgan	May 14, 2008	Vancouver BC V6K 1H6
239	Arun Jagdeo	May 14, 2008	Winnipeg MB R3E 0M2
240	Sally Nystrom	May 14, 2008	Winnipeg MB R2K 0M5
241	Karla Funk	May 14, 2008	Winnipeg MB R2H 2M6
242	Jason Hildebrand	May 14, 2008	Winnipeg MB R3G 1P1
243	Nancy Hall	May 15, 2008	St. Norbert MB R3L 0V9
244	Mona Sobkowich	May 15, 2008	Winnipeg MB R3G 3G3
245	Dave Hololwaty	May 15, 2008	Winnipeg MB R2K 1C8
246	Robert Loiselle	May 15, 2008	Winnipeg MB R2H 1Y3
247	Katharine Wiebe	May 15, 2008	Winnipeg MB R3C 2A7
248	Patricia Janzen	May 15, 2008	Winnipeg MB R3G 2N5
249	Wilfred Neufeld	May 15, 2008	Winnipeg MB R3G 2N5
250	Eric Stutzman	May 15, 2008	Winnipeg MB R3M 1A8
251	Bernard Ferguson	May 15, 2008	Winnipeg MB R2L 0G4
252	Clark Cunningham	May 15, 2008	Winnipeg MB R3T 1E9
253	Kris Halderson	May 16, 2008	Winnipeg MB R2G 0S7
254	Mark Courtney	May 16, 2008	Winnipeg MB R3L 1G6
255	G. Salmon	May 16, 2008	Winnipeg MB R2H 3B8
256	Sandra Klowak	May 16, 2008	Winnipeg MB R2J 1L4
257	Kath Kolotylo	May 16, 2008	Winnipeg MB R2H 2R5
258	Scott West	May 16, 2008	Winnipeg MB R3G 2Y4
259	North W. Reder	May 16, 2008	Winnipeg MB R2H 2R5

## Form Letters Supporting Project

No.	Name	Date of letter	City
1	Doug Hunt	May 15, 2008	The Pas MB R9A 1M2
2	Joyce Totte	May 15, 2008	The Pas MB R9A 1M3
3	Paul Chapman	May 15, 2008	The Pas MB R9A 1K7
4	William Aaron Goethe	May 15, 2008	Swan River MB R0L 1Z0
5	Rhonda Lukey	May 15, 2008	Swan River MB R0L 1Z0
6	Paula Lynn Jones	May 15, 2008	Swan River MB R0L 1Z0
7	Ward Perchuk	May 15, 2008	Swan River MB R0L 1Z0
8	Eleanor Douglas	May 15, 2008	The Pas MB R9A 1L4
9	Darren M Atkinson	May 15, 2008	Durban MB R0L 0P0
10	Greg Slack	May 15, 2008	Swan River MB R0L 1Z0
11	Rick Bobby	May 15, 2008	Swan River MB R0L 1Z0
12	Laurie Totte	May 15, 2008	The Pas MB R9A 1S4
13	Greg Petryk	May 15, 2008	Cranberry Portage MB R0B 0H0
14	Michelle Petryk	May 15, 2008	Cranberry Portage MB R0B 0H0
15	Nick Totte	May 15, 2008	The Pas MB R9A 1M3
16	Lorraine Petryk	May 15, 2008	Cranberry Portage MB R0B 0H0
17	Michael Petryk	May 15, 2008	Cranberry Portage MB R0B 0H0
18	Travis Romanchuk	May 16 2008	The Pas MB R9A 1S3
19	Shayne Elliott	May 16, 2008	The Pas MB R9A 1R7
20	Tim Chotka	May 16, 2008	Swan River MB R0L 1Z0
21	Ione Anderson	May 16, 2008	Swan River MB R0L 1Z0
22	Don Aikman	May 16, 2008	Wabowden MB R0B 1S0
23	T. K.	May 16, 2008	Swan River MB R0L 1Z0
24	Pete Peters	May 16, 2008	Swan River MB R0L 1Z0
25	Vern Bauman	May 16, 2008	Kenville MB R0L 0Z0
26	Paul LeBlanc	May 16, 2008	Swan River MB R0L 1Z0
27	Ted Unrau	May 16, 2008	Bowsman MB R0L 0H0
28	Brian Nickel	May 16, 2008	Swan River MB R0L 1Z0
29	David Lund	May 16, 2008	Swan River MB R0L 1Z0