

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Kortrek Corporation
PROPOSAL NAME: Atikaki Ecolodge and Wilderness Resort
CLASS OF DEVELOPMENT: Two
TYPE OF DEVELOPMENT: Recreation
CLIENT FILE NO.: 4175.00

OVERVIEW:

The Proposal was received on May 16, 1996. It was dated May 14, 1996. The advertisement of the proposal was as follows:

“A Proposal has been filed by the Kortrek Corporation to construct and operate an ecolodge and resort at Maman Lake immediately west of Little Grand Rapids. The operation would include a lodge, primitive campgrounds, an outfitting service, an interpretive boreal research centre and an outdoor education facility. Outcamps would be operated on Vickers Lake and Eardley Lake. Canoeing, rafting, natural history and cultural tours would be provided through Wilderness Odysseys Ltd.”

The Proposal was advertised in the South-East Times on Friday, June 7, 1996 and in the Selkirk Journal on Monday, June 10, 1996. It was placed in the Main, Centennial and Eco-Network public registries. It was also distributed to TAC members on May 31, 1996. The closing date for comments from members of the public and TAC members was July 9, 1996. This date was informally extended until July 15, 1996 to accommodate some interested members of the public.

COMMENTS FROM THE PUBLIC:

Six public responses were received by July 15, 1996. One late response was also received.

Don Finkbeiner (McDonald Worldwide Travel) Supports the project. For Manitoba to keep pace with other countries and provinces there is a great need to establish resort facilities such as those proposed. This proposal would attract international tourism and create jobs and stimulate the Little Grand Rapids economy. The Proponent is very professional and extremely dedicated to the protection of the environment.

Scott Compton (Thunderbird Lodge and Outposts - Harrop Lake Camp) (1) Any development by other commercial entities will adversely affect our outpost operation at Eardley Lake. Interested in making representation against the proposal.

Disposition:

The number of operations in an area is a matter which falls under the jurisdiction of the Licensing Advisory Committee (LAC). All concerns received on the proposal have been forwarded to the LAC.

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Ralph Rutledge (Shining Falls Camps and Outposts) Numerous lodge operators in the Little Grand Rapids area have a great concern regarding the latest application. Wilderness Odysseys Ltd. presently operates whitewater rafting in this location. Several problems have been encountered with their operation: non-consumptive tours - on Family Lake before the Shining Falls portage, we have observed them fishing in several locations. Fish remains were left on the shoreline and in the water. Cans and bagged garbage were left on the Shining Falls portage. This material was disposed of in our landfill site. Other operators have observed the same problems. Although the proponent mentions a lot about environment impact, his past practices have left a lot to be desired.

All locations of proposed establishments with the exception of Maman Lake have occupancy by existing lodges. The prime activity in the area is angling; the proposal indicates more angling will occur. If further development occurs, we ask why we have been regulated and allocated only certain areas. In the past, all operators have respected each others allocations and have not allowed guests to pass these boundaries. This has resulted in friendly competition, satisfied customers and good fish stock management. Locations and occupancy from existing operations are as follows: Family Lake - Little Grand Rapids Lodge, local residents of Little Grand Rapids, Shining Falls Lodge. Fishing Lake - Fishing Lake Lodge, local residents of Paungassi. Berens River - Norse Lodge Outpost. Poplar River - Norse Lodge Outpost, Cobham River Outpost. Pigeon River - Amphibian Lake Lodge, Norse Lodge Outpost. Bradburn River - Shining Falls Outpost. Eardley Lake - Thunderbird Lodge Outpost. Most of these rivers are also used by the general public.

Maman Lake is a very small lake that does not meet the 500 ha recommended size for commercial operation. There are no substantial water inlets or outlets and the lake is very shallow. It would not support angling, so angling would have to take place in waters which are already allocated. The Sand Beach east of Maman Lake on Family Lake is not exactly right. All sand beaches on Family Lake have been under water for the past two years. During high water conditions the areas behind the beaches are flooded with approximately six to eight inches of water. Development would require extensive tree and brush removal and land fill. All locations proposed are in areas with good angling and there is no question that angling would occur. Existing lodges work closely with Manitoba Natural Resources to conserve fish stocks and ensure top quality angling for an indefinite period of time. Many customers who formerly fished in Ontario speak highly of how the Manitoba government and operators manage their resources. Prior to any new allocations, present operators should have input and priority for expansion.

With respect to Vickers Lake, the writer was told no development would be considered in Atikaki Park until a study for a wilderness park was completed. Wilderness Odysseys has an existing campsite building that does not conform to DNR regulations.

The proposal is well written, but close observation shows numerous flaws that should be dealt with. The deadline for comments should be moved back to October or November when existing operators would be available to meet with the departments involved and discuss the proposal. There should be representation by the MLOA (Manitoba Lodges and Outfitters Association) on any decision making.

Disposition:

Most of the concerns raised are within the jurisdiction of the LAC. Additional information has been requested on solid waste handling practices. ...3

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Scott Compton (Thunderbird Lodge and Outposts) (2) Further to earlier correspondence, an elaboration on concerns, specifically with plans to establish an outcamp on Eardley Lake. The writer operates the only commercial operation on the lake (an eight person outcamp.) Guests are looking for a remote wilderness experience, and many have moved from Ontario operations in search of the privacy offered by a single cabin lake. The occasionally used existing private cottage on the lake deters some potential guests seeking a true outpost experience. All guests asked about the proposed operation question the longevity of the existing operation. The search for privacy is what is driving the shift from main lodge to outpost. As an alternative to the proposal, there are many areas along the Berens, Pigeon, Etomami and Assinika rivers where an outpost could safely be serviced by floatplane. Several lakes along these rivers do not have commercial operations presently on them. Please advise if there is a public hearing on this issue.

Disposition:

These comments have been forwarded to the LAC.

Alice Chambers Ecotourism is like the term sustainable development in that it can be misused to disguise business as usual. The term is being used to describe activities such as snowmobiling and outfitting. Some of the ideas in the proposal are extraordinary but would require a huge capital outlay with no guarantee of reasonable returns. Other ideas are quite preposterous unless the proponent is a multimillionaire who could actually fund the research, conventions, etc. The writer has not found anyone who is aware of a Granite Ridge Boreal Research Centre in Manitoba. Further explanation is required. After reviewing supplementary material, the writer became much more concerned about the scant information provided and the potential overall effects of the proposal. There is little substance in the proposal - it is a conceptual plan only, and requires considerably more detail to fulfill the requirements of a submission in MR 163/88.

Environmental concerns: What is the justification for another lodge and further rafting/canoeing/boating in and around our only wilderness park? There are already more

lodges and camps in the park than one would expect in a wilderness park, and another operation will further strain the wilderness definition. With lodges come trails, roads, hydro lines, wastewater and sewage treatment and disposal, garbage disposal, caches for oil, gas, canoes, rafts and supplies, perhaps shelters to protect these supplies, effects on traditional use of the area, etc. The proposal does not adequately address these problems. Since the proposal is for a year round operation, what would the tourists do in winter? Ski or snowmobile trails are not mentioned, but presumably this is the type of entertainment which would be required. New trails should not be built in or near the park. How much development/habitat fragmentation can occur and still allow an area to be defined as pristine? How do compostable toilets work in winter and are two enough? A central shower using cold water will not be appreciated in winter, spring and fall and perhaps not even in summer. Similar concerns exist for the lift pumps for water, the bioconversion systems for wastewater, and greywater recycling. What evidence is there that these treatments will be effective in the climate? Traditional systems may be needed until the proposed newer systems are proven to be dependable. Although a number of words and phrases are used denoting preservation, etc., the proposal is certainly not benign to the environment and the effects would be scattered across many lakes and rivers. Why would roads and cars be needed if water is to be the means of transportation? Hydro and telephone lines are major impacts on a wilderness area, creating predator and poaching corridors. Under Policy 5 of the Planning Act, existing developments are to be protected

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from socioeconomic impacts of newer ones. Overuse and degradation are to be avoided.

Societal and economic concerns: The proponent has been operating long enough in the area to have a track record with First Nations people and his suppliers and employees. What is his relationship with local people? Would he employ local aboriginal people for the interpretive centre or bring employees from the U. S.? What are the past practices? It is essential that Little Grand Rapids people be consulted and their views be included in a review of the project. What relationship does the proponent have with local MNR staff who have dealt with him in the past? Does he have the financial backing to complete plans if the operation is licensed? A half built lodge or a development which causes considerable environmental disruption and cannot be finished or used is not needed. Have market surveys been done to show the feasibility of the proposal, and has the proponent built similar successful operations elsewhere? A river rafting, kayaking and outfitting operation is considerably simpler and different from the development described in the proposal.

If the proponent is serious about the project, guidelines should be issued to deliver a much more thorough proposal. The proposal should demonstrate that the development is needed, will not affect the wilderness of the area, is supported by Little Grand Rapids, is feasible and will result in little or no environmental degradation. There should be no licensing of activities which affect Atikaki Provincial Park until the Parks and Natural Areas public consultation process is completed and there is a final plan for our only wilderness park.

Disposition:

Additional information has been requested to address concerns about waste management and infrastructure. Most of the remaining concerns are LAC considerations. With respect to licensing activities which affect Atikaki Park, the environmental assessment and licensing process will be coordinated with MNR through the LAC.

Tom Johnson (Whiteshell Air Service Ltd.) 1) Emphasis on use of Canadian and Aboriginal resources: Wilderness Odysseys Ltd. has always brought its help and supplies from the USA. 2) Emphasis on use of recyclable materials: good in theory, but all materials have to be returned to Winnipeg for final recycling. 3) Simplicity in design: commercial facilities with handicap access must meet current Manitoba building and fire codes. This could be a real challenge with rocks and logs. 4) Developing Manitoba's eco-tourism industry: this proposal appears to be an application for a full service outfitter, with eco-tourism as a sideline. 5) Family Lake, Fishing Lake, Berens River, Poplar River, Pigeon River and Bradborn River all have full service outfitters. 6) Seaplane base - Maman Lake: not practical due to the size of the lake. 7) Wilderness Odysseys Ltd.: currently operating out of a non-compliance structure on Vickers Lake. 8) A project of this size requires an incredible amount of organization and financial backing. A flawed development could seriously harm tourism in the region.

Disposition:

These comments have been forwarded to the LAC.

Peter Miller (1) The following observations were made at a recent meeting of the Manitoba Environmental Council. MEC has not had the opportunity for a detailed review.

1. There is a recognition that ecotourism is a growing industry and may yield sustainable

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benefits to local communities provided that appropriate standards and criteria are in place. 2. There is concern that such standards have not yet been developed for Manitoba and thus a fear that the development might not be done appropriately. 3. One set of criteria pertains to ecological impacts and impacts on the wilderness values of Atikaki Park and its surroundings. 4. Another set of criteria pertains to whether or not there are sustainable benefits to local communities arising from the development. 5. Related to these is the question of impacts on existing and potential aboriginal land use, including ecotourism initiatives. Are there local aboriginal partners in this enterprise in both its cultural and business aspects? 6. There is a question of cumulative impacts. Is a new lodge necessary or can a partnership be formed with an existing lodge?

The following observations are the writer's:

7. There is a growing literature on standards and other considerations for ecotourism. The World Tourism Organization has developed a set of standards which should be incorporated into any review of the proposal. 8. It is very important to consult local communities when land interests are affected. Alienation of land interests should not occur for the community of Little Grand Rapids. 9. The proposal of the Pine Falls Paper Company to extend the East Side Road northwards to access timber is a potentially competing interest. Wilderness in Canada is becoming increasingly valuable from a socio-economic standpoint. The proposed development by a U.S. interest is a further demonstration of that point. It becomes increasingly critical how we allocate and manage this diminishing public resource. A limited number of operations can be accommodated, each of which adds to a cumulative transformation of the wilderness character of a region. Allocations to one party limits the availability to others unless the character of the region is allowed to be transformed. With the value of this development resting primarily on Manitoba's natural assets, we should look for a major return in social benefits as well as the maximum protection of those assets. 10. Manitoba has subscribed to other relevant sustainable development policies, including *Manitoba's Forest Plan* and the Canadian Council of Forest Ministers *Defining Sustainable Forest Management: A Canadian Approach to Criteria and Indicators*. In other parts of the province, major land use allocations have been made without following the Manitoba Forest Plan. This is an opportunity to follow the process outlined in the plan prior to further development. The Criteria and Indicators document stresses the sustainability of benefits to forest dependent communities and a deeper level of aboriginal participation in forest management. 11. The proposal material on file in the public registries is scant. Manitoba Environment should issue environmental assessment guidelines if it is determined that the proposal fits a publicly developed regional land use plan. 12. The stated intentions of the proposal are positive, but are they credible? 13. Specific concerns to be addressed include sewage and waste management strategies and their impacts, the impacts of the development on the wilderness aesthetic values of the region, the impacts of hydro lines and roads, the impacts of increased air and boat traffic in and around Atikaki Park, the impacts of outcamps, the extent, kinds and guarantees of local benefits, impacts on other operations, and the extent of management involvement and oversight by the local community. 14. A process is needed to assess the proposal which first develops ecotourism guidelines and a regional land use plan with public input, then assesses the proposal against these documents. The community of Little Grand Rapids also needs to do development planning to determine the place of the proposal. The proponent should submit more detailed plans and studies, and the Clean Environment Commission should establish a panel to assess the proposal. The panel should include representation from Little Grand Rapids and informed naturalists. 15. The proposal should have been advertised in Winnipeg.

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We are not in a position to assess the benefits and impacts of the proposal. A better assessment should be done before the character of the area east of Lake Winnipeg is changed irreversibly through piece-meal development.

Disposition:

Additional information has been requested to address a number of the comments raised. A copy of the World Tourism Organization ecotourism guidelines is being ordered. These comments have been forwarded to the LAC.

Peter Miller (2) Attaching a copy of the “Licensing Advisory Committee General Guidelines”, which provide a partial answer to the question of whether provincial standards and criteria for ecotourism exist. Some comments on the guidelines as they apply to the earlier letter:

1. There should be opportunities for comment during the guideline review. In particular, the guidelines should reflect the concepts of Manitoba’s Forest Plan. 2. Guideline 5 states that optimum sustained use of the renewable resource is the first priority, but it does not define optimum. 3. It is not clear how the priorities are applied when there are not simultaneous rival applications for the same water system. Can a non-resident establish an operation which forecloses on future operations by local residents on a lake? Perhaps time limits are needed for non-residents, or partnerships should be required with the local community.

Disposition:

These comments apply to LAC guidelines. They have been forwarded to the LAC.

Peter Czorny (Amphibian Lake Lodge) Serious reservations about the motives of the proponent, as well as his ability to carry out the proposal. A description of a July, 1994 Wilderness Odysseys whitewater rafting trip on the Pigeon River is provided in the letter.

Disposition:

A similar letter has already been provided by the writer to the LAC.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Manitoba Environment - Eastern-Interlake Region Several concerns should be addressed in the licence: used oil products and other regulated hazardous wastes should be collected and disposed of in accordance with legislation requirements. Fuel storage areas should be at least 100 m from any body of water and should comply with MR 97/88R. Sealed engineered plans for the water supply and distribution system and for the wastewater collection, treatment and disposal system for the entire development should be submitted for approval prior to construction to ensure compliance with Public Health Act and Environment Act regulations. Any composting toilet system used must be a self contained system which conforms to N.S.F. International Standard 41 - *Waste water Recycle/Reuse and Water Conservation Devices*. Non-recyclable solid wastes must be collected and disposed of at a solid waste disposal ground which has been approved and

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permitted by the Department. Docks must not be constructed of wood treated with organic preservatives. Compliance is required with MR 339/88R dealing with the storage, handling, preparation and serving of food to the public.

Disposition:

These recommendations can be included as licence conditions.

Manitoba Environment - Water Quality Management Specific detail is lacking in virtually all areas where specific information is required to provide an evaluation of impact upon various environmental sectors. Detail is required to evaluate the integrity and effectiveness of the “bioconversion systems” proposed for wastewater processing. Items which should be included are detailed descriptions of operating principles, proposed size (and justification for same), specifics of construction, proposed location, design efficiency under winter and summer operating conditions, proposed discharge times and locations, etc. Information is not provided concerning the handling, treatment and disposal of sewage and solid waste from the resort. No attempt is made to describe how the development might incorporate the principles of sustainable development. No attempt is made to explain how traditional uses of the area by First Nations will not be infringed upon. The term “composting toilet” is not familiar. A detailed description and discussion of the greywater collection system and the recycling system is required.

Disposition:

Additional information has been requested to address these comments.

Historic Resources Branch No heritage resources have been recorded on Maman Lake, but there is potential for such resources to be present. Several archaeological sites were recorded along the Pigeon River between Amphibian and Round lakes and there is potential that similar heritage resources are located along the shoreline of Maman Lake. Given the lack of extensive soil development, these resources would not be deeply buried, and the construction of lodges, trails, campgrounds and cultural centres could impact intact heritage resources. In addition, potential heritage resources such as rock mosaics are often impacted by realignment when there is increased tourist traffic in an area. The proponent may be required to conduct a heritage resource impact assessment in the areas at Maman Lake that will be cleared. The Branch would make a list of qualified heritage resource consultants available to the proponent and assist with terms of reference for the impact assessment.

Disposition:

The requirement for a heritage resource impact assessment can be included as a licence condition.

Mines Branch No concerns.

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Highway Planning and Design Branch No major concerns. The proponent should contact the Regional Technical Services Engineer for specific information on the winter road system in the immediate vicinity of the proposed development.

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Disposition:

This comment will be forwarded to the proponent for information.

Community Economic Development Services No planning concerns.

Medical Officer of Health, Thompson Region The proposal apparently considers serving 35 people in a resort and 48 people in a campground and utilizing up to 48 staff. Untreated and untested water from the lake is to be utilized for drinking and washing and wastewater is to be processed through unidentified "bioconversion systems." Two "decomposting toilets" are to be available for those 80 guests and 48 staff, and no toilet facilities are identified for outcamps and boat caches. There is no mention of arrangements for food preparation or eating facilities. There are first aid requirements for facilities like this which are probably implicit but should be part of a complete environmental health assessment. Garbage disposal is also a concern, and the performance of all water, sewage and garbage disposal systems in winter is unknown.

Disposition:

Additional information has been requested to address these concerns.

Natural Resources MNR is not prepared to respond to the proposal at this time. MNR through the LAC has indicated a need for a substantial amount of additional information from the proponent before it will be in a position to make recommendations on any tourism licensing components of the application. MNR has requested that an appropriate development proposal be prepared and that the proponent consult with staff of IT&T and MNR to discuss specifics. Concerns were outlined in a letter of May 23, 1996 to the proponent and a response is awaited.

MNR recommends that the proposal be deferred until the additional information requested from the proponent is reviewed by the LAC.

Disposition:

Copies of all responses to the Environment Act Proposal have been forwarded to the LAC. Further environmental assessment and licensing activities will be coordinated with the LAC. The proponent has been advised that an Environment Act Licence would not be issued before the LAC is satisfied with information on the proposal.

Canadian Environmental Assessment Agency Application of the *Canadian Environmental Assessment Act*. with respect to this project will not be required. DFO and the Canadian Coast Guard need additional information to complete their reviews of the project.

Fisheries and Oceans The information provided is insufficient to determine the potential impact of the proposed work on fish and fish habitat. Information is needed to determine if the project, with the implementation of appropriate mitigation measures, will result in the harmful alteration, disruption or destruction of fish habitat. Further information is also required regarding the design and operation of the proposed intake to

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evaluate its potential for the impingement and entrainment of fish. A complete description of the project should be provided, outlining all potential activities that may impact on fish and fish habitat. Important fisheries resources and habitat within the project area should be identified, and appropriate mitigation or compensation measures to ensure no net loss of habitat should be described. An assessment of the significance of residual impacts should also be provided. Once DFO receives the requested information, a determination will be made concerning the need for authorizations under The Fisheries Act. If an authorization is needed, DFO would be a Responsible Authority under CEAA. If not, DFO would provide specialist advice regarding fish and fish habitat to ensure that appropriate mitigation measures to protect fish and fish habitat are met.

Disposition:

Additional information has been requested to address these comments.

Canadian Coast Guard More information is needed before the Coast Guard can assess.

Disposition:

Additional information has been requested.

PUBLIC HEARING:

A public hearing is not recommended for this project at this time. This recommendation will be reviewed following the receipt and review of the requested additional information.

ADDITIONAL INFORMATION:

Additional information was requested to address concerns identified in the preliminary review of the Proposal. A letter requesting the information was provided to

the Proponent on July 23, 1996. A response dated September 9, 1996 was received on September 12, 1996. This response was distributed to interested members of the public for comment. One comment was received.

Alice Chambers Most original concerns remain because there is still little in the way of the requested details or specifics, just general statements with no examples to demonstrate the feasibility of the proposal or the Proponent's level of expertise. Geo-Lite Systems does not have an established history of utilization of their units in climates such as ours. It appears that Canadian use of these systems has mainly been in summer cottages in Ontario for family sized operations. Who will monitor the efficiency / safety of the sewage and greywater systems that will be used? Under solid waste management, no mention is made of waste building materials or other bulky wastes. Pit privies will likely be the norm rather than solar powered self contained composting toilets at remote sites. Otherwise, how would they be heated to ensure that composting took place? Vandalism would also be a concern.

Do guide staff have para-medical training? Is the Little Grand Rapids nursing station prepared and able to accept clients requiring medical attention? Are there many four star fishing lodges nearby with professional guides? If there are, is there any justification to add

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another lodge? Statements in the information indicate that the Proponent does not have the support of local people. Has Hydro indicated support for the use of their cleared rights-of-way for roads? Most wilderness camps have wood fires - will there be no wood fires at any of the proposed venues?

The proposal is lacking in specifics, Manitoba Environment does not have the staff to monitor the development, and there is no proven need for another operation in the area, especially if the area is already pressured. This proposal should be turned down. Even if the Proponent had the confidence of the local people and was prepared to hire them, there must be working examples of the proposed water and waste treatments in which the climate, size etc. of what is being proposed is duplicated.

Disposition:

Remaining concerns about the operation of water and waste systems can be addressed as licence conditions.

Little Grand Rapids First Nation: A letter from the Little Grand Rapids First Nation dated October 7, 1996 was sent to the Minister of Industry, Trade and Tourism. A copy of the letter was provided to Manitoba Environment by the LAC. The Chief and Council of the Little Grand Rapids First Nation requested that the development not be approved. Council noted that any development initiative should benefit the Little Grand Rapids and Pauingassi First Nations, and that further undertakings should be done in consultation with the First Nations.

A faxed memorandum was received on September 20, 1996 from the Historic Resources Branch indicating that a survey of the lodge site and other areas of potential interest had been completed. No heritage resources were recovered during the survey and the Historic Resources Branch has no further concerns with the Proposal.

OTHER APPROVALS - LICENSING ADVISORY COMMITTEE:

Following a meeting of the Licensing Advisory Committee on October 17, 1996, a letter approving portions of the Development was sent to the Proponent on October 25, 1996. Construction of the main lodge was approved subject to conditions. Construction of remote caches, warmup shelters and docks was also approved subject to conditions. Construction approval for outposts was deferred.

RECOMMENDATION:

The circulation of additional information on the Proposal to interested members of the public produced only one response. There appears to be no reason to alter the preliminary recommendation concerning a public hearing. The lack of public response is not interpreted to mean that the members of the public who originally expressed concerns are now satisfied with the project. However, it is likely that any further comments on the project from the public will be directed to Natural Resources or any of several ministers responsible for departments with an interest in the Proposal. Since all environmental concerns can be addressed as licence conditions, and since the Licensing Advisory Committee has approved the establishment of portions of the proposed operation, it is

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recommended that that the Development be licensed under The Environment Act subject to the limits, terms and conditions as described on the attached Draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to the Eastern-Interlake Region. The approval of plans should remain with Environmental Approvals. Plans should be reviewed for approval with department staff, DNR staff and DFO staff as appropriate. A meeting should occur between the Proponent, Eastern-Interlake Region staff and Approvals staff to review the finalized licence and clarify to the Proponent which branch of the Department is responsible for each term.

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December 11, 1996

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