Helios Hernandez 16 Valley View Drive Winnipeg, MB R2Y 0R6

February 19, 2013

Ms. Jennifer Winsor
Environmental Engineer
Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
Suite 160, 123 Main Street
Winnipeg, MB R3C 1A5

Dear Ms. Winsor:

I have reviewed EAL File 5621.00, the Hudson Bay Mining & Smelting Co., Limited (HBM&S) Reed Mine Proposal in Grass River Provincial Park, and offer the attached comments.

I do not support the Proposal and I request that it not proceed for further consideration. If the Proposal proceeds for further consideration, however, I request that a Clean Environment Commission hearing be held to address the issues and concerns associated with this Proposal, as detailed in my comments. These comments are largely taken from previous submissions I have made to proposed peat mines, both inside and outside of provincial parks, and expanded upon in my submission to *Tomorrow Now-Manitoba's Green Plan*. Thank you.

Yours truly

"Original signed by"

Helios Hernandez

Encl.

# HUDSON BAY MINING & SMELTING CO., LIMITED (HBM&S) – REED MINE DEVELOPMENT - EAL FILE 5621.00

**Submitted by Helios Hernandez** 

#### Introduction

I have over 40 years of experience as plant ecologist and impact assessment specialist both in the private sector and in government. The most recent 27 years included a major focus on parks and protected areas. The following comments are drawn from this experience, and rely on publicly available documents. Some of these comments are adapted from submissions I have made previously as a private citizen to Environment Act Licensing proposals for peat mines, to provincial park management plans, and to "Tomorrow Now - Manitoba's Green Plan".

I support the concerns for the Reed Mine Proposal published in the Winnipeg Free Press: <a href="http://www.winnipegfreepress.com/local/idea-of-copper-mine-in-park-angers-environmentalists-189488141.html">http://www.winnipegfreepress.com/local/idea-of-copper-mine-in-park-angers-environmentalists-189488141.html</a>, and request the project not proceed. If review of the Proposal proceeds further, I request a Clean Environment Commission Hearing be held to address the issues discussed below related to mining, generally and in provincial parks in particular.

Page 4 of "Tomorrow Now - Manitoba's Green Plan" states: "This document sets out an eight-year strategic action plan for mobilizing Manitobans to work together to protect the environment while ensuring a prosperous and environmentally-conscious economy." To address this, "Tomorrow Now" lays out a series of policies, proposals, activities, plans and commitments, as ways of balancing the needs of protection and development.

In my opinion, although many of the items proposed in "Tomorrow Now" go a long way towards achieving its stated objective, "Tomorrow Now" does not always successfully meet or address the competing goals of protection and development. A Clean Environment Commission hearing would be able to examine the issues that need to be resolved where conflicts between development and protection need more consideration, especially where existing policy and decisions seem to contradict the "Tomorrow Now" stated objectives.

## The Precedent of Removing Logging in Provincial Parks

In February 1992, the Manitoba Clean Environment Commission (CEC) issued its "Report on Public Hearings Abltibi-Price Inc. FML #01 Forest Resource Management Plan 1991-1998' (94 pp). Hearings were held October 16-19 and November 16, 1991. The CEC considered both oral and written evidence submitted by participants. After considering the evidence presented, regarding Nopiming, the Commission recommended that:

- "Nopiming Provincial Park shall cease to be used as a source of wood fibre for commercial forestry as of three years from the date of issuance of the licence, but in any case no later than 1 January 1996" (page 84);
- "in the interim period between issuance of the forest management licence to Abitibi-Price and date of closure of Nopiming park to logging, the park shall serve as a source of last resort to logging" (page 84); and
- "commercial forestry activity in all provincial parks should be phased out" (page 86).

Although the government rejected the CEC recommendations, 16 years later on November 24, 2008, the Province announced that logging would be banned in all provincial parks except Duck Mountain, and introduced the appropriate legislation. The new legislation came into force June 11, 2009.

The HBM&S Reed Mine Environment Act Proposal to develop a copper mine in Grass River Provincial Park provides an opportunity for the CEC to conduct a similar evaluation regarding the appropriateness of mining activities in provincial parks. In addition, the CEC should determine whether conditions that are more stringent than those applicable outside of parks should be applied to the Reed Mine project and other proposed mining developments in provincial parks, in light of the as-yet-undefined requirement in the section 7(3)(c) of *The Provincial Parks Act* that mining may be permitted "in a manner that does not compromise the main purpose of the park classification".

The Clean Environment Commission would be an appropriate forum to consider whether development activities in provincial parks require more scrutiny that those in undesignated Crown lands and whether, and to what extent, mining activities are appropriate in provincial parks.

## Relevance of "Tomorrow Now" To Reed Mine Proposal

"Tomorrow Now" addresses several issues regarding mining that are not adequately addressed in the Reed Mine Environment Act Proposal.

Mining is mentioned throughout "Tomorrow Now", most notably on page 13 "Green Mining In Manitoba", on page 28 "Mining And Petroleum Green Solutions", on page 29 "Canada's First Comprehensive Peatlands Stewardship Strategy", on page 43 "Review Of Mining In Parks", and on page 43 "Resource Assessments For Proposed New Protected Areas". The key thread running through the items on mining in "Tomorrow Now" is stated in Green Mining (page 13) "... to develop a new mining strategy that will create a road map for the effective and environmentally and socially responsible development of the province's mineral and petroleum resources". Two of these topics are discussed in detail below.

## **Resource Assessment for Proposed New Protected Areas**

The "Tomorrow Now" goal quoted above regarding "green mining" is laudable. However the proposal on page 43 of "Tomorrow Now" to require "mineral assessments in areas proposed for new parks and protected areas" will, in fact, further skew the balance towards development and place additional undue and onerous delays on the establishment of new protected areas. My rationale for this conclusion follows.

Resource assessments are already required for proposed protected areas according to Manitoba's Protected Areas Initiative website (<a href="http://www.gov.mb.ca/conservation/pai/establishing/index.html">http://www.gov.mb.ca/conservation/pai/establishing/index.html</a>). The website states that all proposed protected areas are already reviewed automatically with all major sectors (minerals and petroleum, forestry, and agriculture) before a final decision is made on whether an area is to be protected. It is unclear what additional "resource assessment" will be required by the new process outlined on page 43 of "Tomorrow Now".

Based on my experience as plant ecologist and impact assessment specialist involved in protected areas planning, I can state that many of us involved in protected areas planning commonly refer to the process of creating new protected areas as "waste land" planning - - namely, lands that nobody wants for resource development are easily protected. This approach applies most often to the creation of large

protected areas, but it also applies to smaller sites proposed for protection if they have significant resource development potential. Rarely are large areas having significant economic potential protected.

Evidence for this conclusion can be found in publications of Manitoba's Ecological Reserve Program. That Program was established in 1973. The first ecologically reserve was designated in May 1976, making it the Province's first provincially-designated protected area. The *Ecological Reserves Act* (<a href="http://web2.gov.mb.ca/laws/statutes/ccsm/e005e.php">http://web2.gov.mb.ca/laws/statutes/ccsm/e005e.php</a>) guides the Program.

Section 9 of *The Ecological Reserves Act* led to the creation of an Ecological Reserves Advisory Committee. In 1989, Section 4.2 was added to Manitoba's *Ecological Reserves Act*. It requires the Minister responsible for ecological reserves to report to the Legislature every five years on the "status, management and use of reserves". To date, four such "Five year Reports to The Legislature on Ecological Reserves" have been prepared, covering the periods April 1, 1989 to March 31, 1994; April 1, 1994 to March 31, 1999; April 1, 1999 to March 31, 2004; and April 1, 2004 to 2009. All have been printed, and electronic versions for the last 3 have been posted on the Publications page of the Ecological Reserves program website (<a href="http://www.gov.mb.ca/conservation/parks/ec\_reserves/ec\_publications.html">http://www.gov.mb.ca/conservation/parks/ec\_reserves/ec\_publications.html</a>.

The Ecological Reserves Advisory Committee has provided an Appendix to each of the last 3 Five-Year Reports providing comments and outlining its concerns:

- http://www.gov.mb.ca/conservation/parks/pdf/ec res report 94-99.pdf (page 10),
- http://www.gov.mb.ca/conservation/parks/pdf/eco\_reserve\_booklet\_99\_04.pdf (pages 16-18),
- http://www.gov.mb.ca/conservation/parks/pdf/ec res report 04-09.pdf (pages 29-30).

The Committee discusses two recurring themes in its comments. First, the decision-making process for creating new protected areas (including ecological reserves) occurs very slowly, in contrast to the process for making development decisions. Second, economic resource values often prevent the establishment of new protected areas. These themes are captured most succinctly in the following excerpt from the Committee's contribution to the 1999-2004 Five-year Report (page 17):

"In the past, commitments to development and allocation of resource use and harvesting have often occurred with minimal consideration to setting aside representative protected areas as part of an overall plan. In reviewing major developments, reasonable time limits are placed on making such decisions. However, in the case of protected areas in general and ecological reserves in particular, nominated sites can sit in limbo for many years, and occasionally decades without a decision being made. Since no interim protection is provided to these candidate sites while reviews proceed, other commitments may make future designation impossible. This is particularly the case for minerals, where mineral claims may be staked without prior review and approval anywhere on open Crown or private lands where the Crown owns the mineral rights. The committee recommends that consideration be given to having a more even balance between decisions to approve areas for resource development and areas for resource protection. Decision-making in both cases should follow set and reasonable time frames.

The committee believes the current difficulties in timely establishment of new ecological reserves relate to past decisions on resource allocation and harvest. Ecological reserves are the most protected provincially designated lands. Unlike most other provincially protected lands, existing uses, including, for example, sport hunting, sport fishing and outfitting, become potential obstacles to the creation of new ecological reserves.

Examining the process and progress of establishing new protected areas has led the committee to conclude that decisions appear to require consensus of all participants. This effectively gives all participants a veto on any new protected areas, or greatly delays the decision-making process (emphasis mine). The committee recommends that reasonable but specific timelines be established in evaluating proposed protected areas including ecological reserves. This could be similar to the way timelines are set for decisions on a variety of development decisions, for example under <a href="https://doi.org/10.1001/jhearth-process">The Environment Act."</a>

Based on (a) my experience in protected areas planning, (b) the Protected Areas Initiative information indicating that mineral resource information is already considered in establishment of new protected areas, and (c) the conclusions reached by the Ecological Reserves Advisory Committee cited above, the proposal for additional mineral resource assessments called for on page 43 of the Plan should be withdrawn. Instead, the policy should be revised to establish the proper balance between development and protection, putting them on an equal footing. The new policy should read something like:

Protected areas value assessments in areas proposed for allocation to new resource developments (including mining claims, mining leases, quarry leases, peat leases, petroleum leases, forest management license agreements, etc.) will provide key information required for decision-making. A robust stakeholder consultation process will ensure that all viewpoints are considered.

No doubt many people would view this as putting a stranglehold on any future development. However, it is the only way to meet the stated intent of balancing development and protection. Currently, many mineral resource allocations (claims, leases, licenses, etc.) receive no public review and varying levels of internal government review (including no review). Once mineral rights tenures (e.g. claims and leases) are awarded, they effectively "sterilise" the area from any consideration for future protection, without having to provide compensation, unless a mineral rights holder willingly surrenders the rights. Surrender has occurred in some instances, but they are the exception, not the rule. Recent noteworthy Manitoba examples of surrender include the creation of Little Limestone Provincial Park, Walter Cook Caves Park Reserve, and development of an interpretive trail beside the Brokenhead Wetland Ecological Reserve. Additional discussion of tenure is provided in the section below: "Mining in Parks".

As The Ecological Reserves Advisory Committee recommends, reasonable timelines for both development and protection need to be established. In addition, there is a need to allow for more open and robust review of all mineral allocations, including mining claims. Mining allocations should be registered provisionally. A permanent allocation would only be awarded if the results of the "robust stakeholder consultation process" determine that the claim can proceed.

## **Mining in Parks**

Page 43 of "Tomorrow Now" states: "the province is reviewing mining in parks with the goal of developing a sustainable 'mining in parks' strategy to protect significant recreational or ecological values". I support this goal very strongly.

In addition to the issues raised above in the section on "Resource Assessments for Proposed New Protected Areas", I offer the following comments that need to be considered in developing a policy on "Mining in Parks". They focus on topics related to mining "tenure", "closure plans", "adequacy of site data" and "climate change implications for design standards". They are adapted from comments I provided in previous submissions to the government on *Environment Act* license applications for peat

mines (including one proposed in Hecla/Grindstone Provincial Park) circulated for public review in 2012. Although these comments were for a proposed peat mine, they are general enough to apply to all mining activities, both inside and outside parks. They should be addressed in developing the "green mining strategy" mentioned on page 13 of "Tomorrow Now".

<u>Tenure</u>: The Mines and Minerals Act (<a href="http://web2.gov.mb.ca/laws/statutes/ccsm/m162e.php">http://web2.gov.mb.ca/laws/statutes/ccsm/m162e.php</a>) and Regulations pursuant to the Act lay out the process for awarding mineral rights, the various means of awarding legal tenure (including claims, leases, permits, licenses, etc.), what needs to be done to maintain tenure, the length of tenure, and provisions for renewing tenure.

In the case of peat leases, tenure of a lease is for 10 years and may be renewed for an additional 10 years if the lease holder provides evidence of complying with the lease conditions. If no development of the lease has occurred, both renewal of the lease and the term of renewal are at the discretion of the Minister. It is my experience that many "dormant" or inactive leases are renewed automatically.

This is certainly the case for the peat lease in Hecla/Grindstone Provincial Park. Page i of the Executive Summary of the Sun Gro Horticulture Canada Ltd. — Hay Point Peat Mine Development - EAL File #5548.00 states: "Sun Gro had secured these leases approximately 16 years ago in anticipation of this future need". These peat leases date back to at least 1982, (see page 20 of the March 1988 "Management Plan for Hecla Provincial Park and Grindstone Provincial Recreation Park", <a href="http://www.gov.mb.ca/conservation/parks/pdf/planning/hecla\_grindstone\_management\_plan.pdf">http://www.gov.mb.ca/conservation/parks/pdf/planning/hecla\_grindstone\_management\_plan.pdf</a>). Appendix A of the Sun Gro proposal indicates that the current Sun Gro leases were set to expire May 12, 2012, indicating that no application was submitted for development of a quarry for at least 30 years.

Given the long time that Sun Gro has had development of its leases in mind, why has Sun Gro not conducted long term ecological studies of the site? Those who acquire long-term tenure and hoard it for decades should be required to thoroughly document baseline physical and environmental site conditions as part of their lease rights, so that any applications for development contain adequate, site-specific environmental and climate information. Applicants should not be allowed to rely on very limited cursory site investigations (See discussion in the "Adequacy of Site Data" section below). Tenure documents should specify what environmental and other conditions (e.g. length of baseline ecological studies, restoration research, etc.) are required. This step would go a long way towards balancing the needs of the environment and the rights of development proponents which are currently skewed towards development. Renewal of "dormant" leases should not occur if lease holders do not provide long-term, site —specific environmental information.

As discussed above in "Resource Assessments for Proposed New Protected Areas", a more fundamental issue, however, is the general lack of opportunity for public review and comment when mining tenure is sought. Such public reviews are standard for many, if not most, development projects (e. g., transmission line or highway routings, sewage lagoons, dams, etc.), but they only are legally required when a mine, including a peat mine, is proposed, long after tenure has been awarded. Currently, the issuance of quarry rights and mining claims do not allow for public review and comment.

<u>Closure Plans</u>: Part 14 of *The Mines and Minerals Act* requires that a closure plan be developed and the *Mine Closure Regulation* under this Act (<a href="http://web2.gov.mb.ca/laws/regs/pdf/m162-067.99.pdf">http://web2.gov.mb.ca/laws/regs/pdf/m162-067.99.pdf</a>) lays out the requirements of a closure plan. Based on my previous experience in reviewing such closure plans, including the two peat mine proposals circulated in 2012, these requirements do not adequately

address environmental issues. Similar concerns apply to other mine developments such as the HBM&S Reed Mine. The Reed Mine Environment Act Proposal offers only general statements without supporting documentation. Excerpts from the Reed Mine Proposal are provided below.

Page 17 of Reed Mine Environment Act Proposal states: "The Reed AEP Closure Plan will be updated for the proposed Reed Mine following the procedures outlined in the Mine Closure Regulation (Manitoba Regulation 67/99). HBMS has successfully completed reclamation on many mining operations across Canada with several of these sites located in the Snow Lake region."

Pages 61-62 of Reed Mine Environment Act Proposal state: "At closure, the Reed mine site will be returned to pre-project conditions to the maximum extent possible. The portal and trench will be filled in with local limestone. Once the areas have been filled in, a clay cover or liner will be placed over the resloped portal entrance to prevent groundwater from entering into the opening. Once site infrastructure has been removed and the site has been re-graded, disturbed areas will be re-vegetated with native vegetation species. Scarification of the access road will prevent site access and promote the growth of natural vegetation in the area. Based on HBMS experience with mine closure in the region, growth of grasses and mosses will be apparent within the first few years following closure, whereas trees and shrubs will take longer to establish through natural succession and may be visible within the 5-10 year period following closure.

It is assessed that re-vegetation as well as natural succession will substantially return the mine site to pre-mining conditions. Therefore, residual effects on vegetation as a result of the proposed Reed Mine are assessed to be negligible and not significant."

Page 81 of Reed Mine Environment Act Proposal states: "Following closure activities, once the site has been cleared of existing infrastructure and regraded, soil will be applied to disturbed areas of the Reed Mine site. Re-vegetation will occur as soon as practical following the application of soil.

To ensure the success of the re-vegetation program, a re-vegetation monitoring program will be implemented. Regular monitoring during the growing season will determine the success of the re-vegetation program, and will determine if follow up reseeding or replanting is required. The program will include quarterly monitoring during the growing season until the seedlings appear to be established. Quarterly monitoring will then follow during the growing season, for a minimum of two years, before a successful re-vegetation program can be declared.

Access to the Reed Mine will be prevented by closing off the connection of the western terminus of the access road to PTH 39. The access road will then be scarified to restrict site access and promote growth of local vegetation in the surrounding area."

My key concerns regarding the adequacy of closure plans are summarised below. Although they are taken from peat mining examples, they apply equally to metal mines and other mining developments.

Closure plans are required to address site restoration. However, most closure plans lack sufficient details, and little Manitoba ecologically relevant research is provided since there are no requirements for such research.

Page 8 of the Sun Gro Closure Plan states: "The plant community types to be restored on the Hay Point Bog are designed to have equal to higher ecological values than pre-development conditions. It will take

time, however, for these values to be achieved. Studies have shown that plant species diversity is higher on naturally restored bogs than on undisturbed low-nutrient bogs (Famous et a/. 1993). In general, the density of vertebrate populations and living biomass can be higher on reclaimed bogs." This statement is awkwardly worded, and subject to much ecological debate.

First, the detailed citations for the documents mentioned in the Closure Plan text are not provided. Nor are they included in the list of references provided on pages 92-94 of the Proposal. As a result, readers are not able to obtain and review the documents relied upon in the Closure Plan. This lack of disclosure does not allow one to determine where the studies were conducted and how applicable they may be to Manitoba sites and environments. In addition, all references cited in the Closure Plan are dated 1993-1998. Why are more recent studies not included and cited?

Second, it is well known that the initial stages of ecological recovery can involve species different from those making up a mature, stable community, thus resulting in differences in biodiversity. Biodiversity differences alone are not a measure of the health and value of an undisturbed, low-nutrient bog.

Pages 14-16 of the Sun Gro Closure Plan discuss data from the Elma Demonstration Site & Elma Restoration Site in Manitoba. This is to be commended, but since the data are only for 1995-1999, questions arise as to why more recent Manitoba data are not provided. Given that another decade has passed, more data would allow one to evaluate more definitively the longer-term trends and successes or failures of ecological restoration, after the initial few years for which data are presented in the Closure Plan.

In addition, there is a need to address the extrapolation of small-scale test plots to actual restorations of mined areas that cover hundreds of hectares. Some questions that come to mind include: Have the initial square metre transplants of Sphagnum survived? Are they expanding? What is the current survival rate of tree transplants, height, bud count, etc.? To what extent are non-transplanted species establishing?

The Sunterra Mine Closure Plan forms Appendix C of the Sunterra Environment Act Proposal and is discussed briefly on pages 26, 63, and 66 of the EA Proposal. Unlike the Sun Gro closure plan, it lacks any Manitoba-specific data or documentation of the successes or failures of restoration efforts. No literature cited or references about restoration are provided in either the Sunterra Mine Closure Plan or the Sunterra EA proposal. Sunterra states (EA proposal pages 26 & 66): "Fully harvested areas will be restored based on the experience gained by Sunterra through the guidance of CSPMA and restoration research and following the requirements of The Preservation and Reclamation Policy of the CSPMA."

The Canadian Sphagnum Peat Moss Association (CSPMA) website (<a href="http://www.peatmoss.com/pm-restguide.php">http://www.peatmoss.com/pm-restguide.php</a>) contains the following document:

Quinty, François and Line Rochefort. 2003. *Peatland Restoration Guide, Second Edition*. Canadian Sphagnum Peat Moss Association, St. Albert, Alberta and New Brunswick Department of Natural Resources and Energy, Fredericton, New Brunswick. 106 pp. (http://www.peatmoss.com/pdf/Englishbook.pdf).

This Guide provides information on restoring mined peat sites based on research conducted in 16 sites (seven in southern Quebec, seven in eastern New Brunswick and one each in Alberta and Saskatchewan). Research started in 1993. A search of the guide reveals not a single mention of Manitoba.

Given that peat mining has been under way in Manitoba for some 70 years, the peat mine industry should, by now, have been required to conduct studies of restoration of former peat mines. Peat mine closure plans should be required to provide more substantial ecological information, particularly citing Manitoba data, rather than data from elsewhere where ecological conditions may differ significantly.

Adequacy of Site Data: As discussed in "Tenure" above, given the long term during which tenure is held with no or little development, those companies holding mineral rights should be required to carry out more detailed site investigations. Development applications usually provide the results of reconnaissance level surveys, carried out over a few days covering the different parts of one growing season (late spring, mid summer and early fall). Such surveys may meet the minimum legal requirements, but they are not adequate to obtain a complete ecological description of the area to be affected by mining. Page 20 of the Reed Mine Environment Act Proposal indicates surveys were similarly limited.

Also, gathering data over several years would allow for year-to-year comparisons, and would capture species that present themselves only sporadically or under certain environmental conditions.

<u>Climate Change and Implications for Design Standards</u>: Applications to develop a mine often rely on climate data from nearby communities, and on generally accepted design standards for culverts and other drainage systems (e.g. Manitoba Infrastructure and Transportation standards of 1 in 20 events). The latest available climate "normals" cover the period 1971-2000

http://www.climate.weatheroffice.gc.ca/prods servs/normals documentation e.html. Page 23 of the Reed Mine Environment Act Proposal indicates a similar approach was used for this project. Data cited are for Flin Flon.

As has become evident, 2001-2010 was a decade with very variable weather, including many localized storms (for example, see Gwynne Dyer's July 10, 2012 column:

http://www.winnipegfreepress.com/opinion/westview/wilder-weather-if-you-like-161889215.html).

There appears to be a need for new "normals", or larger contingency margins, to address the increased likelihood of unforeseen weather events with greater extremes than was considered "normal" in the past.

## **Summary & Conclusion**

In keeping with the spirit and intent of "Tomorrow Now – Manitoba's Green Plan", I request that the HBM&S Reed Mine Environment Act Proposal undergo thorough review by The Clean Environment Commission involving public hearings. Such a review should examine not just Reed Mine Proposal specifics, but also the issues of mining in provincial parks and mining throughout Manitoba, as discussed in this submission.

## Winsor, Jennifer (CON)

From:

Cs. Erickson [cs.erickson@shaw.ca] February-04-13 3:50 AM

Sent: To:

Subject:

Winsor, Jennifer (CON)
\*\*\*\*\*\*SPAM\*\*\*\*\*\* Hudbay mine

importance:

High

I do not believe there should be any mining in a provincial park. These lands should be protected!

Sincerely,

Colleen Erickson

60 Charter Drive, Wpg., Mb.

Mine in Grass River Provincial Park

tinafriesen@mymts.net
February-01-13 1:03 PM
Winsor, Jennifer (CON)

Mine in Grass River Provincial Park From: Sent: To:

Subject:

Take a close look at the environmental disaster around the Sherridon mine site before allowing a mining company to do the same to a provincial park. Mining companies cannot be trusted to protect our environment. We won't tolerate another disaster.

Neil Friesen

webmaster@wildernesscommittee.org on behalf of h agger

[h\_agger@hotmail.com]

February-01-13 1:04 PM
Winsor, Jennifer (CON)
: Say "No" to the Reed Mine! Sent: To:

Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

I am stating that the Manitoba government NOT approve the Reed mine project in the Grass river park region, for the sake of the health of the natural environment and wildlife, that is, quality of life of all of us, not only the interests of the Reed mine owners and their governing friends.

webmaster@wildernesscommittee.org on behalf of Jean Hiebert

[geniel@mts.net]

Sent: February-01-13 1:31 PM To:

Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Jennifer Winsor:

I am very disappointed that governments in general, and in this case the Manitoba Government, is not taking greater care to protect our environment, not even our provincial forests. It appears that Hudson Bay Mining has already begun preparations for a copper mine in Grass Lake Provincial Park. Many hectares of trees have already been cleared in anticipation that their license is a fait accompli.

Our Government knows that this particular area is a vital corridor for caribou. Not only will this be disruptive for them, but the immediate area will become a dead zone for many years to come, as is evidenced by the toxic waste areas remaining 20 years after the supposed cleanup of Spruce Point, also in Grass River Provincial Park.

Our habits of not considering externalities must change.

Sincerely,

Jean Hiebert

webmaster@wildernesscommittee.org on behalf of julie guard

[julie.guard@gmail.com]

Sent: February-01-13 2:14 PM To:

Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Subject:

1 February 2013

146 Sherburn Street Winnipeg, Manitoba R3G 2K4

Jennifer Winsor Manitoba Environmental Assessment and Licensing Branch Environmental Approvals 123 Main St Suite 160 Winnipeg MB R3C 1A5

RE: Reed Mine Proposal - Public Comment

Dear Ms. Winsor:

I am writing to express my strong disapproval of the Reed Mine Proposal. understand that mining is an important industry in Manitoba, and that mining has, in the past, been permitted in Manitoba parks. But the popular consensus on such practices has changed, and Manitobans like myself are no longer willing, as people were in the past, to sacrifice our precious natural resources and the environment to the demands of resource industries.

Manitobans must move forward and build an economy that is not so resourcedependent, recognizing that the costs of reckless resource extraction outweighthe short-term herefits and that resource extraction is not a stable occupant. the short-term benefits and that resource extraction is not a stable economic policy in the long term.

Manitoba's parks must be protected. Our ecosystem services and wildlife habitat are not only inherently valuable, but are the foundation of a more sustainable economy. A number of Manitoba species, including the woodland caribou, which are already identified as a threatened species, depend on undisturbed wilderness to survive. Manitoba's government, moreover, is on record as promising to protect caribou habitat. The Reed Mine site is located within a key caribou migration route and right beside calving grounds on Reed Lake. The project is located in the "Naosap" range, which the Manitoba government lists as one of the three most high-risk caribou herds in the province.

I would also like to register my objection to undemocratic and non-transparent way that the government has advanced this project. Although the Reed Mine is not yet licenced, Hudbay Minerals, a repeat environmental violator, has been allowed to begin construction. Manitobans have had no opportunity to comment, and no public information has been provided. This a lack of transparency demonstrates a failure on the part of the Manitoba government to respect the public process, and its "behind the scenes" behavior raises the question: if the government has nothing to hide, why is it hiding its covert approval of this project?

There are too many unanswered questions, a flawed and non-transparent process, and a high risk of environmental harm to the province. The Reed Mine should not, in my view, be approved.

Sincerely,

Julie Guard

CC: Gord Mackintosh, Manitoba Minister of Conservation

Say No to the Reed Mine!003
This letter was created with the use of an online letter writing tool at wildernesscommittee.org

From: webmaster@wildernesscommittee.org on behalf of Tammy Beaulieu

[tammyebeaulieu@gmail.com]
Sent: February-01-13 3:28 PM
To: Winsor. Jennifer (CON)

To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment
•Parks need to be permanently protected to safeguard ecosystem services and wildlife habitat.

•Species like the woodland caribou—listed as "threatened" under both the federal and provincial endangered species acts—depend on undisturbed wilderness to survive. The Manitoba government first committed to protecting caribou habitat in 2000.

•The Reed Mine site is located within a key caribou migration route and right beside calving grounds on Reed Lake. The project is located in the "Naosap" range, which the Manitoba government lists as one of the three most high-risk caribou herds in the province.

•A full licence for the Reed Mine has not yet been granted, however the provincial government has quietly allowed Hudbay to begin construction of this mine-before the public comment period even began.

mine-before the public comment period even began.
•Immediately banning new mining claims will demonstrate the provincial government's commitment to park protection.

•Provincial park mining can have long-term toxic impacts. While Hudbay insists that its previous mine work in Grass River park has had minimal impact, the devastation from the company's Spruce Point Mine Site is still plainly visible.

•The Reed Mine should NOT be approved.

Tammy Beaulieu Portage la Prairie, Manitoba

webmaster@wildernesscommittee.org on behalf of Denny Grey

[dennyjamesgrey@gmail.com]

February-02-13 12:47 PM Sent: To:

Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Good day.

I write today with concerns regarding the Reed Mine in Grass River park. A detailed map of woodland caribou ranges can be found on the page linked below. This map illustrates that caribou use the area zoned for the Reed Mine. Under the endangered species acts, does the Manitoba government not have a legal obligation to protect these lands from disturbance?

Additionally, the Spruce Point Mine Site illustrates the inadequate standards of site rehabilitation once a mining site is closed. As a person who values both nature's integrity and resource development, this is highly concerning. I believe it is the obligation of environmental branches of the provincial government to ensure companies clean up these sites when they're finished with them; this should be written in a contract allowing for resource extraction.

http://wildernesscommittee.org/manitoba/paloma/news\_conference\_stop\_logging\_ca ribou\_habitat

My last concern is with regards to the fact that site construction has begun with the government's consent before an environmental review of the project has even taken place. This is unacceptable for obvious reasons.

I urge you to illustrate your commitment to preserving the health of ecosystems during this time of wavering trust in the Federal Government's ability to do so.

Thank you for reading my comments and I encourage you to reply to my concerns.

Regards,

Denny Grey Winnipeg, MB

webmaster@wildernesscommittee.org on behalf of penny carr

[bioniccarr@hotmail.com]
Sent: February-02-13 5:48 PM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Pat Bowen

[pbowen3@austin.rr.com]

February-02-13 5:50 PM
Winsor, Jennifer (CON)
: Say "No" to the Reed Mine! Sent: To:

Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Victoria Pitchford

[goth\_girl45@hotmail.com]

Sent: February-02-13 6:10 PM To:

Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Parks need to be permanently protected to safeguard ecosystem services and

wildlife habitat.

Species like the woodland caribou-listed as "threatened" under both the federal and provincial endangered species acts-depend on undisturbed wilderness to survive. The Manitoba government first committed to protecting caribou habitat in 2000.

The Reed Mine site is located within a key caribou migration route and right beside calving grounds on Reed Lake. The project is located in the "Naosap" range, which the Manitoba government lists as one of the three most high-risk

caribou herds in the province.

A full licence for the Reed Mine has not yet been granted, however the provincial government has quietly allowed Hudbay to begin construction of this mine-before the public comment period even began.

Immediately banning new mining claims will demonstrate the provincial government's commitment to park protection.

Provincial park mining can have long-term toxic impacts. While Hudbay insists that its previous mine work in Grass River park has had minimal impact, the devastation from the company's Spruce Point Mine Site is still plainly visible.

The Reed Mine should NOT be approved.

webmaster@wildernesscommittee.org on behalf of Lauren Kozen

[laurenblaire@comcast.net]

Sent: February-02-13 6:49 PM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Nicole Weber

[nicole4770@yahoo.com]

February-02-13 7:29 PM
Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Sent: To:

Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

The Reed Mine site is located within a critical caribou migration route and next to calving grounds on Reed Lake. This is a high-rosk caribou herd area. Park mining can have long-term toxic impacts on the area. Immediately banning new mining claims will demonstrate the provincial government's commitment to park protection. The Reed Mine shoul not be approved under any circumstance.

Thank you for your consideration.

webmaster@wildernesscommittee.org on behalf of Thomas Pintagro

[tjp1069@hotmail.com]
Sent: February-02-13 8:27 PM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

From: webmaster@wildernesscommittee.org on behalf of Christeen Anderson [hope4daisies@gmail.com]
Sent: February-02-13 9:24 PM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Say No to the Reed Mine!013 webmaster@wildernesscommittee.org on behalf of Anneke

[annekeatchange@gmail.com]
Sent: February-03-13 2:01 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Birgitta Siponen

[hipuldi@gmail.com]

Sent: February-03-13 2:54 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Kunsioux Drabic

[sioux.01@bigpond.com]
Sent: February-03-13 5:43 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of lori conley

[]]ori522@aol.com]

Sent: February-03-13 6:13 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: RParks need to be permanently protected to safeguard ecosystem services and wildlife habitateed Mine Proposal - Public Comment

Lori Conley 23 pine st easthampton, MA 01027

webmaster@wildernesscommittee.org on behalf of Joan McAllister From:

[joanmcallister@shaw.ca]

Sent: February-03-13 7:47 AM To:

Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Some points to consider:

•Parks need to be permanently protected to safeguard ecosystem services and

wildlife habitat.

•Species like the woodland caribou-listed as "threatened" under both the federal and provincial endangered species acts-depend on undisturbed wilderness to survive. The Manitoba government first committed to protecting caribou habitat in 2000.

•The Reed Mine site is located within a key caribou migration route and right beside calving grounds on Reed Lake. The project is located in the "Naosap" range, which the Manitoba government lists as one of the three most

high-risk caribou herds in the province.

•A full licence for the Reed Mine has not yet been granted, however the provincial government has quietly allowed Hudbay to begin construction of this mine-before the public comment period even began.

•Immediately banning new mining claims will demonstrate the provincial

government's commitment to park protection.

•Provincial park mining can have long-term toxic impacts. While Hudbay insists that its previous mine work in Grass River park has had minimal impact, the devastation from the company's Spruce Point Mine Site is still plainly visible.

•The Reed Mine should NOT be approved.

webmaster@wildernesscommittee.org on behalf of Ann R.

[cam8002@care2.com]

Sent: February-03-13 7:49 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Gloria Picchetti

[picchetti707@sbcglobal.net]
Sent: February-03-13 8:14 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Parks are for nature, wildlife and people not mines.

webmaster@wildernesscommittee.org on behalf of Mike Mountjoy

[mikeym\_m@hotmail.com]

February-03-13 8:34 AM
Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Sent: To:

Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment and a few important points

Parks need to be permanently protected to safeguard ecosystem services and wildlife habitat.

Species like the woodland caribou-listed as "threatened" under both the federal and provincial endangered species acts-depend on undisturbed wilderness to survive. The Manitoba government first committed to protecting caribou habitat in 2000.

The Reed Mine site is located within a key caribou migration route and right beside calving grounds on Reed Lake. The project is located in the "Naosap" range, which the Manitoba government lists as one of the three most high-risk caribou herds in the province.

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Provincial park mining can have long-term toxic impacts. While Hudbay insists that its previous mine work in Grass River park has had minimal impact, the devastation from the company's Spruce Point Mine Site is still plainly visible.

The Reed Mine should NOT be approved.

webmaster@wildernesscommittee.org on behalf of Ben Oscar Andersson

[oscarsito1057@wildmail.com]
Sent: February-03-13 9:17 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of natasha salgado

[viega113@bell.net]

Sent: February-03-13 9:19 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Say No to the Reed Mine!023 webmaster@wildernesscommittee.org on behalf of carol bischoff

[loveswolves2@care2.com]
Sent: February-03-13 9:27 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Lisa Neste

[lilmouse1213@earthlink.net] Sent: February-03-13 10:44 AM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of amy elepano From:

[ajco73@hotmail.com]

Sent: February-03-13 12:00 PM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Allan Yorkowitz From:

[allanyork618@gmail.com]
Sent: February-03-13 12:06 PM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

webmaster@wildernesscommittee.org on behalf of Elisabeth Bechmann

[elisabeth.bechmann@kstp.at] Sent: February-03-13 12:50 PM To:

Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment Parks need to be permanently protected to safeguard ecosystem services and wildlife habitat.

Species like the woodland caribou—listed as "threatened" under both the federal and provincial endangered species acts-depend on undisturbed wilderness to survive. The Manitoba government first committed to protecting caribou habitat in 2000.

•The Reed Mine site is located within a key caribou migration route and right beside calving grounds on Reed Lake. The project is located in the "Naosap" range, which the Manitoba government lists as one of the three most high-risk caribou herds in the province.

•A full licence for the Reed Mine has not yet been granted, however the provincial government has quietly allowed Hudbay to begin construction of this

mine—before the public comment period even began.
•Immediately banning new mining claims will demonstrate the provincial government's commitment to park protection.

•Provincial park mining can have long-term toxic impacts. While Hudbay insists that its previous mine work in Grass River park has had minimal impact, the devastation from the company's Spruce Point Mine Site is still plainly visible.

•The Reed Mine should NOT be approved.

Dr. Elisabeth Bechmann

Austria

webmaster@wildernesscommittee.org on behalf of Elizabeth O'Halloran

[elizabethohalloran@rocketmail.com]

Sent: February-03-13 1:09 PM To:

Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Parks need to be permanently protected to safeguard ecosystem services and

wildlife habitat.

Species like the woodland caribou-listed as "threatened" under both the federal and provincial endangered species acts-depend on undisturbed wilderness to survive. The Manitoba government first committed to protecting

caribou habitat in 2000.

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Immediately banning new mining claims will demonstrate the provincial

government's commitment to park protection.
Provincial park mining can have long-term toxic impacts. While Hudbay insists that its previous mine work in Grass River park has had minimal impact, the devastation from the company's Spruce Point Mine Site is still plainly visible.

The Reed Mine should NOT be approved.

webmaster@wildernesscommittee.org on behalf of Kim Norman

[florida.bound@yahoo.ca]

February-03-13 2:09 PM
Winsor, Jennifer (CON)
Say "No" to the Reed Mine! Sent: To:

Subject:

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

I am appalled at the disgusting way Manitoba destroys wildlife but now the parks within its borders....These Provincial Parks should be protected for ALL OF MANITOBANS to enjoy, not just the business's that you so cater to....Where is the Conservation in Manitoba....So far Manitobans have seen no Conservation since Gord Mackintosh became Minister of Conservation.....Minister of Conservation" for Manitoba,.... Have you not read your title.....apparently not.....Do any of you know what "CONSERVATION" means....apparently not......Apparently you must think all Manitobans are stupid, b/c you keep thumbing your nose at the citizens of your province.....You should be ashamed of yourselves...You need to resign, there is too much controversy surrounding you....eg....bear cubs, Reed mine being built in Provincial Parks, etc....Public input on this issue is just a formality as you have already given the mine permission to start building....You and the Premier of Manitoba should both RESIGN 

webmaster@wildernesscommittee.org on behalf of DAVID COUNCILMAN

[dad4future@care2.com]

Sent: February-03-13 2:30 PM
To: Winsor, Jennifer (CON)
Subject: Say "No" to the Reed Mine!

Jennifer Winsor

Manitoba Environmental Assessment and Licensing Branch

CC: Gord Mackintosh, Manitoba Minister of Conservation

RE: Reed Mine Proposal - Public Comment

Dear Sir,

National and natural lands/parks/rivers need to be protected for the future safety of our world -- for people's good health, clean water, clean land, clean air.....

Mining poisons....and only for societal greed now.....

I encourage you to think future-wise adn NOT APPROVE THE REED MINE!