Webb, Bruce (CWS)

From: Kelsey Sunaert [redacted]
Sent: May-20-16 7:39 AM
To: Webb, Bruce (CWS) BW
Subject: Whitewater lake management file

I would like to show my support for this project as I believe something desperately needs to be done to control the level of whitewater lake. Unnaturally high levels have caused thousands of acres of drowned farmland and put people's yards and homes at risk of flooding. It's also a considerable concern of mine and many others that if something isn't done soon that excessively high water levels combined with another large rain event would cause the flooding of Deloraine. Excessively high water levels have caused an increased level in the water table surrounding whitewater, which in turn has driven salinity levels up and caused potentially irreversible damage to valuable crop land. Fluctuating water levels in whitewater and surrounding areas continue to damage wetlands and crop land. A level on whitewater lake is the only option we have to prevent further damage to our environment and our economy.

Thank you

Kelsey Sunaert

Via Email

Ducks Unlimited Canada
Conserving Canada's Wetlands

Rick Andrews
Manager of Provincial Operations MB

Manitoba Field Office
Unit 2, 545 Conservation Drive
Brandon MB
R7A 7L8

Phone: 204 729-3500
FAX: 204 727-6044
e-mail: r_andrews@ducks.ca

May 20, 2016

Mr. Bruce Webb, Environmental Engineer
Environmental Approvals Branch
Conservation and Water Stewardship
123 Main Street, Suite 160
Winnipeg, MB R3C 1A5

Re: **RM of Deloraine-Winchester Proposal for a licence under Manitoba's Environment Act**

Dear Bruce Webb,

Ducks Unlimited Canada would like to comment on the proposal submitted in March 2016 under Manitoba's Environment Act by KGS on behalf of the Rural Municipality of Deloraine-Winchester to construct and operate two outlets from Whitewater Lake. We believe the report has not fully captured all the direct and indirect impacts on wildlife habitat at Whitewater Lake or downstream along the routes of the proposed outlets.

Ducks Unlimited Canada's concerns are summarized as follows:

1. There is a lack of pre/post development analysis on the increased frequency of low water to dry lake events as a result of the operation of the proposed outlets. The Proposal states minimal effect on the 25 per cent of low water level events but the definition of slightly lower is not well-defined. Additionally, there is no estimate of the frequency of additional dry lake events post-development. The Proposal notes that water levels in the basin are dependent on evaporative loss except at the very highest of water levels. Lowering the normal high water range would accelerate the rate of evaporative loss and reduce the time it takes to reach low water or dry lake levels in the basin. More frequent low water levels or dry lake conditions as a result of artificial lowering of the Lake could likewise make the Lake unsuitable more often for nesting and migratory waterbirds.

Ducks Unlimited Canada's mission

"Ducks Unlimited Canada conserves, restores and manages wetlands and associated habitats for North America's waterfowl. These habitats also benefit other wildlife and people."

2. The Proposal acknowledges that Whitewater Lake is a Provincial Wildlife Management Area, a Candidate Heritage Marsh, an Important Bird Area and a Priority Migratory Bird Habitat of Canada. Their Proposal does not mention that under the latter designation it is rated as "nationally important" for staging migratory shorebirds and staging ducks and no attempt was made to measure the pre/post long-term net effect of the proposed outlets and Lake water levels on migrant waterbirds.

3. The Proposal lists in detail a number of uncommon species that inhabit the Whitewater Lake area (pg 15) including the Piping Plover which is listed as endangered in Manitoba. However, the Proposal also states that the proposed project will not have an impact on wildlife including threatened or endangered species based on the results of a Manitoba Conservation Data Center (CDC) search (pg 21). This is confusing until one reviews what information was requested from the CDC. In Appendix C of the Proposal it becomes clear that the proponents only requested data using the legal descriptions of the two outlet routes and not data including Whitewater Lake itself. In other words the assumption is that the proposed project's impacts will be confined solely to the outlet routes and do not take into account the potential negative impacts on wildlife and wildlife habitat at Whitewater Lake and the surrounding area due to the hydrological changes caused by the operation of the proposed outlets. Altering the low water regime so that it is significantly lower or dries completely could significantly affect wildlife species that nest overwater including some of the species listed in the Proposal (pg 15); for example the very large nesting colony of Franklin's Gulls. We believe a more robust Environmental Assessment is warranted.

4. The Proposal notes that the excavation of the proposed outlets will impact 58.3 ha of wetlands downstream of the Lake. According to the reports by Ed Mackay in Appendix B of the Proposal, the proposed outlets will drain 100 per cent of these wetlands. This will result in a substantial release of carbon to the atmosphere and will also result in increased runoff entering Medora Creek and Elgin Creek. This will likely result in increased nutrient loading to both of these systems which are part of the Lake Winnipeg watershed. It should be noted that this same area (known as the Boissevain Plain) is considered "regionally important" for breeding waterfowl, as well as some rare threatened or endangered species under Environment

Canada's Priority Migratory Bird Habitats of Canada initiative. Excavation of the proposed outlets will also facilitate the drainage of surrounding wetlands into the two proposed outlets downstream, compounding the negative impact on wetland-dependent wildlife habitat at the Lake and in the surrounding area. This will also result in negative impacts to water quality and quantity. Given the high degree of drainage that already exists in this region, and given the potential for this Proposal to stimulate even more local drainage into the proposed outlets and into the Lake, the negative impacts on waterfowl and other wildlife is significant – especially in the long-term.

5. The proposed target water level for the Lake of 496.2 m would result in a surface water area for Whitewater Lake that is smaller than the size of the Wildlife Management Area the Lake inhabits. This would very likely diminish the WMA's inherent objective of providing critical habitat for wetland-dependent wildlife for all Manitobans to enjoy now and in the future.

6. In the Environment Act Proposal submitted by KGS on behalf of the RM of Deloraine-Winchester it is stated that "Project-environment interactions were assessed to identify potential environmental effects associated with construction and operation of the project." To our knowledge there has been no assessment of the environmental effects associated with the operation of the project. The proponents largely focused on environmental effects associated with construction of the project, which in our view are only a minor component of the potential overall environmental effects. This is concerning as there was no attempt made in determining the potential impacts that operations of the project may have on water quality and quantity for downstream receiving environments.

Sincerely,

Rick Andrews
Manager of Provincial Operations Manitoba
RA/jg

Webb, Bruce (CWS)

From: [redacted]
Sent: May-21-16 1:14 AM
To: Webb, Bruce (CWS)
Subject: Re: Whitewater Lake - File 5822.00

Bruce.

This submission was originally sent on May 20. The date setting on my tablet was off by a day.
My apologies if there is any confusion.

Tom Moran
Boissevain

Sent from Samsung tablet

[redacted] wrote:
I am writing with respect to the proposed water level control at Whitewater Lake.

It is apparent that the high levels of the lake in recent years has been problematic to landowners as well as has caused significant damage to infrastructure placed by Manitoba Conservation and Ducks Unlimited. Dykes installed by DU to offset negative environmental impacts when the lake was dry have been destroyed. As well the interpretive and wildlife viewing site constructed by Manitoba Conservation has suffered significant damage.

The Whitewater Lake Wildlife Management Area has long been a significant waterfowl staging and hunting area and has become a globally significant wildlife viewing site with public visitation from around the world. As the lake recovered from being dry in the late 1980's fluctuating water levels resulted in significant loss (hundreds of thousands) of water birds from severe botulism outbreaks. Once the lake levels returned to normal levels botulism became far less problematic. Historically the lake levels have fluctuated naturally based on environmental conditions. Resultant impacts were both positive and negative and occured naturally.

After reviewing the proposal I offer the following comments.

The biological /environmental implications of the operation of a control structure and the resulting regular fluctuation of water levels in the basin does not appear to be adequately addressed.

In addition, the construction of the drainage channels and the drawdown of the lake may arguably result in increased drainage activity in the watershed exacerbating the loss of wetlands, adding to the amount of water leaving the local watershed and further impacting the Lake Winnipeg watershed.

While dealing with excess water in the lake may be necessary the most appropriate way to do that would be to have a fixed level outlet at an agreed upon level. The lake would fluctuate naturally within that level and excess water could be removed. At the same time watershed management at the local level could be more positively addressed.

Thank you for the opportunity to comment on this proposal.

Respectfully.

Tom Moran
Boissevain, MB

Sent from Samsung tablet

Environmental Approvals Branch

Conservation and Water Stewardship

123 Main Street, Suite 160

Winnipeg MB R3C 1A5

Attention: bruce.webb@gov.mb.ca

MUNICIPALITY OF DELORAINE-WINCHESTER – WHITEWATER LAKE MANAGEMENT PROJECT – FILE: 5822.00

Nature Manitoba would like to express our grave concern that this proposal, if enacted, could cause extreme damage to the delicate ecology of this species-rich area.

Whitewater Lake is a terminal basin. Its high biodiversity and richness rely on the fluctuation in water levels that wet-dry cycles create. A crescent of ephemeral wetlands stretching from the west around the north to the northeast corner of the lake proper are extremely productive for waterbirds and an extraordinary variety of species. The health of these wetlands is dependent on the natural variation in water levels and they serve an important ecological function of water retention. Shallow parts of the basin and mudflats created by rising and receding water around the lake create vitally important habitat for many species of breeding and migrating shorebirds, while deeper parts of the lake and ephemeral wetlands provide heterogeneous habitat for water fowl, long-legged waders, and other wetland-associated species. As a terminal basin, water levels on the lake naturally fluctuate from bone dry, as was seen in the 1990s, to the extremely high water levels seen today. The result is that fish are excluded and the aquatic invertebrate community flourishes in a unique manner not seen in connected waterways. The richness of aquatic invertebrates thus created is a key to the richness of birdlife found here. In addition to the rich wildlife, the area also hosts unique plants such as the very rare *Heliotropium curassavicum.* If Whitewater Lake were to be connected to the Souris River, for example, carp could be introduced, with the kind of disastrous results we have seen in many places in the province, like Delta Marsh.

Whitewater Lake is considered a globally significant Important Bird Area (IBA), designated for its massive concentrations of waterfowl (sometimes in excess of 250,000 birds in fall) and tens of thousands of shorebirds, as well as its importance as a breeding site for many dabbling ducks and colonial birds including Franklin's Gulls that can total more than 40,000 birds in a season, Black-crowned Night-Heron and Eared

Grebe. This is essentially the only breeding site in Manitoba for White-faced Ibis, Cattle Egret and Snowy Egret (Canada's second only nest was recorded here in 2011). It is a major stop-over site for Buff-breasted Sandpiper (globally near-threatened). Several threatened grassland species also breed in the upland areas surrounding the lake including Ferruginous Hawk, Loggerhead Shrike and Sprague's Pipit. The area is a major tourist attraction too, bringing bird watchers and hunters from across North America. This is a featured stop on any bird watching itinerary in Manitoba for the unique species found here that can be found nowhere else in the province and for the spectacle of massive flocks of waterbirds and shorebirds. Through various agencies the Government of Manitoba encourage people to visit Whitewater on their way to or from the Grasslands birding trail. It is identified as a major site in Manitoba's Wildlife Viewing Guide, "Pelicans to Polar Bears", and one of Manitoba's top wildlife-viewing sites identified in Tourism Manitoba/Sustainable Development Watchable Wildlife Program.

We believe that linking the lake to any of the nearby creeks would seriously jeopardize the ecology of this globally significant area. Water levels at the lake must be permitted to maintain their natural cycle. The area would in fact benefit from tighter controls of drainage into the lake from nearby fields, which is part of the reason for current extreme water levels; expansion of the Wildlife Management area to encompass the highly productive ephemeral wetlands around the north of the lake; and greater promotion as a tourist attraction for watchable wildlife.

If the current proposal is enacted, when Manitoba swings back into a drought cycle, as is inevitable, the decrease in water-retention capabilities will cause hardship not just for wildlife but also for all agricultural producers in the area. We would ask that we be kept informed as to the progress of the proposed environmental licensing applications for works associated with drainage of Whitewater Lake and on the environmental impact assessment(s) that will be called for due to the factors outlined above, as well as any/all mitigation measures that may be proposed and post-construction monitoring, should the project be approved.

We also are concerned that the Province recently released a surface water management strategy that specifically addresses water management in terminal basins. http://gov.mb.ca/waterstewardship/questionnaires/surface_water_management/index.html. This EA application does not match the direction outlined in that strategy.

We appreciate the opportunity to participate in the review of this project proposal and we look forward to a response to our concerns, as well as being kept informed as to the progress of the proposal. If the Department would like clarification of any of the issues raised above and/or any further information on the bird species mentioned above, our members, including professional and amateur birders, would be glad to assist. Do not hesitate to call or email us.

Yours truly,

Jack Dubois

President, Nature Manitoba

Cc: Honourable C. Cox, Minister of Sustainable Development

Mr. R. Wowchuk, MLA

MUNICIPALITY OF BRENDA-WASKADA

Box 40, Waskada, Manitoba R0M 2E0
Phone: (204)673-2401 Fax: (204)674-2663
Email: waskadan@mymts.net

May 24, 2016

Environmental Approvals Branch
Conservation and Water Stewardship
123 Main Street, Suite 160
Winnipeg, MB R3C 1A5

via email: bruce.webb@gov.mb.ca

Attention: Bruce Webb,
Environmental Engineer.

Dear Bruce:

Re: Municipality of Deloraine-Winchester – Whitewater Lake Management Project,
File 5822.00.

The Municipality of Brenda Waskada would like to make the following comments on the proposal filed by KGS Group on behalf of the Municipality of Deloraine-Winchester.

- Brenda-Waskada has concern over how the gates will function. Firstly of who will be in charge of the gates opening and closing? Secondly, it seems by the explanation of the opening and closing of the gates, that the land between the gates and the Souris River may always have water running. This will cause some of the producers along the Medora Creek to be unable to utilize their historic hay lands with the full opening/closing of the gates during the summer months, as well as disrupting producers from being able to use their creek crossings .
- There is also concern over the channels capacity to take this water. Many years ago a cleanout was done of the Medora Creek Channel, but it failed to finish the last approximately 2-3 miles of the channel. The final channel cleanout should be completed before this control is put in place.
- At all stages during the initial discussions and search for a solution, the Rural Municipality of Brenda stated that they were not against the Whitewater groups search for a solution, but that the Municipality would like to be consulted as plans are put in place. The Municipality was disappointed that it not consulted or provided with an opportunity to question the proposal by KGS Group during its development stage.

The Municipality of Brenda Waskada thanks you for the opportunity to bring forward our concerns regarding this project.

Sincerely yours,
Municipality of Brenda-Waskada

Diane Woodworth,
Chief Administrative Officer.

/djw

5/30/2016

Coral & Curtis Clarke

[redacted] Hadnov, MB

Environmental Approvals Branch
Manitoba Conservation & Water Stewardship

Suite 160, 123 Main
Street Winnipeg, MB

Dear Mr. Bruce Webb, BW

Upon reading the information available in the proposal Whitewater Lake Management Project File:5822.00 we wanted to comment and offer our opinion on the proposal. We would like to bring a couple of factors to your attention that has not been discussed in your proposal.

The biggest concern from our standpoint is being where the water ultimately ends up once it starts down the Medora Creek. The destination of course is the Souris River and ultimately the Assiniboine River (which has had its flooding issues as well). Speaking as a producer who farms along the Souris River the drainage of any body of water directly affects us. We have been dealing with the drainage of Maple Lake to the north which enters the Souris River right at our land. In years were water levels are high we have water coming down the Souris River from the west, Maple Lake drain from the north and now this proposal for the River to take water from the south east within miles of the Maple Lake drain.

The concern we have with your proposal is that while you have stated for there to be gated control on the release of the water. In section 2.6.2 of your proposal you are basing release on the flow period of the Medora and Elgin creeks, but nowhere in your decision is it stated there is consideration of the water levels of the Souris River were it ultimately ends up.

Over the last several years the area of the Souris River were the Maple Lake drains into has not been able to handle the amount of water compounded with the fact that either North Dakota or Saskatchewan can release water without considering the flooding effects to Manitoba creates not only higher water levels but the prolonged time of the flooding. For instance last year of the 420 workable acres we have along the river we were only able to sow 100 to green feed oats and that was in July. Because the land was under water right from spring break up till June due to water being released from other jurisdictions, Maple Lake drain and high rainfall. By narrowing your spectrum of which water levels you are measuring and setting an arbitrary date of May 15 to let the gates results could be devastating for those downstream. If the Souris can't handle the amount of water then it will only back up and affect many more acres then the ones that you are gaining on the end of the lake. Another consideration with this as well, is the quality of the land that you are trying to drain versus the productivity of the land that you end up flooding because attention is not paid to water levels downstream.

Another concern is the quality of water coming from Whitewater Lake (high salt content) into Medora Creek with the sediment ultimately ending up were the water pools i.e. floods which is on River flat land such as ours. When you consider the quality of land that you are trying to gain on the Whitewater Lake by draining it to the quality of land that is being flooded there is no comparison, just look at the soil surveys. Valley bottom land versus Lake Bottom land. We would be interested in knowing the possible impact of that salt on the land quality and production downstream. On our land after a flood it becomes quite obvious what gets left behind from various forms of debris (trees etc) to silt which has been a benefit to the land. If this silt was to become salt infused, it would have a very negative effect on the productivity of the land.

Another factor that has not been included in your analysis is the amount of water that is being drained into Whitewater Lake without permits or without proper measures in place resulting in higher water levels in the lake. You have stated that the levels have risen "primarily due to inflow from snow meld and summer precipitation". Should this not be explored further? Part of the reason the inflow from snowmelt has been higher is due to all the mechanical drainage that has taken place resulting in more water coming faster into the lake. If there was more awareness of the amount of water coming in and being drained into the lake from surrounding areas it might act as a preventative measure to not needing to deal with such an excess of water.

We realize that when there is too much water, nobody wants to be left "holding" it. However if everyone in the area is not prepared to take a share of the burden of water in flood years and want to place that burden on a few rather than across many those few should be compensated for it. Land owners should be compensated for "storing" water or for the province to purchase the land to "store" the water on either at the lake end or the river end or the water flow.

The concerns that have been mentioned above are shared among many of the producers in our area that farm along the Souris River. Being a business that farms along the river we understand that rivers will flood and that is certainly to be expected. However the land is not meant for the storage of water and unfortunately our experience in the last 10 years has been not only has the land flooded but it is the length of time which the land is under water has been the most devastating. The land has gone from being an area that floods in the spring to an area that stores water for 3-4 months of the year (if not more) and can no longer be productive because it is now storing water.

We would be very willing to answer any questions or get together with you to discuss any of these concerns further. We would also volunteer, if you are interested to get together a group of producers who farm along the Souris River that are directly impacted by these drainage proposals, if interested.

We appreciate you granting an extension to allow us to submit our opinions regarding water release from Whitewater Lake and letting us voice our concerns.

Sincerely,

Coral & Curtis Clarke