



## Infrastructure

Engineering and Operations/Highway Planning and Design  
1420-215 Garry Street, Winnipeg, Manitoba, Canada R3C 3P3  
T 204-945-3660 F 204-945-0593  
[www.manitoba.ca](http://www.manitoba.ca)

February 13, 2018

Chief Samuel Knott  
Red Sucker Lake First Nation  
General Delivery  
Red Sucker Lake, MB R0B 1H0

Dear Chief Knott:

**Re: Project 6 All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation – Request for Community Engagement**

---

Manitoba Infrastructure (MI) is proposing an All Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project). Please find attached a copy of the project summary to help provide a general understanding of the proposed project. The project is undergoing an environmental impact assessment (EIA). MI is required to submit an Environmental Impact Statement (EIS) to the Canadian Environmental Assessment Agency (the Agency) and Manitoba Sustainable Development (MSD) for their review and approval of the Project.

Understanding and describing the effects of changes to the environment on indigenous peoples as a result of the Project is an important part of the EIS. MI, as the Project proponent (developer), is inviting you and your community to share your thoughts on the Project.

Please provide any information you would like MI to consider while planning this project and preparing the EIS. Please identify/describe potential effects that you feel the Project may have on your community including environmental effects, and impacts to rights, titles and related interests. The information received in response to this request will be considered and reflected in the Environmental Impact Statement (EIS) that MI is drafting for submission to the Agency and MSD.

Please provide your comments to Jaime Smith via email at [Jaime.Smith@gov.mb.ca](mailto:Jaime.Smith@gov.mb.ca) by March 9, 2018 to ensure they can be considered when MI is drafting the EIS. If no comments are received from your community by this date, MI will report this in the engagement chapter of the EIS. If you have any questions related to this request or you would like to discuss this request further, please contact Edwin Mitchell at 204-794-8635 or [Edwin.Mitchell@gov.mb.ca](mailto:Edwin.Mitchell@gov.mb.ca).

Please note that MI is requesting this information, as the project proponent, as a form of community engagement to inform the project planning process. **This request does not constitute or fulfil the Crown's duty to consult** with indigenous groups when making decisions that may adversely impact the

rights recognized and affirmed by section 35 of Constitution Act. Crown Consultation activities will be carried out under separate processes.

Yours truly,

Redacted

Kimber Osiowy, M.Sc. P.Eng  
Manager, Environmental Services Section

Enclosures

cc: Jaime Smith, Sr. Environmental Coordinator (MI)  
Edwin Mitchell, ARED Officer (MI)  
Cheryl Prosser, Coordinator (INR)



## Infrastructure

Engineering and Operations/Highway Planning and Design  
1420-215 Garry Street, Winnipeg, Manitoba, Canada R3C 3P3  
T 204-945-3660 F 204-945-0593  
[www.manitoba.ca](http://www.manitoba.ca)

February 13, 2018

Chief David McDougall  
St. Theresa Point First Nation  
General Delivery  
St. Theresa Point, MB R0B 1J0

Dear Chief McDougall:

**Re: Project 6 All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation – Request for Community Engagement**

---

Manitoba Infrastructure (MI) is proposing an All Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project). Please find attached a copy of the project summary to help provide a general understanding of the proposed project. The project is undergoing an environmental impact assessment (EIA). MI is required to submit an Environmental Impact Statement (EIS) to the Canadian Environmental Assessment Agency (the Agency) and Manitoba Sustainable Development (MSD) for their review and approval of the Project.

Understanding and describing the effects of changes to the environment on indigenous peoples as a result of the Project is an important part of the EIS. MI, as the Project proponent (developer), is inviting you and your community to share your thoughts on the Project.

Please provide any information you would like MI to consider while planning this project and preparing the EIS. Please identify/describe potential effects that you feel the Project may have on your community including environmental effects, and impacts to rights, titles and related interests. The information received in response to this request will be considered and reflected in the Environmental Impact Statement (EIS) that MI is drafting for submission to the Agency and MSD.

Please provide your comments to Jaime Smith via email at [Jaime.Smith@gov.mb.ca](mailto:Jaime.Smith@gov.mb.ca) by March 9, 2018 to ensure they can be considered when MI is drafting the EIS. If no comments are received from your community by this date, MI will report this in the engagement chapter of the EIS. If you have any questions related to this request or you would like to discuss this request further, please contact Edwin Mitchell at 204-794-8635 or [Edwin.Mitchell@gov.mb.ca](mailto:Edwin.Mitchell@gov.mb.ca).

Please note that MI is requesting this information, as the project proponent, as a form of community engagement to inform the project planning process. **This request does not constitute or fulfil the Crown's duty to consult** with indigenous groups when making decisions that may adversely impact the



rights recognized and affirmed by section 35 of Constitution Act. Crown Consultation activities will be carried out under separate processes.

Yours truly,

Redacted

Kimber Osiowy, M.Sc. P.Eng  
Manager, Environmental Services Section

Enclosures

cc: Jaime Smith, Sr. Environmental Coordinator (MI)  
Edwin Mitchell, ARED Officer (MI)  
Cheryl Prosser, Coordinator (INR)



## Infrastructure

Engineering and Operations/Highway Planning and Design  
1420-215 Garry Street, Winnipeg, Manitoba, Canada R3C 3P3  
T 204-945-3660 F 204-945-0593  
[www.manitoba.ca](http://www.manitoba.ca)

February 13, 2018

Chief Alex McDougall  
Wasagamack First Nation  
General Delivery  
Wasagamack, MB R0B 1Z0

Dear Chief McDougall:

**Re: Project 6 All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation – Request for Community Engagement**

---

Manitoba Infrastructure (MI) is proposing an All Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project). Please find attached a copy of the project summary to help provide a general understanding of the proposed project. The project is undergoing an environmental impact assessment (EIA). MI is required to submit an Environmental Impact Statement (EIS) to the Canadian Environmental Assessment Agency (the Agency) and Manitoba Sustainable Development (MSD) for their review and approval of the Project.

Understanding and describing the effects of changes to the environment on indigenous peoples as a result of the Project is an important part of the EIS. MI, as the Project proponent (developer), is inviting you and your community to share your thoughts on the Project.

Please provide any information you would like MI to consider while planning this project and preparing the EIS. Please identify/describe potential effects that you feel the Project may have on your community including environmental effects, and impacts to rights, titles and related interests. The information received in response to this request will be considered and reflected in the Environmental Impact Statement (EIS) that MI is drafting for submission to the Agency and MSD.

Please provide your comments to Jaime Smith via email at [Jaime.Smith@gov.mb.ca](mailto:Jaime.Smith@gov.mb.ca) by March 9, 2018 to ensure they can be considered when MI is drafting the EIS. If no comments are received from your community by this date, MI will report this in the engagement chapter of the EIS. If you have any questions related to this request or you would like to discuss this request further, please contact Edwin Mitchell at 204-794-8635 or [Edwin.Mitchell@gov.mb.ca](mailto:Edwin.Mitchell@gov.mb.ca).

Please note that MI is requesting this information, as the project proponent, as a form of community engagement to inform the project planning process. **This request does not constitute or fulfil the Crown's duty to consult** with indigenous groups when making decisions that may adversely impact the

rights recognized and affirmed by section 35 of Constitution Act. Crown Consultation activities will be carried out under separate processes.

Yours truly,

Redacted

Kimber Osiowy, M.Sc./P.Eng  
Manager, Environmental Services Section

Enclosures

cc: Jaime Smith, Sr. Environmental Coordinator (MI)  
Edwin Mitchell, ARED Officer (MI)  
Cheryl Prosser, Coordinator (INR)





## Infrastructure

Engineering and Operations/Highway Planning and Design  
1420-215 Garry Street, Winnipeg, Manitoba, Canada R3C 3P3  
T 204-945-3660 F 204-945-0593  
[www.manitoba.ca](http://www.manitoba.ca)

February 13, 2018

President David Chartrand  
Manitoba Metis Federation  
300-150 Henry Avenue  
Winnipeg, MB R3B 0J7

Dear President Chartrand:

**Re: Project 6 All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation – Request for Community Engagement**

---

Manitoba Infrastructure (MI) is proposing an All Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project). Please find attached a copy of the project summary to help provide a general understanding of the proposed project. The project is undergoing an environmental impact assessment (EIA). MI is required to submit an Environmental Impact Statement (EIS) to the Canadian Environmental Assessment Agency (the Agency) and Manitoba Sustainable Development (MSD) for their review and approval of the Project.

Understanding and describing the effects of changes to the environment on indigenous peoples as a result of the Project is an important part of the EIS. MI, as the Project proponent (developer), is inviting you and your community to share your thoughts on the Project.

Please provide any information you would like MI to consider while planning this project and preparing the EIS. Please identify/describe potential effects that you feel the Project may have on your community including environmental effects, and impacts to rights, titles and related interests. The information received in response to this request will be considered and reflected in the Environmental Impact Statement (EIS) that MI is drafting for submission to the Agency and MSD.

Please provide your comments to Jaime Smith via email at [Jaime.Smith@gov.mb.ca](mailto:Jaime.Smith@gov.mb.ca) by March 9, 2018 to ensure they can be considered when MI is drafting the EIS. If no comments are received from your community by this date, MI will report this in the engagement chapter of the EIS. If you have any questions related to this request or you would like to discuss this request further, please contact Edwin Mitchell at 204-794-8635 or [Edwin.Mitchell@gov.mb.ca](mailto:Edwin.Mitchell@gov.mb.ca).

Please note that MI is requesting this information, as the project proponent, as a form of community engagement to inform the project planning process. **This request does not constitute or fulfil the Crown's duty to consult** with indigenous groups when making decisions that may adversely impact the

rights recognized and affirmed by section 35 of Constitution Act. Crown Consultation activities will be carried out under separate processes.

Yours truly,

Redacted

Kimber Osiowy, M.Sc. P/Eng  
Manager, Environmental Services Section

**Enclosures**

cc: Jaime Smith, Sr. Environmental Coordinator (MI)  
Edwin Mitchell, ARED Officer (MI)  
Cheryl Prosser, Coordinator (INR)



# **Proposed All Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (Project P6)**

## **Project Background**

The communities of Manto Sipi Cree Nation, Bunibonibee Cree Nation, God's Lake First Nation and God's Lake Narrows Northern Affairs Community, on the east side of Lake Winnipeg, rely primarily on winter road and air travel to transport people and goods. In 2008, the Government of Manitoba announced a strategic initiative to provide improved, safer and more reliable transportation services for Manitoba communities on the east side of Lake Winnipeg. The East Side Road Authority (ESRA) was established as a provincial Crown Agency to manage the East Side Transportation Initiative. The project mandate included planning, design and construction of all-season roads to improve the connectivity of First Nations and other northern communities on the east side of Lake Winnipeg to the provincial highway system. Project P6 is one of these projects. ESRA has since been absorbed into Manitoba Infrastructure (MI), Remote Road Operations which will continue to manage the project.

## **Project Description**

The proposed all-season road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation consists of approximately 141km of road and new right-of-way (ROW) on provincial Crown land. The project includes three road sections starting at the Reserve boundaries and generally heads west and southwest from Manto Sipi Cree Nation approximately 72km, southeast from Bunibonibee Cree Nation approximately 39km and northwest from God's Lake First Nation approximately 30km where the three sections will intersect. MI continues discussion with Manto Sipi on an 8km section of road to finalize the alignment near the community.

An existing on-Reserve access road at Bunibonibee Cree Nation will connect to the P6 all-season road project. On-Reserve access roads will need to be constructed separately at Manto Sipi Cree Nation and God's Lake First Nation to connect to the all-season road that will terminate at the Reserve boundaries.

The road will be a gravel-surface public highway with a design width of 10m, a design speed of 90km/h and a posted speed of 70km/h. The road will generally follow the current winter road alignment, with up to two major water crossings (bridges) over God's River and Magill Creek. Approximately 51 other stream crossings will be constructed using corrugated metal culverts or box culverts and equalization culverts to maintain surficial groundwater movement. The construction of the project will also require temporary bridges, trails, laydown areas and construction camps. The project will make use of rock quarries and clay and granular borrow areas. A copy of the project description submitted to Canadian Environmental Assessment Agency can be found here: <http://www.ceaa-acee.gc.ca/050/documents/p80138/119253E.pdf>

## **Community Involvement and Alignment Considerations**

The Indigenous and Public Engagement Program (IPEP) builds on past studies, ongoing discussions with the Manto Sipi CN, Bunibonibee CN and God's Lake FN, as well as other Indigenous communities and stakeholders with interest in the east side of Lake Winnipeg. MI as

the proponent (project developer), has had ongoing discussions with these three communities and others since 2009 with respect to the development of an all-season road network on the east side of Lake Winnipeg. Traditional Knowledge (TK) and local knowledge was used in the selection of the alignments including the road linking Manto Sipi CN, Bunibonibee CN and God's Lake FN.

Specific to the Environmental Impact Assessment (EIA) for this Project, MI conducted three rounds (4, 5 and 6) of engagement with the three local Cree Nation communities and the God's Lake Narrows Northern Affairs Community (NAC) who will be directly affected by the Project. Engagement activities included supplying project information, identifying valued components (VCs), obtaining feedback on potential effects and mitigation, and presenting the results of the environmental assessment. Other communities in the larger area are also being invited to provide information related to the project.

TK and local information pertaining to traditional land uses, economic activities, ceremonial pursuits, as well as local ecological knowledge will be incorporated into the EIA process as it facilitates the direct inclusion of local Indigenous communities in project planning and design. TK information is obtained through existing information (with permission), TK studies with the consent of the affected communities, and TK workshops, interviews, community meetings and Open Houses.

The IPEP extended beyond the local Indigenous communities, with additional Public Open Houses in Winnipeg and discussions with interested stakeholders. Information from previous engagement and Crown consultation initiatives and/or programs such as the Large Area Network Study will also be incorporated. The IPEP includes providing descriptions of the Project and soliciting input on comments and questions relating to the Project and the environmental assessment, prior to submission of the EIS.

## **Environmental approvals**

The proposed P6 all-season road is currently undergoing an environmental assessment under *The Environment Act* (Manitoba) as well as an environmental assessment under *The Canadian Environmental Assessment Act 2012* (Canada). Under this process, Manitoba Infrastructure has submitted a project description to Manitoba Sustainable Development and the Canadian Environmental Assessment Agency for review. Manitoba Infrastructure will be submitting an Environmental Impact Statement (EIS) that will describe the predicted environmental effects of the proposed project, and mitigation measures to avoid or minimize those effects shortly. Further information on this process is available on the MSD website at:

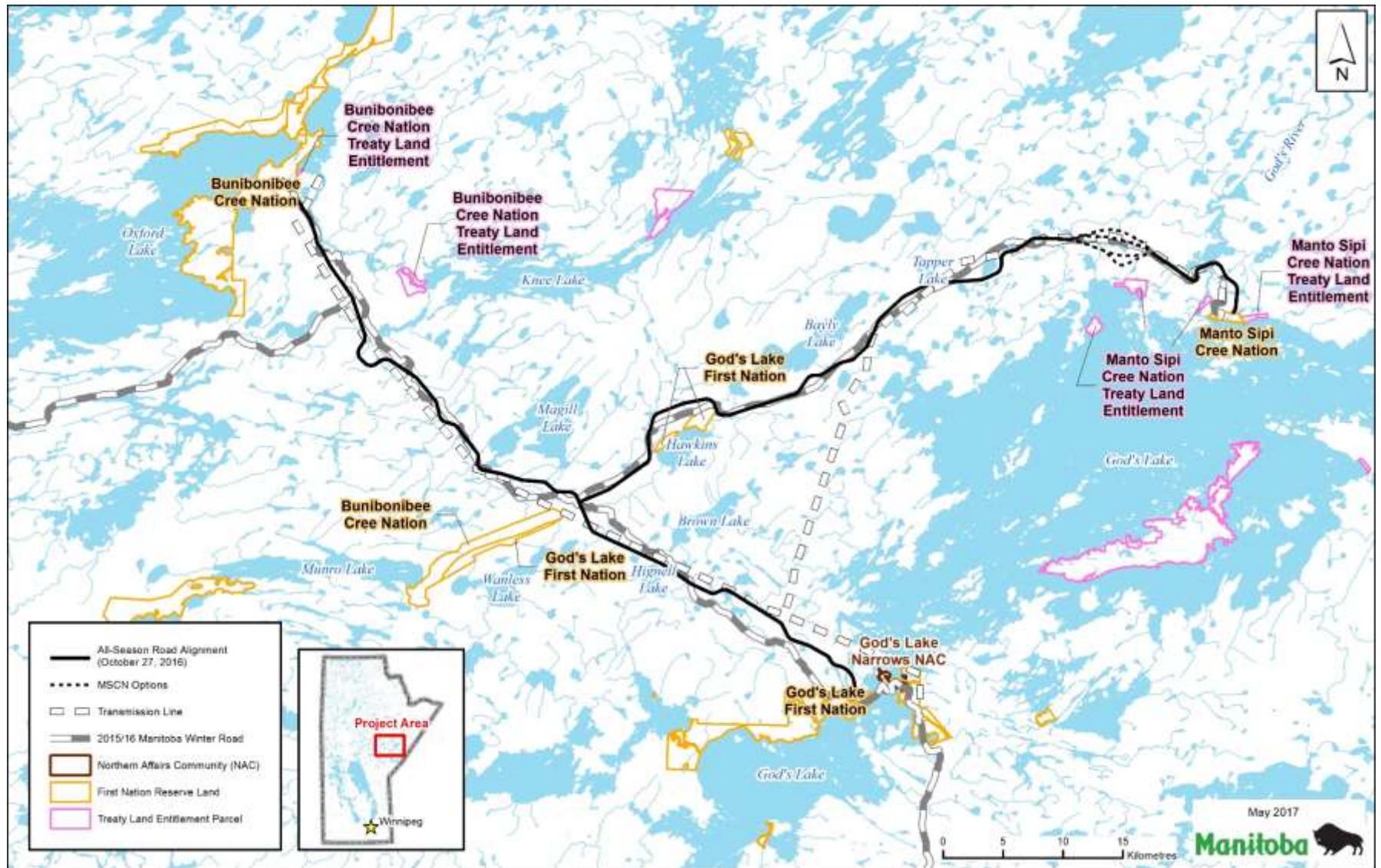
<http://www.gov.mb.ca/sd/eal/registries/5897p6road/index.html>

and the CEAA website at:

<http://www.ceaa-acee.gc.ca/050/details-eng.cfm?evaluation=80138>

The proposed project will not proceed until environmental approvals are in place, consultation has been completed and any subsequent permitting that may be required has been approved.

## Project 6 - All Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation





## Appendix 5-10: Manitoba Metis Federation Response to Engagement Letter

---



# MANITOBA METIS FEDERATION INC.

300 - 150 Henry Avenue, Winnipeg, Manitoba R3B 0J7

Phone: (204) 586-8474 Fax: (204) 947-1816 Website: [www.mmf.mb.ca](http://www.mmf.mb.ca)

David Chartrand, LL.D. (Hon)  
*President*

March 9, 2018

\*\*\*VIA E-MAIL\*\*\*

Mr. Kimber Osiowy  
Manager, Environmental Services Section  
Engineering and Operations/Highway Planning and Design  
Manitoba Infrastructure  
1420 – 215 Garry Street  
Winnipeg, MB R3C 3P3

Dear Mr. Osiowy,

**Re: Project 6 All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation – Request for Community Engagement**

The Manitoba Metis Federation (MMF) received your letter, dated February 13, 2018, in which you provide a project summary and details of Manitoba Infrastructure's (MI) preparation of an Environmental impact assessment (EIS) on Project 6: All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project).

The MMF notes from your letter that MI, as the project proponent, is seeking input and information from the Manitoba Metis Community (the Community) regarding potential impacts of Project. As indicated in our letters and correspondence to MI, Manitoba Sustainable Development (MSD), and the Canadian Environmental Assessment Agency (CEAA), the Project is located in a region with known contemporary and historical use by the Community. The MMF has been very concerned that, to date, the environmental assessment process failed to obtain and meaningfully consider Metis-specific information in the preparation of the EIS.

**About the Manitoba Metis Federation**

The MMF is the democratically elected government of the Metis Nation's Manitoba Metis Community and is duly authorized by the citizens and harvesters of the Community for the purposes of dealing with the Community's rights, claims, and interests, including conducting consultations and negotiating accommodations. The MMF represents a rights-bearing Metis Community consistent with *R. v. Powley*, [2003] 2 S.C.R. 207. In addition, the Manitoba Provincial Court's decision in *R. v. Goodon*, [2009] M.J. No 3 (M.P.C.), recognized the Manitoba Metis Community's right to hunt, as well as the existence of a vibrant, regional, rights-bearing Metis Community that is represented by the MMF, which encompasses southwestern Manitoba and extends to central and northern Manitoba, the United States, and Saskatchewan. As the Supreme Court of Canada articulated in *Powley*, the Metis right to hunt is "recognized as part of the special aboriginal relationship to the land" (para. 50).

The 2012 *Points of Agreement on Metis Harvesting in Manitoba*, and agreement between the MMF and the Province of Manitoba, was signed at the MMF's 44<sup>th</sup> Annual General Assembly and commits to the "recognition of Metis harvesting (including fishing) rights in mutually agreed [upon] regions of the province and relies on the MMF's Metis Laws of the [Harvest] as the basis for the development of new provincial regulations governing Metis harvesting" (Manitoba Metis Federation 2012).

In 2013, the Supreme Court of Canada ruled in *Manitoba Metis Federation Inc. v. Canada* 2013 SCC 14 that in "[t]hat the federal Crown failed to implement the land grant provision set out in s. 31 of the *Manitoba Act, 1870* [which promised 1.4 million acres of land to Metis children] in accordance with the honour of the Crown." This victory was the culmination of a long legal battle led by the MMF and an important step in the advancement of the MMF land claim in Manitoba. On April 14, 2016, the Supreme Court of Canada ruled in the *Daniels v. Canada* case that the Metis are recognized as "Indians" under Section 91(24) of the Constitution Act of 1867. The Metis are now included as one of the Indigenous groups recognized as "Indians" under the Constitution Act of 1867. As a result of the ruling, there remains no doubt that the federal government has jurisdiction over Metis issues and that "it is the federal government to whom [Metis] can turn" (para. 50). As a result, the federal government has a duty to negotiate with Metis communities when their Aboriginal rights are engaged (para. 56).

On November 15, 2016, Canada and the MMF executed a Framework Agreement that establishes a negotiation process the purposes of which are to jointly develop a renewed nation-to-nation, government-to-government relationship between the Crown and the Manitoba Metis Community that advances reconciliation between the Parties consistent with the purpose of section 35 of the *Constitution Act, 1982* and to arrive at a shared solution that advances reconciliation between the Parties consistent with the purpose of section 35 of the *Constitution Act, 1982* and the Supreme Court of Canada's decision in *Manitoba Metis Federation Inc. v. Canada (AG)*. This was an historic step for the Community and a milestone in its relationship with Canada.

The Metis Laws of the Harvest combined with decisions such as the *Powley* case, the *Goodon* case, the 2012 *Points of Agreement on Metis Harvesting in Manitoba*, the *Manitoba Metis Federation* case, the *Daniels* case, and the Canada-MMF Framework Agreement all work together to ensure that the Community's rights are upheld, enabling the Metis to maintain an important aspect of their cultural identity and connection to the land while ensuring the natural environment is protected and species are conserved.

The MMF adopted Resolution no. 8 at the 2007 Annual General Assembly in order to set out a working framework for engagement, consultation, and accommodation to be followed by federal and provincial governments and industry when making decisions and developing plans and projects that may impact the Community. Under Resolution no. 8, direction has been provided by the Manitoba Metis Community for the Provincial Home Office of the MMF to take the lead and be the main contact on all consultations affecting the Community and to work closely with the Regions and Locals to ensure governments and industry abide by environmental and constitutional obligations to the Metis.



As you are aware, in engaging with the MMF on behalf of the Manitoba Metis Community, the MMF's Resolution No. 8 Framework process provides direction for the implementation of five phases:

Phase I: Notice and Response;  
Phase II: Funding and Capacity;  
Phase III: Engagement and Consultation;  
Phase IV: Partnership and Accommodation; and  
Phase V: Implementation.

As we believe the Project will have an impact on the rights, interests, and claims of the Manitoba Metis Community, the process as set out above will need to be followed.

### **Manitoba Metis Rights, Interests, and Potential Effects of the Project**

Based on the Manitoba Metis Community's constitutionally protected rights, the requirements under the *Environment Act* (MB) and *CEAA, 2012* (CAN), as well as the MMF's previous experiences on MI projects such as PR 304 to Berens River, Project 4, Project 7 and 7A and the Shoal Lake Access Road, the MMF anticipates the following as potential impacts to the Manitoba Metis Community's rights, claims and interests:

- Avoiding, mitigating, or accommodating negative impacts to the current use of lands and resources for traditional purposes by Manitoba Metis citizens;
- Avoiding, mitigating, or accommodating negative impacts to the health and socio-economic conditions of Manitoba Metis citizens;
- Avoiding, mitigating, or accommodating negative impacts to the physical and cultural heritage of Metis peoples in Manitoba;
- Avoiding, mitigating, or accommodating negative impacts to Manitoba Metis informal and formal socio-cultural and economic systems;
- Avoiding, mitigating, or accommodating negative impacts to Manitoba Metis citizens individual commercial harvesting associated with traditional land-use;
- Manitoba Metis citizens are able to equitably participate in the economic benefits and opportunities of the project;
- Through ongoing consultation and specific roles and/or employment, Manitoba Metis citizens are able to participate in the environmental and cultural monitoring and management of the project; and,
- Manitoba Metis citizens are able to participate in decision-making with respect to the project throughout its lifespan.

It is critical that impacts to our Community's rights, claims, and interests and both primary and secondary impacts on the Community's livelihood are collected and included in the Project EIS for meaningful consideration by both the Proponent and the Crown.

In keeping with the EIS guidelines provided by CEAA, the MMF would like to arrange a meeting between representatives of the MMF and MI to discuss the Project and discuss a process for providing funding and capacity support for an appropriate and meaningful level of engagement with the Community. Capacity funding will support engagement with our citizens and harvesters, hearing the Community's concerns and gathering traditional land-use, occupancy, and traditional knowledge with respect to the project area that will allow MI to address the impacts listed above. This information will

also assist MSD in ensuring the Crown has the information necessary to proceed with the environmental assessment process.

The MMF anticipates reading your response and working collaboratively with MI, MSD and CEAA to complete the licensing and Crown-Aboriginal consultation processes for this Project. Please do not hesitate to contact me at your earliest opportunity via telephone at 204-586-8474, extension 234 or via email at [jasmine.langhan@mmf.mb.ca](mailto:jasmine.langhan@mmf.mb.ca) to schedule a meeting to further discuss any matters raised in this letter.

Best regards,

Redacted

Jasmine Langhan

Cc: MMF President's Office  
Marci Riel, MMF Director of Energy and Infrastructure  
Jaime Smith, Sr. Environmental Coordinator, Manitoba Infrastructure  
Edwin Michell, ARED Officer, Manitoba Infrastructure  
Cheryl Prosser, Coordinator, Manitoba Indigenous and Northern Relations

Appendix 5-11:  
Manitoba Infrastructure Letter to  
Manitoba Metis Federation Requesting  
Supporting Information

---





## Infrastructure

Engineering and Operations/Highway Planning and Design  
1420-215 Garry Street, Winnipeg, Manitoba, Canada R3C 3P3  
T 204-945-3660 F 204-945-0593  
www.manitoba.ca

April 24, 2018

Jasmin Langhan  
Manitoba Metis Federation  
300-150 Henry Avenue  
Winnipeg, MB R3B 0J7

**Re: All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation**

---

Dear Ms. Langhan,

Through the Canadian Environmental Assessment Agency (the Agency) Guidelines, the Agency asked Manitoba Infrastructure (MI) to provide the Manitoba Metis Federation (MMF) with project information and seek MMF's input on the All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project). As a part of MI's engagement activities for the Project, to provide the MMF an opportunity to learn about the project prior to the submission of the EIS, MI sent a project information package to MMF. The information included summaries of the Project's background; description; community involvement and alignment considerations; environmental approvals required under CEAA 2012 and Environment Act; links to the project registry on CEAA and MSD's website and a website link to the full project description.

MI will also submit a copy of the Environmental Impact Statement to MMF, once completed, for MMF's review and comment. The MMF's comments will be considered during the Agency's conformity review process period. MI will continue to provide interested stakeholders, such as the MMF, with project information and progress throughout the Project's lifecycle on MI's website including information on design, construction, and operation.

To support the Agency's information needs, MI requested the MMF to identify/describe potential effects that the Project may have on the Métis community. MMF responded with a letter dated March 9, 2018 asserting that the P6 All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project) is located in a region with known contemporary and historical use by the Métis Community. The MMF also has asserted potential effects of the Project to the asserted Métis community. MI will include the information provided by the MMF in the Environmental Impact Statement (EIS) and other information as attached.

MI has included/considered the MMF as an interested stakeholder since the Project is located well outside of the recognized Métis Natural Resource Harvesting area in Manitoba. To date, the MMF has not supplied any information in support of the asserted Métis use within the Project area. Our regional staff have not come across Métis individuals using this area for the exercise of rights. This

area is mainly used by Manto Sipi Cree Nation, God's Lake First Nation, and Bunibonibee Cree Nation. If you have any information in support of Métis use of this area, please provide it to MI by May 4, 2018. MI plans to submit the EIS to the Agency shortly thereafter.

MI has two roles in this Project, as a proponent for the Agency's process and as a provincial Crown for Manitoba's process. This current request is strictly to meet CEAA, 2012 requirements. In terms of Crown consultation, Manitoba will advise MMF shortly.

Thank you for providing information to contribute to the Project EIS.

Best regards,

Redacted

Kimber Osiowy, M.Sc. P. Eng  
Manager, Environmental Services

cc: Jaime Smith – Sr. Environmental Coordinator, MI  
Cheryl Prosser – Coordinator, INR

Attachment: [Excerpts from the P6 EIS related to the MMF and the Manitoba Métis Community]

Appendix 5-12:  
Manitoba Metis Federation Response to  
Manitoba Infrastructure's Request for  
Supporting Information

---





# MANITOBA METIS FEDERATION INC.

300 - 150 Henry Avenue, Winnipeg, Manitoba R3B 0J7

Phone: (204) 586-8474 Fax: (204) 947-1816 Website: [www.mmf.mb.ca](http://www.mmf.mb.ca)

David Chartrand, LL.D. (Hon)  
President

May 4, 2018

\*\*\*VIA E-MAIL\*\*\*

Kimber Osiowy  
Manitoba Infrastructure  
1420-215 Garry Street  
Winnipeg, MB R3C 3P3

Dear Mr. Osiowy,

**Re: All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (Project 6)**

The Manitoba Metis Federation (MMF) is in receipt of your letter, dated April 24, 2018, with regard to the proposed All Season Road – P6 – indicated above. I note that your letter indicates that Manitoba Infrastructure (MI) will be acting as both the proponent and the provincial Crown for Project 6 and is responsible for undertaking appropriate engagement and consultation with the Community as required under *CEAA 2012* and the *Environment Act*. I also note that your letter provides details of Manitoba Infrastructure's approach to engagement and consultation with the MMF on behalf of the Manitoba Metis Community (the Community) for Project 6.

CEAA's EIS Guidelines require MI to seek the MMF's input on the Project and to consider the potential impacts of the project on the rights, claims and interests of the citizens of the Metis Nation's Manitoba Metis Community. The MMF has been proactively working with CEAA on Project 6 to ensure the impacts of the project are fully considered and addressed in the federal licensing process and looks forward to the opportunity to work with you on the issues integral to the provincial process. As both the Proponent and the Crown, MI has a significant role to play in a full, proper and meaningful engagement and consultation process with the MMF on behalf of our Community. With that objective in mind, I bring to your attention two items: the lack of concern on the part of MI to the assessment and consideration of the impacts of the project on the citizens of the Community and the language used in your letter to refer to the Metis government in Manitoba and the rights-bearing community it represents.

By way of this correspondence, I am raising a concern that MI's opinion of an appropriate engagement and consultation process with the Community will not meet the requirements set forth by the Canadian Environmental Assessment Agency (CEAA) under the Project 6 EIS guidelines and will not appropriately fulfill the Crown's duty to consult obligations to the Community. I am also raising a concern that MI's continued disrespect to the MMF and the rights-bearing community it represents is unlikely to result in the proactive and productive regulatory process that MI, as the Proponent, will require in order to move toward construction in a timely manner.



Please connect with Jasmine Langhan, MMF Engagement and Consultation Coordinator to arrange a discussion of the matters brought forward in the correspondence to date and to schedule a meeting to begin working on an appropriate engagement and consultation work plan. She can be reached via telephone at 204-586-8474, ext. 234 or via email at [jasmine.langhan@mmf.mb.ca](mailto:jasmine.langhan@mmf.mb.ca).

Meq-wetch,

Redacted

Marci Riel  
Director, Energy and Infrastructure

Cc: Jasmine Langhan, Engagement and Consultation Coordinator, MMF  
Jaime Smith, Sr. Environmental Coordinator, Manitoba Infrastructure  
Cheryl Prosser, Coordinator, Manitoba Indigenous and Northern Relations  
Janet Scott, Project Manager, Canadian Environmental Assessment Agency

## Appendix 5-13: Comments Submitted to the Canadian Environmental Assessment Agency

---

**From:** <email Councillor Moses Okimaw>  
**To:** [Scott Janet ICEAAI](#)  
**Subject:** Potential Impact of P6  
**Date:** July 11, 2017 2:22:14 PM

---

We are unable to make comments simply because we do not possess the expertise to review the studies that were done or we don't have the requisite knowledge of the nature of the construction and how such construction will impact what's on the land. We don't have the financial resources to engage the appropriate consultants given the short time period.

**From:** [Gaile Whelan Enns](#)  
**To:** [Project 6 All Season Road / Projet 6 Route Toutes Saison \[CEAA/ACE](#)  
**Cc:** [Moses Okimaw](#)  
**Subject:** Comments: Project 6 — All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation  
**Date:** August 28, 2017 10:01:27 PM  
**Attachments:** [CEAA Public Registry.docx](#)

---

## Project 6 — All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation - EA Guidelines Review

NOTICE: This email is sent on behalf of Manto Sipi Cree Nation and Moses Okimaw, Councillor and portfolio holder for matters pertaining to this project and the federal responsibilities under CEAA for this project. Comments result from meetings, review of the Guidelines for P6 EIS, and discussions with the proponent.

NOTE - document attached.

---

Manto Sipi Cree Nation, our community, lands, rights, and traditional land uses, economy are all potentially affected by this project. We anticipate potential social effects also once the road is in place.

We have reviewed the CEAA Guidelines for the proponent's EA for the project. We note that sections of the Guidelines that are specific to Aboriginal/Indigenous groups. We expect all of these sections to be fully and completely filed in the EA, and to reflect our situation with respect to the project. It is imperative that the EA clearly contain information about each of the First Nations potentially affected by the project. That is general content about Indigenous of First Nation rights, land use, benefits or effects from the project is not sufficient. Manto Sipi Cree Nation assumes that the EA will fulfill these sections of the Guidelines with respect to our Nation, our rights, our land use, and potential effects on our community, lands, access to lands and ability to exercise our rights etc.

### 2.4 Application of the Precautionary Principle

We are interested in what the proponent will provide in this section of their EA, as the department is not know for avoiding environmental effects in its activity in northern Manitoba.

### 3.2 Factors to be Considered

Due to the amount of discussion about potential mining activity near our lake and our community we are particularly interested in the cumulative effects factor to be considered in the EA. Current effects, and future project effects are important to us, especially given the history of mining in our lake.

#### 3.2.1 Changes to the Environment

While there are air pollution, CO2, and green house gas emissions requirements in the detailed outline for the EA we are also concerned that the potential effects on permafrost in our region, and in the entire project area ( including where material will be obtained, transported, etc) be included and that planning for the project take into account the presence of permafrost.

#### 3.2.2 Valued Components to be Examined



The Guidelines for CEAA EA indicate these must include:

- with respect to aboriginal peoples, an effect of any change that may be caused to the environment on:
  - health and socio-economic conditions;
  - physical and cultural heritage;
  - the current use of lands and resources for traditional purposes; or
  - any structure, site or thing that is of historical, archaeological, paleontological or architectural significance.
- the effect of that change, other than the effects mentioned above, on:
  - health and socio-economic conditions,
  - physical and cultural heritage, or
  - any structure, site or thing that is of historical, archaeological, paleontological or architectural significance.

We do not feel that sufficient archeological study has been conducted, and know that the current records of the provincial government are not complete for our region. Predictive modeling in relation to Indigenous sites has certainly not been applied to the project area. Our own intended traditional lands study ( which starts in September) may help to inform the proponent but we will continue to be worried.

More study and more interviews are needed.

We need to locate our sacred and archeological sites and make sure they are protected and secure. We are not sure the proponent has taken the necessary steps regarding these needed VCs.

We hope that the proponent will have a complete set of VCs and avoid combining species and environment elements into few VCs, which can mean they are dropping or ignoring components that matter to us.

We wish to see VCs for the small mammals common, that are trapped, and hunted. We wish to see VCs for the birds in our region, including those that use the Lake. We wish to see VC to reflect the benefits to our community and the impacts to our community from the road.

We wish to see VC to show how the loss of lands will impact our community.

As a project wholly inside Indigenous traditional territories the VCs need to reflect the Indigenous role in the region.

### 3.2.3 Boundaries

Studies by the proponent have been sectioned according to each of the three First Nations' land use. It is important to have a whole project area, that includes all potential activity by the proponent all potential effects of the project. The Right of Way is not the project area. Nor is the work corridor the project area. Given three communities would be served by the road, and given the ROW and corridor would cross traplines, travel lines, and the new infrastructure will affect species, and exercise of our rights the project area must reflect these land uses and effects.

### 4.2.2 Community Knowledge and Aboriginal Traditional Knowledge

"the environmental assessment of a designated project may take into account community knowledge and Aboriginal traditional knowledge"

"The proponent will incorporate into the EIS the community knowledge and Aboriginal traditional knowledge to which it has access or that is acquired through public participation and engagement with Indigenous groups..."

Manto Sipi Cree Nation considers inclusion of aboriginal traditional knowledge a required part of the proponent's EIS/EA. The reference to 'which it has access ....' concerns us.

We do not yet have the full information gathered by the government proponent back in our hands.

It took some time to obtain some of its reports, and they arrived with a contract to sign informing us that we could not use the information in our consultations or EA reviews etc etc. This is wrong.

We also have been asking for our digital data since spring 2017 and it has not been provided to us. This is community information and the intellectual capital of our land users and knowledge carriers. CEAA needs to find better standards and methods with respect to Crown proponents and their holding of Indigenous data. We have asked for the maps, and the data used in their design. To date this has not happened.

Quote: "Agreement should be obtained from Indigenous groups regarding the use, management and protection of their existing traditional knowledge information during and after the EA." No such step to enter into an agreement with Manto Sipi has occurred.

#### 4.3 Study Strategy and Methodology

Quote: "All data, models and studies will be documented such that the analyses are transparent and reproducible. All data collection methods will be specified. The uncertainty, reliability, sensitivity and conservativeness of models used to reach conclusions must be indicated."

We have no confidence that these steps are being taken. Methodology content is lacking in the reports we have obtained from the proponent to date.

Quote: "Where the conclusions drawn from scientific, engineering and technical knowledge are inconsistent with the conclusions drawn from Aboriginal traditional knowledge, the EIS will present each perspective on the issue and a statement of the proponent's conclusions."

It is our experience that Crown proponents in Manitoba do not take the steps above.

Quote: "The proponent will provide Indigenous groups the opportunity to review and provide comments on the information used for describing and assessing effects on Aboriginal peoples."

CEAA must understand that our community members, our Council, have not been funded to participate in any of the engagement, EIS discussions, meetings about the proponent's project etc to date. We must have the capacity to be able to participate in the next steps.

#### 4.5

Quote: Summary of the EIS

##### 1. Follow-up and monitoring programs proposed

"The summary will have sufficient details for the reader to understand the project, any potential environmental effects, proposed mitigation measures, and the significance of the residual effects. The summary will include key maps illustrating the project location and key project components."

We want to know whether our people will be part of the monitoring program activities and whether the future road would be monitored during construction and through its life cycle.

## Part 2 Contents of EIS

### 1.3 Project Location

We ask that clear reference to the treaty area, and traditional territories that will be affected by the P 6 road be included. We expect the current land use in the area to include what the proponent knows to date regarding traditional land use in the whole project area, the whole aboriginal territories.

### 1.4 Regulatory Framework

We ask that this section include the intended community plans, lands plans, and other upcoming plans regarding lands and communities.

## 2.1 Purpose of the Project

Quote: "The EIS will also describe the predicted environmental, economic and social benefits of the project." Will this section also include the predicted risks or costs of the project ?

## 2.2 Alternative Means

Quote: " In its alternative means analysis, the proponent will address, at a minimum, the following project components:

- highway route;
- location of access roads (permanent and temporary);
- location of borrow areas, rock quarries, and gravel pits; and
- location and type of bridges and culverts (permanent and temporary)."

Very little of this information has been available to us, we look forward to seeing the alternative routes, locations for bridges, options for burrow pits etc.

## 3.2 Site Activities

We wish to know whether our land users, trappers, hunters etc will be part of the site preparation activities. This is like pre monitoring or early monitoring for our community. We need to know how restoration of closed roads, burrow pits etc will be handled.

## 5.0 Engagement with Indigenous Peoples

We are glad to see this section in the Guidelines for the proponent. We are not sure the proponent understands our rights, and our land entitlements.

## 5.1 Indigenous Engagement Activities

Quote: "In preparing the EIS, the proponent will ensure that groups have access to timely and relevant information on the project and how the project may adversely impact them." When does this start?

We would like to receive minutes or a report of each meeting, and every visit to our community.

## 6.0 Effects Assessment

Are all the maps available digitally to the affected communities? Does the proponent need to provide us with digital maps so we can look at them on screen ? Does the proponent need to show all its data sources ?

### 6.1.1 Emissions

The information here does not seem to include the ghg Emissions from the project itself, planning, construction, operation during its life cycle etc.  
Will this be in the EIS?

WE need to know how much muskeg will be disrupted including due to medicinal plants in the musket.

### 6.1.3, 4, 5, 6, 7

We assume that traditional knowledge will inform these parts of the EIS.

Each of these sections of the Assessment are based on the project area - but we see no specifics as to how the project area is defined. See our concerns above.

### 6.1.8 Endangered Species

How do the Manitoba listed and identified species get into the EIS ? Is a different EIS done for Manitoba so that these species are also part of the EIS ?

### 6.1.9 Indigenous Peoples

efers to the scope of the EA, which may also relate to the project area. We are concerned that the proponent may identify the scope and the proponent may select a scope for the EA and the project area to benefit the decisions they wish to see.

How does scope of the EA and the project area integrate traditional knowledge and the rights and exercise of rights of our people?

We are glad to see the contents here, the list of what must be included. The limited

study done to date by the proponent does not sufficiently reflect our land use, our traditional knowledge, the species or areas that are important to us.

Most of this work has not been done by the proponent, to our knowledge to date.

## 6.2 Changes to the Environment

This section is very important to us also. We are seeing many changes in our environment and our territory already, and will watch these sections.

Our concern for groundwater, given the damage to ground water and water sources in northern Manitoba, will guide review of the EIS.

## 6.3 Changes to VCs

Does CEAA only allow these VCs? Or does the proponent add to the list, and identify specific VCs?

6.3.4 section is important to us.

6.3.5 does this potential added VC include intended land acquisition, outstanding lands etc?

## 6.5 - Significance of Effects

Does this section include content of the EIS where traditional knowledge does not agree with the technical content from the proponent ?

Does the proponent need to explain any such difference in significance assessment ?

### 6.6.3 Cumulative Effects

Quote: "Cumulative effects are defined as changes to the environment due to the project combined with the existence of other past, present and reasonably foreseeable physical activities. Cumulative effects may result if:

- the implementation of the project may cause direct residual adverse effects on the VC, taking into account the application of technically and economically feasible mitigation measures; and,
- the same VC may be affected by other past, present and future physical activities [\[17\]](#)."

This means that the selection of VCs done by the proponent can limit identification of cumulative effects. Can Manto Sipi comment on the VCs needed for cumulative affects to be identified ?

We are stopping out comments at this point.

Thank you for the opportunity to review the draft EIS Guidelines for P6.

Mose Okimaw  
Councillor  
Manto Sipi Cree Nation  
Manitoba



CEAA Public Registry  
August 28, 2017

Project 6 — All-Season Road Linking Manto Sipi Cree Nation,  
Bunibonibee Cree Nation and God's Lake First Nation - EA Guidelines  
Review

NOTICE: This email is sent on behalf of Manto Sipi Cree Nation and Moses Okimaw, Councillor and portfolio holder for matters pertaining to this project and the federal responsibilities under CEAA for this project.

---

Manto Sipi Cree Nation, our community, lands, rights, and traditional land uses, economy are all potentially affected by this project. We anticipate potential social effects also once the road is in place.

We have reviewed the CEAA Guidelines for the proponent's EA for the project. We note that sections of the Guidelines that are specific to Aboriginal/Indigenous groups. We expect all of these sections to be fully and completely filed in the EA, and to reflect our situation with respect to the project. It is imperative that the EA clearly contain information about each of the First Nations potentially affected by the project. That is general content about Indigenous of First Nation rights, land use, benefits or effects from the project is not sufficient. Manto Sipi Cree Nation assumes that the EA will fulfill these sections of the Guidelines with respect to our Nation, our rights, our land use, and potential effects on our community, lands, access to lands and ability to exercise our rights etc.

#### 2.4 Application of the Precautionary Principle

We are interested in what the proponent will provide in this section of their EA, as the department is not know for avoiding environmental effects in its activity in northern Manitoba.

#### 3.2 Factors to be Considered

Due to the amount of discussion about potential mining activity near our lake and our community we are particularly interested in the cumulative effects factor to be considered in the EA. Current effects,

and future project effects are important to us, especially given the history of mining in our lake.

### 3.2.1 Changes to the Environment

While there are air pollution, CO<sub>2</sub>, and green house gas emissions requirements in the detailed outline for the EA we are also concerned that the potential effects on permafrost in our region, and in the entire project area ( including where material will be obtained, transported, etc) be included and that planning for the project take into account the presence of permafrost.

### 3.2.2 Valued Components to be Examined

“The Guidelines for CEAA EA indicate these must include:

- with respect to aboriginal peoples, an effect of any change that may be caused to the environment on:
  - health and socio-economic conditions;
  - physical and cultural heritage;
  - the current use of lands and resources for traditional purposes; or
  - any structure, site or thing that is of historical, archaeological, paleontological or architectural significance.
- the effect of that change, other than the effects mentioned above, on:
  - health and socio-economic conditions,
  - physical and cultural heritage, or
  - any structure, site or thing that is of historical, archaeological, paleontological or architectural significance.”

We do not feel that sufficient archeological study has been conducted, and know that the current records of the provincial government are not complete for our region. Predictive modeling in relation to Indigenous sites has certainly not been applied to the project area. Our own intended traditional lands study ( which starts in September) may help to inform the proponent but we will continue to be worried. More study and more interviews are needed.

We need to locate our sacred and archeological sites and make sure they are protected and secure. We are not sure the proponent has taken the necessary steps regarding these needed VCs.

We hope that the proponent will have a complete set of VCs and avoid combining species and environment elements into few VCs, which can mean they are dropping or ignoring components that matter to us.

We wish to see VCs for the small mammals common, that are trapped, and hunted.

We wish to see VCs for the birds in our region, including those that use the Lake.

We wish to see VC to reflect the benefits to our community and the impacts to our community from the road.

We wish to see VC to show how the loss of lands will impact our community.

As a project wholly inside Indigenous traditional territories the VCs need to reflect the Indigenous role in the region.

### 3.2.3 Boundaries

Studies by the proponent have been sectioned according to each of the three First Nations' land use. It is important to have a whole project area, that includes all potential activity by the proponent all potential effects of the project. The Right of Way is not the project area. Nor is the work corridor the project area. Given three communities would be served by the road, and given the ROW and corridor would cross traplines, travel lines, and the new infrastructure will affect species, and exercise of our rights the project area must reflect these land uses and effects.

### 4.2.2 Community Knowledge and Aboriginal Traditional Knowledge

Quote: "the environmental assessment of a designated project may take into account community knowledge and Aboriginal traditional knowledge"

"The proponent will incorporate into the EIS the community knowledge and Aboriginal traditional knowledge to which it has access or that is

acquired through public participation and engagement with Indigenous groups...”

Manto Sipi Cree Nation considers inclusion of aboriginal traditional knowledge a required part of the proponent’s EIS/EA. The reference to ‘which it has access ....’ concerns us.

We do not yet have the full information gathered by the government proponent back in our hands. It took some time to obtain some of its reports, and they arrived with a contract to sign informing us that we could not use the information in our consultations or EA reviews etc etc. This is wrong. We also have been asking for our digital data since spring 2017 and it has not been provided to us. This is community information and the intellectual capital of our land users and knowledge carriers. CEAA needs to find better standards and methods with respect to Crown proponents and their holding of Indigenous data. We have asked for the maps, and the data used in their design. To date this has not happened.

Quote: "Agreement should be obtained from Indigenous groups regarding the use, management and protection of their existing traditional knowledge information during and after the EA." No such step to enter into an agreement with Manto Sipi has occurred.

#### 4.3 Study Strategy and Methodology

Quote: "All data, models and studies will be documented such that the analyses are transparent and reproducible. All data collection methods will be specified. The uncertainty, reliability, sensitivity and conservativeness of models used to reach conclusions must be indicated."

We have no confidence that these steps are being taken. Methodology content is lacking in the reports we have obtained from the proponent to date.

Quote: "Where the conclusions drawn from scientific, engineering and technical knowledge are inconsistent with the conclusions drawn from Aboriginal traditional knowledge, the EIS will present each perspective on the issue and a statement of the proponent's conclusions."



It is our experience that Crown proponents in Manitoba do not take the steps above.

Quote: "The proponent will provide Indigenous groups the opportunity to review and provide comments on the information used for describing and assessing effects on Aboriginal peoples."

CEAA must understand that our community members, our Council, have not been funded to participate in any of the engagement, EIS discussions, meetings about the proponent's project etc to date. We must have the capacity to be able to participate in the next steps.

#### 4.5

Quote: Summary of the EIS

##### 1. Follow-up and monitoring programs proposed

"The summary will have sufficient details for the reader to understand the project, any potential environmental effects, proposed mitigation measures, and the significance of the residual effects. The summary will include key maps illustrating the project location and key project components."

We want to know whether our people will be part of the monitoring program activities and whether the future road would be monitored during construction and through its life cycle.

#### Part 2 Contents of EIS

##### 1.3 Project Location

We ask that clear reference to the treaty area, and traditional territories that will be affected by the P 6 road be included. We expect the current land use in the area to include what the proponent knows to date regarding traditional land use in the whole project area, the whole aboriginal territories.

##### 1.4 Regulatory Framework

We ask that this section include the intended community plans, lands plans, and other upcoming plans regarding lands and communities.

## 2.1 Purpose of the Project

Quote: "The EIS will also describe the predicted environmental, economic and social benefits of the project."

Will this section also include the predicted risks or costs of the project ?

## 2.2 Alternative Means

Quote: " In its alternative means analysis, the proponent will address, at a minimum, the following project components:

- highway route;
- location of access roads (permanent and temporary);
- location of borrow areas, rock quarries, and gravel pits; and
- location and type of bridges and culverts (permanent and temporary)."

Very little of this information has been available to us, we look forward to seeing the alternative routes, locations for bridges, options for burrow pits etc.

## 3.2 Site Activities

We wish to know whether our land users, trappers, hunters etc will be part of the site preparation activities. This is like pre monitoring or early monitoring for our community. We need to know how restoration of closed roads, burrow pits etc will be handled.

## 5.0 Engagement with Indigenous Peoples

We are glad to see this section in the Guidelines for the proponent. We are not sure the proponent understands our rights, and our land entitlements.

### 5.1 Indigenous Engagement Activities

Quote: "In preparing the EIS, the proponent will ensure that groups have access to timely and relevant information on the project and how the project may adversely impact them." When does this start?

We would like to receive minutes or a report of each meeting, and every visit to our community.

## 6.0 Effects Assessment

Are all the maps available digitally to the affected communities? Does the proponent need to provide us with digital maps so we can look at them on screen ? Does the proponent need to show all its data sources ?

#### 6.1.1 Emissions

The information here does not seem to include the ghg Emissions from the project itself, planning, construction, operation during its life cycle etc. Will this be in the EIS?

WE need to know how much muskeg will be disrupted including due to medicinal plants in the musket.

#### 6.1.3, 4, 5, 6, 7

We assume that traditional knowledge will inform these parts of the EIS. Each of these sections of the Assessment are based on the project area - but we see no specifics as to how the project area is defined. See our concerns above.

#### 6.1.8 Endangered Species

How do the Manitoba listed and identified species get into the EIS ? Is a different EIS done for Manitoba so that these species are also part of the EIS ?

#### 6.1.9 Indigenous Peoples

refers to the scope of the EA, which may also relate to the project area. We are concerned that the proponent may identify the scope and the proponent may select a scope for the EA and the project area to benefit the decisions they wish to see. How does scope of the EA and the project area integrate traditional knowledge and the rights and exercise of rights of our people?

We are glad to see the contents here, the list of what must be included. The limited study done to date by the proponent does not sufficiently reflect our land use, our traditional knowledge, the species or areas that are important to us.

Most of this work has not been done by the proponent, to our knowledge, to date.

## 6.2 Changes to the Environment

This section is very important to us also. We are seeing many changes in our environment and our territory already, and will watch these sections.

Our concern for groundwater, given the damage to ground water and water sources in northern Manitoba, will guide review of the EIS.

## 6.3 Changes to VCs

Does CEAA only allow these VCs? Or does the proponent add to the list, and identify specific VCs? Will our knowledge contribute to the VC list?

6.3.4 section is important to us.

6.3.5 does this potential added VC include intended land acquisition, outstanding lands etc?

## 6.5 - Significance of Effects

Does this section include content of the EIS where traditional knowledge does not agree with the technical content from the proponent ?

Does the proponent need to explain any such difference in significance assessment ?

## 6.6.3 Cumulative Effects

Quote: "Cumulative effects are defined as changes to the environment due to the project combined with the existence of other past, present and reasonably foreseeable physical activities. Cumulative effects may result if:

- the implementation of the project may cause direct residual adverse effects on the VC, taking into account the application of technically and economically feasible mitigation measures; and,
- the same VC may be affected by other past, present and future physical activities [\[17\]](#)."

This means that the selection of VCs done by the proponent can limit identification of cumulative effects. Can Manto Sipi comment on the VCs needed for cumulative affects to be identified ?

We are stopping our comments at this point. It is good to see the expectations CEAA places on the proponent regarding our lands, community, rights, and exercise of those rights.

Thank you for the opportunity to review the draft EIS Guidelines for P6.

Mose Okimaw  
Councillor  
Manto Sipi Cree Nation  
Manitoba  
August 23, 2017



**From:** [Loretta Mowatt](#)  
**To:** [Scott Janet \[CEAA\]](#)  
**Cc:** [Wayne Anderson](#); [Irene Linklater](#)  
**Subject:** NHCN Review of Project 6  
**Date:** July 4, 2017 4:18:49 PM  
**Attachments:** [NHCN Review of P6 for CEAA July 4 2017.pdf](#)

---

Good Afternoon,

Please find attached Norway House Cree Nation's response to the June 13, 2017 Request for Comments on the potential impacts of the proposed Project 6 All-Season road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation, and God's Lake First Nation, Agency File No.: 005622.

The information for the NHCN contact is:

Wayne Anderson  
Executive Director of PDC & Lands  
Norway House Cree Nation  
Box 250  
Norway House, MB  
R0B 1B0  
Phone: (204) 359 – 5254  
Fax: (204) 359 – 4186  
Email: [wanderson@nhcn.ca](mailto:wanderson@nhcn.ca)

Thank you.

Loretta Mowatt  
Environmental Coordinator  
Norway House Cree Nation  
Box 250  
Norway House, MB  
R0B 1B0

**NORWAY HOUSE CREE NATION**  
**REVIEW for Canadian Environmental Assessment Agency**  
**PROJECT 6 – All-Season Road Linking Manto Sipi Cree Nation,**  
**Bunibonibee Cree Nation and God’s Lake First Nation**  
**July 4, 2017**

**Purpose of Report**

This report is in response to a letter, dated June 13, 2017, from the Canadian Environmental Assessment Agency (CEAA) pertaining to Project 6, an all-season road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation, and God’s Lake First Nation. The proponent is Manitoba Infrastructure, and this report looks at the 29 – page Project Description Summary, dated May 2017, as submitted to the CEAA and Manitoba Sustainable Development. The letter to Chief and Council invites NHCN to provide comment on potential environmental effects and impacts of the Project on the community.

**Regulatory Authorities**

As part of its obligations under CEAA 2012, the Agency must make a determination if a federal environmental assessment is required. In order to assist in making this determination, a 20 public comment period has been established to receive input and comment from Indigenous communities, including NHCN, from June 13 to July 4, 2017.

Under the Manitoba Environment Act, Project 6 requires an Environment Act License as a Class 2 Development – It is unclear what correspondence has been received by NHCN from Manitoba. A majority of activities for Project 6 will fall under provincial authority and legislation, including work and other permits.

A Federal Environmental Impact Statement (EIS) *may* be required which will identify mitigatory measures to minimize impacts.

**Summary of Project**

The Project will be conducted on unoccupied provincial Crown Lands and proposes 138 kilometres of a 2 – lane, gravel all season road with 3 sections connecting the 3 First Nations at the Reserve Boundaries, and 2 bridges. The proposed Project 6 will follow existing winter road routes, and is located entirely outside of the Norway House Resource Management Area. The proponent estimates the total time for Project completion at 11 years (3 years pre-construction and 8 years construction) to commence in 2020.

**NHCN Impacts**

The main issue for consideration by NHCN is that Project 6 is one component of the East Side Transportation Network Initiative intended to link east side communities to the rest of Manitoba through a series of new and existing roads. The East Side Plans contemplate linking Project 6 with Provincial Road 373 at some point in the future.

Project 6 anticipates at least 2 bridges and culverts along the Hayes River Watershed, which may impact the flow of the streams and rivers in the Norway House Resource Area that flow into the Hayes River Watershed. NHCN was one of several First Nations that endorsed the designation of the Hayes River as a Canadian Heritage River.

The project description further anticipates the use of the existing winter road networks for the transport of equipment and materials for construction purposes, which accesses the road from PR 373 south of the Norway House Ferry on the East Nelson River.

**NORWAY HOUSE CREE NATION**  
**REVIEW for Canadian Environmental Assessment Agency**  
**PROJECT 6 – All-Season Road Linking Manto Sipi Cree Nation,**  
**Bunibonibee Cree Nation and God's Lake First Nation**  
**July 4, 2017**

Project impacts to NHCN can be divided into Preparation or Pre - Construction, Construction, and Operational Phase.

**1. Preparation Phase**

During the Preparation phase, impacts will include:

- Increased winter traffic along PR 373, Molson Lake Access Road, and Oxford House Winter Road as equipment and supplies are hauled in;
- It is anticipated that fuels for construction, explosives, and other dangerous product will be hauled into the Project area using the existing network with potential for spills or if roads deteriorate and materials left prior to being delivered to their destination;
- Increased travel for the Project may impact migration of Caribou, Moose, Wolves, and other game/fur bearing animals.

**2. Construction Phase**

Potential impacts to the NH Resource Area and Members include:

- Increased traffic through existing winter road network through NH RMA;
- Hauling of equipment and other supplies on existing winter road;
- Equipment and noise may impact fur bearers, moose, and caribou;
- Impacts the natural flow of local streams and rivers;
- Impacts fish, fish habitat, and spawning;
- Impacts to wetlands and traditional medicines in the region;

**3. Operational Phase**

Potential impacts to NH Resource Area and Members include:

- Increased traffic through NH RMA;
- Increased access to NH RMA;
- Increase pressure on NH resources including services and shops;
- Competing interests for hunting of large and small game;
- Impacts to caribou, moose, wolves, and other game/fur bearing animals;
- Impacts to traditional activities including hunting, trapping, and fishing; and
- Impacts to ecotourism in the NH RMA, including Molson Lake Lodge and outpost camps which are owned by NHCN.

**Conclusion**

Over the long term, Project 6, as part of the overall future plans to link east side communities through existing provincial roads will have an impact on NHCN as the road network contemplates seasonal access during the construction period as well as possible future permanent roads through the NH RMA. Potential impacts identified include changes to the environment, lands, waters, large and small game habitat, impacts to hunting and trapping, and pressure on resources due to increased access to the NH territory along and adjacent to the future linkage route between PR 373 and Project 6.

NHCN recommends an environmental assessment that incorporates Project 6 as well as future plans to link to Provincial Road 373. Further input is required from Members who utilize area, as well as the Registered Trapline Holders. Further, an EIS will assist in reviewing the proposed mitigation measures.

**From:** [Sarah Colgrove](#)  
**To:** [Scott Janet \[CEAA\]](#)  
**Cc:** [d.muswaggon@pimicikamak.ca](#); [c.merrick@pimicikamak.ca](#); [Kate Kempton](#); [darrell.ouimet@gov.mb.ca](#)  
**Subject:** Comments re File No 005622  
**Date:** July 4, 2017 3:15:13 PM  
**Attachments:** [sc Pimicikamak Letter to CEAA july 4 2017 from DM.pdf](#)  
[Attachment 2 Cross Lake Band of Indians June 27 2017 from DM.pdf](#)

---

Dear Ms. Scott and Ms. Sigurdson,

Please find attached draft comments from Pimicikamak in response to your letter to the Cross Lake band of Indians requesting comments on the potential impacts of the Proposed Project 6 – All-season Road.

Due to Pimicikamak's General Assembly, I was unable to obtain final instructions regarding this letter during the today's workday. Final and signed copies of these documents are forthcoming.

Thank you,

Sarah Colgrove

250 University Ave, 8<sup>th</sup> floor  
Toronto Ontario M5H 3E5  
p: 416.981.9333  
f: 416.981.9350  
[www.oktlaw.com](#)

\*\*\*\*\*

This e-mail message and any attachments may be privileged, confidential and subject to copyright. Any unauthorized review, copying, transmittal, use or disclosure is prohibited. If you are not the intended recipient you have received this message in error. Please immediately notify us by reply or collect telephone call to (416) 981-9330 and destroy this message and any attachments.

\*\*\*\*\*

**David Muswaggon**  
Pimicikamak Okimawin  
Box 399 -1144G Mikisew Road  
Cross Lake MB R0B 0J0  
73263

July 4, 2017

**SENT VIA E-MAIL: [janet.scott@ceaa-acee.gc.ca](mailto:janet.scott@ceaa-acee.gc.ca)**

Shauna Sigurdson  
Regional Director, Prairie and Northern Region  
Canadian Environmental Assessment Agency  
Canada Place, Ste 1145, 9700 Jasper Avenue  
Edmonton AB T5J 4C3

Attention: Janet Scott

Dear Shauna Sigurdson:

**Re: Comments on the Potential Impacts of the Proposed Project 6 - All-season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation, and God's Lake First Nation Project  
Your File No. 005622**

Pimicikamak Okimawin is in receipt of the Canadian Environmental Assessment Association's letter to the Cross Lake Band of Indians dated June 13, 2017, regarding the proposed Project 6 – All-season Road Linking Manto Sipi Cree Nation, Bunobonibee Cree Nation, and God's Lake First Nation Project. The attached Project Description indicates that the All-season Road will be part of a network of infrastructure which will provide year-round access to communities which are members of the Wabanong Nakaygum Okimawin (WNO).

Although the attached Project Description indicates that consultations with those First Nations began in 1999, this is the first offer of consultation that Pimicikamak has received. Pimicikamak is not a member of WNO, so it has not been included in the traditional land-use planning which has been conducted for these roads.

Pimicikamak stands to be detrimentally affected by this and future roads. It is a direct neighbour to Bunobonibee Cree Nation, and shares territorial waterways. It is a signatory to Treaty No 5, which is the territory within which this and the WNO road network will be constructed. Pimicikamak has rights throughout Treaty No 5 territory, although it exercises most such rights in its traditional territory. Finally, Pimicikamak is a neighbour to several members of WNO, which will be all connected to this road by future roads.



Pimicikamak's territory and the surrounding Treaty No 5 areas have been severely affected by the Manitoba Hydro projects and other developments such as forestry. Traditional land use is rarer and more difficult than Pimicikamak desires, due to all these impacts. Any further impacts caused by this road will be cumulative, directly reducing the scarce traditional land and resource that remains.

Pimicikamak is concerned that the proposed road – and its links to the broader network of roads which is planned – will have environmental impacts on Pimicikamak's traditional territory and its members, on surrounding Treaty No 5 areas which it relies upon, and on its citizens, by physically altering Treaty No 5 territory and by increasing traffic into its territory and putting additional pressure on the scarce resources which remain. In particular, the proposed All-season Road includes an access point at Oxford Lake, which is at the edge of Pimicikamak's territory and is connected to waterways leading to the heart of its territory.

These new impacts require an environmental impact assessment, in order to assess the impact within Pimicikamak's territory, which has not yet been considered, as well as the cumulative effect on Pimicikamak's land, resources, and cultural practices. In particular, the following impacts are likely:

- decrease in fish, aquatic species, migratory birds, game, and fur-bearing animals within Pimicikamak territory, due to increased harvesting by non-Pimicikamak members within Pimicikamak territory, and increased use of Pimicikamak's lands and waters, on top of the depletion already caused by existing projects in the territory;
- decrease in fish, aquatic species, migratory birds, game, and fur-bearing animals within Pimicikamak territory, due to the physical impacts of this and future roads, and to increased harvesting, in areas which are part of Treaty No 5 territory and are ecologically-connected with the lands and waters of Pimicikamak's territory, on top of the depletion already caused by existing projects in the territory;
- decrease in traditional activities including fishing, trapping, and hunting by Pimicikamak's members on its territory, due to resource depletion by non-Pimicikamak members with increased access to Pimicikamak's territory and ecologically-connected areas, and due to the physical impact on ecologically-connected areas, on top of the depletion already caused by existing projects in the territory;
- impact on socio-economic conditions for Pimicikamak members who rely on traditional subsistence for food and/or commercial uses, due to resource depletion as set out above;
- impacts on Pimicikamak's established and claimed Aboriginal and Treaty rights to harvest resources within the territory, due to resource depletion as set out above;
- impacts on established and claimed Aboriginal and Treaty rights to manage and steward resources within the territory, due to an increase in non-members using land and

resources without passing through the Reserve where Pimicikamak's public education and regulatory resources are located;

- potential damage to archeological and cultural sites on and around Oxford Lake and its tributaries due to increased traffic to the location by non-Pimicikamak members; and
- if consultation is not carried out, impacts on established and claimed Aboriginal and Treaty rights to be consulted when the Crown contemplates actions which may affect Pimicikamak's interests in its territory, and the erosion of reconciliation and the relationship with the Crown.

Pimicikamak has never been consulted or accommodated regarding these roads, and has not consented to any of them. Our citizenry is very concerned about the effects of this and future roads, which are in addition to the already-severe impact on our lands and resources.

We are also concerned about how the Crown is managing its relationship with Pimicikamak, and the relationship between Pimicikamak and its neighbours.

A federal environmental assessment and full consultation process is needed to assess the cumulative and direct impacts of the proposed All-season Road and the roads to which it will connect, and to begin to discharge the Crown's constitutional Duty to Consult and Accommodate Pimicikamak as a signatory to Treaty No 5 and an Aboriginal people whose rights and interests will be impacted by this road.

Sincerely yours,

David Muswaggon  
*Executive Council Member responsible for Lands,  
Natural Resources, NFA and Consultation*

- c. Chief Cathy Merrick – Pimicikamak Okimawin (c.merrick@pimicikamak.ca)  
Sarah Colgrove – Olthuis Kleer Townshend LLP (scolgrove@oktlaw.com)  
Kate Kempton – Olthuis Kleer Townshend LLP (kkempton@oktlaw.com)  
Darrell Ouimet - Manitoba Sustainable Development (darrell.ouimet@gov.mb.ca)  
Janet Scott - Canadian Environmental Assessment Agency (janet.scott@ceaa-acee.gc.ca)

**Attachment 2: Information to Inform Whether a Federal EA is Required****Please respond by: July 4, 2017**

Project 6 – All-season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation, and God's Lake First Nation – Manitoba Infrastructure  
Agency File No.: 005622

Cross Lake Band of Indians			
EA Contact Name:	Sarah Colgrove	Telephone:	416.981.9333
Address:	250 University Ave, Toronto ON M5H 3E5	Fax:	416.981.9350
Email:	scolgrove@oktlaw.com		

The Agency must determine whether a federal environmental assessment is required for this project. You can contribute to the decision-making process by providing the information available to your group at this time on the Project's anticipated environmental effects and impacts on Cross Lake Band of Indians' potential and established rights. You may use this form or use another format of your choice.

8. Please identify any environmental effects of the Project that are of concern to your group or community. Also please identify environmental effects that are not listed in the project description.

See letter attached

2. Please describe how the potential environmental effects of the Project could result in changes to your group or community's:

(a) health and socio-economic conditions (e.g. country foods, drinking water, logging or other commercial activities that rely on natural resources)

See letter attached

(b) physical and cultural heritage (e.g. ceremonial sites, burial sites, cultural landscapes)

See letter attached

(c) current use of lands and resources for traditional purposes (e.g. hunting, fishing, trapping)

See letter attached

(d) structures, sites or things of historical, archaeological, paleontological or architectural significance (e.g. artifacts, important historic buildings or symbols)

See letter attached

3. If you expect the Project may impact Cross Lake Band of Indians' potential and established rights, please describe how.

See letter attached

**David Muswaggon**

Print Name of responder

**Pimicikamak Executive Councillor**

Title of responder

Signature

**June 27 2017**

Date

Please respond to the above questions by **July 4, 2017** via email at [janet.scott@ceaa-acee.gc.ca](mailto:janet.scott@ceaa-acee.gc.ca) or fax at 780-495-2876. Thank you.

**From:** [Stephen Howatt](#)  
**To:** [Sigurdson.Shauna \[CEAA\]](#)  
**Cc:** [Jasmine Langhan](#); [Marci Riel](#); [Scott.Janet \[CEAA\]](#); [kimber.osiowy@gov.mb.ca](mailto:kimber.osiowy@gov.mb.ca); [darrell.ouimet@gov.mb.ca](mailto:darrell.ouimet@gov.mb.ca)  
**Subject:** MMF Response to CEAA 6.13.17 Letter re Project 6  
**Date:** July 12, 2017 11:03:51 AM  
**Attachments:** [MMF Response to CEAA 6.13.17 Letter re Project 6.pdf](#)

---

Good day Ms. Sigurdson,

On behalf of Jasmine Langhan, Engagement and Consultation Coordinator of the Manitoba Metis Federation, please see the attached letter in response to your letter, dated June 13, 2017, regarding the proposed Project 6 - All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation & God's Lake First Nation.

Please do not hesitate to contact us if you have any questions or concerns.

All the best,

Stephen

**Stephen Howatt**  
**Consultation Project Officer**  
Manitoba Metis Federation  
300-150 Henry Avenue  
Winnipeg, MB, R3B 0J7  
Tel: (204)586-8474 **Ext. 240**  
E-mail: [stephen.howatt@mmf.mb.ca](mailto:stephen.howatt@mmf.mb.ca)



# MANITOBA METIS FEDERATION INC.

300 - 150 Henry Avenue, Winnipeg, Manitoba R3B 0J7

Phone: (204) 586-8474 Fax: (204) 947-1816 Website: [www.mmf.mb.ca](http://www.mmf.mb.ca)

David Chartrand, LL.D. (Hon)  
*President*

July 12, 2017

\*\*\*VIA E-MAIL\*\*\*

Ms. Shauna Sigurdson  
Regional Director - Prairies and Northern Region  
Canadian Environmental Assessment Agency  
Suite 1145, 9700 Jasper Avenue  
Edmonton, AB T5J 4C3

Dear Ms. Sigurdson,

**Re: Request for Comments on the Potential Impacts of the Proposed Project 6 - All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation & God's Lake First Nation**

The Manitoba Metis Federation (MMF) is in receipt of your letter, dated June 13, 2017, in which you provide notice to the MMF that the Canadian Environmental Assessment Agency (CEAA) has received a project description from Manitoba Infrastructure (the Proponent) for the proposed Project 6 - All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation & God's Lake First Nation Project (the Project). We note that your letter invites the MMF to provide our views on the potential environmental effects and impacts of the Project.

As you are aware, the Project is located within a region with known contemporary and historical use by our Community for fishing, hunting, trapping and cultural purposes. Given this, a full, proper and meaningful engagement and consultation process with our Community needs to be undertaken to best understand the potential effects of the Project on our Community.

The MMF is the self-governing representative for the Metis Nation's Manitoba Metis Community, and as such, must promote, protect and advance the collective rights of its citizens. The MMF represents the citizens and harvesters of the Community, who use the lands, waters and resources throughout the province of Manitoba – including the area in which this project is being proposed. It is of significant importance that the rights, claims and interests of the Community be recognized and respected.

Further to the MMF's responsibility in this regard, the MMF's 2007 Resolution No. 8 sets out a process for the MMF's engagement in discussions with governments, industry and other proponents in matters that relate to the interests and rights of the Community. The MMF Home Office is the central point of contact for all consultation and engagement on behalf of the



Community. In engaging the MMF, on behalf of the Community, the Resolution No. 8 Framework calls for the implementation of five phases:

Phase I: Notice and Response;  
Phase II: Funding and Capacity;  
Phase III: Engagement and Consultation;  
Phase IV: Partnership and Accommodation; and  
Phase V: Implementation.

As we believe the Project may have an impact on the rights, interests, and claims of the Community, the process as set out above will need to be followed.

The MMF would like to arrange a meeting between representatives of the MMF and CEAA to discuss the Project and a process for ensuring the MMF and the Manitoba Metis Community is adequately informed as to the Project's potential impacts to our Community's use of the lands, waters and resources. The MMF looks forward to hearing your response and working collaboratively with CEAA on this Project to ensure Metis-specific information and concerns from the Community are incorporated into full, proper and meaningful engagement and consultation processes with our Community.

Please contact me at your earliest opportunity via telephone at 204-586-8474, ext. 234 or via email [jasmine.langhan@mmf.mb.ca](mailto:jasmine.langhan@mmf.mb.ca) to schedule a meeting to further discuss the Project, the Resolution No. 8 process, or if you require any further clarification on any matters raised in this letter.

Best regards,

-original signed by-

Jasmine Langhan  
MMF Engagement & Consultation Coordinator

Cc: MMF President's Office  
Marci Riel – MMF Director of Energy and Infrastructure  
Janet Scott – Canadian Environmental Assessment Agency  
Darrell Ouimet – Manitoba Sustainable Development  
Kimber Osiowy – Manitoba Infrastructure, proponent

**From:** [Jasmine Langhan](#)  
**To:** [Sigurdson.Shauna \[CEAA\]](#)  
**Cc:** [Scott.Janet \[CEAA\]](#); [ouimet@gov.mb.ca](mailto:ouimet@gov.mb.ca); [kimber.osiowy@gov.mb.ca](mailto:kimber.osiowy@gov.mb.ca); [Marci Riel](#); [Morrissa Boerchers](#); [Stephen Howatt](#)  
**Subject:** Project 6 - CEA Registry File No. 80138  
**Date:** August 28, 2017 1:00:47 PM  
**Attachments:** [MMF Response Letter MSD Notice re MI Project 6.pdf](#)  
**Importance:** High

---

Good afternoon Ms. Sigurdson,

We are in receipt of your letter dated July 28, 2017 to the Manitoba Metis Federation (MMF) with respect to Project 6 – All Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation (the Project). Please see attached response the MMF submitted to Manitoba Sustainable Development on the Project on August 4, 2017. We trust this response addresses the matters raised within your letter.

We look forward to meeting with the Agency (CEAA) in the near future to discuss the Project, EIS guidelines and creating a specific budget and work plan to ensure the Manitoba Metis Community is fully, properly and meaningfully consulted on this project.

Please do not hesitate to contact us if you require anything further.

Best regards,  
Jasmine Langhan

**Jasmine Langhan**  
**Engagement & Consultation Coordinator**  
Manitoba Metis Federation  
300-150 Henry Avenue  
Winnipeg, MB R3B 0J7  
Phone: 204-586-8474 **ext. 234**  
Fax: 204-947-1816  
E-mail: [jasmine.langhan@mmf.mb.ca](mailto:jasmine.langhan@mmf.mb.ca)

---

**From:** Stephen Howatt  
**Sent:** August-04-17 1:48 PM  
**To:** [Ouimet@gov.mb.ca](mailto:Ouimet@gov.mb.ca)  
**Cc:** Jasmine Langhan <[jasmine.langhan@mmf.mb.ca](mailto:jasmine.langhan@mmf.mb.ca)>; Don Roulette <[droulette@mmf.mb.ca](mailto:droulette@mmf.mb.ca)>; Scott,Janet [CEAA] <[Janet.Scott@ceaa-acee.gc.ca](mailto:Janet.Scott@ceaa-acee.gc.ca)>  
**Subject:** MMF Response Letter MSD Notice re MI Project 6

Good afternoon Mr. Ouimet,

On behalf of Don Roulette, MMF Executive Director, please see the attached response from the MMF to the MB Sustainable Development "Notice of Environment Act Proposal" regarding Manitoba Infrastructure Project 6.

Please do not hesitate to contact us if you have any questions or concerns.

All the best,

Stephen

**Stephen Howatt**

**Consultation Project Officer**

Manitoba Metis Federation

300-150 Henry Avenue

Winnipeg, MB, R3B 0J7

Tel: (204)586-8474 **Ext. 240**

E-mail: [stephen.howatt@mmf.mb.ca](mailto:stephen.howatt@mmf.mb.ca)



# MANITOBA METIS FEDERATION INC.

300 - 150 Henry Avenue, Winnipeg, Manitoba R3B 0J7

Phone: (204) 586-8474 Fax: (204) 947-1816 Website: [www.mmf.mb.ca](http://www.mmf.mb.ca)

David Chartrand, LL.D. (Hon)  
*President*

August 3, 2017

\*\*\*VIA E-MAIL\*\*\*

Mr. Darrell Ouimet  
Environment Officer - Environmental Approvals Branch  
Manitoba Sustainable Development  
123 Main Street, Suite 160  
Winnipeg, MB R3C 1A5

Dear Mr. Ouimet,

**Re: Manitoba Infrastructure - Project 6 – All-Season Road Linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation File: 5897.00**

The Manitoba Metis Federation (MMF) is responding to the Notice of Environment Act Proposal posted by Manitoba Sustainable Development (MSD) on the Environmental Approvals Branch Registry on June 30, 2017 regarding the proposed Manitoba Infrastructure (the Proponent) for Project 6 - All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation & God's Lake First Nation Project (the Project). MSD's notice invites anyone likely to be affected by the Project and who wishes to make a representation either for or against the proposal should write to MSD.

The Project is located within a region with known contemporary and historical use by the Manitoba Métis Community (Community) for fishing, hunting, trapping and cultural purposes. Furthermore, based on the MMF's involvement in the recent East Side Road Authority Project 4 – All-Season Road from Berens River to Poplar River First Nation, we anticipate that the proposed Project 6 will similarly impact our harvesters' ability to exercise their Aboriginal rights.

The MMF is very concerned that, to date, the environmental assessment process has failed to consider the lack of Metis-specific information within the EAP. Without Metis-specific information the EAP fails to adequately and accurately assess the impact to all Indigenous groups affected by the Project and in doing so, fails to consider the appropriate measures necessary to sufficiently mitigate those impacts. Given this, a full, proper and meaningful engagement and consultation process with our Community needs to be undertaken to best understand the potential impacts of the Project on our Community.

The MMF is the self-governing representative for the Métis Nation's Manitoba Métis Community, and as such, must promote, protect, and advance the collective rights of its citizens. The MMF represents the citizens and harvesters of the Community, who use the lands, waters and resources throughout the province of Manitoba – including the area in which this project is being proposed. It is of significant importance that the rights, claims and interests of the Community be recognized and respected.



Further to the MMF's responsibility in this regard, the MMF's 2007 Resolution No. 8 sets out a process for the MMF's engagement in discussions with governments, industry and other proponents in matters that relate to the interests and rights of the Community. The MMF Home Office is the central point of contact for all consultation and engagement on behalf of the Community. In engaging the MMF, on behalf of the Community, the Resolution No. 8 Framework calls for the implementation of five phases:

Phase I: Notice and Response;  
Phase II: Funding and Capacity;  
Phase III: Engagement and Consultation;  
Phase IV: Partnership and Accommodation; and  
Phase V: Implementation.

As we believe the Project may have an impact on the rights, interests, and claims of the Community, the process as set out above will need to be followed.

The MMF is aware of the necessity behind the proposal and while the MMF is not opposed to the construction of Project 6, the need for the road should not supersede the duty to consult. The construction of the Project will have a lasting impact on the Indigenous Community, and if this lack of Metis-specific information is not remedied, this oversight will set a precedent of ignoring our Community in provincial environmental assessment processes, which does not align with Manitoba's duty to consult requirements as the Crown.

The MMF would like to arrange a meeting between representatives of the MMF and MSD to discuss the Project and a process for ensuring the MMF and the Manitoba Métis Community is appropriately informed as to the Project's potential impacts to our Community's use of the lands, waters and resources. The MMF looks forward to hearing your response and working collaboratively with MSD on this Project to ensure Metis-specific information and concerns from the Community are incorporated into full, proper and meaningful engagement and consultation processes with our Community.

Please contact me at your earliest opportunity via telephone at 204-586-8474, ext. 234 or via email [jasmine.langhan@mmf.mb.ca](mailto:jasmine.langhan@mmf.mb.ca) to schedule a meeting to further discuss the Project, the Resolution No. 8 process, or if you require any further clarification on any matters raised in this letter.

Me-quetch,

<original signed by>

Donald Roulette  
Executive Director  
Manitoba Metis Federation

Cc: MMF President's Office  
Jasmine Langhan – MMF Engagement and Consultation Coordinator  
Jack Park – MMF Minister Responsible for Energy and Infrastructure  
Marc Riel – MMF Director of Energy and Infrastructure  
Janet Scott – Canadian Environmental Assessment Agency

## Chapter 6: Effects Assessment



## TABLE OF CONTENTS

	Page
<b>6.0 EFFECTS ASSESSMENT .....</b>	<b>6-1</b>
6.1 Project Setting and Baseline Conditions .....	6-1
6.1.1 Atmospheric Environment .....	6-1
6.1.2 Geology and Geochemistry .....	6-8
6.1.3 Topography and Soil .....	6-13
6.1.4 Riparian, Wetland and Terrestrial Environments .....	6-20
6.1.5 Groundwater and Surface Water .....	6-47
6.1.6 Fish and Fish Habitat .....	6-53
6.1.7 Migratory Birds and Habitat .....	6-62
6.1.8 Species at Risk .....	6-67
6.1.9 Indigenous Peoples .....	6-89
6.1.10 Federal Decisions and Transboundary Effects .....	6-129
6.1.11 Human Environment .....	6-130
6.2 Predicted Changes to the Physical Environment .....	6-135
6.2.1 Changes to Atmospheric Environment .....	6-136
6.2.2 Changes to Geology and Geochemistry .....	6-142
6.2.3 Changes to Topography and Soil .....	6-143
6.2.4 Changes to Groundwater and Surface Water .....	6-144
6.2.5 Changes to Riparian, Wetland and Terrestrial Environments .....	6-148
6.3 Predicted Effects on Valued Components .....	6-163
6.3.1 Fish and Fish Habitat .....	6-164
6.3.2 Migratory Birds .....	6-172
6.3.3 Species at Risk .....	6-176
6.3.4 Indigenous Peoples and Human Health .....	6-181
6.3.5 Federal Decision and Transboundary Effects .....	6-192
6.4 Mitigation .....	6-193
6.4.1 Atmospheric Environment .....	6-194
6.4.2 Geology and Geochemistry .....	6-196
6.4.3 Topography and Soil .....	6-196
6.4.4 Groundwater and Surface Water .....	6-199
6.4.5 Riparian, Wetland and Terrestrial Environments .....	6-201
6.4.6 Fish and Fish Habitat .....	6-209

6.4.7	Migratory Birds .....	6-213
6.4.8	Species at Risk.....	6-215
6.4.9	Indigenous Peoples .....	6-217
6.4.10	Federal Decision and Transboundary Effects .....	6-225
6.5	Significance of Residual Effects.....	6-225
6.5.1	Atmospheric Environment.....	6-226
6.5.2	Geology and Geochemistry.....	6-229
6.5.3	Topography and Soil .....	6-229
6.5.4	Groundwater and Surface Water .....	6-230
6.5.5	Riparian, Wetland and Terrestrial Environments .....	6-233
6.5.6	Fish and Fish Habitat.....	6-240
6.5.7	Migratory Birds .....	6-243
6.5.8	Species at Risk.....	6-245
6.5.9	Indigenous Peoples .....	6-248
6.5.10	Federal Decision and Transboundary Effects .....	6-254
6.6	Other Effects .....	6-254
6.6.1	Effects of Potential Accidents or Malfunctions .....	6-254
6.6.2	Effects of the Environment on the Project .....	6-260
6.6.3	Cumulative Effects Assessment .....	6-268

## LIST OF TABLES

Table 6.1:	Monthly Temperature, Rainfall and Snowfall Data from the Island Lake Climate Station (1981 to 2010) .....	6-4
Table 6.2:	Area (km <sup>2</sup> ) and Percent Coverage of Soil Classes Among Assessment Areas.....	6-15
Table 6.3:	Vegetation Cover Classes among Vegetation Assessment Areas .....	6-23
Table 6.4:	Land Burned by Forest Fire among Vegetation Assessment Areas. ....	6-25
Table 6.5:	Plants of Sustenance and Cultural Value Identified by Members of the Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation Within the Vegetation Local Assessment Area.....	6-30
Table 6.6:	Area and Proportion of Wetland Types Among Vegetation Assessment Areas.....	6-35
Table 6.7:	Trail Camera data for caribou, moose, wolf and bear in the Wildlife RAA, March 1, 2016 to August 15, 2017 .....	6-38
Table 6.8:	Trail Camera Counts for Furbearer in the Wildlife RAA, March 1, 2016 to March 31, 2017 .....	6-39
Table 6.9:	Aerial Multi-Species Surveys conducted in portions of the RAA, 2012 – 2016 .....	6-40

Table 6.10:	Aerial Moose Survey Results.....	6-42
Table 6.11:	Mammal Species Observation by Participants of Wildlife Workshops in Local Communities .....	6-43
Table 6.12:	Key Attributes of Major Watercourse Crossings Along the All-Season Road .....	6-47
Table 6.13:	Key <i>In situ</i> Water Quality Measured at Major Watercourse Crossings Along the Proposed All-Season Road (June 2016) .....	6-51
Table 6.14	Documented Fish Species Presence in Major Watercourses in the Aquatic RAA .....	6-55
Table 6.15:	Aquatic Environment Characteristics of Watercourse Crossings Along the All-Season Road Alignment. ....	6-58
Table 6.16:	Total number of bird observations by habitat type.....	6-66
Table 6.17:	Vegetation Species at Risk previously recorded in the God’s Lake area and surrounding Hayes River Upland Ecoregion. ....	6-68
Table 6.18:	Mammal Species at Risk That May Occur in the Wildlife Regional Assessment Area.....	6-70
Table 6.19:	Bird Species at Risk That May Occur in the Wildlife Regional Assessment Area.....	6-79
Table 6.20:	Manto Sipi Cree Nation: On-Reserve Population 2016 and 2011 .....	6-93
Table 6.21:	Population Demographics for Manto Sipi Cree Nation, 2011 .....	6-93
Table 6.22:	Select Local Businesses in Manto Sipi Cree Nation.....	6-94
Table 6.23:	Overview of Infrastructure and Utilities – Manto Sipi Cree Nation.....	6-96
Table 6.24:	Summary of Services in Manto Sipi Cree Nation .....	6-96
Table 6.25:	Bunibonibee Cree Nation: On-Reserve Population 2016 and 2011 .....	6-99
Table 6.26:	Population Demographics for Bunibonibee Cree Nation, 2011 .....	6-100
Table 6.27:	Select Local Businesses in Bunibonibee Cree Nation.....	6-101
Table 6.28:	Overview of Infrastructure and Utilities – Bunibonibee Cree Nation.....	6-101
Table 6.29:	Summary of Services in Bunibonibee Cree Nation .....	6-103
Table 6.30:	God’s Lake First Nation: On-Reserve Population 2016 and 2011.....	6-106
Table 6.31:	Population Demographics for God’s Lake First Nation, 2011.....	6-107
Table 6.32:	Select Local Businesses in God’s Lake First Nation .....	6-109
Table 6.33:	Overview of Infrastructure and Utilities – God’s Lake First Nation .....	6-109
Table 6.34:	Summary of Services in God’s Lake First Nation.....	6-110
Table 6.35:	God’s Lake Narrows Northern Affairs Community Population, 1985 to 2016 .....	6-113
Table 6.36:	Population Demographics for God’s Lake Narrows Northern Affairs Community, 2016 .....	6-114
Table 6.37:	Select Local Businesses in God’s Lake Narrows Northern Affairs Community .....	6-114

Table 6.38:	Overview of Infrastructure and Utilities – God’s Lake Narrows Northern Affairs Community.....	6-115
Table 6.39:	Summary of Services in God’s Lake Narrows Northern Affairs Community.....	6-115
Table 6.40:	Harvesting Areas for Plants of Sustenance and Cultural Value Identified by Community Members. ....	6-133
Table 6.41:	Total Habitat Alteration and Loss at the Proposed Watercourse Crossings.....	6-170
Table 6.42:	Accidents and Malfunctions – Release of Hazardous Materials.....	6-255
Table 6.43:	Potential Accidents and Malfunctions, Mitigation Measures and Evaluation of Environmental Risk .....	6-262
Table 6.44:	Evaluation of Effects of the Environment on the Project .....	6-269
Table 6.45:	Past, Present and Future Physical Activities Considered in the Cumulative Effects Assessment .....	6-276
Table 6.46:	Summary of Cumulative Residual Environmental Effects on VCs .....	6-278

## LIST OF FIGURES

Figure 6-1:	Local Assessment Areas for the proposed Project .....	6-2
Figure 6-2:	Regional Assessment Areas for the proposed Project.....	6-3
Figure 6-3:	Wind rose for the God’s Lake Narrows Airport .....	6-4
Figure 6-4:	Bedrock geology in the vicinity of the proposed Project.....	6-9
Figure 6-5:	Surficial geology in the vicinity of the proposed Project .....	6-10
Figure 6-6:	Quarry and mining activity in the vicinity of the proposed Project and potential construction quarry sites .....	6-12
Figure 6-7:	Ecodistricts and Areas of Special Interest in the vicinity of the proposed Project .....	6-14
Figure 6-8:	Soil classification in the vicinity of the proposed Project (Vegetation LAA and RAA shown) .....	6-16
Figure 6-9:	Land cover in the vicinity of the proposed Project.....	6-22
Figure 6-10:	Fire history in the vicinity of the proposed Project .....	6-26
Figure 6-11:	Wetland classification in the vicinity of the proposed Project (Vegetation LAA and RAA shown).....	6-33
Figure 6-12:	Ranges for Norway House and Eastern Migratory Population – DU 4 (Wildlife LAA and RAA shown).....	6-41
Figure 6-13:	Historical daily water levels for Back Lake (04AA003) Hydrometric Station (1970 to 2016).....	6-48
Figure 6-14:	Historical daily discharge graph for the God’s River at Confluence with Hayes River (04AD002) Hydrometric Station (1968 to 2016).....	6-49

Figure 6-15:	Historical daily discharge graph for the Hayes River (04AB001) Hydrometric Station (1973 to 2016) .....	6-50
Figure 6-16:	Traditional Territories of Manto Sipi Cree Nation, Bunibonibee Cree Nation and God's Lake First Nation and the lodge locations within the Indigenous RAA.....	6-91
Figure 6-17:	First Nation reserve land, Treaty Land Entitlements and Registered Traplines in the vicinity of the proposed Project .....	6-92
Figure 6-18:	Manto Sipi Cree Nation businesses, services, infrastructure and utilities .....	6-95
Figure 6-19:	Bunibonibee Cree Nation businesses, services, infrastructure and utilities .....	6-102
Figure 6-20:	God's Lake First Nation and Narrows Northern Affairs Community businesses, services, infrastructure and utilities .....	6-108
Figure 6-21:	Registered Trapline Districts in relation to the Indigenous Land/Resource Use RAA .....	6-118
Figure 6-22:	Métis Natural Resource Harvesting Zone .....	6-121
Figure 6-23:	Approach to Scoping and Screening of VCs for further Cumulative Effects Analysis .....	6-273

## LIST OF PHOTOGRAPHS

Photograph 6-1:	Aspen Hardwood (V5).....	6-23
Photograph 6-2:	Trembling aspen mixedwood/tall shrub (V8) .....	6-23
Photograph 6-3:	Trembling aspen mixedwood/low shrub (V9) .....	6-23
Photograph 6-4:	Black spruce mixedwood/feathermoss (V18).....	6-23
Photograph 6-5:	Jack pine/ feathermoss (V25) .....	6-24
Photograph 6-6:	Jack pine- black spruce/lichen (V26).....	6-24
Photograph 6-7:	Black spruce/shrub- and herb- poor (V27) .....	6-24
Photograph 6-8:	Jack pine- black spruce/ feathermoss (V28) .....	6-24
Photograph 6-9:	Black spruce/ feathermoss (V29).....	6-24
Photograph 6-10:	Black spruce/ Labrador tea/feathermoss (Sphagnum) (V30) .....	6-24
Photograph 6-11:	Black Spruce/herb poor/Sphagnum (feathermoss) (V32) .....	6-25
Photograph 6-12:	Treed Bog (V33) .....	6-36
Photograph 6-13:	Treed Poor Fen.....	6-36
Photograph 6-14:	Shrub Rich Fen .....	6-36
Photograph 6-15:	Graminoid Rich Fen.....	6-36
Photograph 6-16:	Graminoid Poor Fen.....	6-36

Photograph 6-17:	Magill Creek (P6a-X019) – Upstream View Crossing Site .....	6-60
Photograph 6-18:	God’s River (Crossing P6b-X015) – Upstream View at Crossing Site .....	6-61
Photograph 6-19:	Woodland caribou captured on a trail camera in the Regional Assessment Area (Joro Consultants 2018b). ....	6-69
Photograph 6-20:	Wolverine captured on a trail camera in the Regional Assessment Area (Joro Consultants 2018a). ....	6-76

## LIST OF APPENDICES

Appendix 6-1:	Plant Species Observed in the Vegetation Local Assessment Area
Appendix 6-2:	Bird Species Observed in the Wildlife Regional Assessment Area
Appendix 6-3:	Interaction Between the VCs and Key Project Activities
Appendix 6-4:	Assessment of Environmental Effects Before Application of Proposed Mitigation Measures
Appendix 6-5:	Assessment of Environmental Effects After Application of Proposed Mitigation Measures



## 6.0 EFFECTS ASSESSMENT

The existing baseline conditions, predicted changes to the environment and Valued Components (VCs), measures to mitigate adverse effects and the assessment of significance of residual effects are described in this chapter in accordance with the Guidelines for the Preparation of an Environmental Impact Statement (EIS) pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA, 2012) (Canadian Environmental Assessment Agency [Agency] 2017a). The effects of accidents and malfunctions, effects of the environment on the project and cumulative effects are also assessed.

### 6.1 Project Setting and Baseline Conditions

The project setting and baseline conditions within the Local Assessment Areas (LAA, **Figure 6-1**) and Regional Assessment Area (RAA, **Figure 6-2**) are described in the following sub-sections. Sufficient detail is provided to enable identification of how the the proposed Project 6 – All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation and God’s Lake First Nation (Project) could affect the VCs and an assessment of those effects following the approach described in **Chapter 4**. A description of baseline conditions includes the physical environment, the biological environment and the social environment.

#### 6.1.1 Atmospheric Environment

##### 6.1.1.1 Climate

The Project falls within the High Boreal Ecoclimatic Region that forms a continuous belt from northwestern Ontario, across central Manitoba and Saskatchewan to Great Slave Lake in the southern Northwest Territories (Smith *et al.* 1998). Four seasons with distinct temperature and precipitation regimes occur due to the continental climate. The RAA has relatively short cool summers, characterized by long days with minimal night-time darkness and long cold winters with short days and long nights.

Climate data was obtained from the nearest climate station situated 75 kilometres (km) to the south at Island Lake (Environment and Climate Change Canada 2017a). Local climate normals (1981 to 2010) include a mean annual temperature of -0.7°C with July being the warmest month having a mean temperature of 17.9°C and January being the coldest month on average having a mean temperature of -21.5°C (**Table 6.1**). The average frost-free period is 122 days, spanning from May 27 to September 26. The mean annual snowfall is 185.8 cm with the most snow in the month of November (mean of 35.9 cm). The mean annual rainfall is 400.8 mm with the highest rainfall amount in the month of July (mean of 92.8 mm). On average, precipitation falls on 151 days each year (less than or equal to 0.2 mm). Wind measured at the God’s Lake Narrows airport show that prevailing wind blows from the west and northwest, as illustrated in **Figure 6-3**. Climate extremes recorded at the Island Lake climate station between 1981 and 2010 included a maximum temperature of 37.3°C on July 24, 2007, a minimum temperature of -45.0°C on January 1, 1974, a maximum daily rainfall of 77.5 mm on July 11, 1977 and a maximum daily snowfall of 37.8 cm on May 4, 1994.

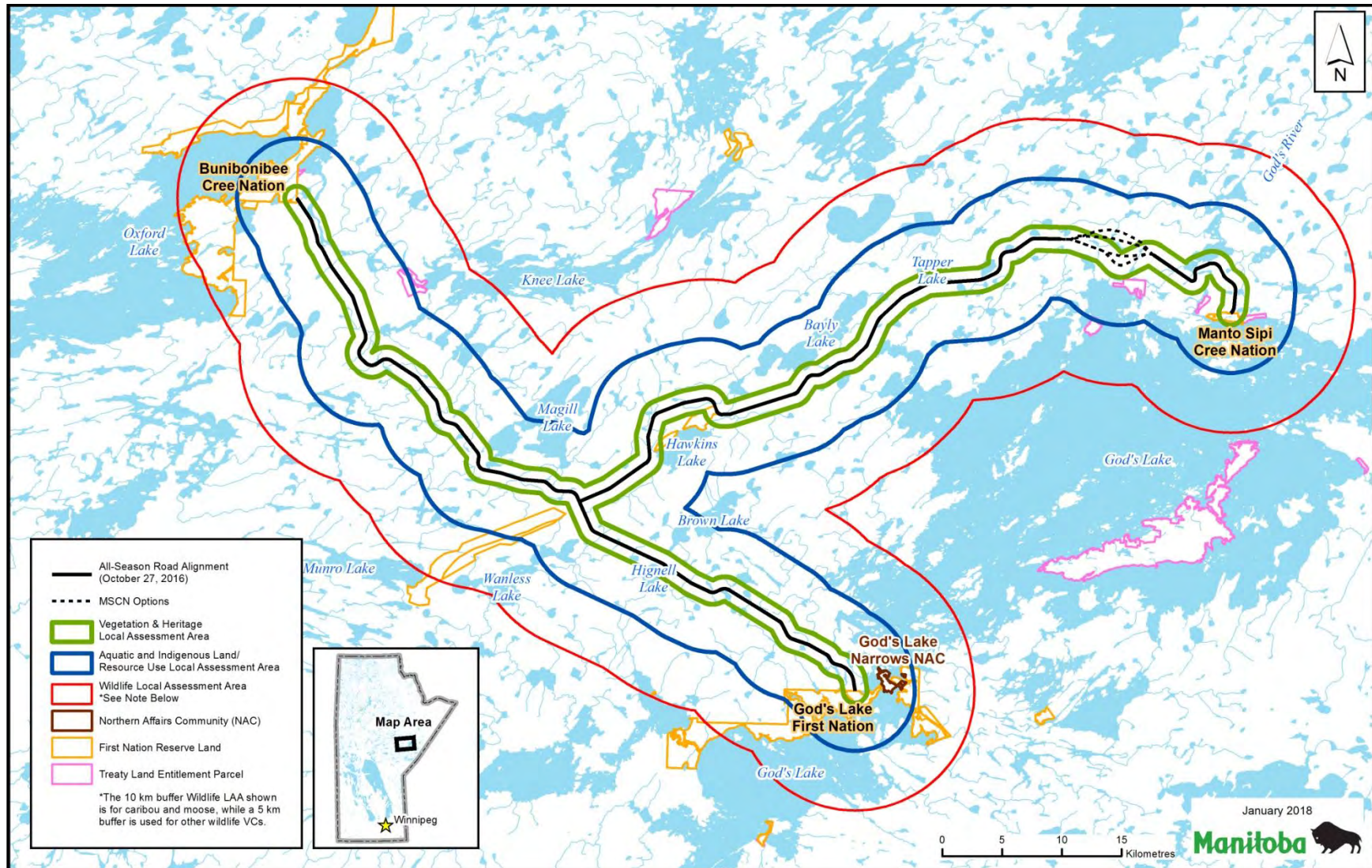


Figure 6-1: Local Assessment Areas for the proposed Project



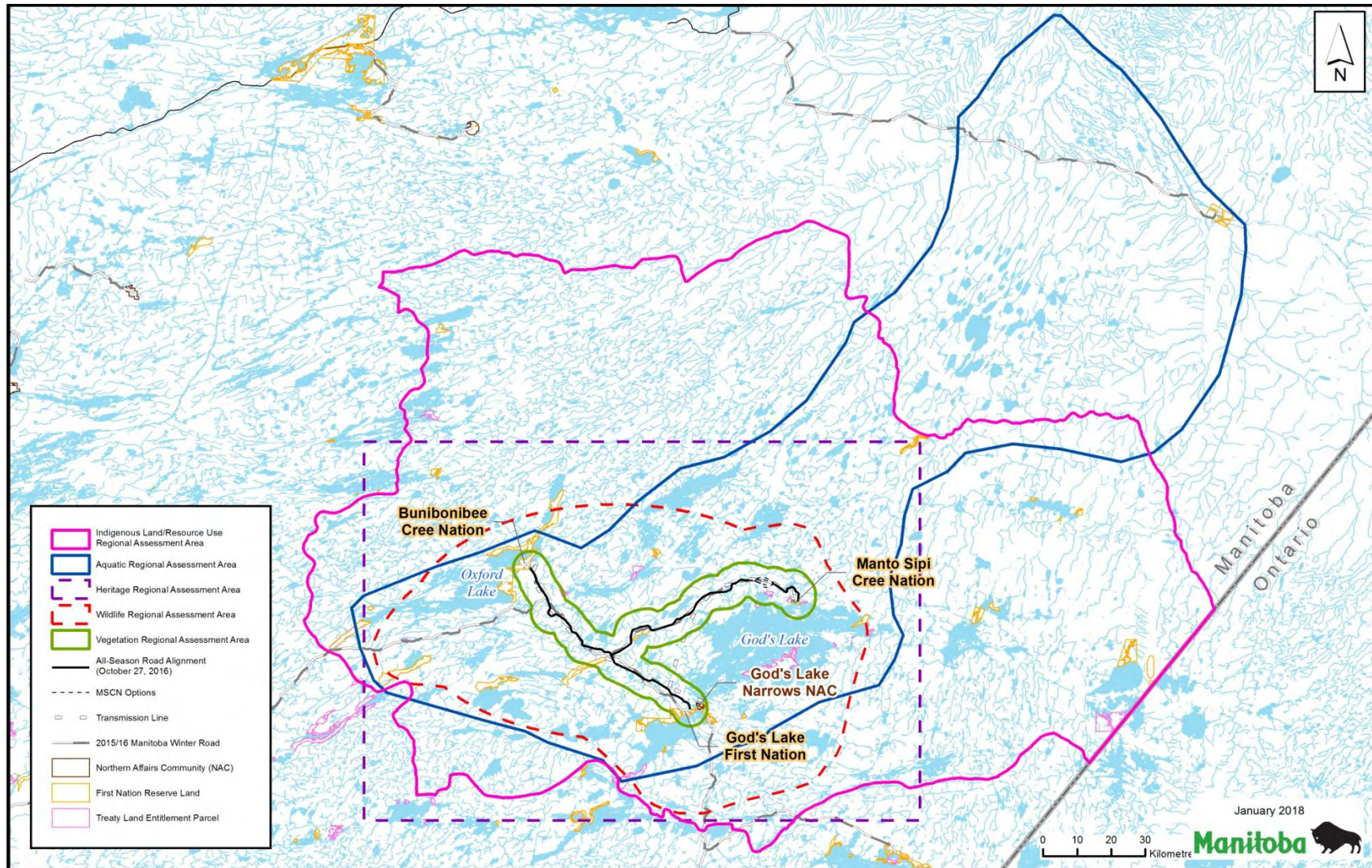
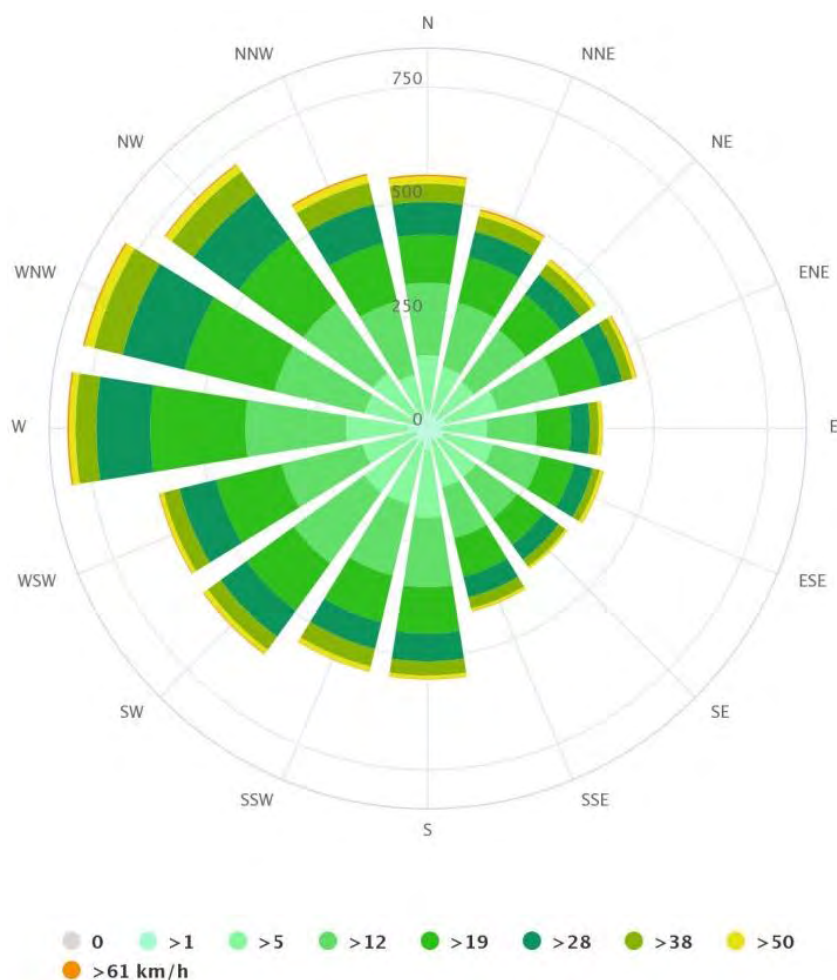


Figure 6-2: Regional Assessment Areas for the proposed Project

Table 6.1: Monthly Temperature, Rainfall and Snowfall Data from the Island Lake Climate Station (1981 to 2010)

Parameter	Month												Year	
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Mean Ann.	Total Ann.
Average daily temperature (°C)	-21.5	-18.5	-10.5	-0.5	7.3	14.1	17.9	16.8	10.2	2.8	-7.7	-18.3	-0.7	-
Rainfall accumulation (mm)	0.3	0.4	2.7	10.9	37.8	74.7	92.8	78.4	62.3	35.6	4.4	0.7		400.8
Snowfall accumulation (cm)	25.9	24	23.9	17.3	8.5	0.5	0	0	2.3	18.4	35.9	29.1		185.8

Source: Environment and Climate Change Canada 2017a



Source: Meteoblue 2017

Figure 6-3: Wind rose for the God's Lake Narrows Airport



#### 6.1.1.2 Air Quality

Air quality is expected to be very good in the vicinity of the Project as the area is remote and there are no major emission sources (ex. industry) in the RAA. No air quality measurements were taken within the RAA as no useful information would be gained due to the lack of measurable concentrations of contaminants in the air shed. While no existing air quality monitoring stations are located in the RAA, Environment Canada operates a monitoring station in Thompson Manitoba (approximately 200 km north-west of the Project) (Government of Manitoba 2017c). A review of the air quality data at the Thompson station (located within the city of Thompson) show that levels of sulfur dioxide (SO<sub>2</sub>), fine particulates (PM<sub>2.5</sub>) and respirable particulate matter (PM<sub>10</sub>) are routinely below the Manitoba Ambient Air Quality Criteria (Government of Manitoba 2005). No measurements are recorded for diesel particulate matter, carbon monoxide (CO), nitrogen oxide (NO<sub>x</sub>) and volatile organic compounds (VOCs).

Using the publicly available data from the Manitoba Air Quality (Manitoba Sustainable Development, 2018b) the applicable statistics for the 2016 to 2018 (January 1<sup>st</sup> to November 14<sup>th</sup>) period were generated for sulfur dioxide (SO<sub>2</sub>), fine particulates (PM<sub>2.5</sub>), and respirable particulate matter (PM<sub>10</sub>).

CCME (2018) has established criteria for two measurements of SO<sub>2</sub>, a 1hr average<sup>1</sup>, and an annual average<sup>2</sup>. The 2020 value for each of these criteria is 70 parts per billion (ppb) (1hr) and 5.0 ppb (annual). Manitoba Sustainable Development (2005) has set the criteria at 340 ppb (1hr), 110 ppb (24hr), and 20 (annual). For the January 1, 2016 to Nov 14, 2018 period, Thompson's SO<sub>2</sub> parameters were 862 ppb (1hr), 50 ppb (24hr), and 8.7 ppb (annual) exceeding both criteria established by CCME and the 1 hr average criteria established by Manitoba.

Fine particulates were evaluated using a 24hr average<sup>3</sup> and annual average<sup>4</sup>. The CCME (2012) standards for 2020 are 27 µg/m<sup>3</sup> (24hr) and 8.8 µg/m<sup>3</sup> (annual) while Manitoba only has standards for a 24 hr average set at 30 µg/m<sup>3</sup> (Manitoba Sustainable Development 2005). For the January 1, 2016 to Nov 14, 2018 period, Thompson's PM<sub>2.5</sub> parameters were 20.2 µg/m<sup>3</sup> (24hr), and 5.4 µg/m<sup>3</sup> (annual) below all established criteria.

Criteria for PM<sub>10</sub> has not yet been established by CCME but Manitoba Sustainable Development (2005) has set the criteria for 24hr average at 50 µg/m<sup>3</sup>. For the January 1, 2016 to Nov 14, 2018 period, Thompson's PM<sub>10</sub> was 42.9, below the guideline.

The SO<sub>2</sub> data from Thompson contains periodic spikes in concentrations (accounting for the high 1hr average results) likely the result of industry within the city. Industrial activity as well as forest fires

<sup>1</sup> Three year average of the 99<sup>th</sup> percentile daily maximums from 1 hr average concentrations; calculated using CCME formula.

<sup>2</sup> Arithmetic mean of all 1hr averages; calculated using CCME formula.

<sup>3</sup> Three year average of the annual 98<sup>th</sup> percentile reading of daily averages; calculated using CCME formula.

<sup>4</sup> Three year average of the annual average of daily averages; calculated using CCME formula.

(common in the summer months throughout northern Manitoba) may also have an effect on PM<sub>2.5</sub> and PM<sub>10</sub> levels.

Thompson and other industrial centers are such as the Pas and Flin Flon, are well removed from the project area and the major industrial facilities that are found in these communities and which may contribute to reduced air quality are not present within the RAA (Environment and Climate Change Canada 2017d). There are no major sources of air pollution which could be blown into the LAA or RAA by prevailing winds. Thus, it is unlikely that air quality is influenced by anything other than localized anthropogenic sources from Manto Sipi Cree Nation, Bunibonibee Cree Nation, God's Lake First Nation and God's Lake Northern Affairs Community related to operations of vehicles in the communities and along the winter road when open. As there are no current industrial activities in the region, contaminants such as particulates (PM<sub>2.5</sub>, PM<sub>10</sub>), SO<sub>2</sub>, VOCs, NO<sub>x</sub>, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) are not expected to significantly affect air quality in the RAA.

The most noteworthy influence on air quality of the RAA is forest fires that occur within and beyond the RAA. Forest fires contribute smoke, particulates, carbon monoxide and other compounds to airsheds. Smoke and particulates may also blow in from other parts of the Province and beyond provincial borders. Other potential sources of emissions in the RAA are highly localized and may include airplanes, boats and vehicular traffic within the remote communities, seasonal vehicular traffic on the winter road and snowmobile and ATV traffic on trails. Due to low population density and the absence of nearby industrial facilities, it is unlikely that the activities described contribute to the RAA air quality.

#### *6.1.1.3 Climate Change and Greenhouse Gas Emissions*

Science conclusively shows that the world's climate is changing and that human activities are accelerating these changes (Government of Manitoba 2017a). While fluctuations in climate have occurred in the past over long periods of time, the current accelerated rate is attributed to massive increases in carbon dioxide and other greenhouse gases (GHGs) to the atmosphere. A GHG is a gas in the atmosphere that absorbs infrared radiation, traps heat in the atmosphere and contributes to the greenhouse gas effect, which is a phenomenon that contributes to the warming of the earth's surface and associated climate change effect. Manitoba Sustainable Development (MSD), Climate Change and Air Quality Branch states that Manitoba will face earlier and more severe climate change effects due to its northerly latitude and location in the centre of the continent (Government of Manitoba 2017a).

Climate change has been linked to GHG emissions that contribute to atmospheric increases in levels of CO<sub>2</sub> and other gases (ex: CH<sub>4</sub>, N<sub>2</sub>O) that increase global temperatures, change climate and precipitation patterns and increase the frequency of extreme weather events. GHG emissions for the current, undeveloped state of the Project are estimated at 1,953 tonnes of CO<sub>2</sub>, 20 tonnes of CH<sub>4</sub> and 0.1 tonnes of N<sub>2</sub>O, which equate to a total of 2,481 tonnes of CO<sub>2</sub>equivalent (CO<sub>2</sub>e) per year (**Appendix A**; Dillon Consulting Limited 2017). This value includes the estimated GHG emissions associated with the existing winter road (construction and vehicular use), area air travel and forest processes (land cover and forest