



Sustainable Development

Environmental Stewardship Division
Environmental Approvals Branch
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www.gov.mb.ca/conservation/eal

File: 5991.00

April 9, 2019

Marlene Gifford
AECOM Canada Ltd.
99 Commerce Drive
Winnipeg, MB R3P 0Y7

Dear Ms. Gifford:

Re: Wanipigow Sand Extraction Project

Thank you for your March 12, 2019 correspondence responding to comments and concerns raised by the Technical Advisory Committee (TAC) and the public regarding the proposed Wanipigow Sand Extraction Project by Canadian Premium Sand Inc.

The additional information was placed on the public registry and sent to TAC for review. Attached you will find the requests for additional information resulting from your response.

If you have any questions, please contact me at 204-945-7012.

Yours sincerely,

Jennifer Winsor, P.Eng.

- c. Siobhan Burland Ross – Environmental Approvals Branch, Manitoba Sustainable Development
Robert Archibald, Canadian Premium Sand Inc. (via email)
Public Registries



Health, Seniors and Active Living

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April 9, 2019

Dear Ms. Winsor:

RE: Wanipigow Sand Extraction Project EAP - Response to TAC - File 5991.00

The following is the response to the additional information provided by Canadian Premium Sand Inc.

The key ongoing concerns which require monitoring and potential mitigation strategies from a public health perspective include: air quality, noise, traffic safety and dust management. It is recommended that provincial guidelines and standards not be exceeded during the project operation.

There are a few specific questions:

1. Can information be provided about the location of human residences to the quarry site?
How much dust will be generated from quarrying activities, and will it impact local residents?
2. Will respirable silica dust levels be measured?
3. During dry dusty conditions when air quality concerns are anticipated, what is the strategy to monitor for and mitigate air quality issues?
4. It is recommended that noise levels be monitored and not exceed provincial standards.

With regard to traffic safety and other potential emerging issues that affect health, communities next to large projects such as this have often developed community advisory committees to liaise with the company to address any emerging issues as they evolve. Concerns generated from these groups could be raised to Sustainable Development as necessary.

Can information be provided on whether any influx of workers is expected to come into the area and where they would live? Are all workers expected to be local? Community planning is often needed to support changes in population and demographics and prevent adverse consequences.

Public Health would appreciate an opportunity for further dialogue on this project and potential input into the risk management plans.

Sincerely,

ORIGINAL SIGNED BY SUSAN ROBERECKI

Susan Roberecki, MD, FRCPC, MSc
Medical Officer of Health, Environmental Health
Population and Public Health Branch
Manitoba Health, Seniors and Active Living

cc: Dr. Karen Robinson, MOH, Interlake Eastern Health Authority
Dr. Tim Hilderman, MOH, Interlake Eastern Health Authority

DATE: 09 April 2019

TO: Jennifer Winsor
Environmental Approvals Branch
Manitoba Sustainable Development
1007 Century Street, Winnipeg

FROM: Muntaseer Ibn Azkar
Air Quality Section
Environmental Compliance and
Enforcement Branch
Manitoba Sustainable Development
1007 Century Street, Winnipeg

SUBJECT: Wanipigow Sand Extraction Project – Canadian Premium Sand Inc. (File 5991.00)

Air Quality Section has reviewed the proponent's response to Technical Advisory Committee (TAC) and provides the following comments:

- Although the proponent has mentioned that no crushing or grinding activities will be conducted during the quarrying process, there is still a potential for crystalline silica or other silica materials to be re-suspended or airborne during the processing (ex. handling, storage piles, transport, breaking of lumps). It is suggested that crystalline silica emission estimation be undertaken and its mitigation measures.
- As the modeling results show some exceedances of PM₁₀ and PM_{2.5}, Air Quality Section suggest that the Best Available Control Technologies (BACT) be implemented to manage particulate matter emissions.

Winsor, Jennifer (SD)

From: Beruar, Omkar (GET)
Sent: April-08-19 2:12 PM
To: Winsor, Jennifer (SD)
Cc: Burland Ross, Siobhan (SD); Mraz, Peter (GET)
Subject: RE: Wanipigow Sand Extraction Project EAP - Response to TAC - File 5991.00

Hi Jennifer,

The only comment I have is that CPS is required to have a mine closure plan approved with adequate financial assurance prior to starting operation on the site in order to be compliant with legislation.

Thanks

Omkar

From: Winsor, Jennifer (SD) <Jennifer.Winsor@gov.mb.ca>
Sent: March-14-19 10:37 AM
To: Ibn Azkar, Muntaseer (SD) <Muntaseer.IbnAzkar@gov.mb.ca>; Pochailo, Janis (MR) <Janis.Pochailo@gov.mb.ca>; Miller, Glenn (SD) <Glenn.Miller@gov.mb.ca>; Oertel, Diane (SD) <Diane.Oertel@gov.mb.ca>; Iqbal, Muhammad (SD) <Muhammad.Iqbal@gov.mb.ca>; Robinson, Karen (HSAL) <Karen.Robinson@gov.mb.ca>; Methot, Michelle (SD) <Michelle.Methot@gov.mb.ca>; Osiowy, Kimber (MI) <Kimber.Osiowy@gov.mb.ca>; Epp, Jane (SD) <Jane.Epp@gov.mb.ca>; Wiseman, Kylene (SD) <Kylene.Wiseman@gov.mb.ca>; Beruar, Omkar (GET) <Omkar.Beruar@gov.mb.ca>
Subject: Wanipigow Sand Extraction Project EAP - Response to TAC - File 5991.00
Importance: High

Good morning,

Thank you for providing comments regarding the Canadian Premium Sand Inc. - Wanipigow Sand Extraction Project Environment Act Proposal (EAP). The information you provided was sent to the proponent for response.

The response from the proponent is now on the Public Registry and can be reviewed here:

<https://www.gov.mb.ca/sd/eal/registries/5991wanipigow/index.html>.

If you have further questions and/or comments regarding the proponent's additional information provided, please send your comments to my attention on or before **April 8th, 2019**.

Best regards,

Jennifer Winsor, P.Eng.
Environmental Engineer
Environmental Approvals Branch
Department of Sustainable Development
1007 Century Street
Winnipeg, MB R3H 0W4
Ph: 204-945-7012
Fax: 204-945-5229

**Eastern Region Comments
on
Proponent's response to TAAC Comments
(Lands Branch, Eastern Region, MBSD – Feb. 12, 2019)**

Wanipigow Sand Extraction Project

Lands Branch, Eastern Region

10

Initial Lands Branch Comment: The Closure Plan has not yet been developed. As rehabilitation is planned to be ongoing throughout the life of the project, the closure plan should be submitted for review as soon as possible, and annual review with field staff should occur to discuss the progress of the rehabilitation and proposal for the current year.

Response:

As indicated in Section 8.4 of the EAP 'Closure Plan Review', the proposed Closure Plan will outline detailed mitigation plans and monitoring activities that will be implemented to rehabilitate the Project Site during the closure phase of the Project. The Closure Plan will describe the plan for annual reclamation, which will include the submission of annual reclamation reporting to MBSD. The reports will include results of the revegetation monitoring program (with photographs and maps).

Comments:

An initial closure plan should be submitted during the review process and prior approval of the EAL. Information provided is not sufficient to ensure proper rehabilitation will be conducted on site.

9

Initial Wildlife Comment: The natural land cover does not appear to be "common" to the regional area as the underlying soils and surficial geology appear to be substantially different in the Local Project Area compared to the Regional Project Area.

Response:

With respect to the natural vegetation land cover, information provided in the EAP (Section 4.3.1 'Vegetation'), as obtained from the Manitoba Forest Resource Inventory, indicates vegetated land cover within the Project Site (within which the Project Footprint is located) consists of cover types and tree species present in the Regional Project Area (up to 10 km beyond the Project Site) and common within the larger Lac Seul Upland Ecoregion within which the Project Site is located. The Lac Seul Upland Ecoregion is part of the national Ecological Land Classification System used for overseeing ecological resources within Canada in a geographical representation. Therefore, comparison of ecological resources impacts (e.g. vegetated land cover) with the Project Site, to the larger Lac Seul Upland Ecoregion, is considered appropriate.

Comments:

It is acknowledged that the project site area consists of cover types and tree species present in the Regional Project Area (up to 10 km beyond the Project Site). However, the underlying silica sand deposits, which are unique to the project site area, are expected to influence local vegetation /ground cover characteristics, and in doing so would be expected to create fine scale habitat conditions that would not necessarily be common in the regional project area. Tables 4.1 – 4.3 confirm that the vegetation mosaic (tree/stand types) in the project site area is different than that in the regional project area, and the reconnaissance surveys do not include any additional information at a finer scale (e.g. shrub and ground cover).

10

Initial Wildlife Comment: The Closure Plan has not yet been developed. As rehabilitation is planned to be ongoing through the life of the Project, the Closure Plan should be submitted for review as soon as possible, and annual reviews with field staff should occur to discuss the progress of rehabilitation and proposals for the current year.

We are assuming that details on re-vegetation, including maps, will be in the Closure Plan; however; annual meetings should occur to view rehabilitation progress and proposals for the current year. Annual meetings with the proponent and departmental staff should occur to discuss reclamation progress and review the annual reclamation plans.

Response:

A Closure Plan is currently being developed in accordance with applicable regulations.

As indicated in Section 8.4 of the EAP 'Closure Plan Review', the proposed Closure Plan will outline detailed mitigation plans and monitoring activities that will be implemented to rehabilitate the Project Site during the closure phase of the Project. The Closure Plan will describe the plan for annual reclamation, which will include the submission of annual reclamation reporting to MBSD. The reports will include results of the revegetation monitoring program (with photographs and maps).

As indicated in Section 8.1 of the EAP 'Success of Revegetation Efforts', a revegetation monitoring program will be implemented to determine the effectiveness of revegetation techniques used on previously disturbed land and to determine if follow-up reseeding or replanting is required

Annual meetings with MBSD and the CPS Community Oversight Committee to review the rehabilitation progress will be proposed within the Closure Plan.

Comments:

Acknowledged – Regional MBSD staff look forward to reviewing the Closure Plan and participating in the annual meetings, which we assume will include site visits to view the progress of rehabilitation.

11

Initial Wildlife Comment: Concern raised regarding the practicality / feasibility of having gated control access for the two Project access roads, i.e. likelihood of trucks unlocking and relocking the gate, potentially resulting in open access.

Response:

In addition to having gates at both access roads, CPS will employ site security to deter unauthorized access to the facility when the gates are not locked.

Comments:

It is acknowledged that site security (consisting of manned gates?) will help to deter unauthorized access to the facility when the gates are not locked. Our experience with other developments is that truckers will not open and close gates during active haul periods, accordingly, it would not be reasonable to expect that the gates will be locked when hauling is occurring. And, since hauling will be occurring continuously, we are anticipating that the gates will be open most of the time, unless the proponent plans to have security staff open and close the gates for each truck.

12

Initial Wildlife Comment: Inquiry regarding the location of Q2, Q3 and Q4 with respect to the Project Schedule (EAP Sec. 2.13).

Response:

Q2, Q3 and Q4 refer to a temporal scale references in 2019, not locations of Project activities. i.e. Q2 = April, May, June; Q3 = July, August, September; Q4 = October, November, December.

Comments:

Clarification noted.

13

Initial Wildlife Comment: Please clarify (with maps illustrating QL #s) the sequence of road building (main roads and secondary roads), quarrying and reclamation. It is not clear where quarrying will begin and how it will proceed. Our preference is to build the main access road, and then begin quarrying at the end of road, thereby allowing access to be decommissioned in a progressive (back to front) and orderly manner.

Response:

Mining sequence will begin and proceed based on ongoing geotechnical work and market demands.

Comments:

Please provide a map depicting how mining is expected to begin and proceed in the first few years of operation. This will be particularly important as a timber sale is currently in effect (and a work permit issued), which will result in forest cover being cleared in the project footprint area. The two activities should be coordinated to ensure that forest harvest occurs in a manner consistent with the proponent's commitments in the EAP respecting construction and maximum annual cleared areas.

14

Initial Wildlife Comment: For highly mobile mammal and avian species the majority of direct and indirect effects of the Project will likely not be restricted to an area 2 km beyond the Project Site. Furthermore, we do not believe that 10 km reflects the maximum spatial extent of potential effect of the Project. Rather, given the scope and duration of the Project, the Project has the potential to exert affects on a variety of species, possibly beyond 10 km.

The only way to assess effects is through monitoring, and the proponent does not plan on conducting any wildlife monitoring activities.

Response:

An Environmental Monitoring Program will be developed for the Project that will require an Project Environmental Monitor to document wildlife observations (such as moose) in the Project Site Area, and will implement additional wildlife protection mitigation measures beyond those stipulated in the EAP (Table 6-5: Wildlife), as needed. Wildlife monitoring will be conducted in accordance with requirements stipulated within an Environment Act Licence for the Project.

Comments:

We look forward to receiving and reviewing the EMP and request that it include a wildlife monitoring component designed in a manner that potential effects of the project can be assessed, and adaptive mitigative measures can be applied as required. We recommend that the proponent consult with MBSD staff in the development of the wildlife monitoring component.

15

Initial Wildlife Comment: Please clarify how the terrestrial (field?) reconnaissance was conducted (e.g. time of year, transects, routes, what was recorded), as well as what would be considered "rare". The

information in Table 4-1 suggests that the Project Area appears to be different from what is present in the Regional Area. For example, the Local Project Area appears to be substantially higher, drier and appreciably more deciduous-dominated compared to the Regional Project Area.

Response:

Characterization of the Project Site Area relied on a combination of land cover information obtained from the Manitoba Forest Resource Inventory and on-site general reconnaissance throughout the Project Site Area within representative vegetated communities where the Project Footprint would be located. As indicated in Section 4.3.1 'Vegetation' in the EAP, terrestrial reconnaissance was conducted during October 10 - 12, 2018. Locations and photographs of general reconnaissance areas are provided in Appendix C of the EAP. Respected local community Elders who accompanied the field reconnaissance team on October 12, 2018, and who were also familiar with the Regional Project Area, confirmed that vegetative communities containing medicinal plants were common throughout the Project Site Area and that over 100 plants were used in traditional medicinal medicines which are found in a wide variety of vegetative communities. This information was interpreted to indicate that no vegetation communities that were considered 'rare' (i.e. uncommon) were present in the Project Site Area (EAP Appendix G1 'Hollow Water First Nation Traditional Ecological Knowledge Report).

Regarding the land cover characteristics within the Project Site Area as compared to the Regional Project Area, and larger Lac Seul Uplands Ecoregion, please see response #9 above.

Comments:

To re-state- The information in Table 4-1 suggests that the Project Area appears to be different from what is present in the Regional Area. For example, the Local Project Area appears to be substantially higher, drier and appreciably more deciduous-dominated compared to the Regional Project Area. The on-site general reconnaissance conducted October 10-12 and documented in Appendix C appears to be focused primarily on tree species/stand types (no shrub/ground cover information) and will provide insufficient baseline data to allow for a meaningful assessment of rehabilitation measures.

16

Initial Wildlife Comment: Figure 4-4 and 4-5 are not consistent in their depiction of "forested".

Response:

The GIS data used to produce Figures 4-4 and 4-5 in the EAP, which included information on forested and non-forested cover types, was obtained from the Manitoba Land Initiative Manitoba Forest Resource Inventory.

Comments:

Acknowledged

17

Initial Wildlife Comment: What is meant by "mature" and "over-mature"? "Young" is described in Table 4-3 as greater than 3 m, but there is no description of mature or over-mature.

Response:

As indicated in a footnote at the end of Table 4-3 in the EAP, forest age class information is based on the Manitoba Forest Resource Inventory data for 'Cutting Class' which is based on size, vigour, state of development and maturity of a stand for harvesting purposes.

Comments:

Acknowledged

18

Initial Wildlife Comment: The Local Project Area is within GHA 26, and portions of the Regional Project Area are within two GHAs - GHA 26 and GHA 17A. Recent aerial surveys in these GHAs indicate that moose densities in the Regional Project Area range from "Low" to "Medium". While moose

observations in the Project Area are less common than in the Regional Project Area, they are still more common here than in other parts of the GHAs.

When considering recent changes associated with the new all-season road (e.g. increased access, increased traffic volume, increased hunting pressure), it is inaccurate to assume that moose hunting does not occur within the Local Project Area. In view of the importance of moose to indigenous communities, as well as recent moose declines in these areas (hence the current closure to licenced moose hunting in GHA 26), the potential socioeconomic effects of the Project on moose should have been considered in the both the Regional Project Area and the Local Project Area.

Response:

Information regarding the low moose abundance and frequency of moose hunting within the Local and Regional Project Area was obtained from regional and Local Project Area Traditional Ecological Knowledge studies (Appendix G in the EAP) and is considered accurate based on information from members of the local communities who traditionally use the Local and Regional Project Area land and resources.

The 'Scope of Effect' regarding residual Project effects to wildlife in Section 6.4.2 of the EAP should read 'Regional Project Area' rather than 'Local Project Area'. Mitigation measures proposed in Section 6.4.2 of the EAP for the protection of wildlife, and the expected on-going moose management efforts of MBSD in the regional Game Hunting Areas, are considered sufficient to mitigate adverse effects to regional moose and other wildlife populations.

Comments:

We do not disagree with the accuracy of the information gathered in the TEK study, however, TEK represents one layer of information, and if there are other layers of information that will contribute to our understanding of moose abundance/frequency of hunting, e.g. aerial surveys, GPS collar data, officer reports, etc., then these sources should be considered along with the community-based information. The information provided in Appendix G of the EAP states *that there is not much if any current or past traditional moose hunting in the project area and that moose and deer have not been seen in the area but that moose and deer tracks have been observed.* It is not clear, however, whether these statements refer to the project site area, or the regional project area; e.g. 4.6.4.2 of the EAP states *that results of a previous regional TEK study indicated that the Project Site Area has a low frequency of use of moose occurrence compared with other locations in the Regional Project Area (East Side Road Authority 2009; Appendix G2). Considering moose hunting is not currently conducted in the Local Project Area, the potential socioeconomic effects of the Project on moose hunting will not be assessed in this document..* MBSD's information confirms that moose are present in both the project site area and the regional project area, and that moose hunting by indigenous peoples occurs in these areas, including hunting by members of communities other than Hollow Water FN. Recent moose declines in this area have been attributed to a wide range of interacting factors that affect birth and death rates, including cumulative affects from human developments. The *expected on-going moose management efforts of MBSD in the regional Game Hunting Areas include reviewing proposed new developments such as the Wanipigow Sand Extraction Project, considering potential additive effects on moose, and requiring developers to undertake appropriate mitigation and/or monitoring measures to enable an assessment of effects.*

19

Initial Wildlife Comment: While caribou are wary and difficult to see on-foot, data from previously radio-collared caribou in the indicate that caribou have used habitats in the Regional Project Area (no caribou in this area are collared at the present time).

The Project is expected to have effects within the Regional Project Area, accordingly, caribou should not have been removed from consideration for assessment.

Response:

Information regarding the current lack of caribou within the Regional Project Area (i.e. within 10 km of the Project Site Area) was obtained from a Local Project Area Traditional Ecological Knowledge study (Section 4.3.2 'Wildlife'; Section 4.3.3 'Species of Conservation Concern' in the EAP) and is considered accurate based on information from members of the local communities who traditionally and regularly use the Local and Regional Project Area land and resources.

Comments:

We do not disagree with the accuracy of the information gathered in the TEK study, however, TEK represents one layer of information, and if there are other layers of information that will contribute to our understanding of caribou occupancy in the area, then these sources should be considered along with the community-based information. The information provided in Appendix G of the EAP states that caribou are not seen or hunted in the project area. It is not clear, however, whether this statement refers to the project site area, or the regional project area, as section 4.6.4.2 of the EAP states that Caribou hunting does not occur in the Local Project Area (Appendix G1). Therefore, the potential socioeconomic effects of the Project on caribou hunting will not be assessed in this document. MBSD's monitoring information indicates no evidence of caribou within the project site area. However, the portion of the regional project area north of the Wanipigow River is within the range of the Atiko woodland caribou herd. MBSD is not currently actively monitoring the Atiko caribou herd, but previous monitoring studies have confirmed the presence of caribou within the regional project area, and there is no evidence to suggest that this is no longer the case.

20

Initial Wildlife Comment: Please clarify how the terrestrial (field?) reconnaissance was conducted (e.g. time of year, transects, routes, what was recorded). If in fact, all the terrestrial reconnaissance was conducted during a 3-day period in October (Oct 10-12), the resulting data should not be used to form conclusions about presence and absence of wildlife species (e.g. caribou).

Response:

Refer to response #15 above regarding information on Project Site Area reconnaissance efforts. Information regarding the abundance and potential presence of wildlife species, including caribou, was primarily obtained from previously documented references and results of the Traditional Ecological Knowledge studies for the Local and Regional Project Areas

Comments:

Please refer to our comments for 15, 18 and 19 above. The information presented by the proponent does not consider all sources of available data and is insufficient to form conclusions about the presence or absence of wildlife species in the regional project area.

21

Initial Wildlife Comment: Wolverine (a SARA species) is not included in the table, but should be. Wolverine should have been included in the assessment.

Response:

As indicated in Section 4.3.3 'Species of Conservation Concern' in the EAP, 'Species at Risk' are defined for the purpose of the EAP as those species listed in The Endangered Species and Ecosystems Act of Manitoba, and/or those listed as 'Endangered' or 'Threatened' in Schedule 1 of the federal Species at Risk Act.

The wolverine is not listed as a 'Threatened' or 'Endangered' species under The Endangered Species and Ecosystems Act, the federal Species at Risk Act, or by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). The wolverine is listed as a species of 'Special Concern' by COSEWIC and in Schedule 1 of the Species at Risk Act. Species listed as 'Special Concern' under the federal Species at Risk Act are not legally protected (i.e. 'general prohibitions' do not apply) under the Species at Risk Act, which applies to federal land and not provincial Crown land.

There is the potential for Wolverine to occur within the Regional Project Area. The measures proposed to protect wildlife in Section 6.4.2 'Wildlife' of the EAP are considered sufficient to mitigate adverse effects to the regional wolverine population.

Comments:

We agree that wolverine may potentially occur within the regional project area. As wolverine are listed as a species of special concern under SARA, this should have been noted in the EAP.

22

Initial Wildlife Comment: Any assessment must also consider the Regional Project Area. Now that there is an all-season road all the way to Berens River, traffic has increased on the road and members of some other First Nations using the road have a tradition of harvesting caribou (opportunistically) in the Regional Project Area. Accordingly, lack of caribou hunting in the Local Project Area should not be used as justification for removing caribou from consideration in the assessment.

Response:

The potential for Project related effects on caribou was not assessed in the EAP due to the lack of caribou in the Regional Project Area (i.e. within 10 km of the Project Site Area), and therefore absence of expected potential Project effects to caribou.

Refer to response #19 regarding the source of information for caribou in the Regional Project Area

Comments:

Please see our comments herein respecting the occurrence of caribou in the regional project area.

23

Initial Wildlife Comment: Regarding the scope of effect regarding Wildlife (EAP Section 6.4.2:) to be limited to the Local Project Area, and the conclusion statement regarding Project impacts to Regional Project Area wildlife, the above clauses are contradictory (Regional vs Local Project Area).

Response:

As indicated in response #18: The 'Scope of Effect' regarding residual Project effects to wildlife in Section 6.4.2 of the EAP should read 'Regional Project Area' rather than 'Local Project Area'.

Comments:

Acknowledged

24

Initial Wildlife Comment:: A number of measures are specified to mitigate effects; however, while some effects may be partially reversible, it will not be possible to reverse other effects. It will be difficult to mitigate certain effects; e.g. posting speed signs will not prevent wildlife collisions, gated access roads will not work as envisioned (see previous comments), no-go windows for nesting birds will help protect birds, but may be inadequate to protect denning mammals. Furthermore, annual rehabilitation will require more discussion to ensure that the stated objectives are being addressed.

Response:

The purpose of applying the proposed mitigation measures is to minimize or avoid unacceptable adverse environmental effects, including adverse effects to regional wildlife populations, beyond a regulatory threshold or level considered unacceptable by regulatory authorities.

Regarding annual rehabilitation of quarries and Project Closure Plan, please refer to response #10.

Comments:

The proposed mitigative measures are acknowledged; however, the wording in the EAP suggests that all the assessed potential effects will *be minimized or avoided*. For some of the potential effects, it would have been more accurate to have stated that a proposed measure will help to reduce (rather than minimize) effects; e.g. posting speed signs, gating access roads, wildlife warning signs. Regional MBSD staff look forward to reviewing the Closure Plan and participating in the annual meetings, which we assume will include site visits to view the progress of rehabilitation.

25

Initial Wildlife Comment: The Lac Seul Upland Ecoregion should not be the area used to measure effects on wildlife populations. It is more appropriate to measure effects using the Local and Regional Project Areas. This is doable, and the proponent should be required to prepare a proposed wildlife monitoring plan for review.

Response:

Refer to responses #9 and #14 above.

Comments:

We look forward to receiving and reviewing the EMP and request that it include a wildlife monitoring component designed in a manner that potential effects of the project can be assessed. We recommend that the proponent consult with MBSD staff in the development of the wildlife monitoring component

26

Initial Wildlife Comment: The effects of the Project should not be considered in isolation of other developments occurring in the area. Impacts from this project are additive to those already occurring from other factors; as such; the cumulative effects of the Project should have been considered in the assessment.

Response:

A Cumulative Effects Assessment is not required in an Environment Act Proposal under The Environment Act as per the 'Information Bulletin – Environment Act Proposal Report Guidelines' (March 2018). However, to provide both the Canadian Environmental Assessment Agency and MBSD with information regarding potential cumulative environmental effects of the Project, a Cumulative Effects Assessment has been prepared (see Attachment C of this Table 1).

Comments:

The cumulative effects assessment only includes effects on federal lands, or values/resources under federal jurisdiction. While the report lists previous developments occurring in this area (e.g. new ASR, transmission line, etc.), it offers no meaningful assessment of the current or previous projects other than repeating what has already been stated in the EAPs.

The following is clipped from the cumulative effects assessment report for reference. Our comments relate to the excerpts in bold italics and are inserted in red type:

4.3 Moose:

As indicated in Section 4.3.2, 'Wildlife' in the EAP, Traditional Knowledge has indicated that moose are not common in the Local and Regional Project Areas. Cumulative effects assessments supported by baseline information regarding moose were included in Environmental Impact Statements for the most

recent major developments in the larger regional area, which included an all-season road project between Provincial Road 304 to Berens River (East Side Road Authority 2009) and also between Berens River and Poplar River (Manitoba East Side Road Authority 2016). **Cumulative effects assessments of those two major all-season road projects in the regional area indicated that no significant adverse cumulative effects on moose were anticipated in relation to cumulative effects due to habitat loss and fragmentation, hunting, predation, and vehicular collisions.** MBSD maintains that these previous projects are associated with impacts on both moose and woodland caribou. We have previously documented our disagreement with the proponent's conclusions on the potential immediate, long term and cumulative effects of these projects on both species. No additional large-scale major projects are planned for the regional area that would result in additional cumulative effects beyond those that have already been assessed for these two major all-season road projects, and this current Project, in the regional area.

Although the potential for cumulative effects on moose related to vehicular collisions may increase with the increased truck traffic associated with this proposed Project in combination with the current vehicular traffic on local and regional roads and highways, vehicular collisions with moose are unlikely to result in a significant effect on the regional moose population, **considering the regional moose population is currently low, which has resulted in an on-going licensed moose hunting prohibition in Game Hunting Area 26, within which lies the Local Project Area (see Section 4.6.4.2, 'Hunting', in the EAP).** Vehicular collisions are not the only potential effect of this project on moose. Information regarding existing moose-vehicle collision frequency for the regional Rice River Road has indicated a very low collision rate of only one known moose-vehicle collision during monitoring studies between 2011 and 2016 (Manitoba East Side Road Authority 2016).

Mitigation measures proposed for this Project to minimize adverse effects to vegetative communities, and contribution to cumulative effects of regional vegetation impacts, are expected to sufficiently mitigate adverse effects to migratory birds. Regarding other wildlife in the Project Regional Area and Lac Seul Upland Ecoregion, **the regional moose population is low and is currently being managed by Manitoba Sustainable Development through a hunting restriction within the Game Hunting Area that overlaps with the Project Site Area and Regional Project Area.** The low regional moose population is an on-going concern for local and regional communities. The fact that low moose numbers are an ongoing concern justifies a conservation approach to assessing the potential effects of the project on moose. **Mitigation measures proposed for this Project to mitigate adverse effects to wildlife (Section 6.4.2 of the EAP), in conjunction with the continued Manitoba Sustainable Development hunting restriction for Game Hunting Area #26, is considered sufficient to mitigate the potential for significant adverse effects to moose.** The hunting restrictions in this area are not intended to be ongoing, rather, they are short-term in nature. Furthermore, hunting is only one of numerous factors implicated in recovering the population and maintaining stable numbers; e.g. predation, parasites/disease, habitat, access roads and other human developments must also be considered and in managing the moose population. *However, continuation of the on-going regional moose population monitoring by Manitoba Sustainable Development is recommended.* The developer should assume responsibility for some role in cooperative monitoring of the moose population.

Potential Project impacts to Species at Risk were not identified as a key concern expressed by local communities during the Engagement Program or during on-going Project-related meetings with provincial regulators. Please advise as to which project-related meetings with provincial regulators are being referenced.

27

Initial Wildlife Comment: Explain how the effects of the Project on hunting and trapping will be 'reversible'.

Response:

For clarification: effects on the 'activities' of hunting and trapping in the Project Site Area are reversible because after Project closure, the Project Site Area is proposed to be rehabilitated to return the landscape to pre-Project conditions to the extent feasible making the rehabilitated Project Site Area suitable again for hunting and trapping activities

Comments:

Given the anticipated lifespan of the project (54 years), we do not believe it is possible to conclude that, upon project closure, the project site area will be successfully rehabilitated to pre-project conditions. The presence of deep sand deposits in the project site area is what makes this area unique. Section 6.2.1 states that *impacts on geology and topography have been assessed as being moderate considering sand is being removed from the Project Site and will not be replaced (i.e., impacts to the geology will be irreversible/permanent)*. However, *backfilling of quarry cells with stockpiled excavated materials and re-contouring of the land to conform with the surrounding area will result in minor residual impacts to the Project Site topography*. Given that 10-30 meters of sand will be extracted, and it appears that excavation will occur down to bedrock (i.e. no sand layer to be left in place), please explain how impacts to topography are expected to be minor, and how the landscape will be rehabilitated to pre-project conditions in terms of soils, drainage patterns and vegetation communities conducive to supporting habitat for big game and furbearer species.

DATE: April 5, 2019

TO: Environmental Assessment and
Licensing Branch
Sustainable Development
1007 Century Street
Winnipeg MB R3H 0W4

FROM: Environmental Compliance and
Enforcement Branch
Sustainable Development
Box 4000
Lac du Bonnet MB R0E 1A0

**SUBJECT: Environment Act Proposal Review – Wanipigow Sand Extraction Project
Client File No. 5991.00 – Proponent's Response to Issue/Question #28 and #29 re:
Wastewater Management**

The proponent's response to Issue/Question 28 and 29 states that *"Both the Seymourville and Hollow Water First Nation wastewater treatment facilities are available. If the facilities eventually require expansion as a result of the Project, CPS will financially participate in upgrading these facilities."*

An expansion of the Community of Seymourville's wastewater treatment lagoon would require the submission of an Environment Act proposal, followed by an environmental assessment/licensing process. CPS should be cognizant of the timeline associated with this process and plan for alternative wastewater management options for the duration of the approvals/licensing process, in the event that a future expansion of the lagoon is necessary.