

Hi Jennifer,

My name is Jared Baldwin and I have been a community member of Pelican Inlet (formerly Pelican Harbour) since 2009 when I purchased Lot 70 and then Lot 69 a few years later. I was familiar with the area for most of my life but really fell in love with it while working for many years as a geotechnical engineer on local infrastructure and mining projects. In the early 2010s my parents also purchased two lots in Pelican Inlet and have since built a cottage. I have done some developing myself but am still a few years away from that ultimate family cottage in the woods.

This letter contains my comments on Canada Premium Sand Inc's (CPS) proposal for an Environmental License (License) under the Manitoba's Environment Act (Act) for the Wanipigow Sand Extraction Project, Public Registry File No. 5991.00 (Proposal).

I am not in outright or direct opposition to this project. I can fully support this project if it is executed properly. In fact, I think that this project has the potential to be quite valuable to the area. That said, CPS carries a great burden to submit a thorough and detailed engineering and environmental analysis to support this project. This would include at minimum a) identifying all potential risks, b) analyzing, quantifying and assessing those risks using leading industry standards, methods and guidelines, c) designing/developing mitigations that commit to regulatory standards or self-imposed limits to minimize or preferably completely eliminate those risks, d) be held accountable to those limits by way of clearly written and easy to apply licensure conditions administered by Manitoba, and e) submit a detailed closure plan.

After review of the Proposal I have to very blunt, this Proposal has fallen extremely short of what I consider industry standard for a project like this. A big red flag for me is the lack of a geotechnical and hydrogeotechnical/hydrogeological (hydrogeo) investigation. The Proposal makes reference to an investigation being started in January 2019 but claims the study is only for determining processing requirements and makes no reference to assessing many other areas of concern. Another major red flag is the lack of commitment to mandatory operating limits by way of scientifically measurable methods.

I've done my best to go through the entire Proposal but there's a good chance I've missed things. Accordingly, these comments may not necessarily represent the entire Proposal and I may submit additional comments from time to time. Other concerns that I have that aren't discussed herein include project effects on local avian and terrestrial wildlife, inhabitant and traveling public safety along the travel path between site and transfer, and the carcinogenic dangers from long term silica exposure. I hope and anticipate that others who can comment more specifically about these do so.

For simplicity my comments are broken into sections.

**Missing, incomplete, incorrect and/or inconsistent information**

- 1) Little or no acknowledgement of the cottage and recreational developments in the area, namely Mantago Bay, Driftwood Beach, Blueberry Point, Ayers' Cove, and Pelican Inlet. Many of which share property lines with the proposed mine.
- 2) Only one well is identified in Pelican Inlet (Figure 4-3, Page 26). A simple search in the provincial well database confirms that there are many more wells in Pelican Inlet (as well as other developments) than identified.

- 3) The Proposal specifies up to 30 m of stripping over bedrock with re-use of the non-silica sand overburden for reclamation. Figures and descriptions suggest this reclamation/revegetation work will result in a finished cover that blends into the surroundings. During operations the Proposal specifies that groundwater seepage into the open excavations may be used to supplement water requirements for processing. Doesn't this imply that without pumping that each mineral extraction cell would effectively end up under water? Revegetation efforts as described would be useless if this were the case. The unconfined (perched) groundwater system in the area is fairly high relative to the stratigraphic column and my experience tells me that every one of these cells will end up under water without major intervention. CPS will likely learn very quickly that their current plan to recreate low-lying boreal forest will fail. Would replacement of the overburden into these abandoned cells/ponds even be permitted? CPS hasn't addressed what they would do if each cell overcame their efforts and became stagnant ponds. This needs to be clarified and addressed in detail.
- 4) On Page 24 there is a very brief description of the existing surface water environment. There may be in fact no named or navigable rivers or lakes in the immediate area but I can guarantee that there are wetlands and surface drainage paths teeming with aquatic and terrestrial life. I have personally found many blue-spotted salamanders in the area. I have even logged this finding into the online Manitoba Herp Atals. This section significantly under represents surface water in the area and its ecological importance.
- 5) Figure 3-1 in Appendix F identifies POR\_northwest as a recreational RV / mobile dwelling in Pelican Inlet. Although there are a few trailers in Pelican Inlet, our Condominium Declaration clearly identifies trailers as a temporary means to help with lot development. The number of cottages in our development greatly outnumber RVs or mobile homes.

### Groundwater

As noted earlier a major red flag in the Proposal is the complete lack of any supporting geotechnical and hydrogeo information. An assessment of this project's effect on surface water and the perched groundwater and granite aquifer cannot possibly be completed without this information yet the Proposal contains all sorts of subjective and qualitative statements about how groundwater will be used and managed to support operations. Below is an example of some important questions that are unanswered and need quantitative and objective analysis before an assessment of effects can be made:

- 1) If long term groundwater pumping to manage seepage into mineral extraction cells is required, there will absolutely be an effect on surface water and the perched groundwater system. This effect has not been quantified. What could this drawdown look like? These possible drawdown effects need to incorporate a sensitivity analysis by varying aquifer properties and characteristics to represent the natural variability of the underlying and geospatial stratigraphy. As cells increase in number and get larger and deeper, more seepage will need to be controlled. What does the drawdown effect look like after 10, 20, 30, 40, 50 years as excavations and operations spiral outwards towards neighbouring properties?
- 2) As cells/excavations are completed and work progresses outwards, what will the effect be on surface water? It seems to me that it is entirely plausible that surface water flows will reverse at topographical inflection points and can begin to flow toward these abandoned ponds instead of toward Lake Winnipeg. What effect will that have on natural surface drainage patterns and the ecosystem that depends on these patterns?

- 3) Assuming that abandoned cells end up as ponds, all of the previously naturally filtered precipitation and freshet will now become standing water and possibly become a vector for introducing contamination into the perched groundwater table. Geologically speaking the perched groundwater table is also connected to and part of the greater granite aquifer recharge system. Could this now uncontrolled surface water end up contaminating the granite aquifer too? Section 6.2.3 says that the magnitude of effect on groundwater is minor. This is a subjective and unsubstantiated assessment without a proper technical data and analysis to support it. The same can be said about many other risk assessments in Section 6
- 4) The Proposal says that processing by-products will be mixed with additives and made into 'filter cakes' and disposed of in the reclaimed cells. What are these additives? Do they have potential adverse environmental or health effects? The Proposal doesn't elaborate whatsoever on what possible contaminants reside in this filter cake and what, if anything, needs to be done during disposal to encapsulate this material.

CPS must understand that a detailed geotechnical and hydrogeo investigation complete with a minimum one full year worth of sampling, monitoring and testing for seasonable variability must be completed prior to claiming any reasonable understanding of surface and groundwater in the area to support this project. These investigations must include but not be limited to thorough sampling, monitoring and testing of surface water and the perched and granite groundwater systems spread over a sufficiently large and representative area for analysis and assessment of effects. Continued sampling, monitoring and testing thereafter needs to also be a mandatory condition of license, including establishing a baseline of surface water and groundwater quantity and quality in third party wells.

#### **Commitment to License Conditions**

The Proposal lacks commitment to actual measurable thresholds or limits that will define mandatory operating conditions. CPS needs to be on the record committing to established regulatory as well as self-defined, measureable, healthy and scientifically derived thresholds, otherwise operations cease until those limits are met and held for a demonstrated period. For example:

- 1) **Air quality.** Air Quality Report (Appendix E) analysis in the Proposal shows that models predict exceedances of the MAAQC for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) even with all of the listed mitigations. Nowhere in the Proposal does it say how operations may change to prevent these exceedances or halt when monitoring shows exceedances. The Air Quality Report (Appendix E) also makes reference to dry periods (such as drought and cold months) where the naturally occurring in-situ moisture of the silica sand becomes less reliable as a natural dust inhibitor. This should be an automatic flag for ceasing operations because models suggest that these conditions will likely lead to poor/failed air quality. Certain environmental conditions need to be established that define acceptable operating windows (such as wind speeds, directions, seasons, weather patterns, etc.). Rigorous air quality monitoring needs to be a mandatory condition of license.
- 2) **Noise.** The Proposal repeats ad nauseam that operations will be 24-7 with vague conceptual plans/ideas to inhibit noise travel without actually committing to measureable noise thresholds. Maybe these precautions will work earlier on when operations are central on the property but what about as operations move outwards towards property limits? CPS needs to make outright commitments to staying below certain decibel thresholds at pre-established locations (such as



property boundaries, communities, etc.) during pre-determined operating windows (such as typical business hours, evenings/mornings, overnight, weekends, holidays, etc.). If stricter decibel limits cannot be achieved during evening/morning, overnight, weekends, or holidays then 24-7 operations must terminate. There may even be the need to include environmental qualifiers that impact noise travel (such as wind speed, wind direction, etc.). Rigorous noise monitoring needs to be a mandatory condition of license.

- 3) **Surface water.** CPS has not presented baseline information on the quantity and quality of surface water in the area and so there is no basis for requiring CPS to be held accountable for maintaining those levels and being held responsible for deleterious changes. An assessment of what effects this project has on surface water cannot be made. This is unacceptable.
- 4) **Groundwater quality.** CPS has not presented baseline information on the quantity and quality of groundwater in the area and so there is no basis for requiring CPS to be held accountable for maintaining those levels and being held responsible for deleterious changes. An assessment of what effects this project has on groundwater cannot be made. This is unacceptable.
- 5) **Physical limits.** The project site area (shown in Figure 4-3) shares many property lines with neighbouring developments. In some cases, such as with Pelican Inlet and Ayers' Cove for instance, there is a public road dissecting their lease holds. Does CPS actually plan to extract from the areas that are severed from their processing plant? How will this be sequenced? Will the road be moved or remain as is and end up straddling excavations? These questions are somewhat rhetorical because I must insist that mineral extraction cells remain a minimum 1 km from existing private boundaries and 500 m from existing public roads with existing vegetation left in tact. I suggest these distances because they result in operations maintaining a reasonable distance from private property where many folks have made significant private investments. They also likely have the added benefit of helping with air quality and noise and keeping a more pristine natural environment along public corridors. A proper technical analysis should be completed to verify or increase, whichever is greater, these distances.
- 6) **Closure Plan.** The Proposal completely sidesteps including a Closure Plan, which is an essential part of ensuring a Mine's commitment to meeting environmental obligations and decommissioning. Closure Plans are especially important for tying mining developments to proper closure and decommissioning when ownership changes, operations downsize because of market conditions or during corporate bankruptcy. A recent legal finding in Alberta puts the obligation on companies, even in bankruptcy, to clean up and decommission their old or abandoned oil wells – this sets a precedent that must certainly apply here. Closure planning often carries a significant financial burden and so a Closure Plan is also needed at this time so that Manitoba has assurances that CPS has the financial wherewithal to follow through on their obligations. May I even suggest that Manitoba require a corporate financial set aside for this work as another license condition?
- 7) **Follow-up studies.** The Proposal is riddled with a veiled promise to complete "follow-up studies". This is outright laziness. CPS is trying to ram this application through knowing they've undershot the minimum standard for mine planning. They are simply trying to skate through this process by promising to be corporately responsible without actually committing to anything binding. This is unacceptable.
- 8) **Manitoba Infrastructure.** Page 15 contains a brief point on CPS working with MI to determine their role with maintaining infrastructure. There is insufficient information for understanding

what CPS' obligations will be for maintaining infrastructure that they will be significantly impacting. The terms of this agreement need to be laid out clearly.

### **Closure**

Although local employment and opportunity is hugely important, it cannot be allowed to supersede our world's growing need for environmental sustainability and responsibility. Although I appreciate and understand the palpable excitement for local economic growth, the effect that this project as presented will have within its footprint and beyond has great potential to harm the environment and its inhabitants.

The Proposal is rife with the 'promise to do it right when the time comes'. This is lazy and demonstrates an attempt to hastily acquire a License in the absence of essential engineering and environmental support and is an insult to how far science, engineering, mine planning, and environmental regulation has come in Canada and the developed World. They have a responsibility to use science and engineering to its current state of the art to make this an example of excellence in mining and not an environmental misadventure waiting to happen because they didn't plan well enough.

I strongly recommend that Manitoba deny CPS a License under the Act after this initial open for comment phase and that a License also not be entertained until, notwithstanding any other requirements as determined by Manitoba, CPS has done their due diligence in filling substantial gaps in their Proposal.



**Myers** LLP

Barristers & Solicitors

February 12, 2019

Reply to: Alex J. Nisbet  
File No. 29833-217 JBH

com

**Via Email**

Environmental Approvals Branch  
Manitoba Sustainable Development  
1007 Century Street  
Winnipeg MB R3H 0W4

**Attention: Jennifer Winsor**

Dear Madam:

**RE: Wanipigow Sand Extraction Project – File: 5991.00**

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Please be advised that we represent Sagkeeng First Nation ("SFN") regarding the Wanipigow Sand Extraction Project (the "Project"). This letter is in response to the Notice of Environment Act Proposal which contained an invitation for anyone likely to be affected by the Project to provide comments. This letter is to serve as SFN's comments and views regarding the Project.

To date, there has been no consultation with SFN regarding the Project. SFN members exercise their Treaty and Aboriginal rights to hunt, fish and harvest in SFN's traditional territory, especially on Lake Winnipeg and along its shorelines. The Project Site Area is situated within SFN's traditional territory. SFN is a signatory to Treaty No. 1 and further has asserted title to unceded lands in the Province of Manitoba, the details of which are set out in Court of Queen's Bench File No. CI07-01-52308.

These comments do not constitute consent or agreement to the Project and this is not, and is not to be considered to be, consultation.

Upon review of the Environment Act Proposal (the "EAP") dated December 18, 2018, as provided to Manitoba Sustainable Development by Canadian Premium Sand Inc. (hereinafter "CPS"), it is apparent to SFN that there will be numerous adverse effects as a result of the Project. The Project is a substantial undertaking that will be in operation for 54 years. Table 6-1 as found on page 58 of the EAP indicates that the Project stands to have numerous potential interactions with physical, aquatic, terrestrial, and atmospheric environmental components throughout the construction, operation, maintenance, and decommissioning of the Project.

SFN disputes some determinations made by AECOM within the EAP. Table 6-1 found on page 58 states the following with respect to fish and fish habitat:

*Although fish and fish habitat occur in the Project Regional Area, no fish habitat occurs within the Project Site area. Therefore, Project related activities [sic] not anticipated to interact with fish or fish habitat.*

Due to the close proximity of quarry leases to Lake Winnipeg, the need for further environmental assessment and independent expert study is obvious and absolutely necessary to determine the possibility of adverse effects to fish and fish habitat due to project runoff and groundwater contamination. Mining activities of this nature may create a pathway for chemicals and/or bacteria to more easily reach the groundwater.

Further, it is clear that the Aboriginal and Treaty rights of SFN and its members have not been properly assessed. Page 76 of the EAP states the following:

*The Project Site is not within a Traditional Territory of any other Regional Project Area First Nation including the Little Black River, Sagkeeng and Bloodvein First Nations. Considering this Project does not utilize water from, or discharge water to, Lake Winnipeg, resources associated with Lake Winnipeg that First Nations depend on, those identified First Nations within the Regional Project Area (Little Black River, Sagkeeng and Bloodvein First Nations) will not be affected.*

SFN exercises traditional hunting rights over the Project Regional Area and the Project Site area. SFN is unsure as to how CPS and/or AECOM came to the erroneous conclusion in the passage above as no consultation with SFN or its members has occurred to date regarding the impacts of the Project. The Project will have diverse effects on aquatic and terrestrial wildlife and migratory birds in the region due to vegetation clearing activities, noise and light pollution from equipment during construction and operation, truck traffic, and dust from mining. These effects will only be magnified by the fact that sand quarrying and other Project activities will

take place 24 hours per day, 7 days per week, year-round (except during extreme weather events) for up to 54 years.

During the operation phase, 3 to 4 trucks per hour will be loading sand at the facility for transportation to Winnipeg for distribution. SFN is located adjacent to PR 304 which appears to be the ideal transport route for the sand. Similar frack sand mines and processing facilities in the United States have been linked to adverse health impacts to individuals working in the mine and processing facility; individuals transporting the cargo; individuals living near this type of development; and individuals living near transport routes. The potential health and socioeconomic effects to SFN and its members as a result of the Project are unknown at this time and must be studied further.

### **Moving Forward**

SFN is of the view that the Project clearly poses the potential for adverse environmental effects and impacts to SFN's Aboriginal and Treaty rights. Due to the duration and location of the project; further studies, independent expert reports, adequate consultation, and a public hearing are essential for a project of this nature that will have untold long-term effects on the region.

We have been informed that the work done to date for the Project is "investigative" in nature and is not "advanced exploration." We require that CPS, as the proponent, consult and accommodate SFN in a detailed and meaningful manner as soon as possible and that the Project review be carried out with the utmost transparency with multiple opportunities for SFN and its community members to be informed and to provide traditional knowledge.

We are unsure as to whether Manitoba conducted a preliminary assessment of the impact that the Project would have on SFN's Treaty and Aboriginal rights. If this assessment has been conducted, we request that you provide us with same, and if this assessment has not been conducted, we require clarification as to why this has not occurred.

We thank you for this opportunity to provide comments and look forward to discussing the Project in the near future. We require you to respond directly to the writer concerning this matter and that you provide us directly with any decisions rendered by the Environmental Approvals Branch.



If SFN's concerns are not addressed and reasonable accommodation and mitigation does not occur, then we expect to receive instructions to pursue every remedy available to SFN, including injunction and Judicial review.

Trusting this is satisfactory.

Yours truly,

MYERS LLP

Per:

A handwritten signature in dark ink, appearing to read 'ALEX J. NISBET', with some additional scribbles below the name.

ALEX J. NISBET

AJN/cln

cc: Chief Derrick Henderson

## Winsor, Jennifer (SD)

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**From:** Lindy Clubb [REDACTED]  
**Sent:** February-11-19 3:59 PM  
**To:** Winsor, Jennifer (SD)  
**Subject:** Wanipigow Sand Extraction Project- file #5991.00

Dear Ms. Winsor,

I am a frequent traveller on Highway 59 to Sagkeeng First Nation, weekly for lodge ceremonies, monthly for medicine picking ( yes, we pick cedar in the winter) and twice annually for Sun Dance ceremonies. I have travelled to Hollow Water, Black River and Bloodvein for ceremonies, filed trips, and environmental consultation. The increased traffic on roads to and from Pine Falls , Brokenhead, and the beaches area from this proposal is a huge concern. It's a narrow two land road often plugged by snow and storms north of Brokenhead. And it is already congested with lake traffic. Visibility is an issue with any large trucks, so is the accident factor and increased risk of collision with wildlife and lower air quality with increased emissions. Are these trucks environmentally friendly? Barging the sand or using a rail line is preferable to increased truck traffic. The trucks will be passing though a large protected boggy area. I did not see erosion and sediment control plans and practises affiliated with the company's environment review, or attachments from Manitoba Highways on this matter. It is my understanding, having helped with the regulations on this and having been instrumental in projects from shoreline erosion control to stream crossings, that any highway construction or repair work affiliated with this or hydro supply for the project has to have erosion control. It's a law put in place for good reasons. Please ensure that it is.

Manitoba is not known for its thorough consultation with native people in communities and I appreciate the outreach work so far but not all the community members are aware of this project, its implications, its scale, and its proximity, to the best of my knowledge, having been with community members over the past few months. More work should take place by the company and Sustainable Development with incentives for community members to attend and comment on an informal basis. Open houses are generally an announce and defend exercise, not consistent with consultation on decision making. Traditional ecological knowledge for the area ought to be considered in any decisions. or license approvals.

The amount of groundwater to be used is very large. Why isn't surface water to be used? What guarantees do we have that the closed loop system works? what are the emergency plans for anticipation of failure? Will the amounts of withdrawals from local aquifers be monitored, gauged and paid for? We often give licenses for withdrawals, such as those for irrigation and hog barns, and fail to meter the amounts.

With our provincial record of abandoned mines and polluted sites that need restoration mounting, I suggest a 3 million dollar bond be asked for as a license condition, specifically for restoration - a promise that is easy to make and hard to deliver. I have seen the figures for costs of reclamation for resource activities across the nation.....I am on a national committee for that issue.....and we overlook the issue of what mines or pits do afterwards to clean up their sites. Any restoration or bioengineering must include native and medicinal plants suitable for the region, timing, and maintenance or follow up, with training and local employment.

Our provincial record of sharing profits from resource extraction with local communities is abysmal. Another license condition should be an investment with profit sharing, contributions by the company in traditional and healing activities, youth training and sports, improved housing, or whatever the community decides is worthwhile.

We shouldn't be shipping out all the benefits from the area as well as our silica sand.

Sincerely,

original signed by  
Lindy Clubb



## Winsor, Jennifer (SD)

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**From:** John Neufeld [REDACTED]  
**Sent:** February-11-19 3:53 PM  
**To:** Winsor, Jennifer (SD)  
**Subject:** Wanipigow Sand Project file 5911.00

Attention: Jennifer Winsor

Dear Jennifer.

In November 2018 I was at the hollow water community hall for a presentation by Claim Post regarding the Wanipigow Sand Project.

I am a cottage owner at Pelican Inlet, lot 78. And i have a number of concerns which i believe need to be addressed. All of these concerns would affect both the livability of the surrounding communities, substantial safety concerns, meaningful safety issues and real impact on property values.

At the outset I want to state that I have grown up in a mining town and I am in favour of responsible resource extraction and I recognize the potential economic benefit to surrounding communities. I am not in favour of this current proposal for the following reasons.

### Noise pollution.

While the proposal for plant operation indicates an enclosed facility, actual quarrying work would be done with heavy equipment in the open air. The significant noise from heavy equipment will substantially affect local wildlife and local land users. While Claim Post was drilling test holes we were easily able to hear the sound of machinery from our cottage. **This is a massive concern.** When we went to locate and observe the test drilling, we recognized that this machinery would be substantially quieter than actually heavy equipment needed for quarry operation. This will have a substantial, 24 hour impact on enjoyment and usage of this area for activities of daily living and recreation.

Magnitude of Effect: Moderate Direction of Effect: Adverse Duration of Effect: Long term Frequency: Continuous Scope of Effect: Project Local Area Reversibility: Reversible

### Massive Water Consumption

The volume of water needed, as described by Claim Post is massive. It seems that the amount of water needed to establish operations and maintain operations will have a meaningful impact. the AECOM reports indicates the following ground water impacts. but as of yet no evidence that the aquifer can handle the quantity of water that will be withdrawn. this **MUST** be addressed.

Magnitude of Effect: Minor Direction of Effect: Adverse Duration of Effect: Long term Frequency: Intermittent Scope of Effect: Project Region Reversibility: Reversible Resource processing will require 1,817 m3/hour (8,000 US gpm) of water which will be continuously recycled in a closed-loop sand wash system.

### Transportation safety



The AECOM report did not indicate the volume of truck traffic on the 304 highway. In the verbal presentation Claim Post indicated that it would about to 1 truck every 15 minutes leaving the plant 24 hours per day. This means that at any one time there will be 4-6 trucks on the 304 going south under load and 4-6 trucks returning north. The 304 is a highway with poor maintenance and limited unpaved shoulders. This is a safety concern. Claim Post also indicated that it would utilize local drivers. At this point the local area can't provide enough qualified experienced drivers to begin operations.

#### **degradation of highway infrastructure**

The volume of truck traffic will have an almost immediate and significantly negative impact on the 304 Highway which will have a negative effect on all vehicles and drivers.

#### **site topography.**

In the presentation to the community, Claim Post indicated that there would be a 5-15 meter drop in the topography of the site after remediation was complete. The AECON report In my view this effectively turns this area from a generally dry ridge to an area of non drainable slew or standing water. I can not conceive how this is an acceptable remediation. it will certainly not be boreal forrest suitable.

#### **Recreation and Tourism**

The AECON report indicated that the Project site is not located within an area that is used for tourism. Given the noise pollution and traffic concerns, i would be interested to know what the scope of the area surveyed included. did it include The substantial fishing on the nearby waters of Lake Winnipeg and the Manigatogan River, or the nearby cottage areas? Also this area has had restricted hunting due to the already suffering Moose Population. stating that "The Project Site area is not located within an area that is used for tourism" is a definite misrepresentation.

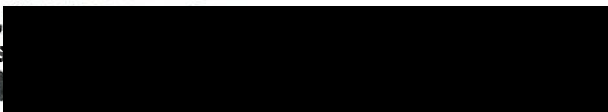
Magnitude of Effect: Negligible to Minor Direction of Effect: Positive Duration of Effect: Long term Frequency: Continuous Scope of Effect: Local and Regional Project Areas Reversibility: Reversible  
The Project Site area is not located within an area that is used for tourism.

I look forward to your response, to receiving information about ongoing hearings and developments

Sincerely Yours

John Neufeld

Cottage Owner,  
Mailing address  
Phone number



## Winsor, Jennifer (SD)

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**From:** DAVE KENNEDY [REDACTED]  
**Sent:** February-12-19 12:09 AM  
**To:** Winsor, Jennifer (SD)  
**Subject:** Sand Extraction Project

To Jennifer Winsor

Please accept this email as a submission regarding the proposed project. I do not object to the project since it will have considerable economic benefit for the province as a whole and for an area of the province that lacks major economic activity for its residents. I do have concerns regarding one component of the project that was not mentioned in the Report of the Environmental Act Proposal.

Comment: I am concerned with the impact of the increased traffic that will be on Hwy #304 and Hwy #59. The report makes no mention of any plans regarding these two highways. It is my expectation that neither highway would be able to withstand the large scale traffic that the project will generate, especially with the heavy loads involved. Without changes to these two highways, I expect considerable damage will result, with no indication that the project will address this issue. Furthermore, I am very concerned that the additional traffic -- sand trucks, delivery trucks for other required material to maintain the work site, and private vehicles for staff and other visitors to and from the project site -- adds considerable danger to the lives of people living in the area or using the highways to access their homes, cabins and resort centres. Highway #59 is the only major highway on the east side of Lake Winnipeg that provides access to large vacation and resort areas of the province.

Approval of this project needs to come with a clear plan on mitigating risk of traffic accidents and the deterioration of highway infrastructure. At a minimum, Hwy #59 needs to be completed as a 4 lane road to the intersection with hwy #304, and preferably to the interchange with the exit to Grand Beach. This would permit non-commercial traffic to avoid the truck traffic on #304 by using #59 from Hwy. #11 south. If that section is made 4 lanes, the increase in traffic for it would be easily accommodated. At the same time, #304 will need to have major reconstruction at intersections and other danger points as well as the rebuilding and repair of the road base and pavement.

Please accept these comments in the constructive manner in which they are offered,

Dave Kennedy  
[REDACTED]

Winnipeg, MB  
Cottage owner that travels Hwy. #59 weekly in summer months.

## Winsor, Jennifer (SD)

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**From:** Lori Parenteau [REDACTED]  
**Sent:** February-11-19 9:44 PM  
**To:** Winsor, Jennifer (SD)  
**Subject:** Wanipigow Sand Extraction 5991

Hello, may you please take careful consideration allowing this to happen. There are many concerns, from people living in Hollow Water and surrounding areas. Some people are afraid to speak up. Once the 59 highway turns into a single lane, I have have seen many accidents. Many impatient people, darting in and out trying to move up a car length. Once your on the 304, past Pine Falls, the road becomes bumpy, with many turns. Some spots have blind corners. Many parts of the 304, there is no where to pull off to the side. With 100 +trucks flying up and down this road, you can be sure it will deteriorate quickly.

Deer, moose, bears and other animals suddenly appear up from the steep part of the ditches. Accidents already do happen here. WHEN these trucks are in the mix, swerving around vehicles on the side of the road, coming around a blind spot MORE PEOPLE WILL BE KILLED. During summer months I see many people walking along side the 304. My husband is a truck driver, I'm not against the trucks, I'm against their route they will be traveling.

Last year there was a 64,000 h fire Noth of Bissett and Wanipigow lake, some parts of the road were so thick with smoke we drove alot slower to be safe. But if you have trucks needing to make quota, they won't be doing the 90kmh.

The 304 is a LIFELINE, to get out if a fire happens. If a big truck tips over and blocks both lanes, where do we go?! We don't even have cell service until we reach Pine Falls. Please, Please, think of all these important issues. This is just the truck problem. Not even the destruction the plant will do to wildlife habitat and surrounding areas.

Other than Money...what are the environmental, or other benefits of the Sand Extraction Project?

Sincerely, Lori Parenteau.

## Winsor, Jennifer (SD)

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**From:** Zapotoczny, Noel [REDACTED]  
**Sent:** February-11-19 12:30 PM  
**To:** Winsor, Jennifer (SD)  
**Subject:** Wanipigow Sand Extraction Project

Hi Jennifer,

I'm a cabin owner in Hillside Beach and am very concerned about this project. I have young children and we drive the lake every weekend. Traffic is already pretty busy and at times dangerous. With this project and an extra 500+ large trucks/semis using our highway each day, I think that was the number. If not, any increase in regular, consistent heavy machinery using the roads will be an accident waiting to happen. We have friends out there with young kids as well and I don't want to think of what could happen. I strongly urge you or the decision makers to not go forward with this project. If you are not the person I should be expressing my concerns to if you know who I should be I would appreciate their contact info. Thanks very much Jennifer.

Regards,



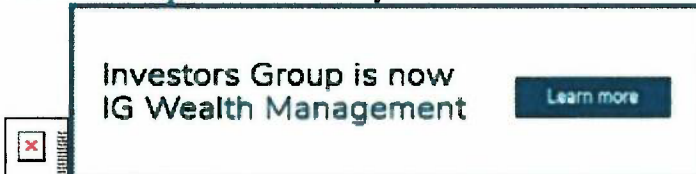
Noel Zapotoczny-B. A. (Hons.)

Associate Consultant

Phone: [REDACTED]

Fax: [REDACTED]

Assistant: [Stephanie Salamandyk](#)



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## Winsor, Jennifer (SD)

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**From:** [REDACTED]  
**Sent:** February-11-19 9:42 AM  
**To:** Winsor, Jennifer (SD)  
**Subject:** Wanipigow Sand Extraction Project

Good morning

I own a cottage in the Pelican Inlet [formerly Pelican Harbour] Development, north of the Village of Manigotagan and close to the proposed sand extraction project. My concerns center principally around the increase in heavy truck traffic on Highway 304 between the development and Pine Falls and between Pine Falls until Highway 304 opens out into a broad expanse of agricultural farm land. Highway 304 in these areas is narrow, twisting and rough with few good prolonged passing opportunities. I think it is reasonably foreseeable that there will be an increase in the potential for head on collisions along this route resulting when tourist and other types of traffic become backed up behind slower loaded trucks and with traffic possibly backed up behind trucks coming the other way.

After a quick read of the Environment Act I'm not sure if these potential impacts are considered as part of the environmental approval process. I hope that, if not, that they are considered at some point in other processes along with remedial measures [such as passing lanes?], if they are determined to be warranted.

Regards

David R Petkau

[REDACTED]  
Winnipeg, Manitoba  
[REDACTED]