Subject:

FW: Canadian Premium Sand EAP

Importance:

High

From: Sylvia Lasko

**Sent:** February-11-19 8:55 AM

To: Winsor, Jennifer (SD) < Jennifer. Winsor@gov.mb.ca>

Subject: RE: Canadian Premium Sand EAP

Importance: High

Hi Jennifer, thanks very much for your response and all the information. I have shared this with the Hillside Beach Community Association, and family & friends who will be affected by this project.

Our main concern is the amount of trucks hauling from the site to Winnipeg – the increased traffic is a big red flag. We use highway 59 and 304 extensively from April to September, and also in the winter months. My sister and her family, all of our adult children, grandchildren, friends visiting us... we're very worried about safety on the highways.

I realize this information was made public on Dec 31<sup>st</sup>, it's unfortunate we didn't catch the posting until now. Is there any way the public review period end date can be extended? Even for a few days? I feel certain that more people will respond with concerns. An idea could be to reduce the number of days the company would be allowed to haul and return to site.

Thanks very much.

Best regards, Sylvia Lasko

From:

Sent:

February-04-19 11:33 AM

To:

Winsor, Jennifer (SD)

Subject:

Wanipigow sand extraction project - file 5991.00

#### Hi Jennifer,

I am contacting you re: the proposal pursuant to the Environment Act related to the Wanipigow Sand Extraction Project – file 5991.00.

Can you please provide me with information regarding the anticipated increase in truck traffic on Hwy 59 resulting from the project.

I would like to know the route that will be used to transport sand to Winnipeg and what portion of that is single lane on Hwy 59.

Once in full operation, what will be the # of trucks per hour on hwy 59 as a result of the sand extraction project and what % is this of usual traffic volumes on hwy 59.

As a property owner in Belair, I'm interested in receiving accurate information rather than relying on media reports. Thank you for your assistance.

**Shelley Morris** 

From:

Sent:

February-07-19 1:59 PM

To:

Winsor, Jennifer (SD)

Cc:

'John MacLise'

Subject:

Wanipigow sand extraction project - file 5991.00

#### Hi Jennifer,

We are contacting you re: the proposal pursuant to the Environment Act related to the Wanipigow Sand Extraction Project – file 5991.00. As a Manitoba property owner in Belair, Manitoba, we are concerned about the increased truck traffic on Hwy 59 resulting from the project.

We have seen reports on the volume of trucks ranging from a low of 3-4 trucks per hour leaving the plant (75 -100 truckloads per day) to 240 truckloads a day once in full operation in year 3, or more depending on the size of truck/road weight restrictions.

Our understanding is that the trucks will be travelling from Highway 304 to Highway 59 which is a single lane highway until south of Brokenhead, a 25 km stretch of road with heavy lake traffic on summer weekends.

Before this application is approved, we believe that the Province needs to address concerns regarding taxpayer cost of highway wear and tear, as well as safety concerns. If it is to go ahead, consideration should perhaps be given to twinning the single lane portion of Hwy 59 or precluding 24 hour/365 day operations. An assessment of existing traffic volumes weekday vs weekend, summer/non-summer should be reviewed and an evaluation done on the increased traffic relating to the Canadian Sand operation and the impact this will have on existing infrastructure and safety issues. While the project will generate tax revenue, it needs to be weighed against the potential increased costs for infrastructure to accommodate the operation.

Thank your for the opportunity to comment. Please confirm that this email will be brought forward as part of the public input to this review.

Shelley Morris & John MacLise

## Jennifer Winsor, Environmental Engineer

**Environmental Approvals Branch** 

Manitoba Sustainable Development

February the 5.2019

# The Wanipigow Sand Extraction Project in Manitoba

We are responding to the proposed project above.

The following are our concerns and opinions:

Dear Madam.

We are writing to you, to express our deep concerns about the above project, as it impacts us, as naturalists and cottage lot holders in the greater area of this proposed sand mine.

#### Our main concerns are:

Health risks to the workers of the plant due to dangerous levels of silica dust.

Health risks to the people of the nearby communities of Seymourville, Hollow Water First Nation, Manigotogan and various surrounding Cottage Subdivisions through blowing silica dust.

The Company proposal lists three 70 meter high, year round, open silica sand stockpiles!

This project brings permanent changes to the landscape, disrupts the fauna ,threatens nearby Lake Winnipeg through chemical leaks.

It disrupts community life in all surrounding settlements aggravated by the company's plans to operate the plant year round, day and night.

We are alarmed about **the planned enormous consumption of ground water** for the washing plant, where a great portion evaporates during the drying cycle.

They also need a large amount of make up water, for the water loss at the thickener tank, needed for the sand reject material.

This may permanently deplete the ground water levels in the whole area.

The implications of the project's planned truck transport of the silica sand, round the clock, all year are staggering.

Initially the company stated 5 trucks per hour, with a later increase to 10 trucks! In addition to the sand trucks, there also will be propane trucks and numerous water trucks on the road on a daily basis!

The first stretch, along Hwy 304 to Hwy 59 to a terminal in Winnipeg a total distance of about 180 km! The first stretch, along Hwy 304 from Manigotogan to the Junction with Hwy 11, is a narrow 2 lane paved road. The road, winding over hills, without shoulders, is the only over land route for the entire population along the east side of Lake Winnipeg. Within the environs of each community, there are pedestrians, hitchhikers and children on bicycles present and are especially at risk! A real hazard is the Power Dam near Pine Falls, across the Winnipeg River, where all traffic is squeezed by a higher sidewalk and rails on both sides. Heavy trucks meeting on this narrow bridge in the mist of the power dam raceway, with children on

Heavy trucks meeting on this narrow bridge in the mist of the power dam raceway, with children on bicycles and pedestrians is an accident waiting to happen!

Further on the route enters Hwy 59, a modern 2 lane Highway that connects the City of Winnipeg with the Lake Winnipeg beaches, where the cottage population swells to 16000 in the summer. Add to this the visitors to the Grand beach park and other beach locations, creating bumper to bumper traffic on summer weekends. Lastly the South Beach Casino of the Brockenhead First Nation creates another traffic hazard with vehicles turning on and off. Further on the hwy becomes a 4 lane motorway on to Winnipeg.

Let us not forget that this Hwy 304 is the access route to many of the most beautiful Kayak/Canoe Routes on the Canadian Shield and most important the gateway to Canada's newest World Heritage Site "Pimachiowin Aki", the land that gives life!

The company's intention to replace the current technical report with a new and update version in March 2019 is a very suspicious maneuver.

The current technical report is the basis, of consideration, for the regulator, to decide if the Canadian Environmental Assessment Act needs to be applied, and this decision is made in February 2019!

The company's promises, to recruit and train their workforce from the local communities, sounds particularly hollow, when viewed from their time line. Numbers like 50 class 1 truck drivers, 100 technical plant workers with production starting late 2019! It is our view that the laborer jobs will likely go to the locals and technical personnel and experienced truck drivers will be brought in from the outside.

The development of a technically trained and experienced work force takes time and ensures safety.

As Manitobans we ask ourselves where is the gain for the Province if this project would be approved with all the drawbacks listed above?

## Our position in this matter:

IS A TOTAL REJECTION OF THIS PROJECT, AS IT IS PROPOSED by CANADIAN PREMIUM SAND.

This is in part due to the fact that this valuable resource is **used in "fracking"** a very destructive process.

We are opposed to the **sheer volume of the extraction!**Also the day and night operation of the mine as well as **the day and night truck traffic!**This is inhumane **to all people affected** by this project.

Failing an outright rejection by the various regulating agencies,

we could accept an operation with controlled **reduced production**, less truck traffic and less disturbance of the land.

Sincerely

Walter Keller & Alexa Hoerster



February 03, 2019 45 Pelican Inlet Manigotagan, Canada ROE 1E0

Dear Ms Jennifer Windsor,

My wife and I are cabin owners, with two properties (Lot 45 water front and 107 forest) at the Pelican Inlet condominium (registered as WCC344) which is located near Wanipigow. We are young entrepreneurs with RebelleyusInc.com and spend a majority of our time at Pelican Inlet, which is located in immediate proximity to the leased lands that are the site for the proposed Wanipigow Sand Extraction Project. We have owned property at this location since 2012. We are deeply concerned about the potential negative impact of this project, which the company represents as being an open pit mine, operated 24 hours per day, 7 days per week 365 days a year. The proposed span of this project is 54 years, based on the volume of sand the company has projected for mining, as per their projections in their environmental licensing application. Just writing that line has the potential to 'horrify' me as a Manitoba and Pelican Inlet property owner, local resident, and entrepreneur!

However, we are not fundamentally opposed to sustainable and equitable economic development in this area, particularly that which would benefit our First Nations and Metis neighbors, including Hollow Water, Seymourville and Manigitogan, where we are aware of many challenges facing their youth and families, some of that which may be directly mitigated with immediate and proximate opportunities for skills training, employment and even the opportunity for establishing and running economically and environmentally sound local businesses.

We are concerned about a number of practical matters such as health, safety, noise and property values, but also about the potential significant widespread, long term / permanent negative environmental impact of the proposed Project. This potential impact includes what appears to be the high potential for permanent degradation of the land which will be used for sand extraction, likely resulting in a very large decrease in the land elevation, even subsequent to proposed restoration, resulting in creation of large sterile water ponds, and eliminating the natural boreal forests we now so much enjoy and benefit from. An overarching concern of ours is the huge potential for degradation of the quality of life, for all people residing temporarily or permanently in the immediate vicinity of the mine, or travelling to and from these currently pristine recreational and living areas.

The application states that the mine will operate 24 hours per day, 7 days per week year round. The Project application notes the 24-hour use of two large dozers to remove topsoil, trees and shrubs and then to burn the scraped trees and scrub, as well as up to 96 vehicles per hour moving in the vicinity of the mine. Simple math is rather horrific = 2,304 vehicle disturbances per day, exclusive of the heavy equipment and the plant itself. Whether its clearing forest, open quarry mining, operation of the plant, transport of the sand product, or just day to day movements of employees and service providers, this continual operation will generate enormous and continual noise, dust and smoke and it must be assumed that this will seriously impact the air quality and quality of life for all of the concerned people living in this area, for a very very long time.

The paragraphs below reference some of our specific concerns:

- 1. Impact on the water table and the existing and future boreholes being used for human recreational purposes: The company's application does not seem to include a completed geophysical survey and there is real concern that the local (and further afield) aquifers will be disturbed or manipulated in favor of the sand mine to the significant detriment to the cottage owners in the immediate vicinity of the project. What is the assurance that there will not be significant negative impact on our water sources during the long term extraction project? The loss of access to potable water by cottagers is a serious matter and will degrade the value of these properties, as well as the quality of life. The reduction of flow in an already slow recharge borehole may also result in immediate costs to try to mitigate that problem. Can the company (and the province) provide legally enforceable guarantees that the large extraction of ground water for the project will not affect the aquifers serving the Pelican Inlet and other cottage owners?
- 2. The company's forest cover restoration plan. The site to be stripped of forest and quarried is an area of mature/old growth boreal forest. It appears that the company has presented a simplistic plan for forest restoration (reforestation and restitution) of each 5-hectare quarry site, in which between 10 and 30 meters depth will be mined. This project is proposed to denude a pristine boreal forests in close proximity to our condominium community and for the indigenous communities, as an equally or higher level of concern. The diagram in the application specifies an average drop in elevation of 12 meters, which seems unlikely to be conducive to restoration matching the current forest cover, and more likely, to result in a fairly deep and sterile rain water catchment, in which nothing will grow except water based flora. Lack of boreal forest rehabilitation and proper reforestation of the open pit mined regions will be a major degradation of the local area impacting wildlife, human interaction with that sector, and effectively destroying the mature boreal forest. Even if the above projections from my perspective are inaccurate to some degree, I think it is accurate that the regrowth to a mature boreal forest will require about 60-70 years of time and attention. Is this a condition of the license process, and can the Province hold the company to account for this proposed time frame for adequate restoration and rehabilitation of the denuded areas (with lost elevation) to return to a viable boreal forest?

Additionally, we would like the Province to ensure, in the event of the licence being granted, that there is an adequate forest buffer left undisturbed between the industrial activity / excavation and our development – specifically, we would expect that a minimum 100 meters depth of natural forest remain between the mining activity and the road running from our development to Seymourville, which would mitigate noise, dust and other aspects of the proposed mine that would significantly decrease the quality of life in our communities.

- 3. The health risks of the fine silica dust being generated in the open mine operation. The company has provided some assurance of negative pressure movements by conveyor belts of the sand at the extraction site, and that the trucking of silicates will occur with covered vehicles. However, it is my perspective that it is VERY unlikely that these measures will be fully effective in preventing the pollution of the air and the dusting of the roads and the surrounding environment with silicates. What is the assurance of the applicant and the Province, that my family and I will not be routinely and regularly be exposed to fine silicate dust (and by association, chronic exposure to a known carcinogen) as a result of the mining operation adjacent to our home?
- 4. **Traffic and vehicle safety**. The application notes that up to 96 vehicles per hour to and from their plant, including the large trucks transporting mined fine silica sand. This will have a significant negative noise and safety impact on the entire community, as well as on the travel to and from our recreational properties. Even this morning, as I drove to Winnipeg from Pelican Inlet, on a snow covered highway,

the narrow road and wind made for a fairly harrowing experience when passing oncoming vehicles, in terms of a large reduction in visibility and minimal room on the road itself. I expect that this will be hugely aggravated by adding a large number of loaded transport trucks carrying silica sand, or even empty ones on their way back to the mine, as well as a high number of vehicles for support services and employees moving back and forth to the mine.

Currently Highway 304 from Powerview to Manigitogan is narrow and bumpy, with poorly maintained shoulders and is already a safety concern for me now, as I very regularly drive between Winnipeg and our cabin. If I already consider highway #304 to be relatively unsafe, even though it is scenic and enjoyable to drive when there is minimal traffic, I expect that it will become a very dangerous route for all vehicles and drivers, all of the time, including those who work for the mine. How will the Province guarantee the safety of the public traveling on the segment of Highway #304 between Powerview and the Manigitogan River (cottagers, residents of Hollow Water, Manigitogan, and Seymourville, the mine employees, service providers, emergency vehicles, etc.) that I expect to be hugely and negatively impacted if the mine commences operations without a significant improvement in the highway?

Finally, it does not appear that all of the local stakeholders are being considered in this application. There is no visible assessment of the negative impact of noise, dust exposure, deforestation and/or ground water degradation concerning the community where we live, Pelican Inlet, nor for our immediate cottage development neighbors, Ayers Cove, Driftwood Beach, and Blueberry Point. Why are three major cottage developments, more immediately adjacent to the Project than Hollow Water or Seymourville, apparently ignored within the proposal? I would be grateful for the Province to demand adequate investigation of the environmental impact of the project on these communities, prior to moving ahead with the licensing procedures.

Sincerely yours,





From:

Lonny Karlenzig

Sent:

February-01-19 11:41 PM

To:

Winsor, Jennifer (SD)

Subject:

Wanipigow Sand Project

Jennifer Winsor, P. Eng. Environmental Engineer 204-945-7012

Good day,

My name is Lonny Karlenzig, I am a full time resident and small business owner in Manigotagan, MB.

As a resident of one of the surrounding communities of the proposed Wanipigow Sand project who stands to benefit from this project, I have some concerns which I feel have not been adequately addressed.

I have reviewed the Environmental Act proposal submitted by AECOM on behalf of Canadian Premium Sand and as such have discovered a number of concerns regarding this project.

## 1) Water Consumption

The amount of water as listed in the proposal does not convey the initial amount needed to primarily charge the plant. When I asked Bob Archibald the Chief Operating Officer at a town hall meeting here in the month of December 2018, he could not offer me an answer but assured me he would find out and get back to me.

On Jan.28 he sent me an email stating that it would take 120,000 gallons to fill the thickener tank and fresh water tanks in order to run at full capacity.

Now according to the Environmental Act proposal, the amount of water used by the plant as stated in section 2.9 "Water Use" is 1,817 m3/hour or 8000 US gpm. The water would be recycled within the plant with make up water added at a rate of 45 m3/hour or 200 US gpm.

120,000 US gallons = 454.249 m3 1817 m3/hour = 480,000 US gallons/hour

This means the entire capacity of water within the plant would need to circulate through the system 4 times per hour.

Make up water would be added due primarily to evaporation at a maximum rate of:

45 m3/hour = 11,887.7 US gallons/hour

45 m3 x 24 hours = 1080 m3/24 hours or 285,305 US gallons/24 hours

This means that potentially in a 24 hour period they would be replacing the entire original water capacity of the plant more than twice. How then is a closed loop system of any benefit?

Even if the make up water was reduced to 10 m3/hour that is still 2,641.72 US gallons/hour x 24 hours = 63,401.28 US gallons of water in a 24 hour period. Which means they would still be replacing the entire capacity of water within the plant every 48 hours.

Over the course of one year that is approximately 11,570,733 US gallons of water minimum sucked up from the surrounding groundwater supply.

This is an enormous amount of water! I don't see how this is sustainable throughout an entire year seeing how the plant is set to operate 24/7 365 days a year.

#### 2) The Workforce

The workforce is mandated to consist primarily of local residents. Now under the timeline of the Environmental Act proposal, they intend to train 150 employees from scratch with no prior experience related to this type of plant.

Let's use the 50 Class 1 drivers they expect to train in the next 6 months as an example.

What they are proposing is to put 50 inexperienced Class 1 drivers in trucks weighing over 100,000 LBS on Hwy 304. Hwy 304 has no shoulders and is poorly maintained between Manigotagan and Stead, MB, during all seasons. Snow storms, tourist season, wildlife hazards, 24 hours a day at a rate of 4 trucks/hour. Not to mention the hazards on Hwy 59 during the summer tourist season.

That is ridiculous! It's completely irresponsible and from an insurance point of view not finacially or safety minded.

It's unheard of in the transportation industry and I know because I have over 20 years experience in the transportation industry.

This applies to all the professions expected to be required by the plant. How do you train 150 people with absolutely no experience to operate a plant of this size and expect it to be safe?

#### 3) The Quarry

According to section 2.2.1 of the proposal the quarry will be operating 24 hours a day, 7 days a week, 365 days a year. The overburden will be stripped and stock piled adjacent to the site to mitigate noise.

The winds in this area coming off the lake will carry the noise of the quarrying no matter how high they pile it. We have very intense winds here during summer months, we also have nights during the winter when I can hear dogs barking in the community of Hollow Water from here in Manigotagan. That's approximately 17 kilometres away. When the government blasts granite at the quarry near the winter road turn off on Hwy 304 we can hear that as well, it is over 25 kilometres away.

During winter months we hear transport trucks driving up to the winter road as the calm, cold air offers excellent sound coverage. 4 trucks an hour, 24 hours a day is going to make our peaceful community sound like we're living next to the Perimeter Hwy around Winnipeg. This is cottage country.

The planned burning of woody debris as stated in section 1.7.2 of the proposal is another problem. Burning is generally only authorized during winter months. Smoke hangs in the air during calm, cold conditions and the winds will send it towards our communities where many people who suffer from respiratory illnesses will suffer. Clearing 5 hectares of woodland at a time is going to generate enormous amounts of debris.

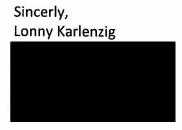
## 4) The Reclamation

The reclamation and stewardship of the mine site after mining will also be an opportunity to do something with the land that could offer sustainable food supply. Growing fruits and vegetables, wild rice, fish farms and commercially viable lumber are just some of the examples.

My mother, June Koop and I have been small scale vegetable farmers here for 10 years. We grow most of our own produce, package and freeze it to meet our needs through the winter. We share our produce with whoever is interested around our community. We pick wild mushrooms and berries when in season, we've had chickens and provided eggs for the community. It's a harsh climate with an average growing season of only 90 days and so we've had to be resourceful but it is possible.

#### Conclusion

I'm sure there are others in the community and around the transportation route that have similar concerns. I am not against this project, I am against the lack of oversight, proper planning and transparency involved with getting this project to the table. This project represents an enormous economic opportunity for our communities, bringing with it employment for up to 3 generations. But I feel that the project is being rushed at the expense of proper planning and only wish to stop and take a moment to think about this some more. What is the hurry after all, the silica sand isn't going anywhere.



From:

Don Lewicki

Sent:

January-24-19 10:51 AM

To:

Winsor, Jennifer (SD)

Subject:

Re: file 5591

Follow Up Flag:

Follow up

Flag Status:

Flagged

Good Morning,

A quick question regarding the sand mine and its effects.

Firstly ,are there going to be upgrades to Hwy 304? My wife and I are cottage owners in the area and travel a number of times throughout the year on Hwy 304. With the projection of greatly increase heavy truck traffic on the road, it will no doubt deteriorate rapidly. It is rough already with patches and cracks that open relatively wide come springtime. As well, during heavy rain events, the road holds an excessive amount of water in the depressions that have been created by years of traffic compressing the asphalt. This is most evident in the first 25 or so Kms North of Powerview. A couple of times we have felt anxious when it feels like the vehicle is losing grip with the road. As well ,when a vehicle passes going the opposite direction a huge amount of water is splashed on the windshield making it impossible to see for a second or 2. Again the degradation of the roadway will occur much quicker with the projected volume of truck traffic expected.

Another area of major concern is the portion of hwy 304 between Manigotagan and the turn off to Hollow Water/Seymourville. This section is gravel and not asphalt. After a couple days of rain, this portion of the hwy is deplorable as it becomes a "soupy", rutted and potholed hazard. This section is desperately required to be asphalted if it is to endure the pounding from the hauling trucks.

I await your response to these concerns.

Don Lewicki

Hon. Wayne Ewasko, MLA Lac du Bonnet

Hon. Niki Ashton, MP Churchill—Keewatinook Aski

Hon. Rochelle Squires, Minister of Sustainable Development, Government of Manitoba

Hon. Ron Schuler, Minister of Infrastructure, Government of Manitoba

Hon. Brain Pallister, Premier of Manitoba

Hon. Catherine McKenna, Minister of Environment and Climate Change, Government of Canada

Hon. Justin Trudeau, Prime Minister of Canada

2019 February 12

Say NO! to Canadian Premium Sand Inc., frac sand proposal, Seymourville, Manitoba

Dear Honourable Officials:

As a seasonal resident of Driftwood Beach, Manigotagan, Manitoba I am sharing my opposition to the Canadian Premium Sand Inc. frac sand mine proposal for Seymourville, Manitoba. The negative impacts this project would have on my family's and neighbours' health and safety, as well as the significant negative environmental and economic impact in the area are too great to ignore.

It is well documented that fine silica dust particles are known carcinogens. The proposed frac sand mining activity is in the heart of a significant population base that would be negatively impacted by the high concentrations of particulate this operation would emit. Transportation safety and highway degradation on PTH 304 and 59 would also be significantly compromised with the increased heavy truck traffic estimated in the hundreds of loads a day.

Mining and facility noise, dust, water pollution, air contamination, and increased heavy truck traffic are activities that deteriorate the existing pristine environmental conditions. I am not confident of any mitigation measures proposed by Canadian Premium Sand Inc. that would address the human safety risks, environmental degradation, and property devaluation associated with this proposed frac sand mine and its operations.

We residents have a right to health and safety, the conservation of our environment, and the fair maintenance of our property value. I implore you to represent the best interests of us, your citizens, in this matter and say NO! to Canadian Premium Sand Inc.'s frac sand proposal in Seymourville—please advise what action you will undertake to do so.

Sincerely,

**Tracy Turner** 

Hon. Catherine McKenna, Minister of Environment and Climate Change, Government of Canada

Hon. Rochelle Squires, Minister of Sustainable Development, Government of Manitoba

Hon. Ron Schuler, Minister of Infrastructure, Government of Manitoba

Hon. Justin Trudeau, Prime Minister of Canada

Hon. Brain Pallister, Premier of Manitoba

Hon. Wayne Ewasko, MLA Lac du Bonnet

Hon. Niki Ashton, MP Churchill—Keewatinook Aski

#### Subject: Canadian Premium Sand Inc., Frac Sand Proposal, Semourville, Manitoba

#### Dear Honourable Officials:

As a resident of Driftwood Beach, Manigotagan, Manitoba I need to express my opposition to the Canadian Premium Sand Inc. frac sand mine proposal. The negative impacts this project will have on my family's and neighbour's health and safety, as well as the significant negative environmental and economic impact in the area are too great to ignore.

It is well documented that fine silica dust particles are known carcinogens. The proposed frac sand mining activity is in the heart of a significant population base that would be negatively impacted by the high concentrations of particulate this operation would emit. Transportation safety and highway degradation on PTH 304 and 59 will also be significantly compromised with increased heavy truck traffic. Based on early estimates that daily truck traffic could eventually number in the hundreds of loads a day.

Mining and facility noise, dust, water pollution, air contamination, increased heavy truck traffic are activities that deteriorate the existing environmental conditions. I am not confident of any mitigation measures proposed by Canadian Premium Sand Inc. that address environmental degradation associated with this proposed frac sand mine and it's operations.

Residents have a right to know their investment in property will be protected from development such as this, which will invariably erode property values and render the area unattractive to both existing owners and future investors.

Please advise what action you will undertake to advocate for our interests.

Sincerely,

Vaughn Thibault

From:

Debra

Sent:

February-12-19 5:12 PM

To:

Winsor, Jennifer (SD)

Subject:

WANIPIGOW SAND EXTRACTION PROJECT - FILE: 5991.00

Hello Jennifer,

I'm writing to you in regards to some concerns I have with the new Sand Extraction Project in the Wanipigow area. I'm a cottage lot owner in the area west of the proposed plant sight and have been enjoying the area for over 30 years. My concerns are noise, air and water pollution and increase of travel on highway 304.

One of my concerns that Manitoba Infrastructure and Canadian Premium Sand comes up with a timely solution to the traffic volume increase that the mining operation will bring on highway 304, whether it is straightening, providing passing lanes and or maintenance, needs to be addressed sooner than later before series safety concerns of increased traffic comes to life.

Another is that the Province of Manitoba up holds the strict standards set out by the CPS guide lines regards to noise, air and water qualities are being achieved and maintained through out the entire lifetime of its operation by frequent monitoring and collaboration with all users in the area with monitoring results and mitigation issues.

I hope the Sand Plant brings prosperity to the area while respecting all aspects of the environment that we all cherish and believe a balanced approach can be achieved.

Martin and Debra Prive

From:

Elyssa McIvor

Sent:

February-12-19 3:50 PM

To:

Winsor, Jennifer (SD)

Subject:

WANIPIGOW SAND EXTRACTION PROJECT - FILE: 5991.00

I am writing to you in regards of this sand extraction project in the east area of Lake Winnipeg.

I am expressing my opposition to the project as it will infringe on my rights as an Anishinabe in my territory. I do not allow treaty lines to define Anisinabe territory. My children are young and have not been given the opportunity to fully explore their relationship with the lands and waters. May I remind you that prior to colonial contact the Anishinabe's traditional territory was and is quite extensive and spans through western and northern Ontario, Minnesota, North Dakota, and half of Manitoba up to and including the 55th parallel.

This is not my only concerns. I am worried what kind of impact this mine will have on Lake Winnipeg. We cannot fully understand the impacts on the lands and waters when other mining operations already have devastating effects on not only the people but the land, water and habitat of any area they are located in or around. I am also very concerned that the lack of concern about wild blueberries, as I had mentioned, my children have not been given the opportunity to explore the traditional lands that were left to them. The groundwater and wells in the area are a huge concern as water is a non-renewable resource and many of the lakes streams and rivers are already being diverted to accomadate the numerous hydro dams in manitoba. Without clean drinking water much plant, animal and human life will cease.

It is very concerning that this plant is being developed when there are rumors of shale exploration in the area. We know that silica sand is used in the fracking process along with high amounts of fresh water. I do hope that this is not true and just a rumor but it would be only devastating but also disappointing to learn that manitoba government had knowledge of this prior to the proposal for this project.

In the proposal documents, no compensation for loss of land is mentioned and if this is the case the people living directly in the area should know that they can request it. Also they should also understand that only 75 jobs are being created and that is not very many considering the area population is about 600 or so. It is misleading for a community of 500+ to believe that community members will be exclusively hired, as in the documents it does state MAY benefit, that is a huge difference from WILL benefit. And will have an impact on the people's employment perspectives.

I hope there is a more thorough process for consultation and that this company does their due dilegence in their DUTY TO CONSULT and also to have the community's support and also have their FREE,PRIOR AND INFORMED CONSENT, before this project is given the go ahead. Having the support of the chief is one thing and is totally different than having the support of the entire surrounding community.

Thank you for giving me the opportunity to share my concerns.

Meegwetch, Elyssa McIvor

From:

Derek Small

Sent:

February-12-19 3:39 PM

To:

Winsor, Jennifer (SD)

Subject:

Wanipigow Sand Extraction Project

#### Attention Jennifer Winsor,

I am writing to express my concerns regarding the proposed project in Seymourville – a few miles away from my cottage at Driftwood Beach. I have been following the protests from a few different parties – Don Sullivan and Lonny Karlenzig. I am more of a progressive person who understands the need for responsible resource development in terms of our economy. The mine offers jobs which is something that is desperately needed in the area – I read the other day that the unemployment rate is 30% in Hollow Water. It's crazy to me that people are worried about an increase of traffic on the way to their second house for something that will create 100 jobs that did not exist before in a community that needs employment. I think that is pretty selfish so long as this is done the right way.

My concerns would be for the health and safety of those living and playing in the area of the mine – once the aggregate is exposed it can obviously become airborne so I'd like to make sure the government is going to enforce that the open pits should be a safe distance from the cottages and residences in there area. The other concern I have and I think most people have is with regards to traffic. From what I have read – the amount of trucks leaving the mine will be significant. I have been working out in Stonewall for 10 years and I reside in East St. Paul. My commute every day is amongst the trucks traveling out #7 highway to the gravel pits and back to the city. I am actually surprised at how few accidents have occurred and during the construction season I'd say there's probably 200 - 300 trucks per day out there. The key part is that it's a divided highway. The road between Pine Falls and Manigotagan can not handle the kind of traffic they are talking about so I think that is something that needs to be addressed first and foremost before any trucks hit the road. It would be foolish and I actually don't believe anyone including the operators of the mine would be stupid enough to run volumes of trucks down that road as it is today.

So that's my 2 cents – I have more faith in the process and government than most so please do your job! Have a good day.



**Derek Small** 

Design & Sales Manager

Box 936 | Stonewall, MB | ROC 2ZO | Address: 4093E Road 84N

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From:

Mike Peacock

Sent:

February-12-19 1:04 PM

To:

Winsor, Jennifer (SD)

Subject:

Wanipigow Sand Extraction Project

Hi Jennifer,

I recently received an email from the Driftwood Cottage Association indicating if we had questions we should forward them to you. If this information has already been provided I apologize and if you could direct me to it that would be great.

- 1. There will be a lot of fine particles in the air due to the extraction of the sand, is there a plan in place to minimize or manage this? Will this be monitored and reported to nearby residents?
- 2. Trucking: has consideration been made to install traffic controls along the proposed trucking routes (i.e. traffic light at corner of HWY 304 and Hwy 59)?
- 3. Any road upgrades planned along heavily travelled roads? Hwy 304 and others.
- 4. What are the reclamation plans? I thought I read CPS will reclaim the mine as they progress, what does this look like? How do you replace that much material, without significant change to the contours of the landscape?
- 5. Are any chemicals used when washing the sand? Disposal? Is there a water management plan in place for the excavation?
- 6. Will the EIA be made public?
- 7. Is there a bond posted in case this is a failed venture to cover the reclamation of the mine?

Thank you,

Mike Peacock

February 12, 2019

Jennifer Winsor, P. Eng. Environmental Engineer, Environmental Approvals Branch Manitoba Sustainable Development

Subject: Proposed Wanipigow Sand Extraction Project (#5991)

Dear Jennifer Winsor,

This letter is in regards to the proposed Wanipigow Sand Extraction Project located adjacent to Hollow Water First Nation, Seymourville NAC and Manigotagan NAC. Canadian Premium Sand (previously Claim Post Resources) are the proponents of the proposed Wanipigow Sand Extraction Project.

The proposed project is calling for the construction of a paved access road within a wetland that links Wanipigow River to Lake Winnipeg, to provide access from the sand mine to PR 304. The wetland in question drains into both the Wanipigow River and Lake Winnipeg via three permanent creeks (please see Fig. 1). The wetland and the three creeks it flows into, are likely fish and mussel habitat due to their connectivity to Wanipigow River and Lake Winnipeg. Connectivity is obvious on the ground, during spring run off and during years with high water levels. The wetland is likely acting as headwaters for the creeks that empty into the Wanipigow River and Lake Winnipeg. These creeks are likely fish bearing due to their connectivity to fish bearing waterways. The wetland that acts as the headwaters for these three creeks is also likely fish bearing for species of fish that inhabit bogs, wetlands and headwater streams, such as the fathead minnow (Pimephales promelas), brook stickleback (Culaea inconstans), pearl dace (Margariscus margarita), central mudminnow, white sucker, redbelly dace and the finescale dace. These species of fish are well known for inhabiting bogs, black spruce muskegs and have even been found in isolated wetlands (The Freshwater Fishes of Manitoba, Stewart and Watkinson). The headwater wetlands crossed by the proposed access roads need to be investigated for the presence of these species of fish.

Road construction through the headwater wetland is likely to influence the flow of water into the creeks that ultimately empty into Wanipigow River and Lake Winnipeg. Decreased water flow from the wetland could alter the fish and mussel habitat characteristics or cause the death of fish and mussels located in the creeks, which would be in violation of Sections 22, 35 and 36 of the Fisheries Act. In addition, two of the potentially impacted creeks run through and create

riparian and fish/mussel habitat on Federal reserve land. The Project requires a review by the Department of Fisheries and Oceans (DFO) under its Fisheries Protection Program to ensure that violations to the *Fisheries Act* and to the *Species At Risk Act* do not occur as a result of works related to the Project.

Lake Winnipeg and Wanipigow River are both considered critical habitat for the Mapleleaf Mussel (Quadrula quadrula) which is listed as 'Endangered' under Schedule 1 of the Species At Risk Act (SARA) and listed as 'Endangered' under the Manitoba Endangered Species and Ecosystems Act.

Mapleleaf Mussel was found in Lake Winnipeg at Seymourville by Dr. Eva Pip (COSEWIC Status and Assessment Report on Mapleleaf Mussel, 2016). It is possible that the creeks potentially impacted by the Project are critical habitat for a *SARA* listed Endangered species due to their connectivity to known critical habitat of the species (Lake Winnipeg and Wanipigow River). Due diligence must be done to ensure that the Project does not impact the critical habitat of the Mapleleaf Mussel, as that is a violation of Section 58 of the *Species At Risk Act*.

Satellite images, topography maps and maps included in the Environment Act Proposal #5991 for the Wanipigow Sand Extraction Project, support the notion that the proposed road construction in the headwater wetland will impact water flow into the creeks that empty into Lake Winnipeg and the Wanipigow River. The creeks are fish bearing due to their connectivity to fish bearing waterways, Lake Winnipeg and Wanipigow River. The Project proponent needs to demonstrate that the proposed road construction in the headwater wetland does not cross fish bearing waterways, does not influence the flow of water into the fish bearing creeks and does not cause fish/mussel habitat alteration, destruction or degradation. The Project proponent must also demonstrate that the creeks located within 1 km of the access road do not contain Mapleleaf Mussel, a species listed as 'Endangered' on the Species At Risk Act and the Manitoba Endangered Species and Ecosystems Act.

Please consider the information presented and require that the Canadian Premium Sand (Claim Post Resources) submit the Wanipigow Sand Extraction Project for DFO review under the Fisheries Protection Program. Canadian Premium Sand should also demonstrate that their proposed project does not cross a fish bearing, headwater wetland and does not impact the flow of water into the three fish bearing creeks that have connectivity to Lake Winnipeg and the Wanipigow River.

Sincerely,

**Dreyson Smith** 

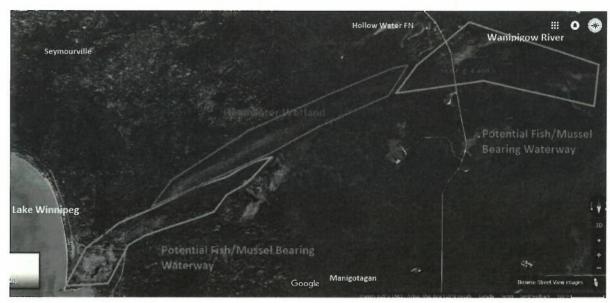


Figure 1: Satellite image showing approximate locations of headwater wetland that drains into three creeks that flows to Lake Winnipeg and the Wanipigow River. Image also outlines fish habitat and potential mussel habitat that is likely dependent on the water flow from the headwater wetland. (Red dots indicate locations where the following ground photos were taken, see Figures 2-5.) Construction of a paved, two lane road directly crosses the headwater wetland.



Figure 2: Photo facing south towards Lake Winnipeg from the road (the lakeshore can be seen in the upper right corner of photo) between Seymourville and Manigotagan. Given direct connectivity to Lake Winnipeg, this creek needs to be investigated for fish habitat and potentially fish spawning grounds.



Figure 3: Photo facing north towards the wetlands that flow into the creek that empties into Lake Winnipeg.



Figure 4: Photo facing north towards the Wanipigow River from the road between Hollow Water First Nation and Manigotagan. Water flowing from the wetland enter into this creek and create fish habitat and possibly spawning habitat on reserve land. Damming the wetland could prevent water from flowing into the creek, risking habitat damage.



Figure 5: Photo facing southwest towards the headwater wetland that Canadian Premium Sand is proposing to construct a road through. This headwater wetland drains into two creeks that run through Hollow Water First Nation.

Wanipigow Sand Extraction Project

File: 5991.00

Attention: Jennifer Winsor

Dear Jennifer,

I am a cottage owner of Lot 61 Pelican Inlet. I too have all of the same concerns that have been mentioned to you in previous correspondence from other cottagers in the area regarding noise pollution, wild life, water consumption (my well which is 300 ft deep only produces 1/4 gal. per minute), traffic issue concerns regarding the volume of transport trucks (curves and narrowness of PR#304 and the dangers of exiting 304 onto Hwy #59), site topography (cannot see that the landscape can be returned due to the amount taken away)

Back around in the 1990's Dow Corning built a silica sand processing plant by the East Selkirk Generating Station which only lasted a few years before being abandoned. This company too promised many local jobs and spin offs but amounted to nothing other than the construction of the plant. It was finally demolished and removed a couple of years ago.

I have downloaded and read all the information that was available on line and attended the information meeting in Seymourville. I also have doubts about the company as to the change over from Claim Post to Canadian Premium Sand.

Sincerely, Adrian De Boer

From:

Sylvia Lasko

Sent:

February-12-19 10:04 AM

To:

Winsor, Jennifer (SD)

Cc:

Ewasko, Wayne (PC Caucus) (LEG); brisco@rmalexander.com; Gerry Behringer; 'Ingrid

Tirschmann'; 'Jenny Lasko'; 'Calvin Lasko'; 'Holly Behringer'; 'Jessica Tait'

Subject:

Concerns re: Canadian Premium Sand EAP

Importance:

High

Good morning, Jennifer,

I respectfully submit my concerns and comments regarding the proposed Wanipigow Sand Extraction Project and ask you to incorporate them into the review process.

1. Annual estimated production rate: 1 million tonnes of silica sand, trucked to Winnipeg.

Why a million tonnes annually for a projected 54 years? This target will have a huge impact on the environment. I had to try to visualize what this amount "looks like": apparently, 1 million tonnes is about the combined mass of a couple of sky scrapers. In reviewing the proposal, "long-term adverse effects to vegetation and regional wildlife populations are not *anticipated*." How can that be true? "Progressive rehabilitation and revegetation of disturbed areas"? I'm trying to understand: remove 1 million tonnes, and rehabilitate same? Every year? For 54 years???

According to their website: Canadian Premium Sand is an emerging company in the silica sand industry. The company is **focused on becoming a leading provider** of premium white silica sand to oil and gas operations in the Western Canada Sedimentary Basin.

I would like to know which *impartial* team of experts will the Government of Manitoba (or maybe the Government of Canada?) employ to substantiate the impact findings. We really need to take our time with this; phrases like "are not anticipated" make me very nervous.

2. Truck Transportation of Silica Sand Product to Winnipeg for Distribution: 40 tonne capacity trucks will transport sand 24 hours a day, 7 days a week. 3-4 trucks per hour will be loading sand at the facility for transportation to Winnipeg.

Further to the inquiry in number 1 above, why so much, so fast? In reviewing Appendix K-N, I see AECom has provided letters of support. Where are the letters of support from all the communities along the way from Winnipeg to the site (ie RM of Alexander, for one). I'd like to have the same intensive review with *all* the potentially impacted communities. Again: 3-4 trucks per hour, 24 hours a day, 7 days a week. For 54 years!

What about the environmental impact of those trucks, for approximately 200 km each way. Have we considered:

- Fuel use
- Greenhouse gas emissions
- Air contaminant emissions
- Spills

- Accidents (this terrifies me we have children, and grandchildren, and family and friends who visit us
  frequently in the RM of Alexander, using highway 59 from Winnipeg. All those trucks, all the time, 100
  km/hr. Oh, the human error factor is increased exponentially! And we're just one family. What about all
  the others living, working and visiting all the communities along the way.)
- Noise
- Congestion
- Even introduction of nonindigenous species (ie look what happened with zebra mussels)

In conclusion, I trust that, as the lead for the environmental assessment process for the proposed Wanipigow Sand Extraction Project, you and your team will "pump the breaks" on this project, in order to have all potential impacts explored. I'm sure that all reasonable people will be able to reach a mutually beneficial compromise.

If there is anything I can do to help, please contact me much for your consideration.

or just reply to this message. Thank you very

Sincerely,
Sylvia Lasko

(cottage owner:

From: Winsor, Jennifer (SD) [mailto:Jennifer.Winsor@gov.mb.ca]

Sent: Thursday, February 7, 2019 12:44 PM

To: 'sylvia.lasko@shaw.ca'

Subject: Canadian Premium Sand EAP

Hi Sylvia,

Your inquiry was sent to my attention, as I'm the lead for the environmental assessment process for the proposed Wanipigow Sand Extraction Project.

The Environment Act Proposal (EAP) for the proposed development can be reviewed here: <a href="https://www.gov.mb.ca/sd/eal/registries/5991wanipigow/index.html">https://www.gov.mb.ca/sd/eal/registries/5991wanipigow/index.html</a>.

The public review period is currently open with the deadline for the submission of comments and/or concerns on February 12<sup>th</sup>, 2019.

Please feel free to email me directly with any concerns or comments regarding the proposed development and I will incorporate them into the review process.

Best regards,

Jennifer Winsor, P.Eng.
Environmental Engineer
Environmental Approvals Branch
Department of Sustainable Development
1007 Century Street

February 7, 2019
Ms. Jennifer Winsor. P. Eng
Environmental Engineer
Manitoba Sustainable Development
Issued via email to Jennifer.Winsor@gov.mb.ca

RE: Public Registry File:5991.00 – TRAFFIC SAFETY NOT ADEQUATELY ASSESSED. Canadian Premium Sand Inc – Wanipigow Sand Extraction Project Environmental Assessment

Dear Ms. Winsor.

This letter responds to the recent advertisement asking for comments and concerns regarding Public Registry File:5991.00 – Canadian Premium Sand Inc, for the proposed Wanipigow Sand Extraction Project. The concerns outlined below relate to the Environment Assessment documentation posted on Manitoba Sustainable Development's Public Registry. The authors of this jointly-submitted letter both routinely travel portions of the Proposed Development's truck transport route to access residences in Victoria Beach and Lakeshore Heights.

Review of the information included in the Environmental Assessment resulted in a number of serious concerns about the lack of comprehensiveness of the assessment for this proposed development.

Our concerns relate chiefly to the **very limited Regional Study Area** applied in this assessment, especially regarding the **very significant increase in heavy transport truck traffic planned for this project.** 

Section 2.4 of the AECOM Environmental Assessment Report describes the project operation requiring the addition of 40-tonne transport trucks operating on a 24-hour, 7 days per week basis, with an additional 96 large transport trucks entering and exiting Hollow Road at Provincial Highway #304, with a frequency of truck traffic reported to be an expected 3-4 trucks per hour. These large transport trucks are routed to proceed down Highway 304 from Hollow Road until the intersection of Highway 304 and Highway 59 near Beaconia, where trucks will proceed south (and also north as they proceed to the site) along the 2-lane, undivided Highway 59 segment (through the small community of Scanterbury) until the highway splits to 4-lane, divided highway south of the Brokenhead Ojibway Nation.

Section 3.2 states that a spatial Study Area is limited to 10 km from the Project Site except for highway traffic, which was assessed with a Traffic Impact Study that was conducted according to AECOM with a stated objective "to determine what measures if any may be required to mitigate adverse impacts to the Level of Service ("LOS") of the highway network." The Traffic Impact Study does not, however, assess the impact of increased transport truck traffic except for the haul route from the site to PR304 near Manigotagan, Manitoba – in other words, the traffic impact study totally ignores the impact of this large increase in transport truck traffic on the highly congested 2-lane, undivided highway segment of Highway 59 from PR 304 to south of Brokenhead where Highway 59 splits into divided, 4-lane highway. After high-profile recent highway transport truck/passenger bus collisions such as the April, 2018 Humboldt Broncos tragedy and considering this stretch of Highway 59 is one of Manitoba's

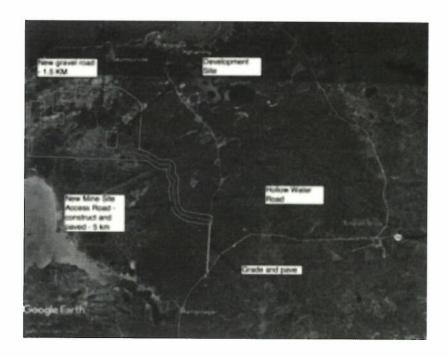
most congested recreational and tourist routes to Manitoba East Beaches lake country, it is not acceptable for a traffic impact study to not examine the impacts to safety on the Highway 59 and Gunn Road corridor for this proposed development.

Human Health, on page 75, would be expected to describe potential effects on highway traffic. However, there is no mention of the potential effects of increased highway traffic on human health and safety along the transport corridor between the development to/from Winnipeg.

In Section 6.7 (Traffic), there is no mention of Highway 59 or Gunn Road and the potential for increased accidents on these highways due to more frequent transport truck traffic.

Appendix N is labelled "TRAFFIC STUDY". Contrary to the Regional Project Area scoping statements provided in Section 3.2, the defined Study Area is limited to the intersection for the haul route from the Site to PR304 near Manigotagan, Manitoba.

As shown in the figure below (obtained from Appendix N "Traffic Study") the study area for this traffic study completely ignores the impact of additional transport truck traffic volumes on Highway 59 from the intersection of Highway 59 and PR 304 along its route to or from the proposed development. Of particular concern are the traffic safety and human health impacts of additional transport truck traffic along a highly congested, 2-lane undivided highway. This highway corridor is used by recreational and tourism traffic travelling north and south between Winnipeg and the East Beach cottage communities along Lake Winnipeg and East of Highway 59. This segment of Highway 59 contains numerous uncontrolled intersections, many absent of turn lanes, each will require traffic to stop to allow vehicles looking to turn left to have the opportunity to turn off Highway 59. The lack of turning and bypass lanes at these intersections mean that adding significant volumes of transport truck traffic, particularly during the summer recreational season, will likely result in rear-end collisions due to traffic intending to turn off Highway 59 but unable to promptly do so due to high traffic intensities.



In total, there is no recognition of the very significant increased traffic burden to Highway #59 and Gunn Road and associated risks to public safety and human health. The undivided Highway 59 will see this increase in semi-trailer burden in confined highway corridor already stressed with high volumes of recreational and tourism traffic.

Letters to Winnipeg Free Press editors (recently published) show similar shared concerns, even suggesting alternatives to truck traffic due to concerns about the safety on the 2-lane segments of Highway 59 along this proposed truck route.

The Environmental Assessment as submitted is significantly deficient in failing to study the changes in highway transport truck traffic activity and corresponding impacts to public safety and human health along this route. The proponent should be directed to do a competent comprehensive assessment of these risks to the public.

Yours truly,

George Rempel

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Roger Rempel