

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Alamos Gold Inc.  
**PROPOSAL NAME:** Lynn Lake Gold Project Substation  
**CLASS OF DEVELOPMENT:** 2  
**TYPE OF DEVELOPMENT:** Transportation & Transmission  
**CLIENT FILE NO.:** 6187.00

As part of the [environmental assessment and licensing process](#), the purpose of this document is to summarize comments received from the public and government's Technical Advisory Committee (TAC), and how they are addressed. It includes a recommendation to inform the director's licensing decision.

### **1.0 OVERVIEW**

Alamos Gold Inc. submitted an Environment Act proposal dated April 26, 2023, to build a 138 kV - 34.5 kV electrical substation for the Lynn Lake Gold Project. The proposed expansion is located on part Block 20, Plan 689 (PLTO) North Division, in the Town of Lynn Lake, and is approximately 0.3 hectares in size. A new 34.5 kV distribution line will also be built to provide electricity from the substation to the proposed MacLellan site. The distribution line does not require an Environment Act Licence as the line voltage is lower than the regulated thresholds; therefore, it is not part of this environmental assessment.

Alamos intends to construct, operate, and eventually decommission the substation site, coinciding with the decommissioning of the MacLellan site. The project will be built on a previously disturbed industrial site, with a small amount of clearing to expand the footprint of the previous site.

The department advertised the proposal in the Thompson Citizen on Friday, June 23, 2023. It was placed in the online Public Registry as follows:  
<https://www.gov.mb.ca/sd/eal/registries/6187/index.html>.

The department distributed the proposal to Technical Advisory Committee (TAC) members on June 15, 2023, for their expert comments.

The closing date for comments from members of the public and TAC members was July 24, 2023.

Based on the comments received, the department sent an additional information request to the proponent on August 24, 2023, and they responded on October 3, 2023. The response satisfied the department's request.

### **2.0 COMMENTS FROM THE PUBLIC**

Manitoba Eco-Network commented on the project. The comments are provided in full in the online Public Registry at: <https://www.gov.mb.ca/sd/eal/registries/6187/index.html>.

Following is a summary of the comments received:

- concerns about the proponent seeking multiple approvals
- no assessment by Canada
- lack of consideration of project alternatives such as wind and solar
- project impact on electrical grid capacity
- inadequate public and Indigenous consultations

Disposition:

- The Classes of Development Regulation allows the submission of multiple related development proposals associated with a project. Canada is aware of this development through assessment of the mining proposals and the substation project does not require federal approval. Manitoba Hydro confirmed that there is sufficient grid capacity for this project.
- For any development proposals, Manitoba welcomes and invites public comments to inform licensing decisions. The same was followed for this project following The Environment Act. This is different than the proponent-led public engagement initiatives. The department has assessed the project and determined that the licensing decision will not adversely affect the exercise of Aboriginal or Treaty rights.
- The department had requested the proponent to provide additional information regarding project alternatives. Their responses satisfied the department's request.

### **3.0 COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE**

TAC responses are listed in Table 1 below. Substantive comments and their dispositions follow the table. TAC comments are provided in full in the online Public Registry at: <https://www.gov.mb.ca/sd/eal/registries/6187/index.html>.

Table 1 Alamos Gold Inc. - Lynn Lake Gold Project Substation  
Technical Advisory Committee Comments

<b>No</b>	<b>Technical Advisory Committee Member</b>	<b>Response Provided</b>
<b>1</b>	<b>Environment and Climate Change</b>	
	Environmental Approvals Branch	
	<ul style="list-style-type: none"> <li>• Air Quality Management</li> </ul>	No response
	<ul style="list-style-type: none"> <li>• Water Power Licensing</li> </ul>	No response
	Environmental Compliance and Enforcement Branch	No response
	Office of Drinking Water	June 19, 2023
	Drainage and Water Rights Licensing Branch	June 19, 2023
	Water Science and Watershed Management Branch	
	<ul style="list-style-type: none"> <li>• Groundwater Management Section</li> </ul>	No response
	Climate and Clean Technology	No response
	Parks Branch	June 22, 2023
<b>2</b>	<b>Economic Development, Investment, Trade and Natural Resources</b>	
	Wildlife and Fisheries Branch (Wildlife)	No response
	Wildlife and Fisheries Branch (Fisheries)	No response
	Forestry and Peatlands Branch	June 29, 2023
	Lands Branch / Crown Land Specialist	July 19, 2023
	Mines Program	No response
	Petroleum Program	July 13, 2023
<b>3</b>	<b>Sport, Culture, Heritage, and Tourism</b>	
	Historic Resources Branch	June 26, 2023
<b>4</b>	<b>Municipal and Northern Relations</b>	
	Community Planning Branch	No response
<b>5</b>	<b>Health, Seniors and Long-Term Care</b>	
	Environmental Health Unit	No response
<b>6</b>	<b>Transportation and Infrastructure</b>	
	Environmental Services and Consultation Branch	July 18, 2023
<b>7</b>	<b>Impact Assessment Agency of Canada</b>	No response

### **3.1 Environment and Climate Change – Drainage and Water Rights Licensing**

The Drainage and Water Rights Licensing Branch had no concerns and noted that:

- The proposed water control works fall within a designated urban area, and therefore do not require authorization under the Water Rights Act. If those water control works drain class 3, 4 or 5 wetlands, or outlet onto areas outside of the urban area, authorization will be required.
- Water control works are defined as any dike, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert, borehole, or contrivance for carrying or conducting water, that temporarily or permanently alters, or may, alter the flow or level of water, water in a water body, by any means, including drainage or changes, or may change the location or direction of flow of water by any means including drainage.

#### **Disposition:**

- The proposed project does not require authorizations.
- The information was provided to the proponent for their information.

### **3.2 Economic Development, Investment, Trade and Natural Resources – Forestry and Peatlands Branch**

The Forestry and Peatlands Branch noted the following:

- Application of the Forest Act and the need for timber permits are only required for Crown timber.
- Trees harvested and removed from private land may require a private load slip or bill of lading.

#### **Disposition:**

- The information was provided to the proponent for their information.

### **3.3 Economic Development, Investment, Trade and Natural Resources – Lands Branch / Crown Land Specialist**

The Lands Branch noted the following:

- Any new development that falls under The Crown Lands Act requires Crown land tenure. The proponent must contact the regional Crown Land Management Specialist to discuss the project details.
- An application for Crown land tenure can be obtained from the Real Estate Services Branch and will be circulated interdepartmentally and to various agencies for review and comment.
- A Work Permit may be required for work conducted on Crown land.

#### **Disposition:**

- The information was provided to the proponent for their information.

### **3.4 Sport, Culture, Heritage, and Tourism - Historic Resources Branch**

The Historic Resources Branch had no concerns and noted that:

- The potential impact to heritage resources is believed to be low based on analysis of current data and evaluated by the type of action proposed.
- If heritage resources are encountered in association with these lands during testing and development, there is an obligation to report any heritage resources and a prohibition on destruction, damage, or alteration of said resources. The branch may require that an acceptable heritage resource management strategy be implemented by the proponent/developer to mitigate the effects of their activity on the heritage resources.

Disposition:

- The information was provided to the proponent for their information.
- The licence contains a clause requiring the proponent to follow The Heritage Resources Act. This includes suspending construction and notifying the Historic Resources Branch if heritage resources are encountered during the construction of the development.

### **3.5 Transportation and Infrastructure - Environmental Services and Consultation Branch**

The Environmental Services Branch noted that:

- Utility permission is required for the proposed distribution line running along and across PR 391.
- A permit is required from MTI's Roadside Development section for any new access or any modifications or improvements to an existing access along PR 391 as well as for placement of signs, structures, and development along PR 391.

Disposition:

- The information was provided to the proponent for their information.

## **4.0 INFORMATION REQUESTS**

In response to the public and TAC comments, the Environmental Approvals Branch sent an additional information request to the proponent on August 24, 2023. Additional information was requested regarding project alternatives, and if other green alternatives such as wind and solar were considered. The proponent responded on October 3, 2023. The responses satisfied the department's request.

### **4.1 Project Alternatives**

#### **Information Request**

The department asked the proponent to provide information on project alternatives.

#### **Proponent's Response to Information Request**

Both wind and solar power options were not considered financially feasible alternatives due to the modest life span of the project and the cost/size of infrastructure requirements associated with developing either wind or solar power options. Additionally, wind or solar power would require expansion of the project disturbance area, and this would have additional environmental

effects. For these reasons, the use of green hydroelectric-generated power, a renewable energy source, was selected as the most viable option.

Disposition:

- The response is satisfactory.

## **5.0 PUBLIC HEARING**

A public hearing is not recommended as the public concerns are addressed through the additional information and terms and conditions of the draft licence.

## **6.0 CROWN-INDIGENOUS CONSULTATION**

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with Indigenous communities when any proposed provincial law, regulation, decision, or action may infringe upon or adversely affect the exercise of the Indigenous rights of that community.

The Initial Assessment conducted for this project has concluded that the decision does not have the potential to adversely affect the exercise of an Aboriginal or Treaty right. Crown-Indigenous consultation will not be undertaken to inform this project's licensing decision. The project would occur on a previously disturbed and privately owned derelict lot within an existing development within the Town of Lynn Lake. There are no anticipated discharges, releases, or impacts during operation.

## **7.0 RECOMMENDATION**

Comments received have been addressed through the provision of information and licence conditions. I recommend that the development be licensed under The Environment Act subject to the limits, terms, and conditions as described on the attached draft Environment Act licence. I also recommend assigning the administration of the licence to the Northern Region of the Environmental Compliance and Enforcement Branch.

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