



**Transportation and Infrastructure**

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Sean Carriere  
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Prairie and Northern Region,  
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**Subject: The Proposed Lake Manitoba and Lake St. Martin Outlet Channels  
Project (the Project) Technical Review Information Requests Round 2  
(August 25, 2022)**

Dear Sean Carriere:

Manitoba Transportation and Infrastructure (MTI) is pleased to submit formal responses to the Impact Assessment Agency of Canada's (IAAC) August 25, 2022, Round 2 Information Requests (IRs) for the proposed Lake Manitoba and Lake St. Martin Outlet Channels Project (the Project). MTI has developed these documents in consideration of information and feedback received on Round 1 Information Request Responses, and technical meetings with the federal review team, Indigenous groups and the Rural Municipality (RM) of Grahamdale.

Please note that MTI considers the Lake Manitoba and Lake St. Martin Outlet Channels Project to be a proposed project. In the submission package the terms "the Project" and "the proposed Project" will be used interchangeably.

MTI would like to reaffirm that the purpose of the proposed Project is to provide flood protection for communities surrounding Lake Manitoba and Lake St. Martin, and allow for more effective management of water levels on both lakes. Climate change is affecting the intensity and frequency of severe weather events such as flooding. Without the proposed Project, the Manitoba government will have fewer options to mitigate flood conditions and respond to our changing climate. Areas around Lake Manitoba and Lake St. Martin are currently vulnerable, as was experienced in the 2011 and 2014 flood events. The need for this proposed Project is urgent and will improve Manitoba's climate resiliency.

## Indigenous Consultation and Stakeholder Engagement

Outreach on the proposed Project started following the record flood of 2011 and the subsequent flood of 2014, which devastated communities around Lake Manitoba and Lake St. Martin. The estimated impact of the 2011 flood for both the provincial and federal governments exceeded \$2.1 billion. Furthermore, it is impossible to quantify the emotional toll that these flood events and associated evacuations continue to have on all affected individuals. Since then, MTI has engaged with 39 Indigenous groups (First Nations, Métis and Northern Affairs communities, and Indigenous organizations) that may be affected by the proposed Project as required for the environmental approval process and by Section 35 of *The Constitution Act, 1982*.

MTI has established an ongoing consultation and engagement process.

Communications with Indigenous groups and the RM of Grahamdale will continue after the anticipated receipt of regulatory approvals and throughout the construction phase. MTI's proposed Environmental Advisory Committee is a concrete example of MTI's commitment to ongoing engagement. The primary goal of consultation and engagement with Indigenous groups is to share information about the proposed Project and its potential effects as well as to gather Indigenous knowledge to better understand, avoid, and/or reduce effects on Indigenous and Treaty Rights. The Indigenous consultation and stakeholder engagement process has provided and will continue to provide further opportunities for feedback on environmental management as well as monitoring plans associated with the construction and operation of the proposed Project. This process is ongoing, collaborative and adaptive to concerns as they arise. The process helps the proposed Project to consider the best interests of all who may be affected.

The Manitoba government is strongly committed to the proposed Project. Ministers and senior government officials are actively involved, and have participated in several meetings with Indigenous groups. During the COVID-19 pandemic, the necessary restrictions and physical distancing protocols limited engagement options; however as Manitoba emerged from the pandemic and as the majority of COVID-19 restrictions ended in May 2022, MTI shifted from limited in-person engagements to more in-person meetings in an effort to increase participation from Indigenous groups. By opening up the lines of communication with Indigenous groups, MTI was able to create a more positive and engaging experience. This has resulted in a higher level of trust and understanding, leading to a more meaningful dialogue and more effective decision making.

## Studies Conducted by Indigenous Groups

The responses to IAAC's Round 2 IRs contain information from draft reports documenting socioeconomic and well-being studies, and First Nation rights impact assessments from Dauphin River First Nation, Kinonjeoshtegon First Nation, Lake Manitoba First Nation, Lake St. Martin First Nation Little Saskatchewan First Nation, Peguis First Nation and Pinaymootang First Nation. It also incorporates information from socioeconomic impact assessment reports provided by Fisher River Cree Nation and the Manitoba Métis Federation.

The information was primarily used in response to IR IAAC-R2-29.

## Design Refinements and Addressing Community Concerns

Addressing community and stakeholder concerns is a priority for MTI. As is the case with any major infrastructure project, the design evolves over time as additional information and feedback becomes available. Design updates are the product of incorporating feedback and advancing the design to optimize the performance of a project while further reducing potential effects. MTI has used an iterative process to advance the Project design while engaging with environment experts, Indigenous groups and stakeholders, to continually evaluate these updates in the context of potential environmental effects and additional mitigation commitments.

As IAAC noted in its January 31, 2023, letter requesting MTI to provide an updated Project Description of the proposed Project, key refinements are already reflected in MTI's filed responses to the Round 1 Information Requests, and as applicable, additional refinements are reflected in MTI's responses to the Round 2 Information Requests. Through design updates, MTI has reaffirmed that the initial Project design serves to protect communities around Lake Manitoba and Lake St. Martin and that this is the right design for this proposed Project, at this time. This updated Project Description does not represent an amendment to the proposed Project Environmental Impact Statement (EIS).

In most instances, design modifications have resulted in a reduction in potential effects. However, MTI understands, and it is MTI's view that the purpose of providing an updated Project Description is to clarify and consolidate the refinements made to the proposed Project. MTI, therefore, provided an updated Project Description to IAAC on May 8, 2023, for posting on the IAAC Public Registry, to support the continued effective review of the proposed Project EIS, IAAC's preparation of the draft Environmental Assessment Report, and to provide support for consultation and engagement activities.

The following list highlights some design updates that have been used to further optimize the Project:

- Lowering the Lake St. Martin Outlet Channel (LSMOC) upstream of the first drop structure and inlet area to address head loss through the Lake St. Martin Narrows, based on ongoing modelling and discussions with Indigenous groups and the RM of Grahamdale.
- Completing of additional flow and sediment modelling to further examine potential effects, and to optimize commissioning and operation of the Project to control sediment release and the effect on water quality.
- Armouring the bottom and side slopes of both channels to address downstream post-operation erosion and sedimentation issues, including the selection of appropriately sized material to protect the channel and its components while allowing wildlife movement.
- While the LSMOC was facilitating baseflow in the earlier design, the Lake Manitoba Outlet Channel (LMOC) now also includes baseflow to address dissolved oxygen levels and potential effects on fish, based on modelling carried out on both channels.
- Removing of LMOC groins at the inlet or outlet area, and removal of rock fill jetties at the LSMOC inlet and shorter jetties at the outlet, based on further analyses of shoreline geomorphology and sediment transport processes.
- Optimizing the LMOC cross-section to allow for a reduction in the quantity of excavation required to meet design objectives.
- Designing of four passive wetland treatment areas to address outflows from cattle operations that will discharge overland runoff into the LMOC outside drain.
- Optimizing the LSMOC drop structures to reduce effects to fish, including shallower slopes, and a trapezoid-shaped base to reduce velocities and provide more width of water at low flows.
- Committing to offset the loss of Class III, IV, and V wetlands. This is consistent with *The Water Rights Act*, as well as offsetting for impacts to peatlands as described in the response to IAAC-R2-13 that reflects updated values for directly affected peatlands.
- Using of an existing temporary winter construction road located east of the LSMOC to access the northern portion of the LSMOC for clearing and excavation work.

As part of the ongoing planning and design process, design modifications have been evaluated and assessed for potential effects on the various valued components used in the Project's environmental assessment. As indicated, in many cases the modifications were made to reduce or mitigate potential adverse effects. The original conclusions of the EIS have been reaffirmed and remain valid. We have also provided a screening level assessment of the planned temporary use of the existing winter access road noted above (see Attachment 1), with conclusions that do not change those already stated in our filings to date.

In addition to testing EIS conclusions, the various mitigation and monitoring plans associated with the Project Environmental Management Program are being examined. These will be updated where appropriate and in consideration of feedback received. MTI has committed to the use of adaptive management and follow-up activities to evaluate and, if necessary, alter the nature and level of mitigation to address issues with design performance and associated effects. MTI has committed to annual reporting on the performance of the proposed Project during construction and commissioning.

### Indigenous Consultation and Stakeholder Engagement Report

In addition to the aforementioned documents, MTI is also submitting as part of this package an updated Indigenous Consultation and Stakeholder Engagement Report (ICSER) (see Attachment 2). The purpose of this report is to provide information to federal and provincial regulators on the consultation and engagement processes undertaken by the proponent, MTI, with potentially affected Indigenous groups and stakeholders in relation to the proposed Project. The information presented in this report is expected to assist federal and provincial regulators with the environmental review processes.

### Conclusion

MTI continues to demonstrate a commitment to engaging, consulting and involving Indigenous groups, the RM of Grahamdale and other stakeholders to address concerns and adapt the proposed Project if/where necessary. Through established relationships, regular meetings and committees, MTI will continue its efforts to communicate, manage and mitigate any issues or impacts that arise as the proposed Project moves forward. It is our belief that the attached responses will inspire confidence and demonstrate evidence of Manitoba's commitment to moving the proposed Project forward in the best way possible.

It is with a sense of urgency in the context of the ever-present flood risk from our changing climate, and the Canadian Environment Assessment Act, 2012 extension deadline, that we look forward to a favourable response and continued collaboration with IAAC in further advancing the proposed Project.

Sincerely,

<Original signed by>

Cynthia Ritchie  
Assistant Deputy Minister

c: Sarah Thiele, Deputy Minister of Transportation and Infrastructure