



The Rural Municipality of Whitemouth
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December 14, 2010

Environmental Assessment & Licensing Branch
Manitoba Conservation
123 Main Street, Suite 160
Winnipeg, MB.
R3C 1A5



BW

Dear Mr. Bruce Webb:

RE: Tin Horton Children's Foundation Youth Leadership Camp (File: 5493.00)

The RM of Whitemouth wishes to respond to the above Environmental Act licence proposal. It is our understanding that water and wastewater services are to be provided by plants onsite. It is the intention of the RM to propose what we feel is a green option to providing these services.

The RM of Whitemouth has water and low pressure sewer systems in close proximity to the site of the proposed camp. The water treatment plant was commissioned in September of 2010 and provides water that meets drinking water standards. The low pressure sewer system is located in Seven Sisters and outlying areas and this system along with the lagoon was completed in 2008.

The RM of Whitemouth feels that the possibility of connecting the proposed camp to these two systems would benefit the environment, the camp and the RM of Whitemouth. This proposal could also open up availability of these services to residences in the Whiteshell Provincial Park.

If you require clarification please contact me.

Regards,

Scott G. Spicer
CAO
RM of Whitemouth

cc. Hon. Greg Selinger Premier
Hon. Bill Blaikie Minister of Conservation

December 21, 2010

Allan Cassidy
Box 698
Pinawa, Mb
R0E 1L0

Environmental Assessment & Licensing Branch
Province of Manitoba
bruce.webb@gov.mb.ca

BW

Re: Tim Horton Children's Foundation Youth Leadership Camp (File 549300)

To whom it may concern:

I am writing this letter in support of the camp being situated on Sylvia Lake in the Whiteshell Park just south of Pinawa.

The camp will assist in the much needed economic development of the area. Eastern Manitoba needs new jobs and economic activity. The Camp will provide these much needed jobs. As to Pinawa, some individuals may move to town and commute to the Camp.

The Camp will not have a major impact on the environment. The Camp WILL NOT affect cross country skiers or hikers or campers. No one skies on Sylvia and no one camps there. The skiing is north of town. Skiers would have to travel half an hour by road to ski Sylvia as the water does not freeze between town and Sylvia. The picture in the paper last year showing skiers out there is a farce. I have lived here since 1989 and no one skies there. They all use the trails north of Pinawa.

Tim Horton's Camp will provide youth leadership to help those less fortunate to have a better life. Tim Horton has shown from other camps they are responsible caring corporate citizens who want to make a positive change to peoples' lives.

Manitobans are fortunate that the company wishes to put the camp at Sylvia Lake.

Thank you

Allan Cassidy
acassidy@mts.net

From: Jeff Simpson [jsimpson@aquaticlife.ca]
Sent: December-30-10 10:33 AM
To: Webb, Bruce (CON) BW
Subject: RE: Tim Hortons Camp

Hi Bruce,

Yes, I do see that it was advertised. Obviously, I have not been reading the papers. I would have preferred to provide a more scientific review.

Certain areas stand out as needing at a minimum mitigation. Noise, was discussed in the public meeting and it was to be at a minimum. Blasting, will certainly not qualify as a minimal noise to the shoreline residents. I am sure most residents are not familiar with this aspect of the proposal. Can this not be minimized or restricted?

It also appears that the belt transects performed by Stantec did not extend far enough for them to see the eagles nest on that shoreline. A buffer zone area seemed not to be considered when they performed there survey.

Regards,

Jeff Simpson

From: Webb, Bruce (CON) [<mailto:Bruce.Webb@gov.mb.ca>]
Sent: Thursday, December 30, 2010 10:21 AM
To: Jeff Simpson
Subject: RE: Tim Hortons Camp

Hello! Comments on the project close on January 5, so there is still time to review the project proposal and send in comments. The project was advertised in the Pinawa Paper on November 30, the Beausejour Clipper on November 29, The Lac du Bonnet Leader on December 2, and the Winnipeg Free Press on December 3. It is also noted as open for comment on our website, and we have an online public registry which contains all the information that we have on the project.

(www.gov.mb.ca/conservation/eal/registries/5493timhorton/index.html)

Any comments are welcome – letter, fax or e-mail all work for us. E-mail is the quickest and most convenient for most people.

Bruce.

Bruce Webb, P.Eng.
Water Development and Control Assessment Officer
Environmental Assessment and Licensing Branch
Manitoba Conservation
160 – 123 Main Street
Winnipeg MB R3C 1A5
Tel: (204) 945-7021 Fax: (204) 945-5229
e-mail: bruce.webb@gov.mb.ca

From: Jeff Simpson [<mailto:jsimpson@aquaticlife.ca>]

Sent: December-29-10 9:00 PM
To: Webb, Bruce (CON)
Subject: Tim Hortons Camp

Dear Bruce,

I have just been informed of the Tim Horton's EIA submission. I am disappointed that as an individual who commented on the initial design I am not notified of the EIA earlier.

In an initial glance I am immediately drawn to the discussion of noise and the town of Pinawa. Blasting no will be significant to a community that is used to quiet.

I would like to know your process of review and comment. I would request an extension of the comment period as this was not publicly promoted to the effected region.

Kindly advise therein,

Jeff Simpson

Aquatic Life Ltd.
34 Alexander Avenue
Pinawa, MB R0E 1L0
Tel: 204 753 5270, Fax: 204 753 2082
jsimpson@aquaticlife.ca

THCF Pinawa Skinner, Blair Comments

From: blair_skinner@cabot-corp.com
Sent: January-03-11 9:51 AM
To: webb, Bruce (CON)
Cc: jsimpson@aquaticlife.ca
Subject: Tim Horton Children's Foundation EIA - Comment from a resident on blasting activities

Hi Bruce, 

I am writing as the Mayor of Pinawa.

A resident of Pinawa has asked me to raise a concern on his behalf with regards to the Tim Horton Children's Foundation EIA. The concern is noise from blasting activities. The EIA discusses impact on fish habitats but does not discuss noise impact on the community of Pinawa.

I presume that commercial blasters would take steps to mitigate the noise impact but the EIA does not address this issue.

Thank you.

Blair C. Skinner
Facility General Manager
Tantalum Mining Corporation of Canada Limited
office: (204)884-2400 extension 201
cell: (204)345-3899

Mayor of the Local Government District of Pinawa Don't forget to visit www.pinawa.com

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Webb, Bruce (CON)

From: attasm1@mymts.net on behalf of Michael Attas [attasm1@mts.net]
Sent: January-04-11 9:28 PM
To: Webb, Bruce (CON)
Subject: File 5493 (Sylvia Lake camp) public comment

Dear Mr. Webb, BW

I would like to comment on some aspects of the Stantec environmental impact assessment report for the Tim Horton proposal to build a camp in the Whiteshell Park on the shores of Sylvia Lake. Specifically, Section 5 on Public Consultation raises concerns with me regarding both process and interpretation of inputs.

Section 5.1 mentions the main public consultation for Pinawa residents, namely the Town Hall Meeting led by Pinawa's Mayor on 2010 April 20. This meeting was highly structured so that questions from the audience were required to conform to pre-assigned categories. Questions directed to Manitoba Conservation staff were not answered, especially regarding the process. In fact, many attendees left with the distinct impression that Manitoba Conservation was a co-proponent for this project, which brings into question the objectivity of the consultation and of the assessment process itself. In particular, questions regarding changes to the Park Use regulations were not addressed at that meeting. For example, as far as I can tell from the material presented, the category of Extensive Recreation Zone does not permit construction of permanent structures.

Appendix A of the report, containing the public consultation materials, was summarized in Section 5.1. To me, the clear message of the comments in the hundred-odd comment forms returned was that almost half the respondents desired a change of location. In other words, while the comments were both for and against the project, many of them suggested that the principle of a youth camp was excellent but the location was poor. The thirteen letters at the end of Appendix A were written by citizens concerned enough to provide more detailed comments and suggestions. They were *unanimous* in opposing the location. The responses (by the Minister of Conservation) to those letters indicated the comments would be "included along with the comments received at the public information sessions, as part of the review process before making a final decision." I see no evidence in the report that either the proponent or Manitoba Conservation have even considered an alternate location.

The executive summary of the Stantec report mentions the "positive socio-economic effects associated with Project construction and operation" of the camp. These are described in more detail in the body of the report. *All* of the positives are at least equally valid if the camp is built in another Eastern Manitoba location. In fact, there are many benefits to locating the camp just outside the Whiteshell Provincial Park, in a wilderness area closer to Pinawa such as the north shore of Natalie Lake or just upstream. The numerous advantages of a location outside the Park have been described by other thoughtful respondents. My point here is that I do not see an assessment of alternate locations in the report, so I doubt that one has been conducted. In other words, the assessment process has not taken this specific public input, which is one of the most frequent requests, into account.

Please let me know how this response from me regarding public consultation and camp location, and other comments received at this stage in the environmental impact process, will affect the progress of this project, if at all. What is the next stage? How can respondents feel they have a voice that is being listened to? How can we be confident that the Government of Manitoba is being objective in its consideration of this project?

Sincerely,

Michael Attas
Pinawa MB

Webb, Bruce (CON)

From: Hugh A [hark@mts.net]
Sent: January-05-11 11:17 AM
To: Conservation, Minister (LEG); Agriculture, Minister (LEG); Water Stewardship, Minister (LEG); Bentham, Barry J (CON); Webb, Bruce (CON)
Subject: THCF Youth Leadership Camp Project, Sylvia Lake, Whiteshell Provincial Park
Attachments: Jan 5 11 Blaikie Struthers Melnick Bentham Webb.doc

Dear Mr. Blaikie, Mr. Struthers, Ms Melnick, Mr. Bentham and Mr. Webb,

Attached is my submission on the unfolding folly at Sylvia Lake in Whiteshell Provincial Park.

As I stated in the final paragraph of the attachment, I expect to receive responses to each and every one of my comments and questions. If you can hasten to make straight the path of the THCF, then you and Tim can take the time to respond, and respond thoroughly, to those citizens who object to this nonsense.

Yours truly,
C. Hugh Arklie
January 5, 2011

Box 126, RR 2
Dugald, MB R0E 0K0

January 5, 2011

To: Bill Blaikie, MLA
Stan Struthers, MLA
Christine Melnick, MLA
Barry Bentham, Parks Branch
Bruce Webb, Environmental Licensing

BW

Re: THCF Youth Leadership
Camp Project
Sylvia Lake

It is hard to know where to begin with the farce known as the THCF Youth Leadership Camp Project in Manitoba. So just for fun, let's start at the end. Stantec calls the end "Closure". Usually it is called a "disclaimer". Curiously, Stantec describes the report as "for the sole benefit of Tim Horton's Children Foundation". Does that mean that I should not have read it? Or does it mean, as I suspect, that Tim paid the fee to a hireling and gets to call the shots. After all, they paid for the tune.

The relationship between Tim and Stantec is quite obvious from the many conclusions reached in the report. They usually go something like this:

"No significant effects on yadda, yadda, yadda are anticipated from yadda, yadda, yadda."

Of course, the real start of this debacle at Sylvia Lake is found at Mediation Lake where elected officials, civil servants and Tim kept the people in the dark for 8 months while secret negotiations contemplated a THCF Camp at Mediation. This was discovered by a nearby resident who informed CJOB. Within a very short time people who had used Mediation as a canoe route told Tim what to expect, a eutrophic lake with an inhospitable landscape. Gordon Jones, a former Parks director, knew this from research that was 30 years old. He told me so. You know, none of us who were right about Mediation ever got a thank you.

In the meantime, Stan Struthers oversaw the construction of a useless road where there was once only a canoe portage route. Today it is gated. Thanks for that Stan.

Poor process always yields poor results. The Parks Branch has perfected poor process. This has its roots in The Provincial Parks Act of 1993 wherein Section 11 calls for a "management plan" for all parks. Somebody please let Stantec know that neither the "Whiteshell Provincial National Park Master" Plan of 1983, nor a 1991 "Review" satisfies the Act. These documents all predate the Act which uses the future tense when referring to the need to "develop" a "management plan".

Much of what Tim is going to get away with at Sylvia is a function of government reluctance to engage with the people who own the parks. (Another example is the construction of a new road and an overpass in Birds Hill Park while the so-called public engagement on a new "management plan" is incomplete.) Perhaps this is why Tim gets the ear of government for 2 years, while the public gets 32 days over the Christmas holidays to respond.

I have read the document which was produced by a non-arms-length consultant for Tim, even if the "Closure" prohibits me. What follows are simply comments taken in chronological order from the document.

Transmittal Letter

Garry Fraser's last paragraph is presumptuous. It does not matter whether he sees no impediment to the licensing of his project. That is not his call, and the statement betrays the overall **attitude of entitlement** amply demonstrated by Tim from Mediation to Sylvia.

Environmental Act Proposal Form

Tim applied for a Class 2 Development. At first glance this is correct. However, when the context is considered **this project should be elevated to Class 3**. This is allowed by Section 11(8)(c). The rationale is that Tim is essentially expropriating over 17 hectares of rare, undeveloped waterfront land in Manitoba's most treasured provincial park.

In any case, and for the same reason, **this proposal must be sent to public hearings** as allowed by Section 11(10). Public hearings are rare for Class 2 Developments, but so is this land.

Executive Summary

The Sylvia site was "selected with assistance from Manitoba Conservation". In the Winnipeg Free Press of February 18, 2010 I accused **Conservation of being an agent for Tim**. I rest my case.

Tim says that in addition to serving youth, "the Project will serve as a community resource to foster volunteerism and community service in the local region, as well as welcoming community groups, colleges and universities with an interest in supporting or benefitting from the Project's core purpose through research, placement or training opportunities." Nice thoughts, but there is no elaboration in following pages. **Please explain with examples.**

Construction is "anticipated to begin in January, 2011". **Is that before or after you read this letter?**

According to Tim, the loss of access to 17 hectares of public parkland is inconsequential since few people commented that it was a concern. Firstly, I doubt that most participants actually contemplated their explicit exclusion and, secondly, it is supremely ignorant of an EIA to assume that human absence from a special piece of waterfront land is somehow problematic!

Study Team

It is noted that **neither a landscape architect nor a social scientist were included on the research team**. This is worrisome from a design standpoint and explains the poor treatment of social impact assessment.

1.1 Project Overview

Throughout the report pains are taken to establish that the project will have “no significant effects” on anything whatsoever. Yet, 3,800 people will use the site every year, not including staff and visitors. **Over 4,000 people coming and going will have a significant effect on something.**

It is unconscionable that the road to be built by provincial taxpayers and the hydro line to be built by Manitoba Hydro ratepayers will escape an environmental assessment. Go figure.

2.1 Tim Horton Children's Foundation

I note that, including the Kananaskis site, none of the other THCF camps are in provincial parks. What do the other jurisdictions understand that we do not? **Are just Manitoba's parks available for privatization?**

3.1 Provincial

There is no provincial parks legislative authority to involve since successive and sundry ministries and directors have steadfastly refused to obey Section 11 of The Provincial Parks Act.

3.2 Federal

A federal CEAA “trigger” includes the Law List. If a federal act could be invoked, that is a “trigger”. It is up to the feds to pull it, not Stantec. **The four federal acts in this section could most certainly be “triggers”**. Look it up.

4.1 Project Summary

I would like to know if the “beach” will have foreign sand delivered. If so, the EIA should be clear.

4.1.1 Project Site Location

*The project site is gratuitously described as “approximately 22 km west of the Park’s only Wilderness Zone”. This is really Stantec-speak and **an attempt to diminish the true wilderness values of the project site in the context of government bureaucratese.***

4.1.2 Site Selection

I have already commented on the incestuous relationships at work.

*Boating and swimming eh? **Got insurance?***

4.1.4 Collateral Developments

It is hilarious that the road and hydro line will be built on the same right-of-way. This is exactly what the province will not do on the east side of Lake Winnipeg. Hilarious, but irrelevant.

4.2.2 Wastewater Treatment Systems

4.2.3 Potable Water Systems

I know bugger-all about your systems, but this process does not allow me the time to learn about them.

5.1 Public Information and Outreach

I would really like a letter from Ron Joyce thanking me in the role I played in preventing the wastage of money at Mediation Lake. Maybe a coffee coupon?

*It is dishonest to paint the rate of disagreement with this project as insignificant without quoting numbers. The website is not readable, so this claim cannot be verified. Also, my letter of disagreement dated March 2, 2010 is not on the website and you made no mention of the negative press, including letters to the editor. Shame on you. **This is where you needed the social scientist.***

6.1.6 Surface Water

***Leave the large beaver flood alone!** Your experts should know that this identifies the beaver as a “Keystone” species in the area upon which many other species depend.*

6.2.1.1 Species at Risk

*I quote: “A pre-construction survey to save plant species was not possible due to timing considerations”. This is unprofessional. **Don’t just pretend to do an EIA, do it.***

6.4 Socioeconomic Environment

This is boilerplate. Is the fee charged by the pound?

6.4.5 Zoning

6.4.6 Land Ownership

These sections, amazingly, confirm that Winnipeg River waterfront has largely been consumed by cottages. So go ahead, confiscate even more.

7.3.6 Aquatic Flora and Fauna

Despite "blasting" there will be no "aquatic faunal effects". If you need a bridge at this project I have one for sale.

7.3.7.3 Nuisance

Relying on Porcupine Island to mitigate noise and light pollution is folly. The island is low-lying and does not include the growing footprint of Pinawa. There will be permanent nuisance.

7.3.8 Resource Use and Recreation

There are precious few cliff-jumping opportunities in Manitoba that are easily accessible. You have the temerity to remove access to the site near the Project? Read my lips: I will jump that cliff as soon as the camp opens. Sue me.

And then there is the ubiquitous conclusion "No significant adverse effects, yadda, yadda, yadda". Some corporate suit says that people can't jump the cliff any more, as people have done for decades, and that is not significant?

7.4.4 Terrestrial Flora and Fauna

"Camp operations are anticipated to accrue positive benefits to local terrestrial flora by increasing regeneration areas through the tree planting programs undertaken as part of the Camp curriculum." Let me get this straight. You are going to cut down a pile of trees for a road, a hydro line and a camp, but now you want brownie points for planting more? Chutzpah!

"Outdoor lights . . . may have both positive and negative effects on wildlife". No. They will have only negative effects. In case you hadn't noticed critters do not need electricity to thrive. They need to be left alone.

At what point did the scientists preparing this report default to creative writers?

7.4.5 Aquatic Flora and Fauna

Where is the "Environmental Protection Plan of Operations"? **Why is it not part of this submission? Send me a copy.**

7.4.6.2 Municipal / Park Services

"The Camp will contribute positive, value-added services to the Park and surrounding regions through tree planting and other enhancement activities". I have already commented on the tree planting. What are the other (multiple) enhancement activities? **Please explain, with examples.**

7.7.2 Operation Phase

I understand that many of the campers will be flown to Winnipeg. **Let's do a GHG calculation on that.**

8.0 Cumulative Effects

Of course there will be adverse cumulative effects! **We are losing significant waterfront to a private operator. This is a classic cumulative effect, and to call it "not significant" is foolish and arrogant. Tim has effectively expropriated 17 hectares of our finest park while the politicians and bureaucrats watch.**

And what about the cumulative effect of adding yet another camp for kids in the park where several already exist?

Wendell Barry said "A conservation effort that concentrates only on the extremes of industrial abuse tends to suggest that the only abuses are the extreme ones when, in fact, the Earth is probably suffering more from many small abuses than from a few large ones".

Tim's Camp is a small abuse that should be expunged before it happens.

Final Comment

Throughout this letter there are several questions and comments. **I fully expect the proponent to respond to each and every one.** If I can read through the tome produced by Stantec for a price, Tim can read this letter and respond. If I sense that the politicians or civil service are suppressing this letter I will take other action.

Yours truly,

C. Hugh Arklie

Webb, Bruce (CON)

From: Gaile Whelan Enns [gailewhelan@gmail.com] on behalf of Gaile Whelan Enns [gwhelan@web.ca]
Sent: January-18-11 7:27 PM
To: Webb, Bruce (CON)
Subject: Tim Horton's Camp - Whiteshell Park
Attachments: TimHo-Sylvia-EALBSubmission-V9.doc; ATT00001..txt

Honourable Bill Blaikie
Minister of Conservation
Room 330 Legislative Building
450 Broadway
Winnipeg, Manitoba R3C 0V8

Bruce Webb *BW*
Environmental Assessment & Licensing Branch
Manitoba Conservation
123 Main Street, Suite 160
Winnipeg, MB R3C 1A5

**Re: Tim Horton Children's Foundation Youth Leadership Camp in Whiteshell
Provincial Park at Sylvia Lake (FILE: 5493.00)**

INTRODUCTION

Manitoba Wildlands is writing to provide comments on the Environmental Impact Assessment (EA) prepared by Stantec for the Tim Horton Children's Foundation (THCF) regarding the proposed Youth Leadership Camp (YLC) slated for development near Sylvia Lake inside Whiteshell Provincial Park.

Please accept these as our comments for inclusion in the public registry file number 5493.00.

We cite all outside sources in footnotes. We refer directly to the EA sections or appendices and italicize any quotes from the EA.

MANAGEMENT PLAN REQUIRED UNDER THE PARKS ACT

No other THCF-YLC in Canada is located inside a Provincial Park. If approved this proposal will restrict or block public access to 17 hectares of public parkland. Whiteshell Provincial Park is classified natural park¹ and the camp site is located within a resource management land use category (LUC).²

Manitoba is bound by its commitments to continue to work towards adequate representation of enduring features in protected areas for each of its natural regions. As this commitment has not yet been met for this natural region, Manitoba has a responsibility not only to maintain, but also to increase the total area of lands and waters

¹ *Provincial Parks Act, Provincial Parks Designation Regulation (MR 37/97)*
<http://web2.gov.mb.ca/laws/regs/pdf/p020-037.97.pdf>

² *Whiteshell Provincial Park Overview, Government of Manitoba: Conservation*
http://www.gov.mb.ca/conservation/parks/pdf/public/whiteshell_overview.pdf

in the province formally protected from development activities. It should be noted that while some new protected lands have been designated in this natural region, the region is also losing options for replacement of representation that result, while a steady increase in new development decisions is being made.

Section 11 of Manitoba's *Provincial Parks Act*³, requires: "...a management plan for each provincial park that ... deals with resource protection, use, development and any other matter the minister considers appropriate." The Whiteshell Park Management Plan published in 1983, does not meet *Provincial Park Act* requirements. The plan predates the 1993 act and the twenty-eight year-old plan has never been updated in spite of a requirement that: "[a] general update of the Master Plan will be undertaken every ten years."⁴

Furthermore the 1983 plan "... recognizes that most of the intensively used areas in Whiteshell have been developed to maximum levels."⁵ So if park developments were nearing maximum capacity in 1983, why are we further developing this protected land?

Manitoba Conservation joint Open Houses with the Tim Horton's Foundation regarding this development emphasized the 1983 Park Plan for the Whiteshell Park. So Manitoba Conservation will need to be clear whether this proposal under the Environment Act is required to be compatible with the 1983 plan or/and the 1993 Parks Act.

Manitoba Wildlands submits that before this or any new developments are considered for Whiteshell Park, an updated management plan, as required under the *Provincial Parks Act* needs to be created.

CONSULTATION

"Public Consultation plays an important role in establishing and managing Manitoba's provincial parks and heritage rivers," states the Parks and Natural Areas website.⁶ The website, however, does not explain if or how the comments submitted are made public? Or how the comments are incorporated into the planning process? What are the current public consultation standards/methodology regarding park development and planning? There appears to be no public standard as to how the department goes about these steps required under the Act. We would advise Manitoba Conservation to provide a public

³ *Provincial Parks Act*, Manitoba Government
<http://web2.gov.mb.ca/laws/statutes/ccsm/p020e.php?ccsm=p20>

⁴ *Whiteshell Park Management Plan* (1983), Manitoba Government: Conservation
http://www.gov.mb.ca/conservation/parks/pdf/planning/whiteshell_master_plan.pdf

⁵ *Ibid.*

⁶ *Public Consultations*, Manitoba Government: Parks and Natural Areas.
<http://www.gov.mb.ca/conservation/parks/consult/public.html>

guide as to the steps required for decisions regarding a development inside all Manitoba Parks and Protected Areas immediately.

Manitoba Wildlands submits that the comments received regarding the THCF-YLC originally proposed location at Meditation Lake should be included in *Appendix A: Public Consultation Materials*. The Meditation Lake public comments are not available online. Is the information from the first meetings regarding Meditation Lake presently available in Public Registry at 123 Main St., Winnipeg?

Section 5.1 of the EA claims that: "*[o]f the 118 respondents, the majority of respondents agreed with the Project in principle (i.e., establishing a Youth Camp in Manitoba), with over half of those respondents supportive of the Sylvia Lake location. Less than half of the respondents disagreed with the Project. A minority of respondents indicated a neutral position on the Project, or did not state a position.*"

It is unclear how the proponent categorized comments in order to determine support for the project, but a cursory Manitoba Wildlands review does not comport with these findings. Granted many comments were supportive of the idea of a children's camp, however many of the same comments also suggested moving the camp to another location. (Some suggested moving outside of the Park altogether, some suggested moving to a more developed area of the Park, and others suggested a different lake or at minimum a different area of Sylvia Lake for water safety reasons.) This raises issues as to the credibility of the report. Manitoba Wildlands would like to know if the public comments in their entirety are available through the PR at 123 Main St., Winnipeg?

ABORIGINAL CONSULTATION

Section 5.3 of the EA states "*Manitoba Conservation advises that they contacted the following First Nations (FNs) with known interests in the North Whiteshell area with information about this proposal: Sagkeeng FN, Brokenhead FN, Lake St. Martin FN, Lake Manitoba FN, Whitedog FN, Fairford FN and Black River FN. Manitoba Conservation advises that no written responses were received from contacted FN's.*"

If no responses were received, were any attempts made to follow up with these FN communities? The crown has a legal duty to consult with FN, and such lazy and sloppy efforts calls into question the honour of the crown. A more thorough consultation should have been performed. We note that the EA does not state if there were other forms of response from these communities.

It is long overdue that proponents for developments – in Manitoba Parks in this case – realize they are not the Crown! An initial letter to potentially affected First Nations simply is not consultation. Was an assessment done by Manitoba Conservation with respect to the usual spectrum of consultation required? Did Manitoba Conservation notify the proponent and its consultants about the steps the department would take, and or

advise the proponent as to which steps to take with regard to the potential impacts on Aboriginal Peoples from this development? Manitoba Wildlands would suggest that all information with respect to these questions be placed in the public registry.

ARCHEOLOGY

Appendix G: Heritage Technical Report outlines the investigation undertaken in regards to archaeologically significant areas. A review of previously found heritage resources data revealed four previously recorded finds either within or adjacent to the proposed camp. Based on this it is likely that more heritage resources within the proposed area that have not yet been discovered. Section 6.0 of *Appendix G* concludes: "*[g]iven that the majority of the camp development is more than 100 m from either the shoreline or the riverbank, there is a Low potential for significant heritage resources to be impacted.*"

This is, however, conflicting because the scale of Figure 3-1 in *Appendix G* indicates that of the four finds: EaKx-64 is more than 100 m from the shoreline, both EaKx-63 and EaKx-7 are approximately 100m from the shoreline, with only EaKx-12 being less than 100 m of the shoreline. This seems to indicate that there may be finds more than 100m from shoreline, contrary to conclusions cited above. Manitoba Wildlands requests a better explanation of this seeming contradiction.

Where heritage sites have been located in the past indicates a high likelihood of as many as 40 sites based on archaeological predictive modelling standards.

ENVIRONMENTAL PROTECTION PLAN

In numerous locations the EA refers to an Environmental Protection Plan (EPP) to be submitted supplementary to the EA in periodic pieces at periodic points during construction and operation of the proposed development. This EPP is really 'the meat on the bones' of the submitted EA: "*...which will outline mitigation activities and beneficial management practices (BMPs) to be conducted during construction and operation phases of the Project life cycle in order to minimize Project-related environmental impacts. Environmental inspection and monitoring activities will be outlined within the EPP.*"

Why is the EPP not part of the EA submission? It appears the proponent is trying to submit an incomplete EA, which will be filled out a later date without an opportunity for public representations as required under the *Environment Act*.⁷ Will the EPP be placed in the public registry? Will there be opportunities for the public to comment on the EPP as it is filed section by section?

Manitoba Wildlands recommends that Manitoba Conservation make sure the EPP is public before licensing and that a comment period be put in place, as it should have been

⁷ *Environment Act*, Manitoba Government
<http://web2.gov.mb.ca/laws/statutes/ccsm/e125e.php?ccsm=e125>

part of the EA. In particular clarity is required as to future practice for reporting under the Act in relation to the operation of the camp under its potential licence.

DFO REVIEW - OPERATIONAL STATEMENT

Section 7.11 of the EA states: "*[a]s the required work activities are not covered by an applicable Operational Statement, a project-specific review by DFO will be sought prior to Project Construction. Any project-specific mitigation measures required by DFO will be detailed in Environment Construction Activities.*"

Adding, "*...no significant adverse aquatic effects due to instream trenching and riparian vegetation removal are anticipated during project construction.*"

There is a very wide contradiction in Section 7. If The Department of Fisheries and Ocean permit is required then where is the information and results of DFO review? Perhaps the proponent does not understand that these steps are best taken in advance of public review, and decisions under the *Environment Act*. As a good corporate citizen and inline with the company's CSR policies Tim Horton's knows better than to file a proposal with various stray elements missing. Otherwise it may be evident that the Foundation does not operate at the level that its parent corporation claims to operate.

Certainly it appears from the EA content that the company, the foundation, and perhaps their consultants do not understand that avoiding federal responsibilities when applying for an environmental licence causes a lot of questions to be asked.

Manitoba Wildlands suggests that ALL the elements of the EA be provided, including for public review, before any licensing decision. This would include: EPP, and federal assessment re water, adequate consultation information, and any other missing reports or notes.

SAND & GRAVEL

Manitoba Wildlands would like an indication if any sand or gravel from a different location will be used for construction of the beach and/or road into the camp? If any other sand or gravel is going to be used, we would like an indication of where this sand or gravel is coming from? In particular we would like to know if sand or gravel is coming from any other crown lands?

EXCAVATION & BLASTING

Section 4.4.4 of the EA states that excavation activities, and in particular rock blasting will be conducted.

"The shockwaves and vibrations generated by blasting can damage internal fish organs, fish eggs or larvae and result in fish kills. ... A blasting plan will be developed in

accordance with DFO requirements prior to construction and submitted to DFO for review and approval."

Manitoba Wildlands submits blasting plan should be part of the EA, and should not be solely submitted to DFO for approval.

What about the impacts of rock blasting will have on birds and other species?

We also submit that adequate notification to local residents of when and where blasting will take place, should be a condition of any license granted. It seems noise issues were ignored.

Section 4.6 of the EA claims, *"it is possible to almost fully restore the environment to its original state."* How is this to be achieved if substantial rock blasting takes place?

All of the impacts of blasting have not been adequately considered.

NUISANCE

The proponent claims that noise, light and traffic nuisance will not extend beyond the Construction project (Section 7.3.7.3 of the EA). Yet, 3,800 people will use the site every year, not including staff and visitors. Why make such a claim? There were public concerns regarding lights and noise voiced in the open house and in the media. Surely this requires more assessment. What are the expected impacts on the town of Pinawa? How will notification be handled?

DECOMMISSIONING

Section 4.6 of the EA states: *"[t]here are no plans to decommission the Project along a specified schedule. ...the camp facilities should have a lifespan of 50 years or more and the camp would remain active as long as it is economically viable."* What does economically viable mean for a charitable summer camp?

Decommissioning costs should be written in as term of the license, if granted. Or in the alternate will the proponent be required to contribute to a trust or reserve fund to cover the costs of decommissioning? If this is not done how can Manitobans be assured that the proponent will bear the cost of decommissioning this proposed site? It is good the proponent is considering decommissioning in its application, but a plan needs to be created. We would remind that this is a site inside a Manitoba Park. All uses should be part of the plan for this park with decommissioning plans, timelines for each site, etc. Again the proponent or its consultants appear to be providing EA content that causes more questions to be asked.



SOCIO-ECONOMIC IMPACTS

Much of the EA focuses on the social and economic benefits that the THCF-YLC will have on the local communities, but these economic considerations should not be given much weight when considering whether to license this proposal. This is an environmental assessment, not an economic assessment. The purpose and intent of Manitoba's *Environment Act* is to consider the environmental impact of proposed developments. These potential environmental impacts of the project then should be primarily considered when deciding whether to license this proposal, and what terms to attach to the license.

SOCIAL BENEFITS CLAIMED

The Tim Horton's Foundation Manitoba representative claimed in interviews and discussions, and in the media that Manitoba children will benefit from this camp. He also confirmed that Aboriginal children from Manitoba would benefit from the camp. Comments were made in the presence of Manitoba Wildlands staff that most campers would be leadership graduates from Tim Horton's camps around the US. During peak operation of the camp (end of June to beginning of September) primarily non-Manitoban children will benefit. Manitoba Wildlands believes the proponent needs to be clear about whether and when Manitoba children, including Aboriginal children will be able to use this camp?

WASTEWATER TREATMENT

Manitoba Wildlands submits that quarterly water quality reports of wastewater treatment should be a condition of the license, if granted. We also submit that these quarterly reports should be included in the public registry, and made publicly accessible.

It is worth noting that towns in Manitoba are required to submit quarterly water quality reports, so a camp that will host 3,800 people per year should comply with the same standards.

SPECIES

The species reports in the EA do not seem adequate.

Section 6.2.1.1. of the EA states that "[a] pre-construction survey for rare plant species was not possible due to timing considerations." Manitoba Wildlands does not accept this answer; the survey for rare plant species should have been done before the EA was filed.

Additionally, field investigations lasting only a couple of days can only provide so much information, as different species may appear at different time of the year. While the EA did refer to data from the Manitoba Conservation Data Centre, this could have been more thorough. Data exists on Whiteshell Park and there are extensive Manitoba Government species data set for the East Side of Lake Winnipeg. These and other data could have been accessed through the Conservation Data Centre, Government Departments, previous environmental studies in the area, and from local and indigenous knowledge.

The "wildlife surveys focused on birds, with a reconnaissance level of investigation for other wildlife species." (EA Appendix E: Section 3.1). Manitoba Wildlands does not accept this. If a wildlife study is not performed for all species types, how are we to know what the potential impacts are on the wildlife in the proposed development area? Once again this EA creates more questions than answers.

Even though no bald eagles were observed during the few days of wildlife study, it is well-known local knowledge that bald eagles frequent area where the camp is proposed. What mitigation activities, if any, will be undertaken to protect bald eagles.

Section 6.2.3 states "*[t]here were no observations of bald eagles or their nests, which was a concern raised by a minority of respondents to the Public Communications Program.*" By this logic a majority of respondents has to name a species for that species to be relevant for the effects of assessment.

As the EA notes Section 6.2.4 notes: "*[t]he beaver flood provides a breeding area for a diversity of amphibian species (e.g., toads, frogs, salamanders).*" Will this beaver flood be disturbed?

Section 6.24.1 of the EA claims: "*[t]he northern leopard frog is the only amphibian species found within the region that is listed as special concern by SARA (Schedule 1) and COSEWIC.*" Yet there is not further description in the EA of what mitigating efforts will be undertaken. What mitigation activities, if any, will be undertaken to protect northern leopard frogs?

Manitoba Wildlands submits that mitigation activities that protect species need to be made part of the license, if granted.

Manitoba Wildlands rejects the species information in the EA product for the proponent. This first analysis is likely to form the baseline upon which future analyses will be compared to. It is vital therefore that the species surveys be as complete as possible. The 'social license' and charitable goods for this project should be based on conservation biology, and ecological thinking - both of which are lacking in the EA as outlined above.

CONCLUSION

Manitoba Wildlands expected a more complete EA from the Time Horton's Foundation.