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**Subject: Project 6 - All-Season Road Manitoba Transportation and Infrastructure  
Comments on the Draft Environmental Assessment Report and Draft  
Potential Conditions**

Dear Tracy Lachine,

Thank you for sharing the Draft Environmental Assessment Report and Draft Potential Conditions for the Project 6 All-Season Road linking Manto Sipi Cree Nation, Bunibonibee Cree Nation, God's Lake First Nation and God's Lake Narrows Northern Affairs Community. As per the requirements of the environmental assessment process, Manitoba Transportation and Infrastructure (MTI) is submitting comments in the attached (Attachment 1) for your consideration.

MTI continues to advance project planning and consultation with Indigenous Nations. Supplemental filings such as environmental management and monitoring plans and other documents that are identified in the final Environmental Assessment Report will be provided to IAAC and potentially impacted Indigenous Nations and communities as they are developed.

We greatly appreciate the assistance you have provided MTI to date and look forward to ongoing collaboration and feedback from the Federal agencies on this Project. For any questions or additional information regarding this submission, please contact Jaime Smith at (204) 391-1682 or [Jaime.Smith@gov.mb.ca](mailto:Jaime.Smith@gov.mb.ca).

Sincerely,



Jaime Smith,  
Environmental Manager - Major Projects  
Manitoba Transportation and Infrastructure

CC: Blair McMahon, Director, Environmental Services, MTI  
Chelsea Fedrau, Project Lead, IAAC  
Tracy Lachine, Project Manager, IAAC

# 1. Comments on the Draft Environmental Assessment Report

MTI proposes that Section 2.3 Project Activities and Timing in the Draft Environmental Assessment Report be reworded to reflect the information provided in the response to information request IR1-04, and as follows:

Construction will occur in segments proceeding sequentially, beginning at Bunibonibee Cree Nation and extending south and eastwards, to optimize construction scheduling and resource use, with the advancement or completion of one segment initiating the construction of the next.

Clearing of the All-Season Road (ASR) alignment is now intended to start in the winter following regulatory approvals to accommodate rerouting of winter road traffic in accordance with the requests of God's Lake First Nation and Manto Sipi Cree Nation. Clearing will be completed during the winter months to facilitate clearing machinery access and minimize environmental effects (e.g., disturbance to breeding birds and other wildlife). Once a segment of the alignment is cleared to an initial width of 20m, winter road traffic would be re-routed to the new alignment, allowing the former winter road corridor to begin re-naturalizing. Better aligning the existing winter road with the P6 ASR will improve road safety and address requests from local communities.

When construction of the all-season road begins, the remaining width of the alignment (i.e. the right-of-way) will be cleared, and the all-season road will be constructed. Right-of-way clearing will be performed in segments, during the winter months to facilitate machinery access and minimize environmental impact. The right-of-way vegetation will be cleared to a width of 60 meters on the inside of curves to improve road user sightlines. To protect nesting birds and other wildlife, clearing and grubbing activities will not occur from April 1st to August 31st, and cleared brush material shall be disposed of or removed by April 30 following clearing activities.

Once right-of-way clearing is complete, roadbed construction will proceed with a coarse base topped with finer materials, also progressing outward from communities. This will provide solid ground for machinery to continue to travel on as construction continues over the rest of the year. The timeline for completing each segment will depend on its length and construction complexity, such as the inclusion of water crossings. However, most segments are expected to be completed within 1 to 2 years. Temporary work sites such as rock quarries and borrow areas will be cleared and developed in winter but will operate (i.e. processing and stockpiling of rock fill and granular materials) year-round during construction.

Quarries and borrow areas will be cleared of vegetation and prepared for use. Rock fill and granular materials will be excavated, crushed, sorted, and stockpiled. Temporary crossing structures may be required within the 60-metre cleared ROW; existing roads and cut lines would be used to access temporary crossings, where feasible.

Construction of the roadbed will include topsoil stripping, unsuitable soil removal, installation of geotechnical materials where appropriate, rock and granular material placement and compaction, and trimming and shaping. Concrete batch plants will be used for bridge abutments, piers, and decking at the watercourse crossings at Magill Creek and God's River.

Culvert installation will also occur during construction and will include installing silt fencing, turbidity curtains, or cofferdams to isolate the work area, excavating the stream bed, laying geotextile material; installing the culvert; placing and compacting granular fill and road topping; installation and maintenance of erosion control measures; and restoration of vegetation following construction.

Construction will occur progressively, followed by removal and reclamation of any temporary components, including revegetation with native vegetation.

## 2. Comments on the Draft Potential Conditions

Table 1. Manitoba Transportation and Infrastructure Comments on the Potential Draft Conditions Issued for the Project 6 All-Season Road

Condition No.	Condition Text	MTI Comment for Submission
2.20	<p>The Proponent shall maintain all records relevant to the implementation of the conditions set out in this document. The Proponent shall retain the records and make them available to the Agency during construction and operation, and for 25 years following the end of operation. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.</p>	<p>There are no plans to decommission the Project. Once constructed, it would be maintained and operated perpetually. This would result in perpetual record keeping which may not be feasible or necessary over the long term.</p> <p>MTI recommends rewording this condition as follows:</p> <p><i>The Proponent shall maintain all records relevant to the implementation of the conditions set out in this document. The Proponent shall retain the records and make them available to the Agency during construction and for <u>25 years following the completion of all-season road construction</u>. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.</i></p>
3.8	<p>The Proponent shall develop, in consultation with Indigenous groups and relevant authorities, and implement, during construction and for at least the first five years of operation, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures with respect to effects to fish and fish habitat. In doing so, the Proponent shall:</p>	<p>As identified in draft Potential Condition 2.4, Manitoba Transportation and Infrastructure will develop and define follow-up programs to focus on key parameters of concern. These follow-up programs will be developed with input from Indigenous Nations and regulators, as applicable.</p> <p>An erratum is required:</p> <p>Manitoba Transportation and Infrastructure wishes to clarify that the paragraph in MTI’s response to IR1-63 on page 7 pertaining to fish passage, offset and bank stabilization monitoring should instead be worded as: “Construction compliance inspections and monitoring will be undertaken to verify that culvert installations and bridge crossings (God’s River and Magill Creek) are</p>

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		<p>implemented according to design, that works are conducted in compliance with Environmental Protection Specifications 130.15 Working Within or Near Water and 130.16 Erosion and Sediment Control, and that practices and procedures meet licence/authorization/permit or legislated requirements. Post construction monitoring of crossings will focus on verifying that structures will not impede fish movement. Post-construction assessments will include velocity measurements at culvert inlets and outlets during spring high-flow conditions to ensure compliance with fish passage criteria. Other protocols will include assessing ground cover, erosion and riparian buffers. Annual spring hydrological assessments and visual inspections at stream crossings will occur during construction and three years following construction. If monitoring results indicate that mitigation measures are ineffective, adaptive management strategies will be implemented to improve mitigation measures.</p> <p>The Department of Fisheries and Oceans will determine the need for any authorizations and fish habitat offsetting through their assessment of the Project under the Fisheries Act. If offsetting is required, MTI will develop an offset plan that includes offset monitoring. This monitoring will confirm compliance with the offset plan and effectiveness of the offsetting (i.e. success of mitigation efforts), which may include tracking vegetation growth, confirming fish use and stability of restored areas through annual surveys. Monitoring will consist of three rounds of monitoring over a 5-year period or as required by Department of Fisheries and Oceans. This approach is consistent with other offset monitoring plans prepared for similar all-season road projects.”</p>

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3.8.4.1	<p>verifying the presence of lake sturgeon and other fish species in all waterbodies that may be affected by the Designated Project including those in Table 6.14 of the Environmental Impact Statement; and</p>	<p>MTI has done extensive baseline surveys for the P6 Project. The aquatic environment in the project area is described in the <i>Aquatic Environment Report: Existing Environment</i> (Appendix C-2 of the EIS). Aquatic environment field data were collected in June 2016 where the ASR alignment intersected watercourses. Data were collected through geographic information systems (GIS), orthophoto analysis, and during field surveys. The data were used to provide a physical description of fish habitat and assess potential fish use.</p> <p>Fish sampling was conducted at each site to determine species presence and potential habitat use. Results from the fish sampling were intended to supplement existing fisheries information and fish presence inferred from the type of habitat present. Data collected during the single sampling event adequately characterizes the existing environment, as no major events or activities which could influence the presence of fish or fish habitat are known to have occurred since the 2016 surveys and the proposed crossing locations have not changed.</p> <p>The P6 alignment crosses a total of 53 watercourses crossings. Of the 53 crossings, 25 were assessed as supporting fish and 28 were assessed as not supporting fish. MTI contends that verification of fish absence in the 28 watercourses assessed as not supporting fish is unnecessary.</p> <p>Of the 25 crossings assessed as supporting fish habitat, 11 were assessed as suitable for large-bodied fish and 14 as unsuitable for large-bodied fish. Among those watercourses supporting large-bodied fish, only God's River is suitable habitat for lake sturgeon. Field sampling confirmed fish presence in 19 of the 25 watercourses assessed as supporting fish. Verification of fish presence in</p>

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		<p>the remaining six watercourses expected (or reported) to have fish will be done to confirm MTI's assessment of the aquatic environment.</p> <p>Potential fish use of each crossing site was assessed based on field data, drainage analysis, and existing watercourse information. Watercourse crossing sites assessed as not supporting fish are headwater wetland areas with no channels or connection to fish-bearing watercourses.</p> <p>Lake Sturgeon inhabit larger lakes and rivers, with God's River being the only sizeable river that would be crossed by the Project. They are typically benthic and commonly found over sand and fine substrates. They spawn in fast moving water, such as rapids or at the base of falls. Critical habitat for the species has not been identified by COSEWIC.</p> <p>As presented in the EIS, MTI has identified options for the crossing of God's River and will make a final design determination with consideration of measures to minimize impacts to the watercourse, fish and fish habitat, and species at risk or species of concern such as Lake Sturgeon. Impacts to fish and fish habitat will be offset through Fisheries Act authorization processes.</p>
3.8.4.2	in waterbodies where presence of fish is confirmed, monitoring changes to fish spawning, fish abundance, and fish movement.	Effects to fish and fish habitat will be addressed through the Fisheries Act Authorization process and any required offsets under that process. Information on fish spawning, fish abundance, and fish movement was not collected during baseline studies of the aquatic environment and are not necessary to monitor post-construction due to the relatively small area of impact at each watercourse crossing and the low risk of residual impacts to fish and fish habitat after mitigations.

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		<p>Given that the project area is largely untouched wilderness, the small footprint of the crossing sites on each impacted watercourse, and the absence of limiting spawning habitat in general, changes to fish spawning, fish abundance or other population level effects are highly unlikely. Baseline information adequately characterizes the existing environment as no major developments which could influence the presence of fish or fish habitat are known to have occurred and the proposed crossing locations have not changed. Impacts to fish movements will be mitigated through crossing designs that allow for fish passage. The crossing of God's River will be a bridge and will not impede fish movement.</p> <p>An assessment of effects to the aquatic environment was conducted by North/South Consultants Inc. The Aquatic Environment Report: Effects Assessment (Appendix C-1 of the EIS) outlines the potential effects, proposed mitigation measures, residual impacts assessment, and monitoring plans. Following the application of proven mitigation measures, residual impacts to fish habitat will be limited to instream and riparian habitat losses at the crossing sites and possibly some sedimentation of instream substrates. Monitoring before, during, and after construction (which will include construction compliance monitoring as well as environmental effects and mitigation verification monitoring) will verify effectiveness of mitigations measures. Water quality monitoring will measure increases in total suspended solids during instream construction activities.</p> <p>No adverse residual impacts to lake sturgeon are expected with the application of mitigation measures. The Department of Fisheries and Oceans will</p>

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		<p>determine the need for any authorizations and fish habitat offsetting through their assessment of the Project under the Fisheries Act.</p> <p>The God's River crossing site provides moderate velocity run habitat with sand and rocky substrates. The immediate crossing area provides foraging habitat for adults. Potential spawning habitat is found at a set of large rapids 4 km downstream of the crossing. No other Project 6 crossing locations provide suitable Lake Sturgeon habitat requirements.</p>
5.1	<p>The Proponent shall perform blasting activities only on weekdays between 9:00 a.m. and 4:00 p.m. and avoid blasting on statutory holidays and days of cultural importance as identified in consultation with Indigenous groups.</p>	<p>Although the Project 6 Environmental Impact Statement identified that MTI would adhere to blasting restrictions as identified in provincial regulations (<i>Manitoba Quarry Minerals Regulation 1992 44(1)</i>), there may be instances in which MTI would need to seek an exemption or extension.</p> <p>Potential Condition 5.1 should instead be worded as follows:</p> <p><i>Unless otherwise approved through an exemption or extension issued under The Mines and Minerals Act, or Manitoba Quarry Minerals Regulation, 1992, the Proponent shall perform blasting activities only on weekdays between 9:00 a.m. and 4:00 p.m. and avoid blasting on statutory holidays and days of cultural importance as identified in consultation with Indigenous groups.</i></p>
6.5	<p>The Proponent shall, during operation, establish no stopping zones for vehicles, along the Designated Project and adjacent to all watercourses, to limit access to fish-bearing watercourses.</p>	<p>Manitoba Transportation and Infrastructure recognizes that this measure may be meant to prevent increased pressure on local fisheries by people residing outside of the Regional Assessment Area. However, Manitoba Transportation and Infrastructure would like to raise that there are no foreseeable plans for an all-season road connection between the proposed project and the existing provincial highway network at this time. Even after construction, the region will still only be accessible to non-local people by air or winter road. As a result,</p>

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		Potential Condition 6.5 may have the undesirable effect of limiting the potential Aboriginal and Treaty Rights practices of local land and resources users.
6.9	The Proponent shall develop, prior to construction in consultation with Indigenous groups and relevant authorities, and implement during construction, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures as it pertains to the quality and quantity of resources used by Indigenous Peoples. In doing so, the Proponent shall	Manitoba Transportation and Infrastructure wishes to clarify that, as per Draft Potential Condition 2.4, details regarding follow-up programs will be included in Environmental Monitoring Plans developed for the Project. Monitoring will be focused on Project-related effects. Monitoring of potential impacts on the quality and quantity of resources will focus on wildlife and vegetation affected by the Project and will not include effects to fish and fish habitat which will be addressed through the Fisheries Act Authorization process and any required offsets under that process.
8.1	The Proponent shall retain, prior to construction, the services of a third-party independent environmental monitor, who is a Qualified Individual as it pertains to environmental monitoring in Manitoba, to independently observe and record on the implementation of the conditions set out in this document during construction and to report findings to the Proponent and the Agency.	Manitoba Transportation and Infrastructure notes that while the term “Qualified Individual” is defined in the draft Potential Conditions, it is unclear whether a local community member(s) with local and traditional knowledge could act as the third-party independent environmental monitor, or whether the Agency intends or expects this role to be held by a technical service provider. Further clarification is requested regarding the roles, responsibilities and relationship of the third-party independent monitor to the project.