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Concerns with the Lake Manitoba and Lake St. Martin Outlet Channels Project EIS

Tataskweyak Cree Nation (TCN) is located on the north shore of Split Lake in northern Manitoba. TCN believes that the Lake St. Martin Diversion Channels Project (the Project) will cause further deterioration of the water quality in Split Lake. Our community is already paying the price for previous ill-conceived work and objects to the Project proceeding before our concerns are fully addressed.

Because the Project is upstream of Split Lake, another level of water contamination is likely to be added to the already poor water quality in Split Lake. A large proportion of the water in Split Lake originates from the north basin of Lake Winnipeg via the Nelson River. It is well established that water quality of Lake Winnipeg has been getting worse as hydroelectric development, coupled with agricultural and municipal pollution in the south, has degraded the water quality of the Lake.

> *"More than anything else, the Elders speak of the water as the lifeblood of their existence. Water, before the hydroelectric project, was always clean. People could get water from the lake and know it was safe. Their nets would not be filled with algae and debris. They could land anywhere along the banks of the lakes and rivers; the shorelines had not yet been destroyed and desecrated. They could navigate the lakes and rivers in safety and know what to expect. In the wintertime they would know where to travel, where the ice was safe. These things are no longer possible."* (Split Lake Cree, 1996)

Upstream developments have already changed water quality and continue to impact water quality in Split Lake.

> *"But Lake Winnipeg is also in trouble. Harmful algae blooms have been increasing in size and frequency on Lake Winnipeg – contaminating beaches, reducing water quality, and damaging Manitoba's important fishing and tourism industries."* Lake Winnipeg Foundation (2019).

Lake Winnipeg Regulation, which transformed the Lake into a hydroelectric reservoir, has changed the natural annual cycle of water levels and outflows to the Nelson River. Before regulation, the highest water levels on the Lake occurred in the spring. Now, after regulation, high water levels occur in the fall, as water is stored for winter hydroelectric generation. Interfering with this natural cycle has had consequences from deteriorating water quality and health concerns to negative impacts on our way of life.

Lake Winnipeg Regulation, combined with intensive agricultural practices and inadequate municipal sewage treatment facilities upstream of the Lake, is destroying the Lake's water quality. The water from Lake Winnipeg flows down the Nelson River and into Split Lake. Toxic algae blooms are now common in Split Lake as well as high levels of turbidity, nutrients, and bacteria. Children can no longer swim in our

community and resource users must travel with bottled water as the water in Split Lake is unfit for drinking. Our town drinking water comes from Split Lake, via a water treatment plant, but residents continue to get sick from bathing in and consuming the treated water. The Project will be a new source of contamination to the water quality in Split Lake.

Review of the Project's EIS highlights several major concerns with the adequacy of the EIS that are summarized below:

- **Lack of meaningful consultation with TCN and other First Nations.**
  TCN was not consulted on the Project before the release of the first version of the EIS. Unsurprisingly, this lack of meaningful consultation limited the scope of the EIS to the proponent's view of how the project will affect the environment. This view has effectively negated a comprehensive and fair analysis of the far-reaching and cumulative effects of the Project. In the EIS's analysis, the effects of reasonably foreseeable projects like Lake Winnipeg Regulation, Portage Diversion, and other ongoing developments like the upgrades to the Winnipeg Wastewater Treatment plants are not taken into account.

- **The analysis of "alternatives means to carry out the Project" is inadequate.**
  The analysis, besides not providing a fair comparison of the benefits and costs of the alternative projects, does not consider the environmental and economic damage that may result from this project compared to other alternative projects. The destruction of a fishery on Lake St. Martin and the possible further contamination of the already poor water quality in Lake Winnipeg and Split Lake were not fully considered in the analysis.

- **The Project is being built so that it can operate year-round, independent of flood conditions.**
  The proposed Lake Manitoba Outlet Channel (LMOC) will have a bottom elevation of approximately 242 m above sea level (m asl) at its inlet from Lake Manitoba. This is roughly the bottom of the lake, meaning that the channels could be operated year-round depending on the design of the inlet structure, and could lower the Lake to an almost dry state. The ramifications of this possibility are not discussed in the EIS., nor is the intake design provided in the project description.

- **There is a lack of physical models to predict the effects of the Project on the environment.**
  Although information on water levels and flows for the pre-project conditions are available, as well as meteorological information and groundwater information, this information has not been used to create models that could be used to predict the changes to the environment caused by the Project. This lack of modelling led to unconvincing predictions of effects on the discharges from the channels on the currents, morphology, sediments, and water quality of the receiving environments in Lake St. Martin and Lake Winnipeg. Employing annual water balance models for Lake Manitoba, Lake St. Martin, Lake Winnipeg, and Split Lake for pre-Project and future conditions with and without the Project are required to understand fully the possible effect of the Project.

- **Trend Analysis is missing from the baseline assessments of water quality and from the cumulative effects analysis of the Project.**
  Baseline data on water quality conditions in Lake Manitoba, Lake St. Martin, and Lake Winnipeg are presented for common water quality parameters in the EIS. However, the trends over time for these parameters are not analysed. By directing flood waters into Lake Manitoba, the

Portage Diversion is changing the water quality of the Lake. Lake Winnipeg Regulation has changed the water quality in Lake Winnipeg. The Project will convey Lake Manitoba waters into Lake Winnipeg, yet the implications of the current trends and possible future trends are not explored in the EIS.

- **The Cumulative Effects Analysis ignores long term effects of multiple floods on water quality in Lake Winnipeg and Split Lake.**
  The effect of multiple flood events are not examined. It is reasonable to expect that one 100-year flood, and a host of other floods of varying return periods, will be diverted into Lake Winnipeg by the Project over the next 100-years. This foreseeable occurrence of floods and their effect on the environment is not considered in the EIS.

- **The EIS does not account for the effects of climate change on the Project or Project effects coupled with climate change on the environment.**
  Manitoba Hydro (2017) predicts that the Assiniboine River watershed and Lake Winnipeg will experience a rise in minimum annual temperatures of 3° C by 2050. They also predict 7% increase in precipitation and over 8% increase in evaporation for these areas. Annual runoff for the Assiniboine River will decline but increase for Lake Winnipeg. Why have climate change projections for the RAA not been included in the EIS? And what are the effects of climate change predictions coupled with the changes resulting from the Project on the environment? The lack of analysis in the EIS for a very real problem facing Manitobans is really concerning.

The concerns TCN has with the EIS need to be reconciled before the Project moves ahead. We are thankful for the opportunity to express our views to Canada but remain disappointed in Manitoba's lack of meaningful consultation with TCN. We encourage you to send the proponent back to the drawing board and start the process of meaningfully consulting with First Nations and others affected by the Project. Revising the EIS to incorporate our concerns would also be a good start.

Attached please find more detailed comments on these major concerns in the accompanying Excel document.

References

Split Lake Cree First Nation. 1996. Analysis of Change, Volume 1. Split Lake, Manitoba.

Lake Winnipeg Foundation. 2019. Water Quality Challenges in Lake Winnipeg. Winnipeg, Manitoba

Manitoba Hydro. 2020. Manitoba Hydro's Climate Change Report. Winnipeg, Manitoba