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SENT BY EMAIL

Sean Carriere, Regional Director Prairie and Northern Region,
Impact Assessment Agency of Canada
Canada Place, Suite 1145, 9700 Jasper Avenue Edmonton, Alberta T5J 4C3
Email: sean.carriere@iaac-aeic.gc.ca

Re: Comments on the Lake Manitoba and Lake St. Martin Outlet Channels Project

Dear Mr. Carriere,

The draft Environmental Assessment Report on the Lake Manitoba and Lake St. Martin Outlet Channels Project, April 2024 (EA Outlets Report), concludes,

“the Agency is of the view that the Project is likely to cause significant adverse environmental effects to Indigenous peoples’ physical and cultural heritage and to structures, sites, and things of historical, archaeological, paleontological, or architectural significance.”

and,

“...taking into account the implementation of key mitigation measures, monitoring, and follow-up programs, the Project is likely to cause significant adverse environmental effects as defined under CEAA 2012”

While the final decision is up to the Minister, the Agency surprisingly did not recommend rejection for this project despite significant adverse effects. Instead, the report recommends mitigation measures, which are not mitigation measures but adaptation measures to significant adverse effects. Despite this being the United Nations decade of Ecological Restoration more natural alternative options for flood mitigation, such as wetland restoration, were not researched. This narrow engineering view of alternatives is problematic and will create future problems as water fluctuates and shifts unnaturally. Different location options for outlet channels are not true “alternatives” and show a lack of serious inquiry and exploration of different options. The lack of wetland restoration alternatives is not reflected in the draft EA Report or mitigation measures, which were provided by the TAG numerous times. This lack of consideration of wetland restoration indicates the lack of incorporating Indigenous knowledge in this EA report. The proponent seeks to mitigate “irreversible” loss, which is impossible. Your report incorrectly uses the word mitigation when adaptation is what is meant. This inaccuracy in the use of words distorts the meaning, and allows ridiculous claims that the many negative impacts can be mitigated.

Agriculture areas in southern Manitoba suffer from increasing droughts due to climate change. Many water tables are so low that drinking water for communities is increasingly at risk. In some cases, communities must truck in water for the first time in their history, such as in Morden, Manitoba. Holistic water management based on Indigenous wisdom and ecosystem restoration principles could solve a range of water issues currently plaguing the Province. This would be prevention, which is another word for mitigation, by providing wetland restoration before Portage la Prairie to prevent flood waters, rather than rerouting them.

As an educator, I felt it necessary to bring awareness to the public about the issues with this Outlet and the process. This is conveyed in two films from the TAG workshop. The first film is called "Our Way of Life is Not for Sale: We Oppose the Outlet Channels at Lake Manitoba and Lake St. Martin". This film shows two dozen First Nation representatives taking control of the TAG workshops, by sending government and staff away, due to feeling unheard by being treated like puppets in a process they could not control. People at this TAG workshop described being traumatized by the process and product. First Nation participants shared their impacts without this being reflected in the summaries shared back. A general unwillingness was noted to consider alternatives based on Indigenous knowledge, asking for wetland restoration upstream of Portage Diversion was considered derogatory. At the same workshop, a participant describes her impacts of flooding including miscarriages, racism, environmental injustice and H. Pylori, due to colonial policy, which is captured in the film, called: "Living with Yearly Overland Flooding at Peguis First Nation". Two webinars, this month, were put together to educate, one by myself and another by Dr. Myrle Ballard. Finally, a petition was started. Please consult these references, with links provided, they are intended to educate and input into the EA feedback with insights.

The Minister is requested to listen to First Nations and ask the Province to halt this project and design a holistic water management plan with Indigenous knowledge. A holistic water management plan would benefit all Manitobans, without compromising natural water cycles. Preventing irreversible devastation requires working with natural water cycles, environment and culture. Ecosystem integrity has to be maintained if we are to survive climate change and biodiversity loss. The "precautionary principle" and the Government of Canada's duty to consult with Indigenous Peoples requires the Agency and Minister to reject this flawed and unnatural project outright. A joint provincial-Indigenous wetland restoration project rather than an outlet channel will address this problem of flooding and drought in southern Manitoba, rather than sending the water north, with irreversible negative impacts.

Truly,

<Original signed by>

Shirley Thompson, Ph.D., M.Eng, B.Sc., B.Ed. (she/her)
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I acknowledge that I live and work on the Native homeland of the Anishinaabeg, Inineew, Anishinew, Dakota, Inuit, Dene and Metis people. I acknowledge the damage of the past, and present, committing to working in meaningful partnership with Native people. I seek to foster an environment of success and possibility for Native students.

CC:

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