



# Fisher River

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## CREE NATION

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Tanishka Gupta

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Impact Assessment Agency of Canada / Government of Canada

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Dear Ms Tansihka Gupta:

We are pleased to provide comments on the Lake Manitoba and Lake St. Martin Outlet Channels Project Environmental Assessment Report prepared by Impact Assessment Agency Canada (the Agency). Relevant excerpts from the report have been copied and pasted and our comments noted below each excerpt for ease of reference. We previously reviewed the Agency's proposed conditions for federal environmental authorization and provided our comments by separate submission. Our comments related to our review of the Environmental Assessment Report, however, may also contain potential conditions that the Agency may wish to consider.

After considering all potential impacts of the proposed Project on environmental valued components and FRCN's treaty and aboriginal rights and socio-economic interests, we agree with the Agency's conclusions that the Project is likely to cause direct and cumulative significant adverse environmental effects on Indigenous peoples' current use of lands and resources for traditional purposes; Indigenous peoples' physical and cultural heritage; and Indigenous peoples' sites or things of historical, archaeological, paleontological, or architectural significance.

We do not entirely agree, however, with the Agency's conclusions that, "after taking into account the implementation of the key mitigation measures identified in this draft EA Report in relation to section 5 of CEAA 2012, the Project is not likely to cause significant adverse environmental effects on fish habitat, migratory birds, federal lands, and Indigenous peoples' health and socio-economic conditions." The Project will certainly have permanent adverse effects on FRCN's economic interests, as much of the area that will be taken up by the Project is licensed to FRCN

for their resource tourism business, which includes outfitting for big game, waterfowl and upland game bird hunts, as well as angling and ecotourism.

It is our conclusion that the Project should not proceed as the risks and adverse impacts far outweigh any potential benefits to residents in the Lake St. Martin and RM of Grahamdale areas and Indigenous people who exercise their treaty and aboriginal rights in the subject regions.

We note that after the Project redesign to accommodate the Lake St. Martin Narrows flow restrictions, the communities in the Lake St. Martin area will still be subject to flooding but to a lesser degree. It is difficult to convince a homeowner that the Project will improve their lives and safety when they are told that they will now only have two feet of flood waters affecting their homes and they won't have to evacuate for as long a period as in pre-Project flood events.

We recommend that the Proponent revisit alternative options with a view to developing a plan that includes components of other flood mitigation options and policies that are economically feasible, and that, when combined, could provide the same or greater level of flood protection with minimal environmental effects, and potentially substantial socio-economic benefits. Examples to consider include the following:

- acquisition of flood prone private lands and restrictive designations on Crown lands;
- creation and enhancement of wetlands and reservoirs,
- better management of forest and agricultural lands to control snow melt and drainage;
- ban or moratorium on peat mining,
- drought mitigation options for the south and southwest part of the province,
- water control works and/or water retention reservoirs on Lake Winnipegosis, Waterhen River, Dauphin Lake, Mossy River, Shellmouth River, Assiniboine River and others.
- Investigate contribution of municipal and provincial drains to flood situations and implement effective management and maintenance systems (currently drains are being cleared of bullrushes and vegetation that filter the water and slows the flow);
- better management of inter-provincial water transfers
- value of ecological goods and services generated by new and enhanced wetlands, effective riparian management, carbon sequestration, improved water quality, etc.

We have provided comments on additional specific areas of concern in our Assessment Report Comments submission, which is attached.

Yours sincerely

**CHIEF AND COUNCIL**

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Chief David Crate, C.M.

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Councillor *Delaney* Mason

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Councillor *Hillary* Murdock



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Councillor Darrell Thaddeus

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Councillor *Barry* Wilson

cc. Harley Jonasson