

**Remarks to RM of St Clements on proposed new gravel pit south of Stead Road.  
Debwendon Inc.**

**December 14, 2021**

Good afternoon. My name is Peggy Bainard Acheson and I am the Treasurer of Debwendon Inc. a registered charity that has a mission statement to protect the Brokenhead Wetland Ecological Reserve and manage the Brokenhead Wetland Interpretive Trail. We are fundamentally opposed to this project because it has the potential to contribute to the further deterioration of the Gull Lake area and the Brokenhead Wetlands in general. I have a few brief points to make:

- Gravel extraction is a non-renewable resource activity. Once its gone, its gone.
- This area, so close to a large center like Winnipeg, has so much potential, but only if we take the care and effort to protect its natural gifts.
- Instead, some people seem to be actively engaged in stripping it of these gifts as fast as they possibly can for profit. Gravel extraction has been going on for over 60 years and the Gull Lake area has contributed as much as it can bear up to this point. The idea of starting up another gravel pit, no matter what mitigations are instituted, is abhorrent and against the practical notion of sustainable development to which the RM and Provincial government purport to adhere.
- Only 3% (or 1240 ha) of the Brokenhead Wetlands is actually protected within the Brokenhead Wetlands Ecological Reserve under the Protected Areas Initiative of the MB government. The rest of these important wetlands take up about 40,000 ha and are unprotected.
- ER's are established under The Ecological Reserve Act and have the highest protection of any provincially designated sites within MB's protected areas network. Note that under Project Context the report states that a trail was installed in 2016, which extends through the forest into the wetland area implying that it is within the ER. It is not. The trail lies alongside but not within the ER. No development is allowed within an ER. Only First Nations such as BON are allowed to continue their traditional rights of hunting, fishing, and harvesting of traditional foods and medicines for personal use.
- The thing we are most concerned about is that the Wetlands recharge area is located outside the Ecological Reserve and the proposed gravel project is not only located within that recharge area, but is within one km of South

Block of ER and within 2 km of the Trail.

- In 1999 the Manitoba government denied the approval of an Environment Act License for a well to supply Gull Lake, which was located across the road from the proposed site. It was shown that this well would have affected the aquifer supplying the wetlands. This denial set a precedent for not allowing disturbance of the source water due to potential impacts on the wetlands and marl springs.
- Any significant impacts to this aquifer would be disastrous to not only the wetlands but the unequalled diversity of plants and animals found there. As this water moves downslope towards Lake Winnipeg it is subsequently discharged to the Wetlands in the form of upwellings that result in marl ponds. The calcium in this water comes out of solution in these ponds producing a sediment known as marl, which results in a slightly higher pH. This important characteristic results in a rare calcareous fen with a rare white cedar swamp and the widest variety of orchids and carnivorous plants of any known location in the province.
- The Brokenhead Wetlands are also important for protecting and buffering Lake Winnipeg – cleaning the water, and acting as a carbon sink, etc.
- The MB Government invested \$1M in resources to build the Interpretive Trail. The RM itself has called the Trail and ER a gem that they are proud to recognize within the boundaries of RM of St. Clements. It brings visitors from all parts of Manitoba, Canada and elsewhere making it an important tourist destination. We do not want to jeopardize the health of the wetlands and their important ecosystems with another gravel pit that could potentially destroy the wetlands and forests where the trail is located.
- The Consultants' report states that the Groundwater Atlas report (Manitoba, 2017) says that gravel operations do not appear to have affected the wetland; however, it neglected to mention that the Atlas report qualified their statement by stating that the wetlands have not been monitored for changes. So, we really have no idea of the cumulative impacts of historic gravel extraction.
- Gull Lake has suffered gravel extraction since the 1950s and the number of abandoned and working pits around the lake are close to a dozen. Abandoned pits have never been rehabilitated and are an eyesore for residents and tourists. The existing active pits represent a public nuisance

and risk in the form of noise, dust and traffic from large gravel trucks that don't seem to think they should abide by existing speed limits on local roads or highways.

- Enough is enough and whether a cumulative impact assessment can adequately discover a level of significant impacts or not, it is unthinkable and unconscionable for any new pits to be developed.
- Mining away the gravel over a long period of time eats away at the very gravel where the aquifer resides. In fact, the gravel is the aquifer, and the aquifer is the gravel. The water saturates the gravel and creates the aquifer. Continued extraction will ultimately dry up the all-important source water leading to the deterioration of the wetlands.
- Removing gravel close to the water table (which we see being done in the existing active pits) can cause massive evaporation and potential drying out of the wetlands. In combination with the drought we are experiencing due to climate change, this presents a double whammy to the wetlands. This has led to the spreading of Invasive Species and the loss of some endemic species.
- The RM of St Clements has a duty to be a role model for environmentally sustainable management of its resources. The decision that is made will be evidence of where your priorities lie. Are you willing to listen to the people who will be most affected? Or, will you succumb to the temptation of saving a few dollars?
- Finally, Gull Lake exists because of a very unique circumstance that occurred during the last ice age. Two glaciers, the Keewatin and the Laurentide, met in the area of the Belair Ridge. As they started to recede around 12,000 years ago, a large block of ice broke away from the ice front and was left abandoned in the gravel moraine, and Gull Lake was born. Over the millennia the beautiful forests, wetlands and grasslands were created that we enjoy today. We are so lucky to be the benefactors of this unusual legacy. Why would we want to ruin it?
- **What we are asking for:**
  - Cancellation of this project at least within 10 km of Gull Lake or the Ecological Reserve.
  - Consultation with the Province on this project and what other options might be.
  - Regional Cumulative impact assessment with monitoring that includes the impacts of gravel extraction on Gull Lake and the Brokenhead Wetlands.

Note:

Selkirk and District Planning Area Development Plan states 1) that proposed developments within 1 mile (1.6km) of a WMA, ER, or PP, etc. will be referred to MB Conservation and Climate for review and comment and 2) that proposed developments located near waterways and water bodies that have the potential to alter, disrupt or destroy aquatic habitat will be referred to MB C&C for review.