

August 30, 2010

Little Limestone Lake Provincial Park Proposal  
Manitoba Parks and Natural Areas  
Box 53, 200 Saulteaux Crescent  
Winnipeg, Manitoba R3J 3W3  
[parksystem@gov.mb.ca](mailto:parksystem@gov.mb.ca)

Honourable Bill Blaikie  
Minister of Conservation  
Room 330 Legislative Building  
450 Broadway  
Winnipeg, Manitoba R3C 0V8  
fax: 204.945.3586

Dear Minister Blaikie;

**Re: Little Limestone Lake Provincial Park Proposal**

Manitoba Wildlands is writing to provide comments on the designation of Little Limestone Lake Park Reserve as a Provincial Park, and about the preparation of a management plan for the park.

“Public Consultation plays an important role in establishing and managing Manitoba's provincial parks and heritage rivers,” states the Parks and Natural Areas website.<sup>1</sup> The website, however, does not explain if or how the comments submitted are made public? Or how the comments are incorporated into the planning process? What are the current public consultation standards/methodology regarding park planning? While the Act requires public reviews, and ‘consultations’ regarding any designation under the Act, there appears to be no public standard as to how the department goes about these steps required under the Act.

**Conservation Plan**

With the co-operation of the Moose Lake Resource Management Board, Mosakahiken Cree Nation, local citizens, industry, interest groups and the public the Manitoba government & Manitoba Conservation say they are developing a conservation plan for the proposed park. What are the current Government of Manitoba consultation standards, policies and practices? Including First Nations consultation standards, policies and practices? Is this review only about the designation of the Park? Why the references to the conservation plan for the proposed park ? What is the time table for the steps to arrive at this conservation plan ? Will there be public review of a draft conservation plan for the park ?

**Protected Areas Commitments**

Manitoba is bound by its commitments to continue to work towards adequate representation of enduring features in protected areas for each of its natural regions. As this commitment has not yet

---

<sup>1</sup> *Public Consultations* Manitoba Government: Parks and Natural Areas.  
<http://www.gov.mb.ca/conservation/parks/consult/public.html>

been met, Manitoba has a responsibility not only to maintain but to increase the total area of lands and waters in the province formally protected from industrial development and activities that significantly impact the landscape. New protected areas should also represent their region's features. Representation is function of landscape units/enduring features adequately representing their enduring features so as to represent the region. To achieve these standards the protection, conservation, and adequate representation the protected area must provide sustainability for the species and habitats included in the protected area. There is little to suggest that Little Limestone Park will meet this standard as it is currently designed.

It is worth mentioning that a third National Park in Manitoba, Lowlands National Park, has been under discussion since the 1970's and studied since 1992. The 2002 proposal included both Little Limestone Lake and Williams Lake.<sup>2</sup> In March of 2004 the Governments of Manitoba and Canada entered into a Memorandum of Understanding (MOU) to establish Lowlands National park by May of 2005.<sup>3</sup> More than a half decade later Manitobans are still waiting for this proposed National Park to be created. To date Manitoba has not fulfilled its provincial commitments for establishment of new protected areas in the region where the national park is to be established. Given the risk to the national park being established Manitoba's responsibility is greater – and must be fulfilled.

The sustainable protection of ecosystems requires contiguous landscapes and wilderness. Threatened woodland caribou in particular are sensitive to habitat disturbances. The nearby Williams Lake woodland caribou herd is not self-sustaining, and therefore at risk, according the Environment Canada's latest Scientific Review.<sup>4</sup> Manitoba should be acting on an urgent basis to protect habitat for this herd.

Protection of natural regions in the Interlake such as the proposed Lowlands National Park, and the original nomination from Skownow First Nation ( which was endorsed by the Mining Sector), would not only ensure habitat for threatened woodland caribou are protected. The park would have encompassed representative features including the Boreal forest, karst landscapes, and aquatic ecosystems. In protecting these areas flora and fauna, in addition to woodland caribou, would be protected at the same time. Because the national park is not in place, as noted above, Manitoba has a responsibility to represent this natural region with protected areas where species and their habitat are sustainable. Perhaps it is worth reminding Manitoba Conservation staff that all four ungulates exist in the wild in this region – and that this is one of the drivers for national park establishment – and for the establishment of provincial protected areas.

Walter Cooks Cave protected area began the process of securing karst landscapes in the region – including northern hibernacula for little brown bats. But Walter Cooks Cave does not adequately represent the karst landscapes; neither does this proposed protected area. We suggest that department

---

<sup>2</sup> *Manitoba Lowlands National Park Proposal* (2002), [Parks Canada](http://manitobawildlands.org/maps/MBLowlandsProposalMap.jpg)  
<http://manitobawildlands.org/maps/MBLowlandsProposalMap.jpg>

<sup>3</sup> *Canada and Manitoba to Establish Lowlands National Park* (23 March 2010), [Manitoba Wildlands](http://manitobawildlands.org/news_item.asp?number=114).  
[http://manitobawildlands.org/news\\_item.asp?number=114](http://manitobawildlands.org/news_item.asp?number=114)

<sup>4</sup> *Scientific Review for the Identification of Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada* (2008), [Environment Canada](http://www.sararegistry.gc.ca/virtual_sara/files/Caribou%5FFull%5F0409%5Fe%2Epdf).  
[http://www.sararegistry.gc.ca/virtual\\_sara/files/Caribou%5FFull%5F0409%5Fe%2Epdf](http://www.sararegistry.gc.ca/virtual_sara/files/Caribou%5FFull%5F0409%5Fe%2Epdf)

staff review the IUCN international standards and requirements for these bat hibernacula and for karst landscapes in order to plan for the protected areas that need to be established in the region. Manitoba Conservation has upheld IUCN categories for protected areas, and flora and fauna standards in a number of other instances. Some confirmation for both bat hibernacula and karst landscape standards should be evident in the department's explanation of its proposal for the park.

### **Mineral Dispositions**

The Little Limestone Lake park designation only encompasses Little Limestone Lake and a very small piece of the shoreline. There needs to be a much larger shore and upland zone in the protected area. The two public bulletins released in 2009 and 2010 regarding the proposal park are inconsistent regarding information about mineral dispositions near the proposed park. A review of the dispositions shows that there are mineral dispositions within the boundary of the proposed park. The maps provided in the Little Limestone Lake Park Reserve April 2009 newsletter<sup>5</sup> show mining claims along the north-western shoreline of the lake. There is no information as to how these dispositions with either be avoided in the boundary of the park, or retired. Nor is there any explanation as to why the surround on the lake in the proposed protected area where there are no mineral dispositions is also minimal. Clearly the opportunity exists to expand the proposed protected area.

### **Tolko**

The lake and proposed park lie within Tolko's Forest Management License Area. Industrial activities near the lake could threaten the integrity of the Lake ecosystem. Information regarding the ability to avoid logging activity near the park is missing from the newsletter. We suggest that department staff review the discussions starting in the late 1990s, and into this decade ( including during the licensing hearings for Tolko ) about establishing a special management area to connect and buffer new protected areas in the region. Tolko has consistently objected to establishment of any new protected areas in its FML since the 1980s ( former company structure), and aggressively objected through all stages of its most recent licensing reviews, and hearings. On that basis alone Manitoba Conservation has an obligation to provide the operational standards for logging ( company or its contractors) within 25 km from the park.

Perhaps Manitoba Conservation staff have forgotten the efforts Tolko went to in order to put an all weather road through the region, including between Williams Lake and Little Limestone Lake, going south. Those appeals took almost two years. Tolko also has consistently down played the impact of its industrial activities on the woodland caribou herds in its FML. The company had no response to impacts on karst landscapes from its activities either during its licensing hearings.

### **Other Developments**

Manitoba Conservation is relatively clear about the back country land use classification intended to show this park will be a protected area. Still a clear statement that there will be no cottage development in this protected area should be part of the newsletters, but is absent. If the affected First Nation is considering cultural and aboriginal tourism options in the park that is to be encouraged, as is any request for specific protections for archeological or sacred sites. Again, Manitoba Conservation is

---

<sup>5</sup> 2009 Newsletter – Little Limestone Lake Park Reserve, [Mantioba Parks and Natural Areas](http://www.gov.mb.ca/conservation/parks/pdf/public/limestome_news_1.pdf)  
[www.gov.mb.ca/conservation/parks/pdf/public/limestome\\_news\\_1.pdf](http://www.gov.mb.ca/conservation/parks/pdf/public/limestome_news_1.pdf)

being silent on these important issues. It is our hope that the affected First Nation has had every opportunity to indicate if they wish a larger, wider buffer around the lake in some areas, or whether they have been assured that no treaty land entitlement land selection by a different First Nation will occur in the new park. After almost eight years of consistent application of both the principles and the operational standards in the First Nations Protected Areas MOU it is no longer clear whether the government of Manitoba is upholding its own policies. Transparency is a principle of the MOU.

### **Marl Lake – Risks – Standards**

The importance of this marl lake is indisputable. Still we wonder why Manitoba Conservation would make so much of the importance of the lake, while still not having any zoning or specifics in the parks act or other acts used for protected areas – so that water is protected and zoned accordingly in parks. The obvious question is why if this marl lake is so important do we have so little attention to protection of the surround on the lake – which is essentially to protect the lake, and its flora and fauna.

The June 2010 newsletter notes that water travels widely and relatively quickly through the karst landscape where Limestone Lake is located. If polluted waters enter from outside of the protected boundary they will cause irreparable damage to Little Limestone Lake delicate marl eco-system. With only a 100 metre (m) buffer zone, risk of pollution of the lake and its surrounding ecosystem from industrial activities outside of the boundary is foreseeable. Having a wider riparian border, or buffer, protected around the lake will help protect surrounding vegetation and help prevent polluted run-off into the lake. Forestry operations, mineral exploration and cottage developments could compromise these riparian zones. The park boundaries should be extended based on ecological sustainability standards.

On what basis was it determined that 100 meter was an appropriate riparian buffer for the park designation? There are other protected waterways in provincial parks with much wider riparian corridors or zones. It is vital to determine standards for appropriate riparian boundaries that will both protect the lake and ensure the local flora and fauna are protected. Did Manitoba Conservation compare these to similar protected areas in other jurisdictions? Dr. Derek Ford, a leading specialist on marl lakes, is set to undertake a scientific study in September 2010 for The Canadian Parks and Wilderness Society (CPWAS) regarding appropriate boundaries for Little Limestone Lake. Will the Parks Branch be taking Dr. Ford's study into consideration?

We assume that Dr. Ford's study will include the basics of international standards for bat hibernacula, karst landscapes and marl lakes. The context of this highly altered, and impacted region will help make Dr. Ford's report relevant to decision making for the proposed park and for the region.

Because public comments close August 31, 2010, the public input provided will not benefit from the Dr. Ford's results, which CPAWs has promised to make public. Manitoba Wildlands suggests that the public comments period be extended until a reasonable time after release of Dr. Ford's study.

### **Access to Information/ Public Review**

Manitoba Conservation needs to resume its practice of setting up a public registry file for any Parks Act review, designation, or park plan. The commitment to include these decisions in public registry contents was made in 1999 and followed for about 4 years. A discretionary summary of unseen and non public public comments does not meet any standard for a public registry. Currently there are 4

designations under the Parks Act where there has been a request for public comments *but no public registry file exists*. It would be best for Manitoba Conservation to establish basic and accessible standards for its public reviews, and post these on its website and in each public registry file.

In particular the references to a conservation plan for the new park are vague, and cause several questions to arise. Given that the pace of park plans in the system in Manitoba means it will take at least another decade to have park plans in place, where does this new protected area sit in the queue? When will the public participation in this plan ( which we assume is a reference to the park plan ) occur? Manitoba Conservation would benefit and help affected communities and communities of interest by releasing its work plan for park plans.

We would appreciate a response to this letter at your earliest convenience. We expect to see this letter and all other public comments regarding Little Limestone Park in a public registry file. This letter is being sent to the email address for comments, and to the Minister's office. Please note new address on letterhead, for response.

Yours truly,



Gaile Whelan Enns  
Director, Manitoba Wildlands