



# Manitoba Duck Mountain Region Audit



**WILDERNESS**  
COMMITTEE



# MANITOBA DUCK MOUNTAIN REGION AUDIT

Field analysis of logging, provincial  
park operations and biodiversity  
care on public lands

**May 2023**

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# About the Audit

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Louisiana-Pacific Corporation is applying for a new 20-year Forest Management Licence for the Duck Mountain region of Manitoba, which includes Duck Mountain Provincial Park. The logging corporation has been operating without a valid long-term logging management plan since January 1, 2006.

A majority of Manitobans, along with the Wilderness Committee, have been calling for an end to logging in provincial parks for decades. First Nations, whose territory includes the Duck Mountain region, have raised concerns about logging and other activities that are infringing on their ability to utilize the area.

The Wilderness Committee conducted on-the-ground research and audits of logging operations in the Duck Mountain area (the Ducks) and in Duck Mountain Provincial Park in 2021 and 2022.

The research occurred over eleven days, and included visiting 17 clearcuts, 37 sections of logging roads, eight proposed cut blocks, with over 40 km of inspections on foot. Logging operations occurring in several areas of Duck Mountain Provincial Park have not yet been investigated.

The Wilderness Committee discovered serious problems with operations in Duck Mountain Provincial Forest and Duck Mountain Provincial Park. These concerns are sorted into four categories: Logging Concerns, Park Dereliction, Biodiversity Loss and Policy, Public Participation and Process.

While the list of concerns brought forward in this report is comprehensive, it does not represent the entirety of grievances the Wilderness Committee has regarding logging in the Duck Mountain region.

## Acknowledgments

The Duck Mountain region, encompassed by Treaties 2 and 4, is the traditional territory of Minegoziibe Anishinabe, Tootinaowaziibeeng First Nation, and Wuskwi Sipiik First Nation and is utilized by other First Nations and Métis peoples. Decision-making on these lands must include free, prior, and informed consent of Indigenous Peoples.

We would like to acknowledge that this report was produced on the Unceded x<sup>w</sup>məθk<sup>w</sup>əy'əm, Sḱwxwú7mesh and səliwətał Territories. Our Winnipeg office is located in Treaty No. 1 Territory, the ancestral and traditional lands of the Anishinaabe (Ojibway), Dakota, Inineew (Cree), Lakota, and Oji-Cree Peoples. It is the Heart of the Métis Nation Homeland.

We value wilderness with all its natural biodiversity, as absolutely vital to the health of people, communities and the planet. The Wilderness Committee is Canada's largest people powered wilderness preservation organization. Founded in 1980, the Wilderness Committee is based in Vancouver, BC and operates nationally with offices in Victoria, Winnipeg and Toronto.

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Rusty- blackbird (Robert McCaw), riparian lowlands in Duck Mountain Park (Eric Reder), bee-like flower scarab (Eric Reder), trembling aspen forest (Eric Reder), eastern wolf (Grambo's Photo) and moose with calf (Grambo's Photo).

**Back cover:** Clearcut in Duck Mountain Park (Eric Reder).

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# Executive summary

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The scale, scope and quality of logging in the Duck Mountain region is unsustainable and in some cases outright illegal. Clearcuts are larger than what is allowed and all-season logging roads disrupt virtually the entire forest region. Species and waterways are not being cared for on the ground nor in the logging management plans. The logging practices in this region are a major threat to biodiversity and logging companies like Louisiana-Pacific are operating under a haphazard scheme of regulation and guidance.



Beaver Lake in Duck Mountain Park.

The findings in this independent report of logging and provincial park operations in the Duck Mountain region of western Manitoba — on lands utilized by Minegoziibe Anishinabe, Wuskwi Sipiik First Nation, Tootinaowaziibeeng First Nation and others — are a result of research undertaken by the Wilderness Committee. The organization has found the stated goals and monitoring activities of Duck Mountain Provincial Park are being ignored.

The Duck Mountain region, including a majority of Duck Mountain Provincial Park, is a unique intersection of ecosystems unlike any other on the planet. The combination of species that meet in this unusual topography at this elevation and latitude create biological diversity that must be protected.

The region is only managed for short-term logging, rather than being managed for biodiversity, provincial park values and the long-term health of the forests. The few regulations that exist to manage this region are outdated and not being enforced or followed.

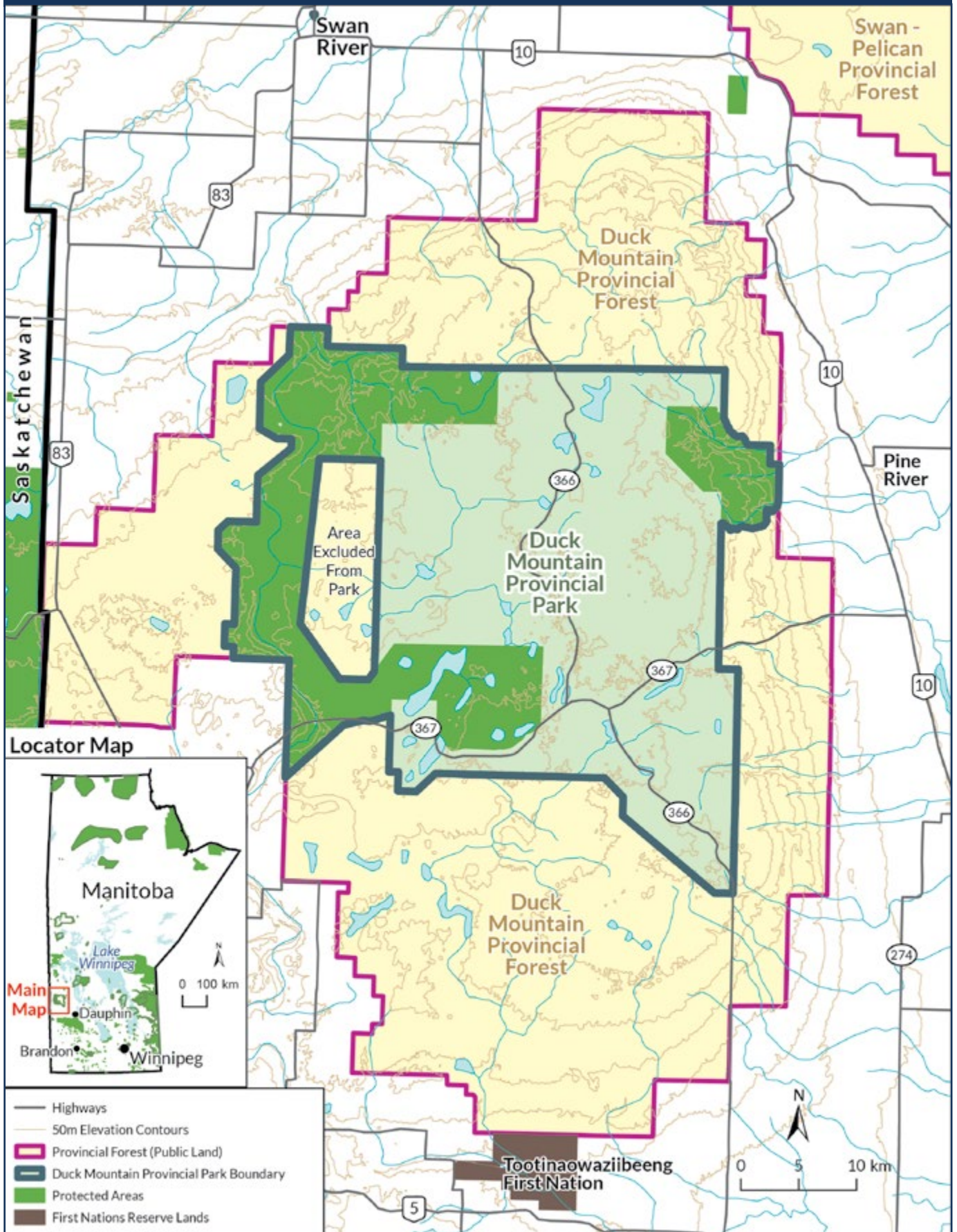
Measurable goals with timelines must be set so the Duck Mountain region can be brought back to a healthy public ecosystem that includes logging in designated areas.

## Highlights

Some of the core findings of this report include:

- The entire region is now cut up by all-season logging roads, including virtually all portions of Duck Mountain Provincial Park.
- Waterways and wetlands are being damaged by logging practices.
- Threatened and endangered species are being ignored.
- Record-sized old trees in the park are being cut down instead of preserved.
- Recreation trails are slated to be bulldozed for logging operations.

# Duck Mountain Provincial Forest and Provincial Park overview





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# SECTION 1: Logging Concerns

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Logging guidelines and regulations are routinely ignored and violated in the Duck Mountain region.<sup>1</sup> Care for water bodies and wetlands in relation to roads is particularly unacceptable. Forest utilization guidelines are all but ignored in clearcuts. There are too many all-season logging roads impacting the area, with over 2,000 km of all-season roads found in the region. There are too many clearcuts that are too large, which will hamper the ability of this tree farm area to supply wood fibre to the processing plant over the long term.

The following is a listing of the specific Logging Concerns addressed:

- 1.a. [Washouts of logging roads](#)
- 1.b. [Damage to wetlands](#)
- 1.c. [Missing culverts](#)
- 1.d. [Improper waterway crossings](#)
- 1.e. [Fish-bearing waterways are threatened](#)
- 1.f. [Logging too close to water bodies](#)
- 1.g. [Oversized cuts and sight lines](#)
- 1.h. [Excess tree waste is rampant](#)
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- 1.j. [Open logging road access](#)
- 1.k. [Logging workers making trails around barricades and through waterways](#)
- 1.l. [Tree blowdowns increasing](#)
- 1.m. [Leave trees damaged, left susceptible to wind downing](#)
- 1.n. [Amount of all-season roads](#)



Pond with little vegetation left (cutblock JFL-807).

1. [https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry-reg\\_MR\\_227-88R.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry-reg_MR_227-88R.pdf)

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## 1.a. Washouts of logging roads

Erosion is occurring on logging roads. Poor construction practices are to blame for it.

Erosion of logging roads allows sedimentation and silt to contaminate wetlands and waterways downhill. This can result in changes to fish, amphibian and invertebrate populations, which must not be allowed in a region where nature preservation is a stated goal. Fixing the damaged roads also means more time is spent doing industrial activity in the forest, thus disturbing nature more.

The planning of inappropriate roads by logging companies and the authorization of such by the government is an indication the real threats of the biodiversity and climate crises, which we are already experiencing, aren't being acted upon.



Washed out logging road (road CWC-5-1).

### Field research results

- Washouts of logging roads were witnessed throughout the Ducks.
- Washouts were documented on a road leading west into Clearwater Creek (CWC).
- Extensive washouts on CWC-5A were documented.
- Vimy Ridge Road was washed out right at its start.
- Washouts were documented along Vimy Ridge Road 1B-1B.
- Culvert was buried by sediment on DFR-4A, just south of the park.

### Audit recommendations

The solution for logging road erosion is to prohibit all-season road construction in sensitive ecosystems. Winter access only for logging and hauling operations will limit the impact on the soil and therefore water, as well as on the wildlife. If they are built, all-season roads should have water bars and appropriate grades.



Replacement culvert and downstream sedimentation (Vimy Ridge Road).

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## 1.b. Damage to wetlands

Wetlands within forests in logging areas are being damaged as all the vegetation around and in the wetland is being mowed down.

Wetlands are critically important as they provide numerous beneficial functions for people, fish and wildlife. Some of these services include protecting and improving water quality, providing fish and wildlife habitats, storing floodwaters and maintaining surface water flow during dry periods. Wetlands need their water level maintained, but also their vegetation to create the necessary microclimate for species that rely on the moist ecosystem.



Wetland damaged by machinery (cutblock CWE-902).

The Duck Mountain Provincial Park Management Plan states, ***“the protection of water quality, both within the park and downstream, is a priority.”*** This is not evident on the ground.

### Field research results

- Cutblock JFL-807 has a large standing water pond in the middle, devoid of vegetation.
- Cutblock VMR-862 has dead wood sitting in a flooded pond that is flowing slowly across the road.
- Washouts documented along Vimy Ridge Road 1B-1B caused damage and sedimentation into wetlands.
- Cutblock CWE-902 had machinery working in warm weather months destroying wetlands.

### Audit recommendations

Greater effort is required ahead of logging to ensure water on the land is not disturbed. Wetlands and surface water in all logged areas must remain intact.



Excess wood waste sitting in wetland area in Duck Mountain Park (cutblock VMR-862).

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## 1.c. Missing culverts

It was routinely observed that culverts were not being installed in the construction of logging roads, even though the culverts were delivered to the cutblock.

Road compaction changes the surface water movement across a landscape. It can dry up wetlands, it can flood areas that weren't wetlands, and it can cause sedimentation to suffocate wetlands. All roads have impacts, and culverts are supposed to limit the impact of roads. Not installing the culverts is simply a cheap shortcut, a disregard for the needs of nature, and irresponsibility on the part of an operator working on public lands and waters.



Uninstalled culverts sit beside damaged creek (road VMR-1B-1B).

### Field research results

- In the summer of 2021 culverts were documented and left uninstalled on LNK-1B road.
- Vimy Ridge Road, near km 8 (road section VMR-1B-1B), culverts are sitting in the bush beside the road and the road is washed out in a couple places.

### Audit recommendations

Limit all-season road construction. Require logging companies to do twice yearly inspections and post photos of crossings publicly. Increase surveillance of logging operations by the government, publicize the results annually.



Road over wetland without culvert and with sediment polluting wetland (road LNK-1B).

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## 1.d. Improper waterway crossings

Water flow and surface water movement is being impacted and impeded by logging roads. This includes both all-season logging roads and logging roads within cutblocks.

Changing the surface water conditions in the forest will change the species composition that can live in the area. Water pooling instead of flowing, or water seep being impeded because of vehicle compaction is disruptive.

### Field research results

- Three different water crossings in cutblocks JFL-806 and JHL-807 are demonstrating improper care for surface water.
- Water running across road section VMR-1B-1B demonstrates improper water crossing.



Water running over road at improper water crossing (cutblock JFL-806).

### Audit recommendations

In sensitive areas, no warm-weather vehicle activity should be allowed. Greater reserve zones — buffers between logging and wet areas — should be instituted. Additionally, increased ability for water to flow through a road area — via bridge, larger culvert, or other construction methods — must be employed.



Water sitting on road in improper wetland crossing (road LNK-1A).

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## 1.e. Fish-bearing waterways are threatened

A fish-bearing creek desecrated with sedimentation and logging debris was discovered in Duck Mountain Provincial Park. An all-terrain vehicle (ATV) trail was also disrupting the creek, possibly from logging companies accessing clearcuts.

Changes to water quality because of flow rate, sedimentation, and logging debris will affect clarity and consequently the fish populations. The Duck Mountain region is known for its healthy trout populations, which are a function of clear, cool waterways. The Duck Mountain Provincial Park Management Plan specifically states:

*“The protection of water quality, both within the park and downstream, is a priority.”*



Fish-bearing waterway (road VMR-1B-1E).

### Field research results

- Road section VMR-1B-1E has a fish-bearing waterway crossing. Logs and sedimentation from logging are in the waterway.

### Audit recommendations

No all-season roads should be allowed in the provincial park, and existing stream crossings must be rehabilitated. If all-season roads are built anywhere else, larger culverts and bridges should be the standard for fish-bearing waterways. ATVs can not be used to cross fish-bearing streams unless temporary bridges are installed. All fish-bearing streams must have sign postings on each road or cutblock.

**This concern is also mentioned in both [Park Dereliction 2.f. section \(page 21\)](#) and [Biodiversity Loss 3.f. section \(page 31\)](#).**

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## 1.f. Logging too close to water bodies

Trees were logged close to the water table and shore of a lake inside Duck Mountain Provincial Park.

In Louisiana-Pacific's proposed 20-year Forest Management Plan, the operational reserve zone on water bodies is claimed to be 100 metres.<sup>2</sup> This is not true on the ground. Buffers on water bodies eliminate erosion that would cause sedimentation, offer shade to preserve microclimates, and provide wildlife habitat.<sup>3</sup>



Stump in riparian buffer from illegal logging (cutblock LNK-800).

### Field research results

- Taking down trees adjacent to the lake, likely due to their size, was documented on cutblock LNK-800 in 2021.
- A clearcut is visible from the Spray Lake hiking trail parking lot, along the shore of the lake.

### Audit recommendations

All water bodies must have enforced buffers. Manitoba's Forest Management Guidelines for Riparian Management Areas states provincial parks are supposed to have a 100+ metre reserved zone.<sup>4</sup>



Stump in riparian buffer from illegal logging (cutblock LNK-800).

2. <https://www.gov.mb.ca/sd/eal/registries/3893.10lp/index.html> Chapter 6, pg 17

3. [https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry\\_riparian\\_areas2009.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry_riparian_areas2009.pdf)

4. [https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry\\_riparian\\_areas2009.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry_riparian_areas2009.pdf)

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## 1.g. Oversized cuts and sight lines

Clearings larger than 400 metres across and straightaways on roads create sight lines that are longer than allowed by the Manitoba Wildlife Guidelines.<sup>5</sup> These guidelines are intended to protect moose populations. The specific guideline states: ***“Distance to thermal or escape cover should not exceed 200 metres and line of sight within cutover should not exceed 400 metres.”***

Moose do not tend to get too far from forest cover, preferring to be within 200 metres of a forest they can disappear back into if threatened. Wolves use linear pathways to hunt. Any logging area that allows extended straight line visibility increases the chances a wolf will see a moose or other prey.<sup>6</sup> The increased hunting success of wolves can lead to a larger wolf population, which further strains a depleted moose population.



Excessive sight lines (cutblock LNK-813).

### Field research results

- Cutblock LNK-811 and LNK-813 show sight lines larger than the allowable 400 metres.
- Vimy Ridge Road has sight lines longer than should be allowed.
- Cutblock JFL-807 has sightlines longer than 400 metres. The option to leave trees existed, but the logging companies cut everything down.
- Drifting River Road has sightlines longer than 400 metres.

### Audit recommendations

No clearcuts should have sight lines longer than 400 metres. All clearcuts from the last several years should have an independent audit – paid for by the logging companies – for size and sightline violations, and the results publicized. Logging roads should not run in straight lines allowing a 400 metre line-of-sight.



Excessive sight lines (cutblock LNK-811).

5. [https://www.wildernesscommittee.org/sites/default/files/2023-04/dm\\_interimmangguide1988.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/dm_interimmangguide1988.pdf)

6. <https://storymaps.arcgis.com/stories/5c9b830f28f54cc7a3be5f87ed79b5bb>



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## 1.h. Excess tree waste is rampant

An incredible number of trees are left piled up and wasted in every clearcut visited.

There are five ways that excess wood left on site hinder ecology and are violations of logging guidance.

- Tree tops left behind are larger than allowable under the Forest Act regulations.<sup>7</sup>
- Unmerchantable species that should be left standing are being cut down. Damaging these trees is a violation of the Forest Act regulations.<sup>8</sup>
- Large dead and dying trees, which are wildlife habitat trees, are being cut down and left on site (this concern is expanded upon in the [Biodiversity Loss 3.a. section \(page 28\)](#)).
- Large piles of trees are being piled up and cause barriers for wildlife travel.<sup>9</sup>
- Large piles of wood waste reduce the amount of productive forest and are against the Biomass Management guidebooks.<sup>10</sup>



Extensive wood waste (cutblock JFL-807).

Logging by its very action causes a loss of nutrients in an ecosystem. Nutrients that took 80 to 120 years to accumulate are loaded onto trucks and hauled away. As such, wood waste should be left on site to decompose. However abandoned logs piled up in eight foot high piles simply will not break down in a natural way.

### Field research results

- Cutblock VMR-853 has incredible piles of wood that creates barriers.
- Cutblocks JFL-807 and JFL-806 are both full of excess wood waste, including many large dead trees that should have remained as wildlife habitat trees.

### Audit recommendations

Only selectively cutting trees that are desired, and leaving the remaining unmerchantable trees as habitat is a way to leave more nature in the forest without creating barriers. This practice will create a healthier mixed-age mixed-species forest. This directive already exists in regulations and guidance documents, but is not being practiced on the ground.

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7. [https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry-reg\\_MR\\_227-88R.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry-reg_MR_227-88R.pdf) (Section 5, vi.1)

8. *ibid* (Section 5 iii)

9. [https://www.wildernesscommittee.org/sites/default/files/2023-04/conservation\\_biomassmgmt\\_practices2015.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/conservation_biomassmgmt_practices2015.pdf) (p. 4)

10. [https://www.wildernesscommittee.org/sites/default/files/2023-04/conservation\\_biomassmgmt\\_practices2015.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/conservation_biomassmgmt_practices2015.pdf) (p. 2)

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## 1.i. Failed replanting

Four years after being clearcut, the sparsely replanted evergreens are dying on the cutblock.

Trees are supposed to be replanted so a similar species composition comes back in the tree plantation, like what existed prior to the forest being clearcut. Evergreens dying off may cause the block to be overtaken by faster-growing hardwoods, unnaturally changing the forest ecosystem.

### Field research results

- VMR-852 had a failed section of evergreen replant.



Struggling evergreen (cutblock VMR-852).

### Audit recommendations

The efforts to replant must include more trees and better tending of seedlings as they're planted. Quicker and better monitoring of replants is needed.



Failing evergreen replant (cutblock VMR-852).

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## 1.j. Open logging road access

Logging roads that don't have gates allow easy vehicle access into areas that once existed as forest sanctuaries for moose populations to thrive. Many gates that do exist are not locked or even closed.

Vehicle access creates the opportunity for regular disturbance deeper into the forest. Open roads allow hunting and poaching as well as illegal and unwanted activity such as overnight camping, tree cutting and open fires.

According to Manitoba's Forestry Road Management guidelines, the ***“reasons for applying road use restrictions include: for the better management, conservation or enhancement of resource values.”***<sup>11</sup> Proper conservation of the Duck Mountain forest region requires road access be restricted, and that is not happening on the ground.



No gate on Island Lake logging road (road ISL-1A).

According to the Duck Mountain Provincial Park Management Plan, ***“[forest access] roads will generally be gated to facilitate regeneration of vegetation and to reduce the impact of roads on wildlife populations.”***<sup>12</sup>

### Field research results

- On road CWC-5A there is no gate at the start, and one place where the gate was wide open on July 25, 2022.
- Vimy Ridge Road has no gate and allows vehicle access directly into the park.
- In 2021 and 2022 the gate on road LNK-1A was unlocked right off Highway 366 near Sinclair Lake.
- Road KTC-7A, by Sinclair Lake off Highway 366, is not gated and has allowed access since 2013. There is new vehicle traffic and new open fire pits here.
- Road ISL-1A in the park has no gate.
- Road CHL-2A across from Singush Lake is not gated. This has allowed someone to drive their vehicle in and cut down trees with a chainsaw inside the provincial park.

### Audit recommendations

All logging roads require gates, and all gates need to be locked at all times. Recent precedent was set for this in the environmental licence to build the Dickstone South logging road in Grass River Provincial Park. Road access was to be explicitly controlled. In Nopiming Provincial Park, the old logging roads — Springer Lake Road and Rocky Ridge Road — are both gated.

This concern is also mentioned in the [Park Dereliction 2.k. section \(page 25\)](#).

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11. [https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry\\_roadmgmt2012.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry_roadmgmt2012.pdf) (p. 10)

12. [https://www.wildernesscommittee.org/sites/default/files/2023-04/dm\\_managplan2007.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/dm_managplan2007.pdf) (p. 16)

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## 1.k. Logging workers making trails around barricades and through waterways

Logging workers are driving all-terrain vehicles (ATV) around barricades meant to prevent vehicle access to logging areas.

The establishment of ATV trails around barricades is the exact behaviour barricades are meant to stop. Once a path is made, others will likely follow. Vehicle access into logging areas further disturbs an area through noise, soil and waterway disruption.



ATV trail around gate (road TEL-1A).

### Field research results

- A logging worker drove an ATV around a barricade to access cutblock JFL-806 in July 2022.
- ATV trails can be found around virtually every barrier placed on logging roads.

### Audit recommendations

All logging areas require gates that are locked. Logging workers needing to access the site must do so through the gate. Any trails found around barricades must be reported and blocked.

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## 1.l. Tree blowdowns increasing

Wind and storms have blown down swaths of trees on the north side and the south side of the park off Highway 366. These are the visible blowdowns and it is likely there are more throughout the region.

Wind blowdowns, which are predicted to be increasing due to the climate crisis, will increase the amount of forest that is disrupted each year.<sup>13</sup>

### Audit recommendations

Along with increasing forest fire risk due to extreme drought, insect infestation and flooding, increased blowdowns must be factored into the amount of forest that can be disturbed by human causes, i.e. logged. The number of clearcuts in the Ducks must decrease due to climate change. The annual allowable cut must decrease.



Blowdown north of park off Highway 366.

13. [https://www.researchgate.net/figure/Study-area-and-locations-of-the-selected-stations-as-well-as-wind-gust-regions-over\\_fig1\\_277677859](https://www.researchgate.net/figure/Study-area-and-locations-of-the-selected-stations-as-well-as-wind-gust-regions-over_fig1_277677859)

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## 1.m. Leave trees damaged, left susceptible to wind downing

Trees that are left behind to facilitate seeding and support biodiversity — known as “leave trees” — are being damaged by logging equipment.<sup>14</sup> Patches of trees that are supposed to be left behind are only individual trees and they are being blown down by the wind.

Damaged leave trees and single trees that quickly blow down only offer a facade of ecological responsibility. Forest Act regulations require leave trees to be undamaged.

Single leave trees blown down on site indicate that the impacts of clearcuts is greater than the government or logging companies acknowledge. The idea of single leave trees is derived from a desire to increase logging and not ecology. If we were managing the forest in an ecological way there would be far larger clumps of trees to preserve biodiversity and seed new trees.



Damaged leave tree (cutblock LNK-810).

### Field research results

- Large leave tree in LNK-810 is damaged by equipment.
- Small leave tree in LNK-800 is both damaged by equipment and blowing over because of being left by itself.
- Leave trees in LNK-813 have been blown over.

### Audit recommendations

Leave tree sections must be larger. Logging companies must be charged for leave tree damage and the charges publicized. An independent audit of all leave patches in the Ducks region should be undertaken, paid for by the logging companies, and the results publicized.



Leave tree blown down (cutblock LNK-813).

14. <https://www.lawinsider.com/dictionary/leave-tree>

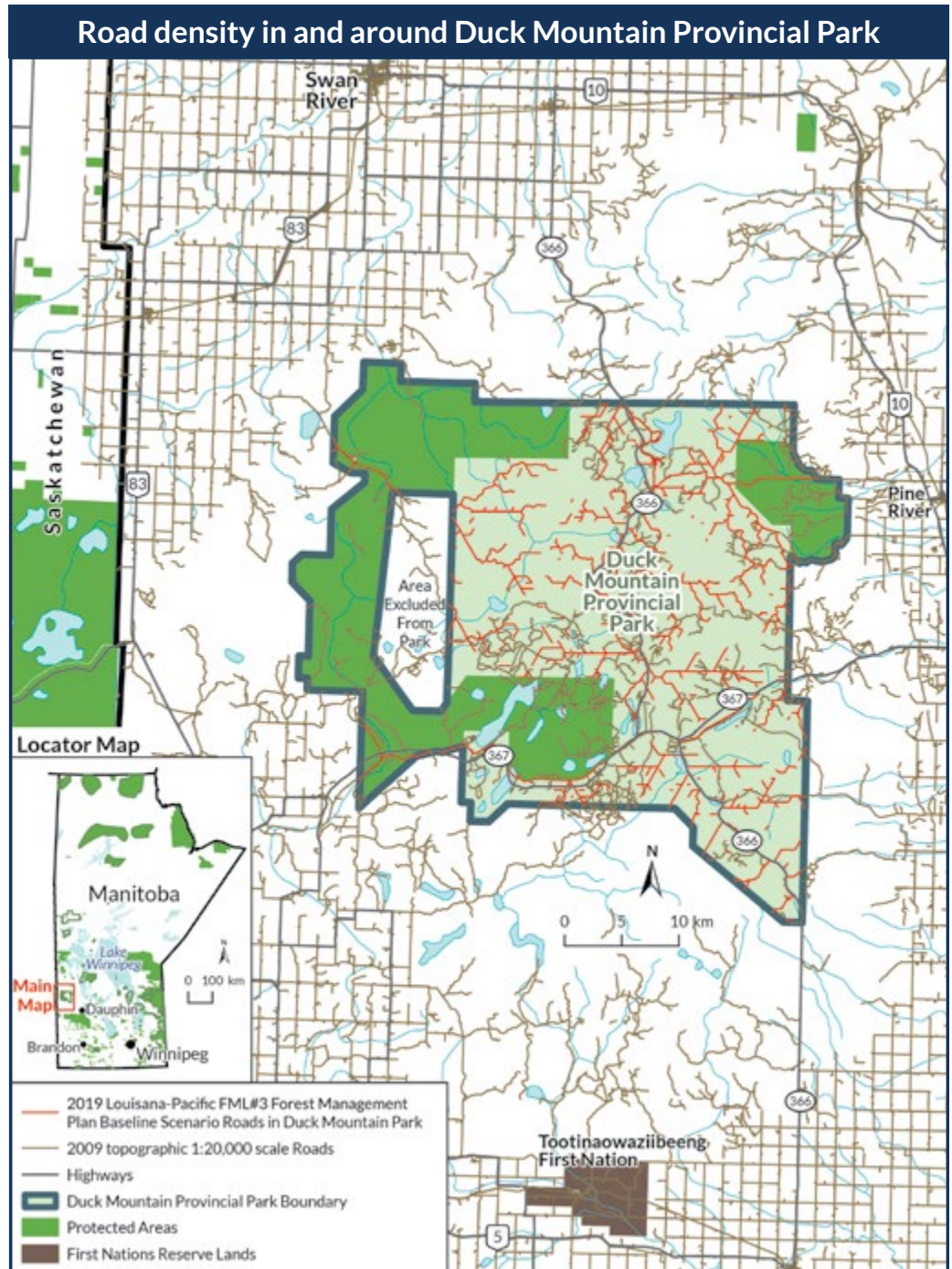
# 1.n. Amount of all-season roads

There are too many all-season roads disrupting the Duck Mountain forest region. More than 2,000 km of logging roads are permanently active, according to the proposed 20-year Forest Management Plan.<sup>15</sup>

The integrity of any natural ecosystem can be measured by road density. Linear disturbances and compacted road right-of-ways immediately degrade a natural area.<sup>16</sup> There are changes to the predator-prey relationships, species usage, surface water, vegetation and noise.

## Audit recommendations

No more all-season roads can be built in Duck Mountain Provincial Park and road construction must be severely limited in the rest of the Ducks. Decommissioning of roads must include physical barriers to prevent ATV traffic, soil and brush break up to allow vegetation growth, and replants on the roadway to eliminate sight lines. Road density and size of intact forest blocks that have not been disturbed are the two metrics that should be analyzed and published by Louisiana-Pacific and the Manitoba government.



15. <https://www.gov.mb.ca/sd/eal/registries/3893.10lp/18.pdf> (Chapter 5, page 48)

16. <https://www.environmentalscience.org/roads>

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## SECTION 2: Park Dereliction

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Duck Mountain Provincial Park has been all but abandoned as a place for people and nature. A majority of the park, including the backcountry land-use areas that are supposed to be preserved, are instead managed for logging and all-terrain vehicle use. The Duck Mountain Provincial Park Management Plan contains many suggestions on how to care for the park, but the plan is being ignored.<sup>17</sup>

In order for the provincial park mandate of nature protection to be fulfilled, park logging must end, all-terrain vehicles need to be eliminated, and people powered trails and destinations need to be established.

The following is a listing of the specific Park Dereliction problems addressed:

- 2.a. [Biking and hiking trails lost](#)
- 2.b. [Large old trees lost](#)
- 2.c. [Ducks' unique ecology remains under threat](#)
- 2.d. [Park signs spread disinformation](#)
- 2.e. [Loss of old forest ecosystems](#)
- 2.f. [Fish-bearing waterways are threatened](#)
- 2.g. [Missing wayside park and trail signage](#)
- 2.h. [All-terrain vehicles causing land, water and air harm](#)
- 2.i. [Amount of forest logged](#)
- 2.j. [Road washouts and culverts](#)
- 2.k. [Open logging road access](#)
- 2.l. [Park management plan being ignored](#)



Kayakers on East Blue Lake in Duck Mountain Park.

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17. [https://www.wildernesscommittee.org/sites/default/files/2023-04/dm\\_managplan2007.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/dm_managplan2007.pdf)

## 2.a. Biking and hiking trails lost

Trails that currently exist in Duck Mountain Provincial Park are slated to be bulldozed and clearcut for logging operations by 2024.

The desire for outdoor people powered recreation is growing in our society and existing trails are becoming more crowded. The Manitoba government is investing money in new trails. Yet trails that already exist in Duck Mountain Provincial Park aren't being publicized, and the government is allowing them to be bulldozed for logging.

From the 2007 Duck Mountain Provincial Park Management Plan:

*“Management strategies are established to provide continued high-quality recreational experiences now and in the future. Planning ensures that growing numbers of park visitors and an expanding variety of recreational pursuits do not gradually erode the recreational experience for park users.”*

Planning to allow logging companies to bulldoze existing trails is not expanding recreational pursuits.



Hikers on Glove Lake Trail.

### Field research results

- There is a trail to the west shore of Line Lake and a trail to the southeast shore of Glove Lake, both of which are currently being used for recreation. These trails are scheduled to be bulldozed and clearcut by 2024 in Louisiana-Pacific's proposed 20-year Forest Management Plan.

### Audit recommendations

All road building and clearcut logging must be stopped in Duck Mountain Provincial Park, and a people-powered trails plan must be established.





## 2.b. Large old trees lost

In two locations, near-record-sized trees were discovered adjacent to logging areas inside Duck Mountain Provincial Park. The Wilderness Committee recorded a massive old trembling aspen and an exceptionally large black spruce in the summer of 2022. It's likely that larger trembling aspen or black spruce than those documented have already been cut down in the park, or are soon to be logged.

Old forests and record-sized trees are exactly the type of ecology parks are supposed to preserve. The scientific understanding of how valuable old trees are to a forest has been growing for years.



Near-record-sized black spruce.

### Recent Developments

In October 2022, it was discovered that logging companies have fastened new logging road signs to the largest aspen we measured inside the provincial park, demonstrating the logging company's disregard for old-tree protection in a park.

## Field research results

- A trembling aspen with a diameter at breast height (DBH) of 75 cm and a black spruce with a DBH of 57 cm were both recorded in the summer of 2022 at logging sites. Tree locations are currently being withheld.

## Audit recommendations

Near-record-sized trees should have stories told about them through park interpretation, to help people learn about and build attachment to nature. That is what parks are for, and what Ontario and British Columbia already do. Record trees should be studied to understand the conditions that allowed such incredible growth. This is the type of research parks should provide.



Near-record-sized black spruce.

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## 2.c. Ducks' unique ecology remains under threat

Duck Mountain Provincial Park is meant to protect a unique area – the Duck Mountain ecodistrict – one of 1,021 ecodistricts across Canada. An ecodistrict is defined by physiographic features including bedrock, surficial geology and topography that, along with climate, help to determine patterns of species association. There is no other ecodistrict like it.

Currently, about 10 per cent of the region is protected as Duck Mountain Provincial Park. There is a global goal to protect at least 30 per cent of lands and waters by 2030 to preserve biodiversity and stave off societal and planetary collapse.<sup>18</sup> Canada has signed on to this goal.<sup>19</sup> To meet this target and preserve ecological diversity, we need to protect at least 30 per cent of the Ducks ecodistrict.



Wetland complex in Duck Mountain Park.

### Audit recommendations

The protected region of Duck Mountain Provincial Park needs to expand by at least 1,000 km<sup>2</sup>. This number was reached with the following calculations:

- 4,886 km<sup>2</sup> in the Duck Mountain ecodistrict.
- 486 km<sup>2</sup> is protected as backcountry land use classification in Duck Mountain Provincial Park.
- 30 per cent of the ecodistrict is 1,466 km<sup>2</sup>.

This area must include Indigenous Protected and Conserved Areas (IPCAs), designated according to the wishes of local First Nations as a priority. Special attention should also be given to steep-gradient drainages at risk from catastrophic weather events due to climate change, as well as regions of high biological value.

**The Manitoba government assessment that the 1992 goal of 12 per cent protected area adequately preserves the Duck Mountain ecodistrict must be publicly repudiated by the government.** The Protected Areas Initiative work abandoned by the current PC government must be restarted, with a new target, timeline and adequate resources.

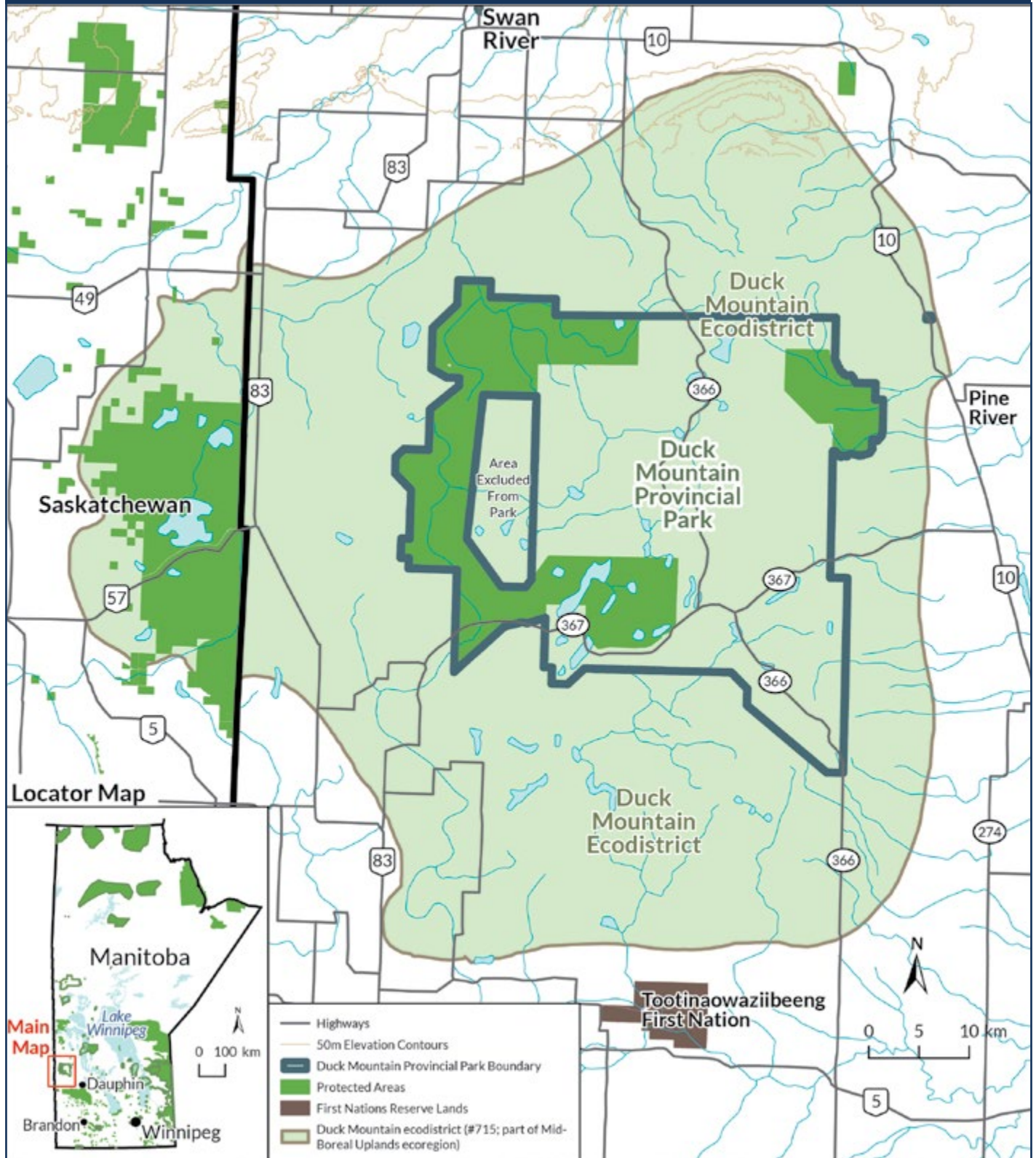
This concern is also discussed in the [Biodiversity Loss 3.c section \(page 29\)](#).

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18. <https://www.hacfornatureandpeople.org/why-30x30>

19. <https://www.canada.ca/en/environment-climate-change/news/2021/11/the-government-of-canada-increases-nature-protection-ambition-to-address-dual-crises-of-biodiversity-loss-and-climate-change.html>

# Duck Mountain Provincial Park and ecodistrict overview



## 2.d. Park signs spread disinformation

Prominent signage in Duck Mountain Provincial Park, put up in 1994, is misleading and out of date as it proclaims logging as a sustainable use of the park.

In 2008 when the province banned logging in all other provincial parks, the Manitoba government stated *“ending the practice of logging inside provincial parks will leave a permanent, positive environmental legacy for future generations of Manitobans,”* acknowledging that park logging causes lasting environmental damage.<sup>20</sup> They also stated Duck Mountain Provincial Park would remain open to logging for economic reasons.<sup>21</sup>

With the knowledge we have today, no scientists will agree that logging is a way to sustain ecological integrity. The signs on display in the park are patently false, and the government stated so in 2008.



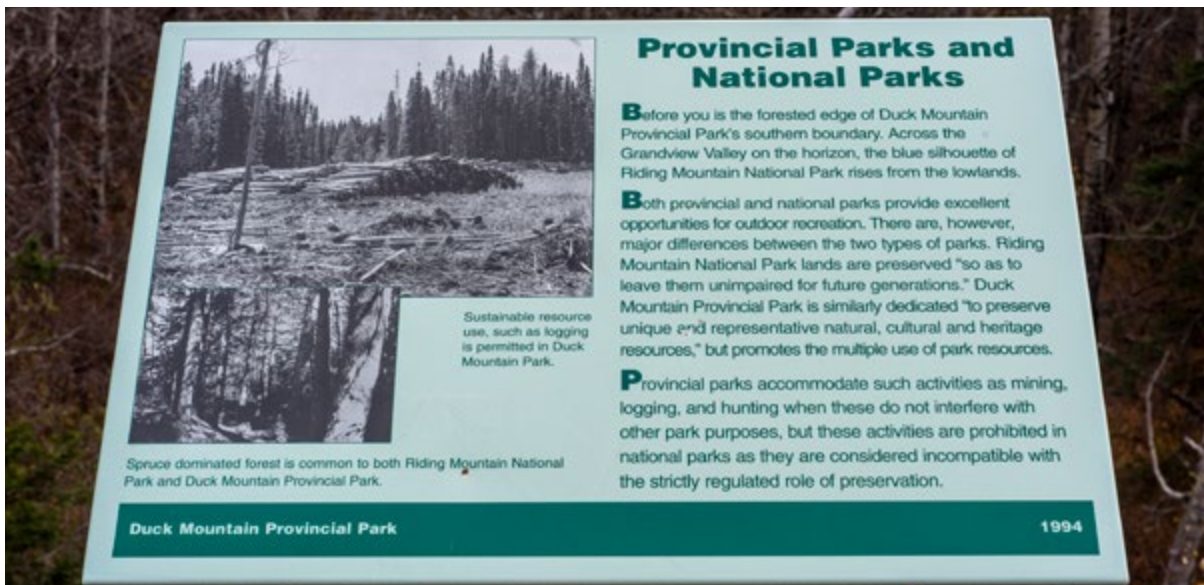
Spray Lake hiking trailhead sign.

## Field research results

- Spray Lake hiking trail sign states “harvesting all of Duck Mountain’s mature evergreens would cause a chain reaction that could eliminate spruce cone seeds, red squirrels and martens. Sustainable logging ensures that seedling are planted to replace cut trees.”
- Signage on Baldy Mountain tower states “provincial parks accommodate such activities as mining, logging, and hunting when it doesn’t interfere with other park purposes.”

## Audit recommendations

The logging signs in Duck Mountain Provincial Park must be removed and replaced with signs that talk about ecology, not mislead about the benefits of logging a park.



Baldy Mountain lookout tower interpretive sign.

20. <https://news.gov.mb.ca/news/index.html?item=4789&posted=2008-11-21>

21. <https://news.gov.mb.ca/news/index.html?item=4789&posted=2008-11-21>

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## 2.e. Loss of old forest ecosystems

The Duck Mountain region is home to some of the oldest forests in the province. But not enough is known about changes to species composition, mycorrhiza and soil nutrients after clearcut logging in the Ducks. It wasn't studied when Louisiana-Pacific was first issued its licence to log the park in 1995 and is not in their most recent forest management plan filing.

Provincial parks are specifically designated for the preservation of nature. They are where we learn how nature works, and how it evolves. Virtually the entire park has been affected by clearcutting in just 27 years. We are losing irreplaceable opportunities to learn more about old forests and in many areas of the park we have already lost them.

### Audit recommendations

All logging in Duck Mountain Provincial Park must be stopped. Old forests outside the park should be added to the park. Old forests in the Ducks should be studied, including the insect species, soil nutrients and the mycorrhiza. Interpretive signage that explains the unique soil, elevation, and age of old forest ecosystems in the Ducks should be installed in various places in the park.

This concern is also discussed in the [Biodiversity Loss 3.a. section \(page 28\)](#).



Near-record sized trembling aspen.

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## 2.f. Fish-bearing waterways are threatened

A fish-bearing waterway was impacted by a logging road inside Duck Mountain Provincial Park, creating a threat to the fish and biodiversity in the region. Waterway crossings must be eliminated inside Duck Mountain Provincial Park, and improved upon elsewhere.

This concern is discussed fully in the [Logging Concerns 1.e. section \(page 6\)](#) and mentioned in the [Biodiversity Loss 3.f. section \(page 31\)](#).



Fish-bearing waterway (road VMR-1B-1E).

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## 2.g. Missing wayside park and trail signage

Existing trails and rest areas are not listed on the Duck Mountain Provincial Park map.

An increasing number of people are interested in outdoor recreation, and now outdoor activities are preferred because they carry lower risk of contracting COVID-19. Some of the signage for this hidden park infrastructure already exists. The trails and rest areas are already there. Opportunities for roadside picnics or trail walks, especially in a provincial park, should be publicized. Not publicizing the park infrastructure keeps people away from the park.



Hidden sign for Line Lake trailhead.

### Field research results

- Line Lake has a trail to it and signage from the east, yet there is no sign pointing from the main road to the hidden trailhead behind the brush dump. Line Lake trail is not on the map.
- Elk Lake has a sign to the wayside pullout but it is not listed on the map.
- Glove Lake and Line Lake West trails exist but they are not labeled and are not on the map.

### Audit recommendations

Add existing park infrastructure to the park map. Add appropriate roadside signage.



Glove Lake hiking trail.

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## 2.h. All-terrain vehicles causing land, water and air harm

All-terrain vehicles (ATV) on the Mossberry Lake multiple-use trail, the only authorized ATV trail in any provincial park in Manitoba, are causing ongoing destruction. In many places the trail is built on soft and wet soil, which can't withstand use by heavy vehicles with aggressive tire treads. The trail is now composed of multiple mud bogs. ATV use causes noise disturbance and perpetuates the burning of fossil fuels for recreation.



Mud bog on braided section of Mossberry Lake trail.

The operation of ATVs in soft and wet soil causes quagmires and mud bogs. As each succeeding vehicle drives into wet soft soil, the depressions get deeper and hold more water. Vehicles that try to avoid the mud hole drive around it, widening the trail. This is known as braiding and continually increases the amount of land destroyed by ATVs.

The trail is listed as not maintained. But mud bogs do not go away on their own. They become a permanently damaged fixture in the middle of the trail. Mud bogs prohibit the use of the trail system by other users such as cyclists and hikers. There is simply too much mud to wade through on a regular basis to make this trail usable for hikers or bikers. ATVs have destroyed the only backpacking trail in the park.

The noise of fossil-fuel engines is disruptive to wildlife.<sup>22</sup> The trail runs through a backcountry section of the park that should be free of disturbance, as required by The Provincial Parks Act.

The promotion of fossil fuel use for recreation inside a park during a climate emergency is not in line with our climate goals. Parks and the protection of natural ecosystems inside them are part of a solution to the unfolding climate emergency.

### Field research results

- Walking in from West Blue Lake access, the trail is mud bogs within a kilometre.
- Walking in from Shallow Lake / Shilliday Lake access, the trail is mud bogs within a kilometre.
- Every kilometre of the 20-kilometre trail has multiple mud bogs that are only getting worse year upon year.

### Audit recommendations

The government must admit that authorizing a multiuse trail through a sensitive natural ecosystem in a park did not work. The trail must be closed to ATVs. The mud bogs and wetland damage must be repaired.

There is an Environment Act licence for this trail, issued in 2012. The Manitoba Parks branch is seemingly in violation of at least 4 of the 22 licence conditions. The Director of Environmental Approvals branch should review and then revoke this licence.

This concern is also mentioned in the [Biodiversity Loss 3.g. section \(page 32\)](#).

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22. <https://www.adirondackcouncil.org/page/blog-139/news/why-all-terrain-vehicles-and-wildlife-do-not-mix-965.html>

## 2.i. Amount of forest logged

In only 27 years, Louisiana-Pacific has impacted virtually every forest in Duck Mountain. There is only one section of forest left in northern Duck Mountain Provincial Park that hasn't been recently disrupted by logging, and plans state it is to be logged by 2024.<sup>23</sup> **In the fall of 2022, heavy construction equipment was pushing roads further into the last intact forest areas in the northern section of the park.**



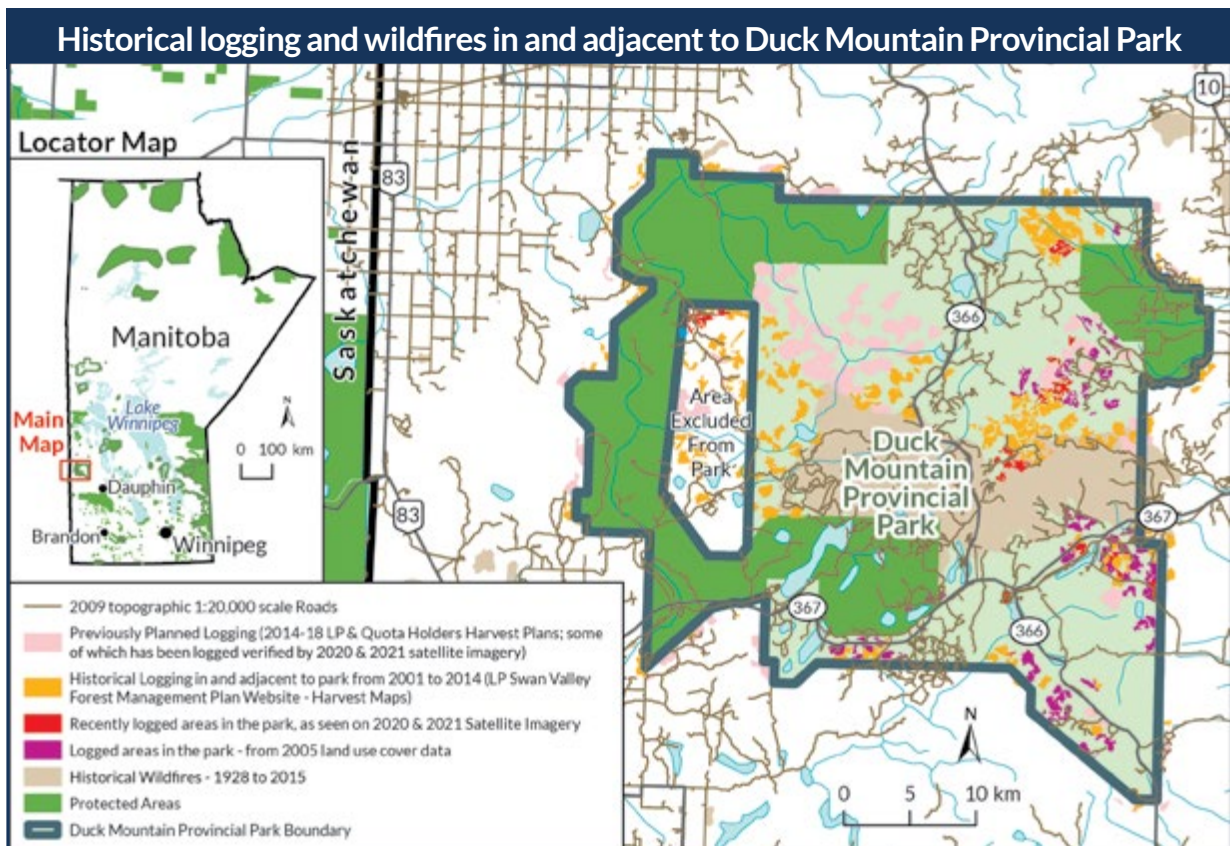
Aerial view of massive adjacent clearcuts (cutblocks VMR-845, VMR-861, VMR-862).

Parks are supposed to nurture healthy ecosystems. Clearcuts and logging roads create a long-term scar and destruction to park environments. According to the proposed 20-year Forest Management Plan, the most impacted watershed in the Ducks is the Upper Valley inside Duck Mountain Provincial Park.

Logging is not a natural ecological process and has no place in a park, as the Clean Environment Commission already ruled in 1992.<sup>24</sup>

### Audit recommendations

Logging must halt in Duck Mountain Provincial Park immediately. The continuation of any logging roads in the Tee Lakes logging area or the Line Lake logging area will destroy the last large intact forests in the park.



23. [https://www.wildernesscommittee.org/sites/default/files/2023-04/lp\\_2022-24\\_harvest\\_overview\\_map.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/lp_2022-24_harvest_overview_map.pdf)

24. [https://www.wildernesscommittee.org/sites/default/files/2023-04/abitibi-price\\_manageplan1991.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/abitibi-price_manageplan1991.pdf)



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## 2.j. Road washouts and culverts

There were washouts on Highway 366 and 367, the two main roads into Duck Mountain Provincial Park. Highway 367 into the park was closed for much of the summer of 2022 and had four washouts.

Culverts at these stream crossings are inadequate for the current climate conditions. More intense rainfall will occur in the future.<sup>25</sup> As the road system with small culverts is washed out, pollution and sedimentation is washed downstream. This damages waterways and fish habitat downstream.

According to the Duck Mountain Provincial Park Management Plan:

***“The protection of water quality, both within the park and downstream, is a priority.”***

Yet when Highway 367 was repaired in the fall of 2022, culverts of the same size that had failed were reinstalled, without adequate erosion controls.



New inadequately sized culverts on Highway 367.

## Field research results

- Culverts on Highway 366 were washed out on the north side of the park.
- Highway 367 on the east side of the park was washed out in four places.

## Audit recommendations

In a provincial park, where we are supposed to be caring for healthy ecosystems better, bridges will be required so waterways can flow without being disturbed.

This concern is also mentioned in the [Biodiversity Loss 3.h. section \(page 32\)](#).

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## 2.k. Open logging road access

Logging roads have no place in a park, and open road access is controlled on all other service roads, such as for gravel pits in parks. All roads must have locked gates to control access.

This concern is also discussed in the [Logging Concern 1.j. section \(page 11\)](#).



Unlocked gate inside Duck Mountain Provincial Park (road LNK-1A).

25. <https://gpm.nasa.gov/resources/faq/how-does-climate-change-affect-precipitation>

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## 2.1. Park management plan being ignored

The Duck Mountain Provincial Park Management Plan contains suggestions of research and policy directives that will be undertaken. There are 13 commitments stated in the plan, ranging from water quality and boat caches to new trail potential and First Nations cultural site identification. Yet we don't see that research available as reports about Duck Mountain Provincial Park nor are those directives discernable on the ground.

Of particular interest is this suggestion from the plan that states:

***“Special conditions may be applied to cutting plans within Provincial Parks including, but not limited to:***

- ***Hauling and operation restrictions.***
- ***Access road limitations.***
- ***Road closure and stream crossing provisions.***
- ***Distances from identified natural features and recreation areas”***

Unfortunately in Louisiana-Pacific's proposed 20-year Forest Management Plan, there is no special guidance listed for logging in Duck Mountain Provincial Park.



Clearcut visible from Spray Lake hiking trail (cutblock LNK-810).

### Duck Mountain Provincial Park Management Plan research notes

- Section 3.2.1 mentions buffers will be maintained along roadways while logging but the clearcuts are directly visible along Highway 366 across from Sinclair Lake (KTC-820) and the Spray Lakes hiking trail parking lot (LNK-810).
- Section 3.3.1 states, regarding all-terrain vehicle (ATV) use, “Concerns about habitat degradation, exotic weed dispersal, air and noise pollution, soil compaction, erosion and siltation of streams have been raised.” Yet no changes to the operation of the trail have occurred, the damaging ATV trail has degraded and was also expanded.
- Section 3.3.2 states: “An inventory of lakes will be conducted to identify cached boats. Designated sites for caching boats will be established on selected lakes.” No such information is listed on the government website.

### Audit recommendations

The Duck Mountain Provincial Park Management Plan was published in 2007, and expected to be valid for 10 to 15 years. It is now 16 years old. A review document explaining the work undertaken as outlined in this plan should be published. A new management plan, based upon the realities of Indigenous Protected and Conserved Areas, people powered trails, the biodiversity crisis and the climate crisis must be produced.

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## SECTION 3: Biodiversity Loss

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The Duck Mountain region is unique on the planet as a distinct ecodistrict. Yet the relationships between species and their habitat are not being investigated or preserved. Instead, cutting down wood fibre is the principal factor in all decisions.

Near-record-sized trees are being logged, fish-bearing waterways are being damaged, and species at risk are being ignored. At least 30 per cent of the Ducks must be permanently protected to halt biodiversity loss. Management of the Ducks must be set up in accordance with the wishes of the First Nations that utilize this region, including Minegoziibe Anishinabe, Wuskwi Sipiik First Nation, and Tootinaowaziibeeng First Nation.

The following is a listing of the specific Biodiversity Loss issues addressed:

- 3.a. [Loss of old forest ecosystems](#)
- 3.b. [Wildlife habitat trees being cut down](#)
- 3.c. [Ducks' unique ecology remains under threat](#)
- 3.d. [Moose population collapse](#)
- 3.e. [Wolf population changes](#)
- 3.f. [Fish-bearing waterways are threatened](#)
- 3.g. [All-terrain vehicles causing land, water and air harm](#)
- 3.h. [Road washouts and culverts](#)
- 3.i. [Species-at-risk management](#)



Pine marten in Duck Mountain Park.

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## 3.a. Loss of old forest ecosystems

All of the largest old trees in the Ducks are being cut down for wood fibre. Large old trees and the forest ecology that allowed them to flourish are given no unique designation or care in logging plans for the Ducks, and we are losing more of these irreplaceable ecosystems every year. Yet some of the largest trees documented in Manitoba were found here.



Older mixed species forest in Duck Mountain Park.

Large healthy pockets of old trees capable of sustaining microclimates and species populations can counter biodiversity loss.<sup>26</sup> Large old trees, referred to as mother trees, are scientifically recognized for their role in both regrowing a forest and creating a healthier forest.<sup>27</sup> The scientific understanding of the value of old trees and how they support a forest is still growing. We are not learning enough about how old trees are making forests resilient in the Ducks, but instead are only managing the forest for wood fibre, which does not take into account the ecosystem value of old trees.

As far back as 1992, Manitoba government documents recognize that the older forests in the Ducks are, “a distinctive old growth ecosystem.”<sup>28</sup>

### Field research results

A trembling aspen with a diameter at breast height (DBH) of 75 cm and a black spruce with a DBH of 57 cm were both recorded in the summer of 2022 at logging sites. Tree locations are currently being withheld.

### Audit recommendations

Protect large areas around old trees. Trees older than 120 years, or a specific circumference per species, should not be harmed during logging operations. The precautionary principle requires leaving pockets of mother trees interspersed throughout a logging area, not just sparse leave blocks of young trees. Research needs to be undertaken on the unique areas of the Ducks to find out what factors contribute to record old tree growth. Insect species, soil nutrients and the mycorrhiza intertwined with old trees should be studied.

This concern is also discussed in the [Park Dereliction 2.e. section \(page 21\)](#).

#### Recent Developments

All logging in the southwest area off West Favel Road must be halted immediately, specifically proposed cutblocks WEF-042, WEF-043, WEF-046, WEF-047, WEF-048, WEF-054, WEF-056, WEF-058, WEF-059, WEF-060, WEF-105. This area must be studied and considered for protection, as mentioned by the Manitoba government in 1992.

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26. <https://geosinstitute.org/past-initiative-forest-legacies/general/scientists-announce-importance-of-the-worlds-primary-forests-and-large-old-trees-in-climate-regulation-and-biodiversity-conservation/>

27. <https://mothertreeproject.org/about-mother-trees-in-the-forest/>

28. [https://www.wildernesscommittee.org/sites/default/files/2023-04/dm\\_draftstudymap1992\\_0.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/dm_draftstudymap1992_0.pdf)

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## 3.b. Wildlife habitat trees being cut down

Large dying and crooked trees of many species are being cut down instead of being left as wildlife habitat. Often referred to as habitat trees, they have no value to logging companies. These trees have been found chopped up and left on the ground interspersed with the excess wood waste burdening the forest floor.

Large old dead trees provide food and a home for many species in the forest. The removal of these trees interferes with natural forest processes and species needs.<sup>29</sup> Of specific concern is the removal of trees that may be utilized by endangered myotis (bats) for roosting. The removal of some of the resources endangered species require to survive is prohibited by endangered species legislation.



Large dead trees chopped up and left (cutblock JFL-806).

Louisiana-Pacific's proposed 20-year Forest Management Plan says ***“the practice of variable retention harvesting retains both live and dead standing wildlife trees.”*** On the ground in clearcuts this is not occurring.

### Field research results

- Virtually every clearcut surveyed has large dead trees that were downed and left on site.
- Cutblock VMR-862 had a large pile of old gnarly birch cut down.
- Cutblock JFL-806 had a large spruce cut down and cut into blocks.

### Audit recommendations

A majority of wildlife habitat trees must be left standing and undamaged during logging operations.

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## 3.c. Ducks' unique ecology remains under threat

A review of biodiversity loss in the Ducks region must include a plan to protect at least 30 per cent of this unique ecology.

**This concern is discussed fully in [Park Dereliction 2.c. section \(page 18\)](#).**



Intact forest area of Duck Mountain Park.

29. <https://www.waldwissen.net/en/forest-ecology/nature-conservation/know-protect-and-promote-habitat-trees>

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### 3.d. Moose population collapse

The moose population has collapsed in the Duck Mountain region, severely enough to force the cancellation of moose hunts even for First Nations and Métis hunters.<sup>30,31</sup> The precipitous decline of moose in the Ducks coincides with the acceleration of industrial clearcut logging in the Ducks through Louisiana-Pacific's Forest Management Licence.

Moose population decline is linked to road access into undisturbed forest blocks, increased wolf populations, brainworm, persistent ticks made more prevalent by climate change and hunting. As outlined in the Logging Concerns section, there are too many all-season roads which are allowing wolves greater success in preying upon moose.<sup>32</sup> Any roads into these undisturbed forest blocks allow easier poaching and hunting by humans. Also covered in the Logging Concerns section is that larger than allowed clearcuts and linear disturbances limit shelter habitat for moose.



Placeholder (Moose traversing a freshly logged area on Tee Lakes Road).

Perhaps the most crucial reason for having a healthy moose population is that hunting moose is a vitally important cultural, health and education component of life for First Nations in the region. Authorizing continued industrial activity that harms moose populations is directly harming First Nations.

#### Field research results

- Virtually every road and clearcut surveyed had wolf scat present, interspersed with moose tracks.

#### Audit recommendations

All activities including trail building, road building and logging have to be substantially curtailed until the moose population rebounds. The Manitoba government must publicize goals for moose population recovery as well as metrics for measurement and decision making. More resources – including staffing and research money – need to be allocated to enable moose population increases.

All logging roads, including existing roads, must eliminate linear sightlines longer than 400 metres.<sup>33</sup> Clearcuts must eliminate all sightlines longer than 400 metres. Larger undisturbed forest blocks without linear disturbances must be established across the entire region.

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30. <https://news.gov.mb.ca/news/index.html?item=8666>

31. <https://mkonation.com/mko/wp-content/uploads/SCN-SCTC-JOINT-PRESS-RELEASE.pdf>

32. <https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.3358>

33. [https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry\\_wildlifeguide1989\\_0.pdf](https://www.wildernesscommittee.org/sites/default/files/2023-04/forestry_wildlifeguide1989_0.pdf)

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### 3.e. Wolf population change

There may be a wolf population increase in Duck Mountain due to easier hunting in man-made forest disturbances such as logging areas, or the increase in available prey as the deer population grows.

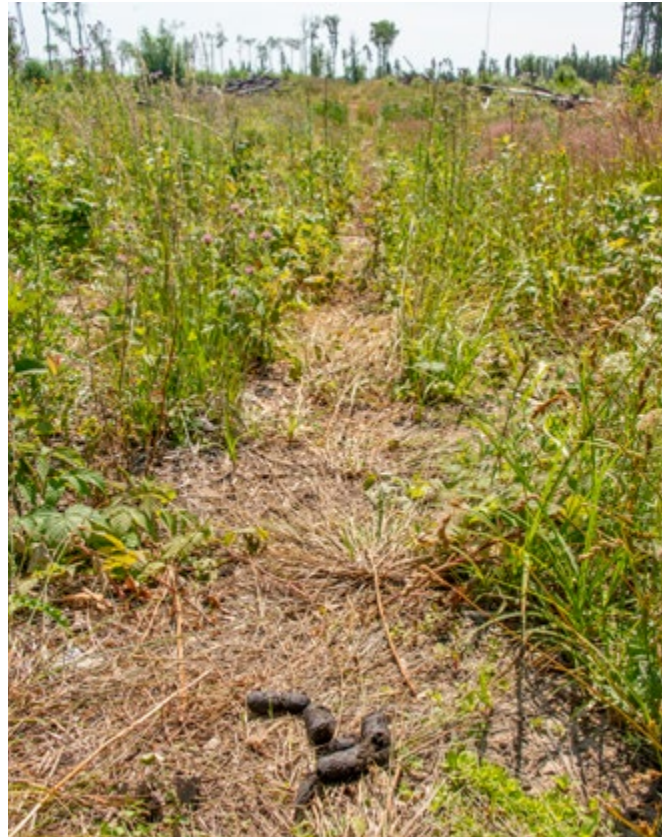
Alternate prey, such as deer, may make it easier for wolves to survive in larger numbers, which can lead to increased moose predation.<sup>34</sup> Wolf hunting success also increases when linear disturbances are added to the forest, such as logging roads and clearcuts. Wolves may be part of the moose decline problem.

#### Field research results

- Virtually every road and clearcut surveyed had wolf scat present, interspersed with moose tracks.

#### Audit recommendations

Monitoring, collaring, and studying wolf populations in existing logged areas of the Ducks is essential, as well as comparable studies in large intact forest blocks. No new logging roads or linear disturbances can be built until we know what is happening with wolf populations in relation to moose populations. The knowledge gleaned from other jurisdictions and other species, such as boreal woodland caribou, must inform wolf population management. It is critically important that landscape protection rather than wolf kills be a management solution for wolf populations.



Wolf scat in clearcut on Vimy Ridge Road.

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### 3.f. Fish-bearing waterways are threatened

A fish-bearing waterway was impacted by a logging road inside Duck Mountain Provincial Park, creating a threat to the fish and biodiversity in the region. Waterway crossings must be either eliminated or improved upon.

This concern is discussed fully in the [Logging Concerns 1.e. section \(page 6\)](#) and mentioned in the [Park Dereliction 2.f. section \(page 21\)](#).



Fish-bearing waterway (road VMR-1B-1E).

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34. <https://wolf.org/original-articles/what-is-apparent-competition-learn-more-about-predator-prey-relations-in-multi-prey-ecosystems/>

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### 3.g. All-terrain vehicles causing land, water and air harm

All-terrain vehicle (ATV) use on the Mossberry Lake multiuse trail inside Duck Mountain Provincial Park is causing ongoing destruction to the biodiversity of the Ducks. The trail must be closed to ATVs. The Environment Act Licence for this trail must be reviewed and revoked.

This concern is discussed fully in the [Park Dereliction 2.h. section \(page 23\)](#).



Illegal dirt bike using Mossberry Lake trail.

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### 3.h. Road washouts and culverts

There were washouts on the two main highways through the Duck Mountain region in the summer of 2022. Bridges instead of culverts need to be installed to better care for water and protect biodiversity.

This concern is discussed fully in the [Park Dereliction 2.j. section \(page 25\)](#).



Washout on Highway 367.



## 3.i. Species-at-risk management

There is virtually no plan to care for species at risk in the Ducks. Species that are protected under both federal and provincial species-at-risk legislation are known to occur here, but only data on the threatened Canada warbler is listed in Louisiana-Pacific's proposed 20-year Forest Management Plan.<sup>35</sup>

Species at risk require specific habitat and have evolved over millennia to thrive in certain environmental conditions. If clearcut logging plans are not taking into account the needs of species at risk, the logging company is contravening federal and provincial endangered species law.

Of specific concern is the lack of guidance for little brown myotis and northern myotis. They utilize large old trees for roosting, which are being cut down in logging operations. There is a federal recovery strategy for these species, yet it is not mentioned in Louisiana-Pacific's proposed 20-year Forest Management Plan.<sup>36</sup>

There are also federal recovery strategies for the rusty blackbird, eastern whip-poor-will, olive-sided flycatcher, and red-headed woodpecker that are not discussed in the proposed logging plans.

### Field research results

- A red-headed woodpecker was documented in the Ducks in July 2022.

### Audit recommendations

As required by federal law, Louisiana-Pacific must demonstrate that its plans to log in the Ducks won't further imperil the endangered species that exist here. The federal government must review Louisiana-Pacific's proposed 20-year Forest Management Plan to ensure it doesn't violate the Species At Risk Act.



Redheaded woodpecker in the Duck Mountain region.



Eastern whip-poor-will (Robert McCaw).

35. <https://www.gov.mb.ca/sd/eal/registries/3893.10lp/18.pdf> (Chapter 5 p. 70)

36. [https://wildlife-species.canada.ca/species-risk-registry/virtual\\_sara/files/plans/Rs-TroisChauveSourisThreeBats-v01-2019Nov-Eng.pdf](https://wildlife-species.canada.ca/species-risk-registry/virtual_sara/files/plans/Rs-TroisChauveSourisThreeBats-v01-2019Nov-Eng.pdf)

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# SECTION 4: Policy, Public Participation and Process

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There is simply no public policy on managing the Duck Mountain region, nor a process for public participation.

The mismanagement of the Duck Mountain region is perpetuated by outdated policies that have not kept up with modern understanding of the biodiversity crisis and logging impacts. Information on logging regulations and guidance is hidden, and public participation is at best a token effort.<sup>37</sup> Misinformation in the management process is clouding the discussion of care for the Ducks.<sup>38</sup>

Logging in parks, no protected area improvements, failing Environment Act processes and logging plans that aren't public are going to continue to tarnish Louisiana-Pacific Corporation and the Manitoba government.

The following is a listing of the specific Policy, Public Participation and Process problems addressed:

## Policy

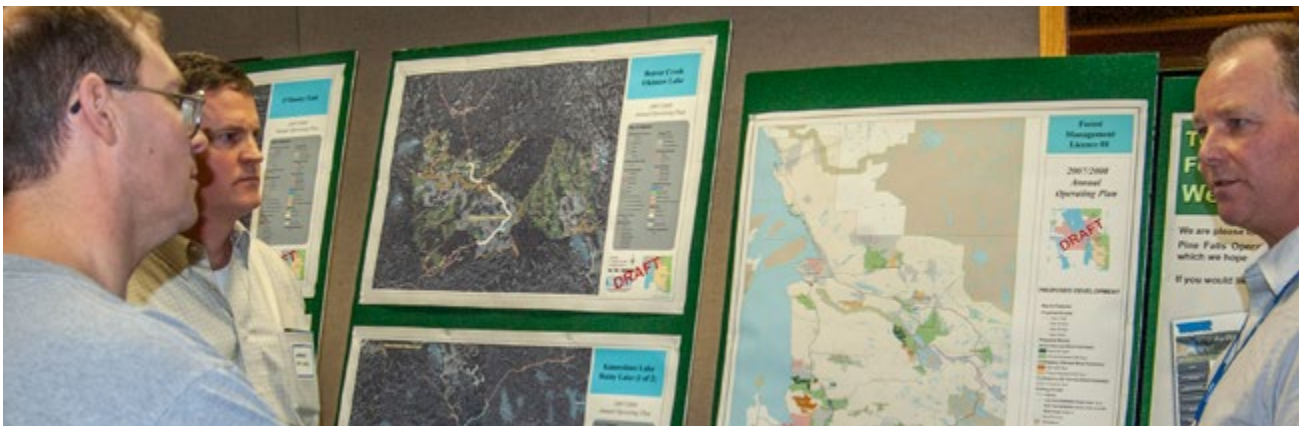
- 4.a. [Park logging must end](#)
- 4.b. [More protected areas needed](#)
- 4.c. [Questionable licence extensions](#)
- 4.d. [Racist laws on moose hunting](#)
- 4.e. [Two-stage licensing hides cumulative impacts](#)

## Public

- 4.f. [No publicized logging plans](#)
- 4.g. [No publicized cumulative logging history](#)
- 4.h. [No public hearings](#)
- 4.i. [Environment Act failings on public comment period](#)

## Process

- 4.j. [Fraudulent wood supply analysis](#)
- 4.k. [Incomplete Technical Advisory Committee for review of forest management plan](#)
- 4.l. [Government lying about park logging](#)
- 4.m. [No Environment Act licence for other logging companies](#)



Logging company's annual logging plan open house in Winnipeg.

37. [https://www.gov.mb.ca/sd/eal/registries/3893.10lp/3893.1\\_ad.pdf](https://www.gov.mb.ca/sd/eal/registries/3893.10lp/3893.1_ad.pdf)

38. <https://www.wildernesscommittee.org/news/debunking-manitobas-provincial-park-logging-response>

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## 4.a. Park logging must end

Duck Mountain Provincial Park is suffering ongoing destruction from industrial logging. Only one other park in the hundreds of parks across the country has logging in it – Algonquin Provincial Park in Ontario – and pressure is mounting to end logging there too.

Logging a park destroys the peace that should be offered to visitors and disrupts the nature that should be preserved in a park.

Choosing to log a park is a policy from a bygone era. Already in 1992, the Clean Environment Commission stated that park logging should end in Manitoba. The federal government banned logging in national parks in 1930.



Clearcut Provincial Park logging banner (cutblock VMR-862).

### Audit recommendations

Remove Duck Mountain Provincial Park from Louisiana-Pacific's Forest Management Licence. Change The Provincial Parks Act to ban logging in all parks.

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## 4.b. More protected areas needed

Not enough of the Duck Mountain ecodistrict is protected from damage by industrial activity. The current Manitoba government refuses to move forward on increasing protected areas as other jurisdictions are doing.

Without protections in place, the biodiversity found in the unique Duck Mountain region will decline from development and industrial activity. In 1992 Manitoba agreed to preserve 12 per cent of lands and waters. Unfortunately we have not reached that goal even 30 years later. Due to the growing biodiversity crisis, countries have adopted a goal of preserving 30 per cent of the lands and waters by 2030.<sup>39</sup>



Duck Mountain Park (Mike Grandmaison).

### Audit recommendations

The Manitoba government must commit to the new protected areas goal the world has agreed upon. The resources to reach the goal on an appropriate timeline must be made available. At least 30 per cent of the Ducks ecodistrict must be preserved, according to the wishes of the Indigenous communities that utilize the region.

39. <https://www.unep.org/un-biodiversity-conference-cop-15>

## 4.c. Questionable licence extensions

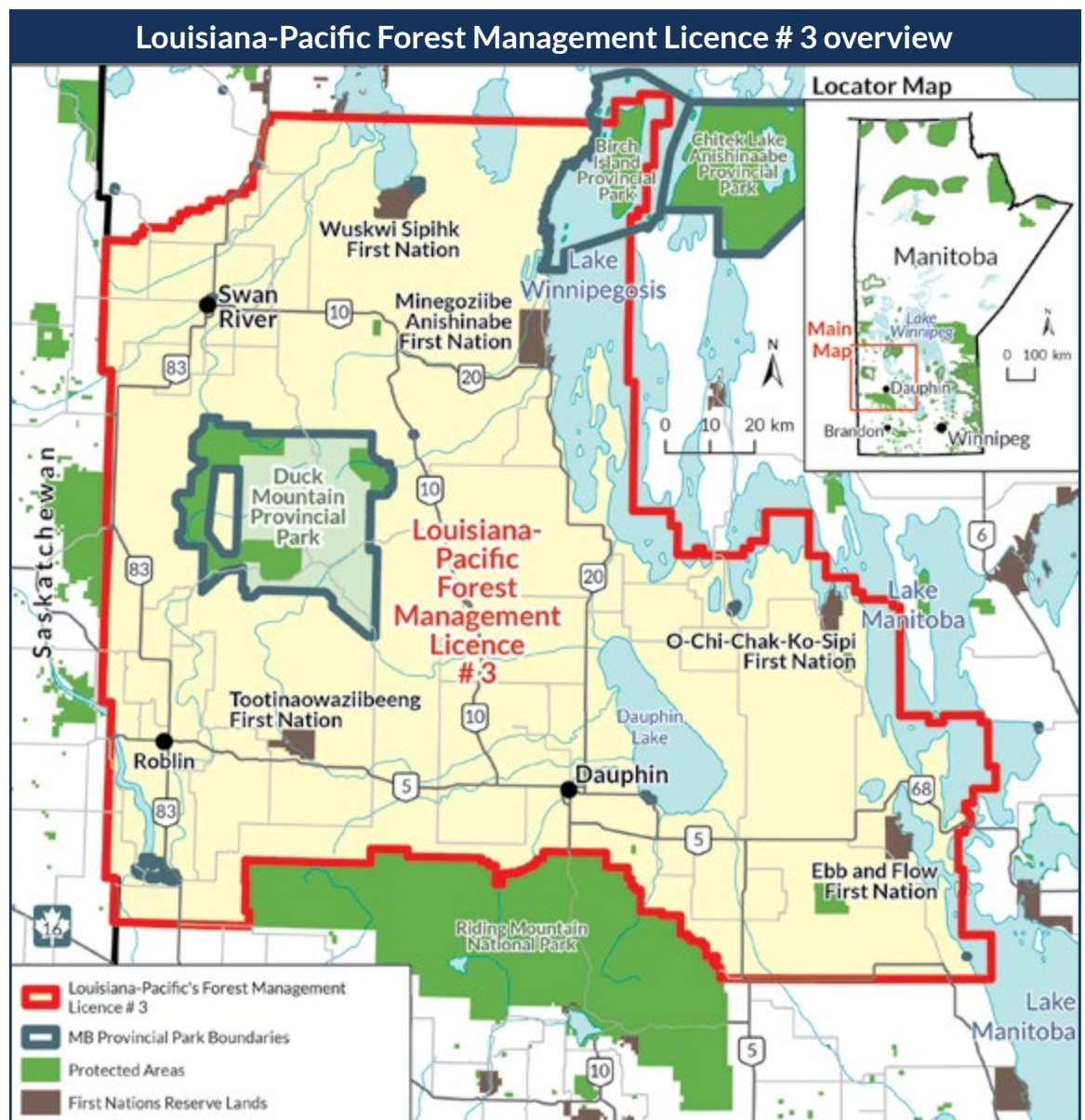
The original contentious 10-year Forest Management Plan for Louisiana-Pacific's operation expired on January 1, 2006 and Louisiana-Pacific has not had an approved forest management plan since. Every year or so when the licence expires, the government grants them an extension with no public review.

Long-term forest management plans allow the public and government experts to ensure public lands are properly cared for. Louisiana-Pacific has gone 17 years without an approved plan. This indicates either incompetence by the provincial government or a lack of resources and attention to the problem.

The scientific understanding of the natural world is increasing every year. The growing biodiversity crisis and the ongoing climate crisis are the reasons why we need a competent and comprehensive plan to preserve the planet. Empty licence extensions are not sufficient to protect the environment.

### Audit recommendations

The Manitoba government needs to find the resources and political will to get a proper logging plan approved before any more logging ensues. A proper logging plan must give stability to workers while preserving nature in the Ducks.



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## 4.d. Racist laws on moose hunting

Indigenous Peoples have been prohibited from hunting for moose in the Ducks due to collapsing moose populations. Yet one of the reasons for the collapsing moose populations is clearcut logging and road building, which the government is still allowing.

Stopping one activity that affects moose populations while allowing the other is a racist policy discriminating against Indigenous communities. If the moose population recovery is important, which it is, then actions to stop the moose population collapse can not target only Indigenous hunters.

### Audit recommendations

Huge swaths of intact forest blocks without roads and logging must be set aside as protected habitat for moose.



Moose hunting prohibited sign in Duck Mountain region.

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## 4.e. Two-stage licensing hides cumulative impacts

The environmental impact of the wood supply required to feed Louisiana-Pacific's wood processing plant is considered under one licence (Environment Act Licence Number 2191 E) and the operation of the plant including pollution and environmental effects from it are considered under a second separate licence (Environment Act Licence Number 2954 RRR).

You can't have one of these operations without the other. The wood doesn't magically get turned into a finished product after it's cut down in the forest, and the wood doesn't magically appear at the door to the plant without massive impacts to the forest where the trees are cut down from. The cumulative effects of both the extensive logging as well as the operation of the polluting factory must be considered together. Jurisdictions around the world are working to enact cumulative impacts reviews to better protect the environment.



Louisiana-Pacific wood processing plant at Minitonas, Manitoba.

### Audit recommendations

The operation of the wood processing plant (Environment Act Licence Number 2191 E) and the 20-year Forest Management Plan (Environment Act Licence Number 2954 RRR) should be merged and reconsidered when the cumulative impacts of both operations can be weighed together.

Additionally The Environment Act should be changed to disallow two-stage licencing, which just occurred with a sand processing plant (Environment Act Licence Number 3367).

## 4.f. No publicized logging plans

The upcoming logging plans for the Ducks region or for any region in Manitoba were not published and made available to the public.

Hidden logging plans removes the ability for the public to know changes are coming to an area they are familiar with, or to bring to light their expertise on a given area. The risk of losing a special area of public lands is very high without sharing this information in advance.

### Audit recommendations

The Manitoba government, Louisiana-Pacific, Spruce Products Limited (a company that is logging in the Duck Mountain region) and Canadian Kraft Paper (holds logging licence over public forest in northern Manitoba) need to publicize their plans to log on public land every year. This should be done on a Manitoba government website in an accessible way ahead of an annual public comment period.



Signs announcing park logging operations in Duck Mountain Park.

### Note:

Following the two lawsuits brought against the Manitoba government and Louisiana-Pacific Corporation by Minegoziibe Anishinabe and Wuskwi Sipiik First Nation in 2022, logging plans were posted to the public registry website for one of Louisiana-Pacific's licences. The logging plans are not linked from any of the government pages on logging or on parks and are in a hard to understand format.



Extensive wood waste (cutblock JFK-807).

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## 4.g. No publicized cumulative logging history

The Manitoba government does not publish cumulative logging history maps for the Duck Mountain region, nor for any area of public land being logged commercially.

The public needs to know the industrial impacts of logging on public lands. Unless the government begins publicizing this cumulative logging information, the public can not offer social licence for the continued destruction of public forests for corporations.

### Audit recommendations

The Manitoba government should publish cumulative logging history and road building maps every year on a government website in an easily accessible format.



Logs piled in Duck Mountain Park.

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## 4.h. No public hearings

The Environmental Approvals office declined to have public hearings on Louisiana-Pacific's proposed 20-year Forest Management Plan. The Wilderness Committee appealed this decision in June to Environment, Climate and Parks Minister Jeff Wharton. We have not had a decision from the branch as of April 2023.

The issuance of a logging licence to log Duck Mountain Provincial Park in 1996 just after the Clean Environment Commission stated logging in parks must end was controversial. A majority of Manitobans support an end to logging in provincial parks.<sup>40</sup>

Continuing to log a public forest without a valid forest management plan from 2006 until now is controversial. Many experts outside of government and the logging company have knowledge that can contribute to proper care of the Ducks. Preventing a hearing on a highly unpopular project stops the public from raising concerns and getting answers to this controversial operation. Community support can not be generated for Louisiana-Pacific or the logging plans here without public hearings.

### Audit recommendations

It is recommended that the minister responsible for The Environment Act hold public hearings on Louisiana-Pacific's 20-year proposal for logging in the Ducks.



Sign banning public from utilizing Duck Mountain Park.

40. <https://www.wildernesscommittee.org/sites/default/files/2023-04/180711-20WC-20June-202018-20Omni-20Report.pdf>

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## 4.i. Environment Act failings on public comment period

The opportunity to provide public input to forest management plans is limited to a short window of 60 days. During this time, the only data available is from the logging company. The experts on the Technical Advisory Committee (TAC) – a panel of government employees whose department oversees a portion of The Environment Act proposal – release their report on the logging company’s filing only after the public comment window closes.



Stump standing in massive clearing (cutblock LNK-813).

Sixty days to submit written analysis on 1,000 pages of the logging company’s information is simply not enough time to gather independent advice. It also does not leave enough time for on-the-ground research. The public does not have an opportunity to provide comments or concerns raised by our experts, the government employees on the TAC. This is akin to getting a home inspected before buying a house, but not being able to review the report until after you’ve purchased the house.

### Audit recommendations

For a project as large and impactful as this, the public comment period should be at least 120 days. On all Environment Act proposals, a second round of public comment is required after the TAC has released their comments on the proponent company’s plans.



Forest razed before Environmental Licence issued, Hollow Water First Nation territory, 2012.



## 4.j. Fraudulent wood supply analysis

When the original Environment Act licence was issued to Louisiana-Pacific in the 1990s, the available wood fibre for the processing plant was vastly overestimated. Despite expert testimony at the time stating the forests couldn't provide as much wood as was being claimed, the fraudulent wood supply estimate was used.<sup>41</sup>

A wood supply analysis indicates how much wood fibre can be removed from the forest, and it informs the annual allowable cut (AAC). Removal of any wood fibre has a detrimental effect on ecosystems, and the larger the amount of wood fibre taken from the forest, the more nature suffers.

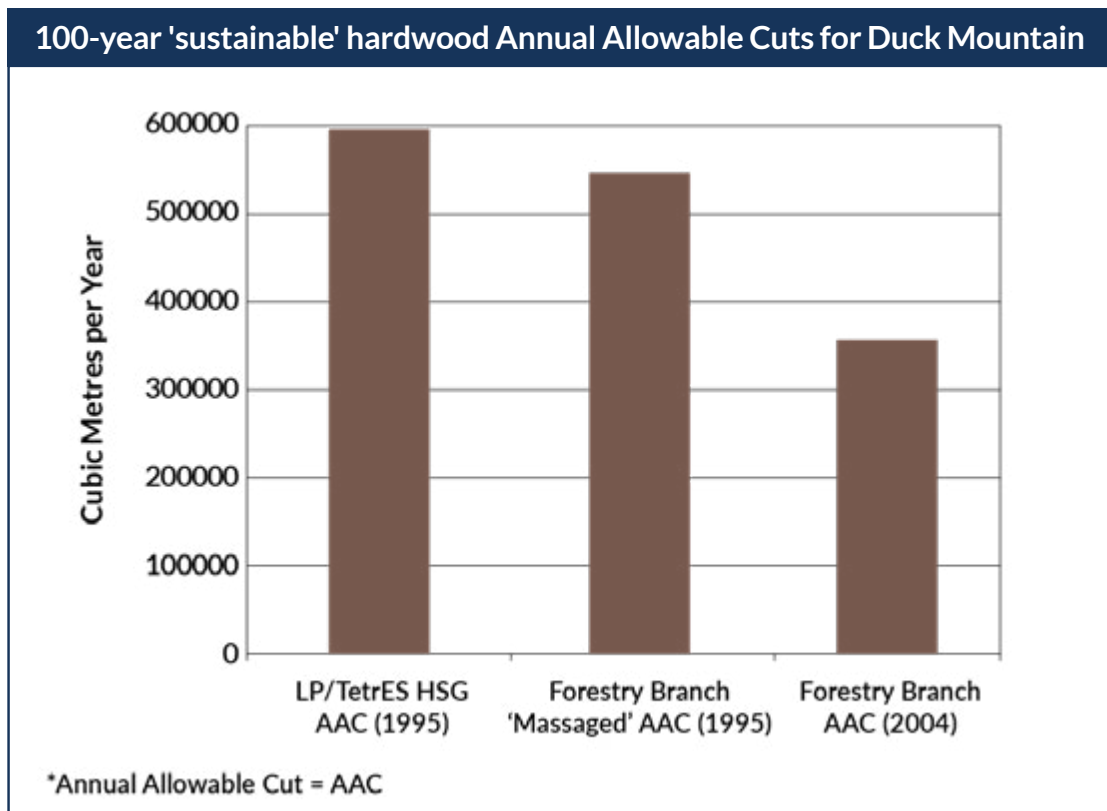
Wood processing plants are designed based upon the amount of wood that is available in the surrounding area: the AAC. Due to the error in AAC enshrined in the very first licence issued, the validity of the entire operation is in question. It's likely that, as in most other places in the country, the processing plant needs more wood than can be provided in any ecologically sustainable way.



Log piles and logging equipment (cutblock LNK-810).

### Audit recommendations

An independent, peer reviewed wood supply analysis is required before a licence can be issued. The resultant wood supply analysis may necessitate substantially lowering the annual allowable cut.



Source: Soprovich, Dan "Overallocation of forests to Louisiana-Pacific" Bluestem Wildlife. Eco-Journal. Sept/Oct 2006

41. <https://www.wildernesscommittee.org/sites/default/files/2021-07/overallocation-lp-ducks-ecojournal-saprovich20062007.pdf>

## 4.k. Incomplete Technical Advisory Committee for review of forest management plan

The Technical Advisory Committee of government experts reviewing Louisiana-Pacific's proposed 20-year Forest Management Plan did not include anyone from the provincial government who works on climate nor any federal scientists who work on species at risk.<sup>42</sup>

First-person evidence from conversations with government employees suggest that cuts to the civil service coupled with COVID-19 absences have compromised the ability of Environmental Approvals to do a proper review.

A long-term plan for this amount of forest will have a serious climate impact that must be reviewed by government experts. Similarly, the management of endangered species habitat proposed by a logging company should be looked at by federal scientists who specialize in endangered species habitat and administration of the Species At Risk Act.

### Audit recommendations

Louisiana-Pacific's proposed 20-year Forest Management Plan must be reviewed by these specialists. Their review must be publicized before this licence can move forward.



Canada warbler, *wilsonia canadensis* (Robert McCaw).



Swan River Conservation Office closure due to staff shortage.

42. [https://www.gov.mb.ca/sd/eal/registries/3893.10lp/tac\\_comments.pdf](https://www.gov.mb.ca/sd/eal/registries/3893.10lp/tac_comments.pdf)

## 4.l. Government lying about park logging

When members of the public contacted the agriculture and resource development minister, at that time Blaine Pedersen, about park logging, the minister instructed the Director of Forestry and Peatlands Matt Conrod to respond. They falsely claimed Louisiana-Pacific isn't logging Duck Mountain Provincial Park.<sup>43</sup>

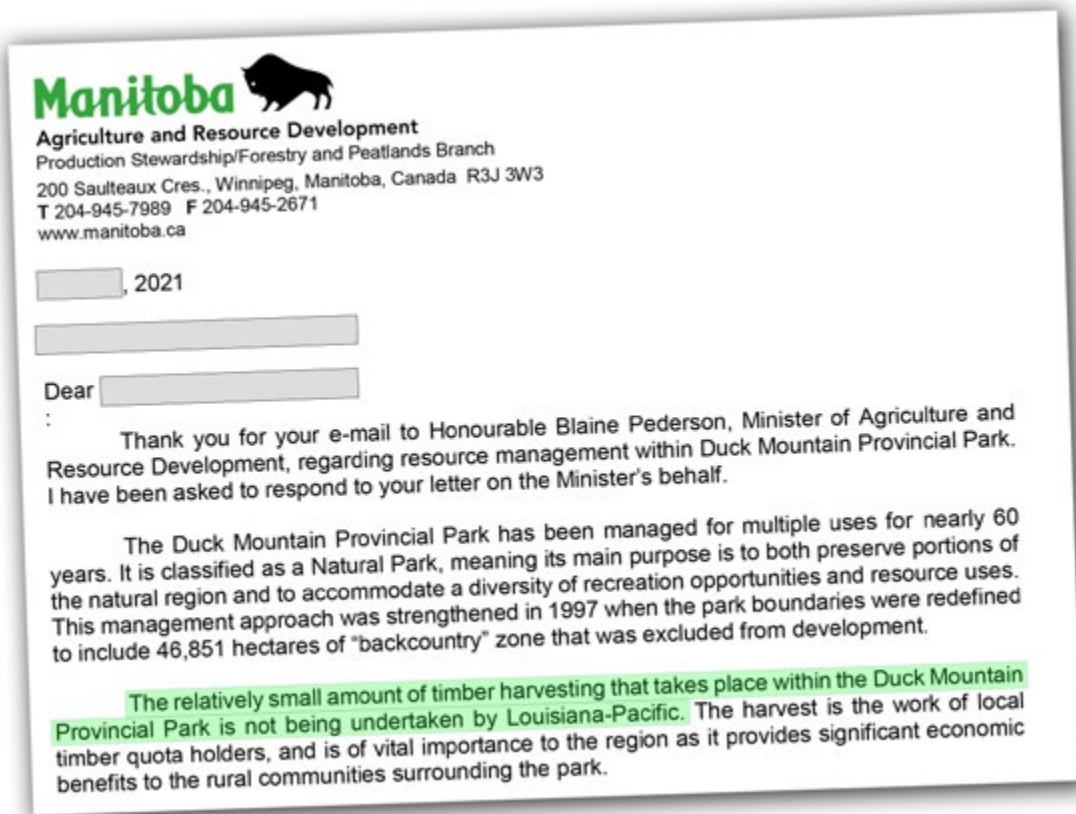
However, as stated in the 2007 Duck Mountain Provincial Park Management Plan on page 15: ***“Planning and implementation of forest harvest activities in approved areas is conducted by Louisiana Pacific Canada Ltd., under licence from the Province of Manitoba.”***

From the outset of Louisiana-Pacific's tenure over public lands in Manitoba, this operation has been controversial. Having the government minister lie to the public makes it more difficult to trust that proper care for the Ducks can be achieved with either Louisiana-Pacific or this government.

The entirety of Duck Mountain Provincial Park is currently within Louisiana-Pacific's Forest Management Licence. There is no other forest management licence for this area. Louisiana-Pacific has filed a proposed 20-year Forest Management Plan that includes continued clearcut logging within a majority of Duck Mountain Provincial Park.

### Audit recommendations

The minister responsible for park logging should contact the members of the public who received misleading letters, and clarify that Louisiana-Pacific is in control of the majority of Duck Mountain Provincial Park. The Manitoba government should publicize a retraction.



Letter from Matt Conrod, director of forestry and peatlands.

43. <https://www.wildernesscommittee.org/news/debunking-manitobas-provincial-park-logging-response>

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## 4.m. No Environment Act licence for other logging companies

The Duck Mountain region is entirely within Louisiana-Pacific's forest management licence, however other logging companies are operating inside this area. Many logging road signs in Duck Mountain Provincial Park are labeled "SPL" for Spruce Products Limited, as they are apparently building the logging roads. Yet the only Environment Act licence Spruce Products has for logging expired in 1996.<sup>44</sup>



Logging road sign for Spruce Products Limited (road KTC-7A).

Another local logging operation, Mountain Quota Holders Association, has an Environment Act licence to log north of the Duck Mountain region, in the Porcupine Hills. This operation also has no current long-term forest management plan, and has instead been granted licence extensions every year or two since 2006. It is unclear if the Mountain Quota Holders are also logging the Ducks as they have in the past.

Both Louisiana-Pacific and the Manitoba government claim Louisiana-Pacific is not logging Duck Mountain Provincial Park even though they hold the licence for the park. Their proposed 20-year Forest Management Plan refers to Spruce Products Limited several times, however only Louisiana-Pacific can be held responsible under The Environment Act for actions on their behalf. Spruce Products Limited does not have an Environment Act licence that can be reviewed and/or enforced. This is despite the major environmental impact that they have on public land every year.

The Manitoba government and Louisiana-Pacific have been using this licencing gap to publicly claim Louisiana-Pacific is not logging a park.

### Audit recommendations

The Manitoba government must publicly clarify who is responsible for logging in Duck Mountain Provincial Park. The government must publicly clarify the role that Spruce Products Limited and Mountain Quota Holders Association have in operating and managing logging in the Duck Mountain region.

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44. [https://www.gov.mb.ca/sd/eal/archive/2014licence.updates/2059s2\\_4046-00.pdf](https://www.gov.mb.ca/sd/eal/archive/2014licence.updates/2059s2_4046-00.pdf)

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