



March 11th, 2013

Honourable Greg Selinger,
Premier of Manitoba
Legislative Assembly of Manitoba
450 Broadway Avenue
Winnipeg, Manitoba

Dear Premier Selinger,

The Wilderness Committee (WC) is seeking an explanation and action to solidify legislation banning logging in provincial parks, in light of our recent issues with Tolko Industries' Dickstone South logging road in Grass River Provincial Park.

To explain why this letter is directed at you, I would like to point out that this problem with a new logging road in a provincial park has endured through two Premiers and four Conservation Ministers. This means five other different decision-makers have been queried about this project, and no satisfactory answer has yet been given. We would appreciate the Premier of Manitoba's personal explanation and attention to this grievous issue.

WC recently brought questions before the Manitoba courts asking whether a logging road was considered logging, and also whether the construction of a logging road would violate the new ban on logging in provincial parks.

After an original decision and a subsequent appeal, we were left with two decisions that qualified the park logging ban legislation.

In the first decision, the judge stated he had no problem considering that a logging road could, in fact, be considered logging. This is what we have been asserting.

In the appeal decision, the judge clearly identified that the legislation in Manitoba does not ban logging in provincial parks. Instead, only "commercial timber cutting rights" are banned in Manitoba parks. The disturbing element of the written decisions is that the judges have stated the **logging is not banned in Manitoba parks**.

There are three important considerations regarding this logging road situation and our legislation which is supposed to ban provincial park logging.

First, when the decision to ban logging was announced on November 21, 2008, the Manitoba government sent out a news release. The first sentence of the news release stated:



The provincial government will introduce legislation which would prohibit logging in 79 out of 80 provincial parks and all future parks effective April 1, 2009, Premier Gary Doer announced today.

Further on was this quote:

“Ending the practice of logging inside provincial parks will leave a permanent, positive environmental legacy for future generations of Manitobans,” said Conservation Minister Stan Struthers.

These are the words that the people of Manitoba were told, by the two decision-makers on this file. This is what we expected, and this is what we congratulated the government for implementing. However, this is not what Manitobans received.

The second point involves the government’s own recommendations, which drove the campaign to end logging in provincial parks. In 1992, the Clean Environment Commission released a very specific recommendation about logging in provincial parks. It stated:

“Commercial forestry activity in all provincial parks should be phased out.”

This is simple and concise. It does not say commercial timber cutting rights, but rather commercial forestry activity. A logging road would be banned according to this recommendation.

The third key point is the public sentiment leading up to the park logging ban. There were over 20,000 signed letters delivered to the government, asking that logging be banned in provincial parks. This has to be one of the largest public engagements on any decision the government has made. The people of Manitoba clearly supported the ban on logging in provincial parks.

More telling than just the number of letters received was the comment made by then-Conservation Minister Stan Struthers to the Wilderness Committee. **We stated to him that 9 out of 10 people we spoke to while canvassing door-to-door agreed that logging in parks should be banned. He replied that he thought that number was probably higher.**

A final critical point regarding this issue has to do with this particular logging operation in this particular section of this particular park. Apart from the overarching provincial policy on logging in parks, which we request that you explain in this letter, there is an extremely serious problem with Tolko’s Dickstone South Road in Grass River Provincial Park.

For decades, the affected section of Grass River Provincial Park was off-limits to logging because it is woodland caribou habitat. This section to the west of Reed Lake is particularly important due to the animals’ use of Reed Lake for raising calves. This logging road puts a large, continuous barrier in between caribou and their desired destination of Reed Lake. Two separate ranges of caribou make use of this area: the Naosap range and the Reed range. In the time that this road project has been under



consideration, the Naosap range of caribou suffered a tremendous loss of habitat due to fire. In spring of 2012, the Wildlife Branch of Manitoba Conservation delayed releasing a recovery strategy for the Naosap range (a report already three years late), admitting that it does not know what the Naosap caribou will do for habitat, or where they may end up. A logical destination for them would be to go further into Grass River Park, where they can avoid disturbance. This new road compromises the critical habitat that they would otherwise be able to make use of.

Additionally, the federal government released their recovery strategy for woodland caribou in October 2012. It listed the Naosap caribou range as the most impacted in Manitoba, with 50% of its habitat disturbed. The federal government requires that at least 65% of caribou habitat remain intact for a caribou range to survive. Allowing this road will lower the chances of survival for the Naosap range of caribou.

The Wilderness Committee requests an explanation as to why Manitobans did not get the promised ban on logging in provincial parks, along with an indication of what the Premier intends to do to rectify the problem. Additionally, the Wilderness Committee would like to see Manitobans receive an analysis of the impacts of this road and other industrial developments on woodland caribou—both the Naosap and Reed ranges--in Grass River Provincial Park.

Sincerely,

Eric Reder
Manitoba Campaigns Director
Wilderness Committee