



Review of 20-Year Forestry Management Plan

Manitoba Métis Federation

October 27, 2023



Table of Contents

1. Introduction	3
2. Background—The Red River Métis and the MMF	3
2.1 The Red River Métis	3
2.2 Red River Métis’ Rights, Claims, and Interests	3
3. Methodology.....	8
3.1 Review Methodology	8
3.2 Community Engagement Methodology	8
4. Summary of Community Meeting and Survey Feedback	9
4.1 Red River Métis Land Use, Harvesting, and Exercise of Rights	9
4.2 Waterways.....	9
4.3 Tick Management.....	10
4.4 Culturally Significant Areas	10
4.5 Engagement and Consultation	10
5. Louisiana Pacific 20-Year Forest Management Plan Review Findings	11
5.1 Red River Métis Land Use in the FML#3 Area.....	11
5.2 Comments and Recommendations.....	17
6. Summary and Further Recommendations	19
Figure 1 MMF Regions and Locals.....	6
Figure 2. Red River Métis Land Use and Occupancy in FML#3	12
Figure 3. Red River Métis Harvesting Areas in FML#3	13
Figure 4. Red River Métis Commercial Harvesting Areas in FML#3	14
Figure 5. MMF Kettle Hills Blueberry Patch IPCA Area of Interest	15
Figure 6. Red River Métis Ecological Knowledge Relevant to Moose Populations in FML#3 Area	16



1. Introduction

The Manitoba Métis Federation (MMF) has been engaged by Louisiana Pacific (LP) to prepare a summary of impacts to Red River Métis Rights, claims, and interests, and to identify areas of interest and concern, in relation to the proposed LP 20-year Forest Management Plan. This report presents a summary of these concerns and impacts based on a review of the LP Management Plan.

The information provided in this report includes sensitive information shared with the MMF by our Red River Métis Citizens, with the understanding that it would be kept confidential and would not be disclosed other than by the MMF. Our Citizens have entrusted the MMF, as the democratically elected government of the Red River Métis, to safeguard and appropriately use this information on their behalf. The information provided in this report is the property of the MMF and cannot be duplicated or distributed without the MMF's written consent. The information described within this report is considered "high-level," meaning it is based on the data that was available at the time of writing, and should be considered an indicative but partial overview of the Red River Métis overall land and resource use within the subject forest areas.

2. Background—The Red River Métis and the MMF

2.1 The Red River Métis

The Red River Métis is an Indigenous collectivity and Aboriginal People within the meaning of section 35 of the Constitution Act, 1982. Based on our emergence as a distinct Indigenous People in the Northwest prior to effective control by Canada and the creation of the province of Manitoba, the Red River Métis holds rights, interests, and claims throughout and beyond the Province of Manitoba.

Since 1982, Métis rights have been recognized and affirmed by section 35 and protected by section 25 of the Constitution Act, 1982. These rights were further confirmed and explained by the Supreme Court of Canada ("SCC") in *R. v. Powley*, 2003 SCC 43. Manitoba Courts also have recognized Red River Métis rights in *R. v. Goodon*, 2008 MBPC 59. These decisions have affirmed that the Métis hold existing Aboriginal rights throughout their traditional territories. Our Citizens and harvesters, rely on and use the lands, waters, and resources of our traditional territory throughout the Province of Manitoba and elsewhere within the historic Northwest, including in and around the area of the Project, to exercise their constitutionally protected rights and to maintain their distinct Red River Métis customs, traditions, and culture.

2.2 Red River Métis' Rights, Claims, and Interests

Based on its emergence as a distinct Indigenous People in the Northwest prior to effective control by Canada and the creation of the province of Manitoba, the Red River Métis holds rights, claims, and interests throughout and beyond the Province of Manitoba consistent with the United Nations Declaration on the Rights of Indigenous Peoples, including the right to self-determination.



The MMF is mandated to promote, protect, and advance the collectively held Aboriginal rights of the Red River Métis. Through this mandate, the MMF engages with governments, industry, and others about potential impacts of projects and activities on our community. In 2007, the MMF Annual General Assembly adopted Resolution No. 8, which provides the framework for engagement, consultation, and accommodation with the Red River Métis. Designed by Métis, for Métis, Resolution No. 8 sets out the process that is to be followed by governments, industry, and other proponents when developing plans or projects that have the potential to impact the section 35 rights, claims, and interests of the Red River Métis. It was unanimously passed by MMF Citizens and mandates a "single-window" approach to consultation and engagement with the Red River Métis through the MMF Home Office.¹

In engaging the MMF, on behalf of the Red River Métis, the Resolution No. 8 Framework calls for the implementation of five phases:

- Phase I: Notice and Response;
- Phase II: Research and Capacity;
- Phase III: Engagement and Consultation;
- Phase IV: Partnership and Accommodation; and
- Phase V: Implementation.

The Project of this Appeal has the potential to impact Red River Métis rights, claims, and interests and as such, engagement and consultation with the MMF, through the process set out above, must be followed. The Project is located within the traditional territory of the Red River Métis, and in the heart of our Homeland. At one time, this was the "postage stamp province" of Manitoba. This is the birthplace of the Red River Métis and where we currently have an outstanding claim flowing from the Federal Crown's failure to diligently implement the land grant provision of 1.4 million acres of land promised to the Red River Métis as a condition for bringing Manitoba into Confederation and set out in section 31 of the *Manitoba Act, 1870* in accordance with the honour of the Crown.²

Red River Métis section 35 rights are distinct from First Nation's rights and must be respected. The Manitoba Métis Federation is the National Government of the Red River Métis.

Prior to the creation of Manitoba, the Red River Métis had always exercised its inherent right of self-determination to develop its own self-government structures and institutions centered around the Red River Settlement and throughout the Northwest. As described by Louis Riel in his 1885 memoirs, Métis self-government was well-established and functioning when Canada came to the Red River Métis in the late 1800s:

¹ More information about Resolution No. 8 is available online at: <http://www.mmfmb.ca/docs/2013-Resolution%208%20Booklet-VFinal.pdf>

² *Manitoba Metis Federation Inc. v. Canada (Attorney General)*, 2013 SCC 14, [2013] 1 SCR 623 ("MMF Case"). The Supreme Court of Canada recognized that this outstanding promise represents "a constitutional grievance going back almost a century and a half. So long as the issue remains outstanding, the goal of reconciliation and constitutional harmony, recognized in s. 35 of the *Constitution Act, 1982* and underlying s. 31 of the *Manitoba Act*, remains unachieved. The ongoing rift in the national fabric that s. 31 was adopted to cure remains unremedied. The unfinished business of reconciliation of the Metis people with Canadian sovereignty is a matter of national and constitutional import" (para. 140).



When the Government of Canada presented itself at our doors it found us at peace. It found that the Métis people of the North-West could not only live well without it . . . but that it had a government of its own, free, peaceful, well-functioning, contributing to the work of civilization in a way that the Company from England could never have done without thousands of soldiers. It was a government with an organized constitution whose junction was more legitimate and worthy of respect, because it was exercised over a country that belonged to it.

Métis self-government has evolved and changed over time to better meet the needs of the Red River Métis. Today, the MMF is the recognized, democratically elected, self-government representative of the Red River Métis and on July 6, 2021, it signed along with the Government of Canada, the Manitoba Metis Self-Government Recognition and Implementation Agreement.

Since 1967, the MMF has been authorized by the Red River Métis through a democratic governance structure at the Local, Regional, and national levels. As part of this governance structure, the MMF maintains a Registry of Red River Métis Citizens.³ By applying for Red River Métis Citizenship, individuals are confirming the MMF is their chosen and elected representative for the purposes clearly set out in its Constitution,⁴ including as related to the collective rights, claims, and interests of the Red River Métis.⁵

The MMF Constitution confirms that the MMF has been created to promote the political, social, cultural, and economic rights and interests of the Red River Métis. The MMF is authorized to represent the Red River Métis' collective rights, interests, and claims. This authorization is grounded in the MMF's democratic processes that ensures the MMF is responsible and accountable to the Red River Métis.

The MMF governance structure includes a centralized MMF President, Cabinet, Regions, and Locals. There are seven (7) Regions and approximately 135 Locals throughout Manitoba (Figure 1). There are more than three thousand Citizens who live outside of Manitoba. All MMF Citizens are Members of a Local. Locals and Regions work together to authorize and support the MMF Cabinet, and the MMF's various departments and offices. Through elections held every four years, Citizens choose and elect the MMF Cabinet consisting of the MMF President, who is the leader and spokesperson for the MMF, a Vice-President of each Region, and two Regional Executive Officers from each Region. The MMF Cabinet also includes the spokeswoman from the Infinity Women Secretariat.

³ MMF Constitution, Article III outlines the citizenship definition and application process. This definition ("Metis" is defined to mean " a person who self-identifies as Métis, is of historic Métis Nation Ancestry, is distinct from other Aboriginal Peoples and is accepted by the Métis Nation ") aligns with the definition of what constitutes a section 35 rights-bearing Metis community as outlined by the Supreme Court of Canada in *Powley* at para. 30.

⁴ *Newfoundland and Labrador v. Labrador Metis Nation*, 2007 NLCA 75 at para 47: "Anyone becoming a member of the [Labrador Metis Nation] should be deemed to know they were authorizing the LMN to deal on their behalf to pursue the objects of the LMN, including those set out in the preamble to its articles of association. This is sufficient authorization to entitle the LMN to bring the suit to enforce the duty to consult in the present case."

⁵ *Behn v. Moulton Contracting Ltd.*, 2013 SCC 26 at para 30: "[A]n Aboriginal group can authorize an individual or an organization to represent it for the purpose of asserting its s.35 rights."



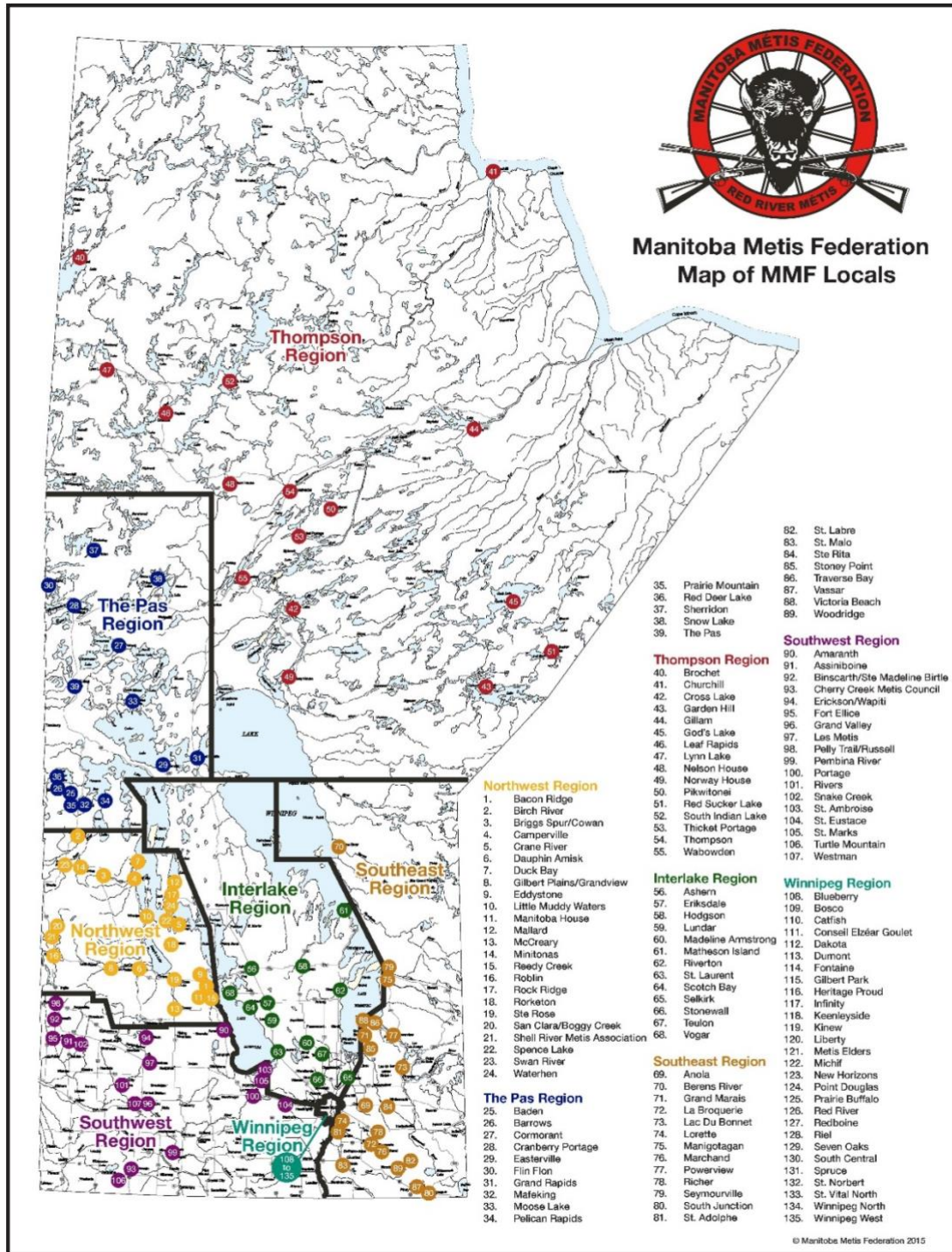


Figure 1 MMF Regions and Locals



The MMF, as the duly authorized representative of the Red River Métis, has been recognized by both the federal and provincial governments in agreements, policies, and legislation. For example, in 2002, *The Child and Family Services Authorities Act* recognized the MMF for the devolution of child and family services to MMF institutions. This Act establishes a series of Child and Family Services Authorities to administer and provide the delivery of services to various distinct Indigenous communities in Manitoba. It creates a Métis Authority, the directors of which is appointed by the MMF.

In 2008, the courts in Manitoba further recognized that "[t]he Métis community today in Manitoba is a well organized and vibrant community. Evidence was presented that the governing body of Métis people in Manitoba, the Manitoba Métis Federation, has a membership of approximately 40,000, most of which reside in southwestern Manitoba."⁶ In 2010, the Manitoba Government adopted a Manitoba Métis Policy, and stated that:

The Manitoba Metis Federation is a political representative of Métis people in Manitoba and represents in Manitoba the Métis who collectively refer to themselves as the Métis Nation. ... Recognition of the Manitoba Métis Federation as the primary representative of the Métis people is an important part of formalizing relationships.⁷

In 2012, the *MMF-Manitoba Harvesting Agreement (2012)* negotiated between the MMF and the Manitoba Government recognized some of the collective section 35 harvesting rights of the Red River Métis and relied on the Citizenship processes of the MMF as proof of belonging to a rights-holding Aboriginal community:

For the purposes of these Points of Agreement, Manitoba will recognize as Métis Rights-Holders, individuals who are residents in Manitoba and who hold a valid MMF Harvesters Card, issued according to the MMF's Laws of the Hunt. [. . . and will] consult with the MMF prior to implementing any changes to the current regulatory regime that may infringe Métis Harvesting Rights.⁸

In 2013, the SCC recognized the "collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada." It went on to grant the MMF standing as the "body representing the collective Métis interest" in the *MMF Case*.⁹ Additionally, in 2016, the *MMF-Canada Framework Agreement* stated:

the Supreme Court of Canada recognized that the claim of the Manitoba Métis Community was "not a series of claims for individual relief" but a "collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada" and went on to grant the MMF standing by concluding "[t]his collective claim merits allowing the body representing the collective Métis interest to come before the court.

⁶ *R. v. Goodon*, 2008 MBPC 59 para 52. Note that the number of MMF Citizens (40,000) identified by the Court was as of 2007. .

⁷ Manitoba Métis Policy, September 2010 at 4, 12, online (PDF): http://www.gov.mb.ca/imr/ir/major-initiatives/pubs/Metispolicy_en.pdf

⁸ MMF-Manitoba Harvesting Points of Agreement (September 29, 2012), ss. 3, 6-7.

⁹ *MMF Case*, *supra* note 6 at para 44.



[and that] Canada is committed to working, on a nation-to-nation, government-to-government basis, with the Métis Nation, through bilateral negotiations with the MMF.¹⁰

On July 6, 2021, the MMF and Canada signed the Manitoba Métis Self-Government Recognition and Implementation Agreement which immediately recognized the MMF as the national government of the Red River Métis.

3. Methodology

3.1 Review Methodology

The MMF undertook a review of LP's proposed 20-Year Forest Management Plan to identify potential concerns with proposed strategy for forest management, effects monitoring, and consultation for FML #3. This review, which included review of both LP's technical documents and spatial data previously collected by the MMF, was completed by Shared Value Solutions Ltd. (SVS) on behalf of the MMF.

The methodology used to identify potential impacts, as described above, included review of the LP's technical documents and shapefiles. Following initial review, researchers identified relevant mapped Red River Métis Land Use and Occupancy data from the MMF's data catalogue. Using both these sources, the review team created maps that show Red River Métis Citizen's knowledge and land use within the potentially impacted areas. This process of spatial analysis allowed reviewers to identify Red River Métis-specific comments and recommendations for steps that LP can take to ensure Red River Métis rights are upheld within the lifetime of the 20-Year Management Plan.

3.2 Community Engagement Methodology

The MMF held a community engagement session on September 21, 2023. The objective of the meeting was to inform Red River Métis Citizens of the proposed 20-year FMP and hear from Red River Métis Citizens about their thoughts, perceptions, and concerns about the FMP and the lands and waters that may be impacted by future forestry activities.

Staff from the MMF's Energy, Infrastructure and Resource Management (EIRM) department facilitated the community meeting. A total of 60 Red River Métis Citizens attended the meeting. EIRM staff documented the input from Red River Métis Citizens by taking extensive notes and, when necessary, confirming verbally that they understood what the participant was saying. EIRM staff also administered a survey (see Appendix A) to gather additional information from Citizens in attendance at the meeting. The survey results were digitized and provided to SVS for analysis and to inform the recommendations being put forward in this report.

¹⁰ MMF-Canada Framework Agreement on Advancing Reconciliation, November 15, 2016, Preamble.



4. Summary of Community Meeting and Survey Feedback

On September 21st, 2023, the MMF held a regional engagement and dialogue session regarding LP's 20-Year Forest Management Plan. Both LP and the Province of Manitoba presented on the activities, measures, and plans proposed within the 20-Year FMP. Following the presentations, Red River Métis Citizens were invited to ask questions or raise specific concerns to the group. Citizens also had the chance to share their concerns about impacts to rights, ecological changes, and potential mitigation measures in a paper survey which was distributed during the meeting (see Appendix A). A total of 60 Red River Métis Citizens joined the meeting to contribute to the conversation. The following subsections outline a synthesis of what we heard from Red River Métis Citizens.

4.1 Red River Métis Land Use, Harvesting, and Exercise of Rights

Concern: Citizens shared concerns about the potential negative impacts of increased forestry activity on their harvesting rights in FML #3.

Analysis: The impacts of the activities and practices proposed in the 20-Year FMP on the rights of Red River Métis Citizens have not been adequately considered. Although LP acknowledges the importance of areas within FML #3 for the exercise of Indigenous harvesting rights, this does not include meaningful recognition of Red River Métis specific harvesting in the area – and therefore cannot properly evaluate the extent to which such activities may impact the harvesting rights of Red River Métis Citizens.

As outlined in the below sections, Red River Métis Citizens have and continue to use areas in FML#3 for hunting, fishing, trapping, and the gathering of firewood and plants, all of which constitute activities that are protected as Aboriginal rights under section 35 of the *Constitution Act*.

4.2 Waterways

Concern: Citizens shared concerns regarding the impact of forestry activity on the quality of water sources located in FML #3. Many the lakes, rivers, creeks, and other waterways in FML#3 are important habitat for species of fish and plants upon which Red River Métis harvesters rely. Citizens reported instances of water flow issues, algal blooms, contamination, and silting of waterways from logged areas.

Analysis: Water is life. It is at the centre of Red River Métis ways of life, including harvesting practices, travel, and knowledge transmission. Given the depth and breadth of Red River Métis Knowledge of the area (Figure 2 through Figure 4), there is further opportunity to strengthen existing management protocols and monitoring of riparian areas through the integration and collection of Red River Métis Knowledge, Land Use, and Occupancy Data. As expressed in Recommendation 4 below, the MMF requests to be meaningfully involved in the creation



and execution of management decisions for riparian areas that consider the unique perspectives and qualities of Red River Métis Knowledge.

4.3 Tick Management

Concern: Citizens expressed concern for the impact clearcuts have on the presence of ticks. This is of concern because ticks are infesting moose, leading to a reduction in the availability of moose for harvest. Should tick presence within FML#3 continue or increase, and affect the moose populations, this within itself represents a potentially negative impact on Red River Métis Rights.

Analysis: The MMF understands from the technical presentation that LP is aware of the tick infestation in cut areas. The MMF welcomes collaboration from LP on the development of environmental management strategies to reduce the tick population and infuse proposed management techniques with Red River Métis specific ecological knowledge.

4.4 Culturally Significant Areas

Concern: FML #3 overlaps with culturally significant areas of the National Homeland of the Red River Métis, including the Kettle Hills IPCA area (see Figure 7). Citizens have observed changes in the Kettle Hills areas and have expressed concern for the destruction of roads that lead to the Kettle Hills and other historic sites.

Analysis: The MMF is encouraged by LP's awareness that new roads developed through forestry work can contribute to increased access to previously undisturbed areas. However, the MMF also wishes to stress that the destruction of previous travel routes can limit access to important sites such as the Kettle Hills, which ultimately may hinder important harvesting and/or knowledge transmission practice. The MMF requests that LP meaningfully engage with the MMF prior to the decommissioning of roads in areas where the FML #3 and IPCA boundaries overlap.

4.5 Engagement and Consultation

Concern: Participants shared appreciation for the approach to engagement and consultation taken by LP thus far. However, they noted the need for the MMF to play a more active role in the activities proposed in the 20-Year Plan.

Analysis: The MMF anticipates a continued commitment from LP and the Province of Manitoba for a collaborative approach to forestry management within FML#3 and the National Homeland of the Red River Métis that meaningfully includes the MMF.



5. Louisiana Pacific 20-Year Forest Management Plan Review Findings

5.1 Red River Métis Land Use in the FML#3 Area

The Red River Métis have a longstanding, intimate connection to the lands and waters within the area of Manitoba that overlaps with FML#3. The area of FML#3 contains many areas of cultural and historical significance, including burial sites, gathering areas, historically significant sites, and areas that facilitate Red River Métis Knowledge transfer between generations (Figure 2). Red River Métis have historically, and continue to, hold rights throughout the FML#3 area, including harvesting a variety of culturally important species through fishing, hunting, trapping, and gathering (Figure 3). In addition to harvesting for family and individual cultural practice and sustenance, some Red River Métis also depend on the FML#3 area for economic purposes through commercial harvesting (Figure 4). The temporal and geographic extent of Red River Métis use and occupancy in the FML#3 area demonstrate the connection and knowledge that the Red River Métis have of the lands and waters in this area, and the mutual benefits of meaningful collaboration throughout adaptive forest management planning in the FML area.

Based on the Red River Métis' close connection to the area, and the ecological importance of the Kettle Hills, and with support from Environment and Climate Change Canada, the MMF is in the process of establishing an Indigenous Protected and Conserved Area (IPCA) to preserve lands, waters, and resources for future generations. IPCAs are areas where Indigenous Nations lead conservation, protection and care of an area, using their own laws, knowledge, and values, and are an important tool for the Government of Canada to achieve their targets of protecting 25% of lands and waters by 2025, and 30% by 2030.

The Kettle Hills Blueberry Patch IPCA aims to protect and revitalize the Red River Métis Breadbasket, a culturally significant area in the Homeland of the Red River Métis. The area was prioritized for protection and conservation after Red River Métis Citizens saw a decline in moose and the amount and productivity of blueberry patches. The IPCA also targets the Pelican Lake Area of Special Interest and Swan Pelican Wildlife Refuge, to protect critical wildlife and bird habitat. As shown in Figure 5, the proposed boundary of the Kettle Hills Blueberry Patch IPCA partially overlaps with FML#3.



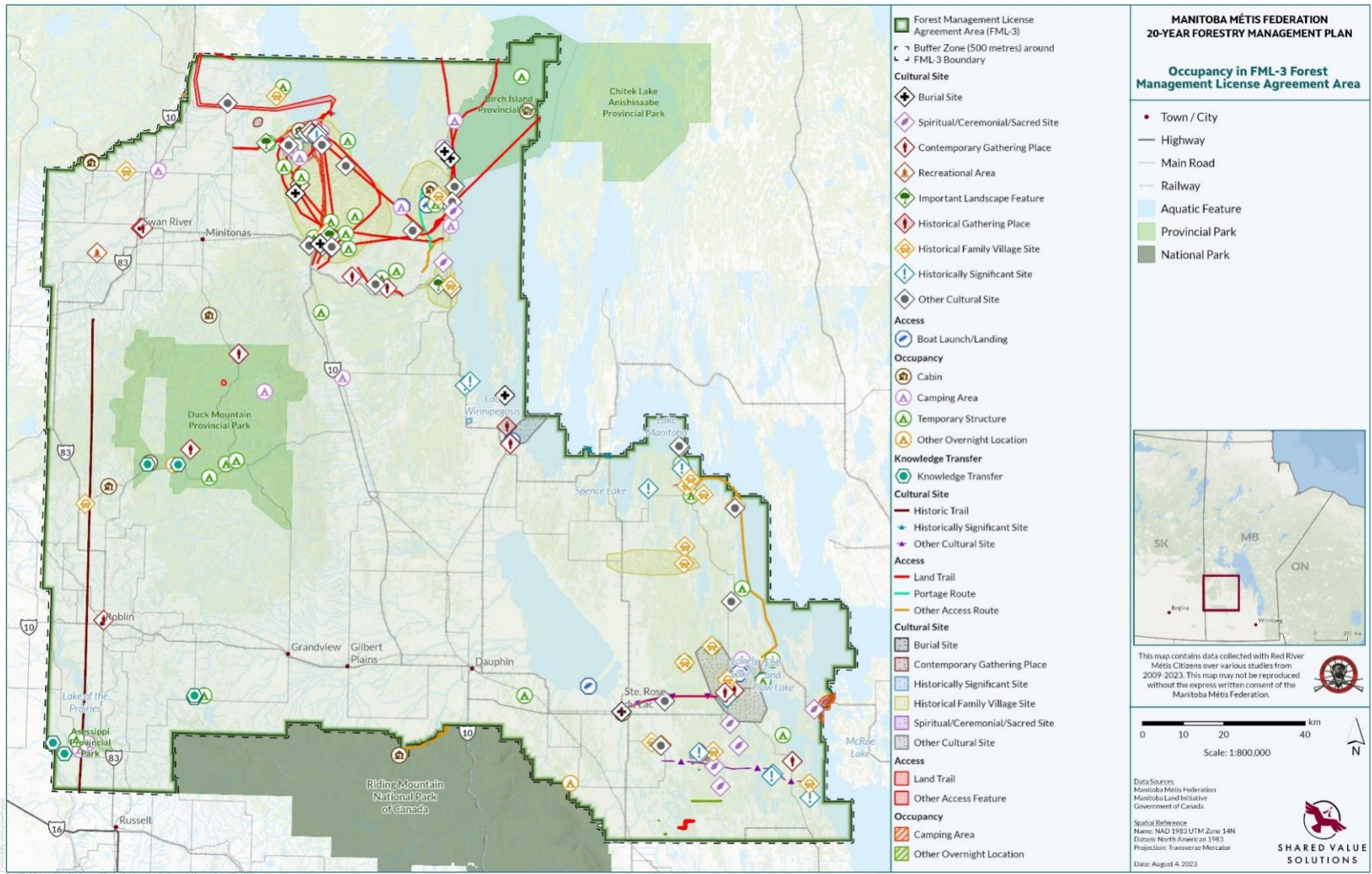


Figure 2. Red River Métis Land Use and Occupancy in FML#3



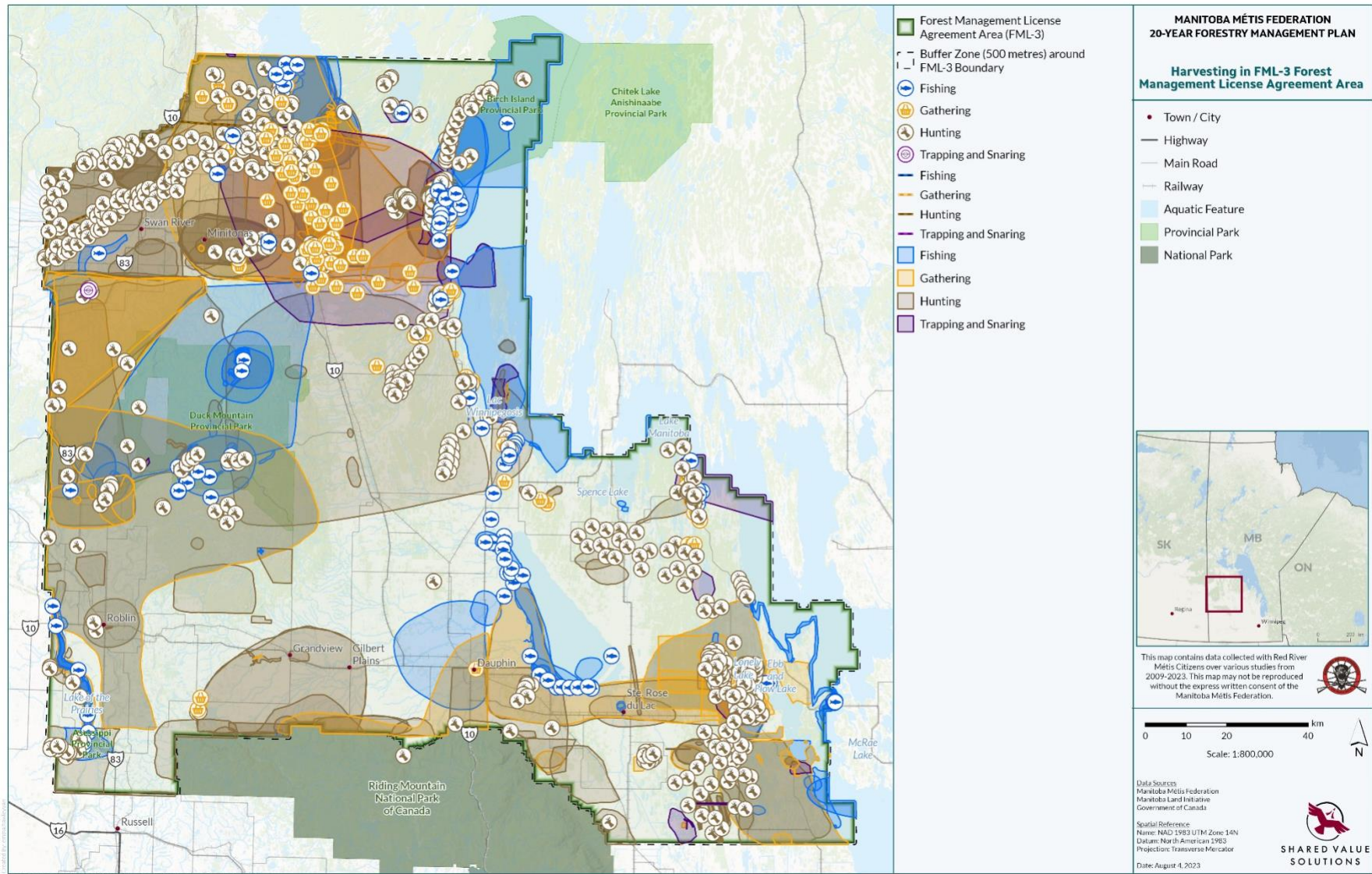


Figure 3. Red River Métis Harvesting Areas in FML#3



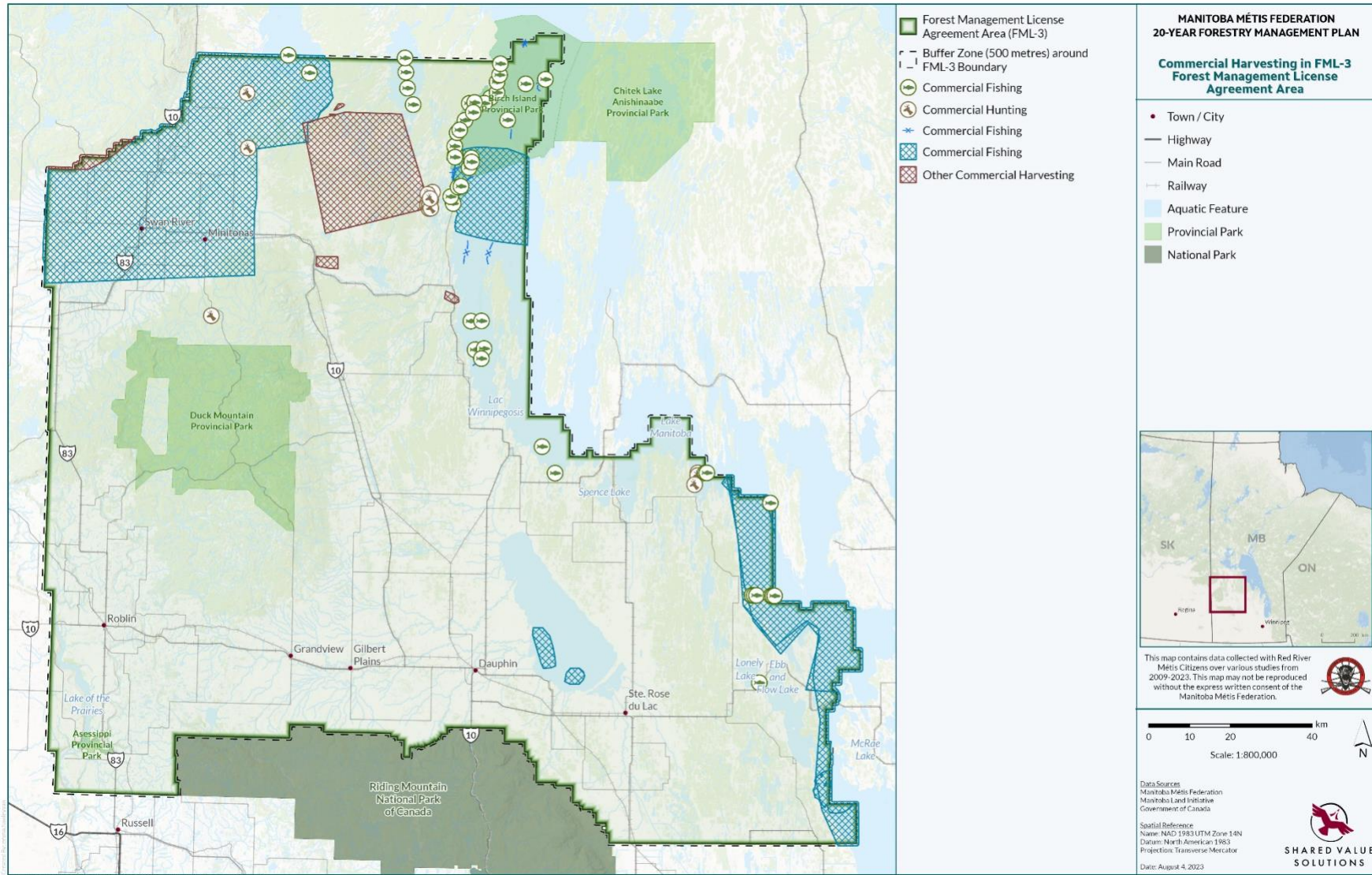


Figure 4. Red River Métis Commercial Harvesting Areas in FML#3



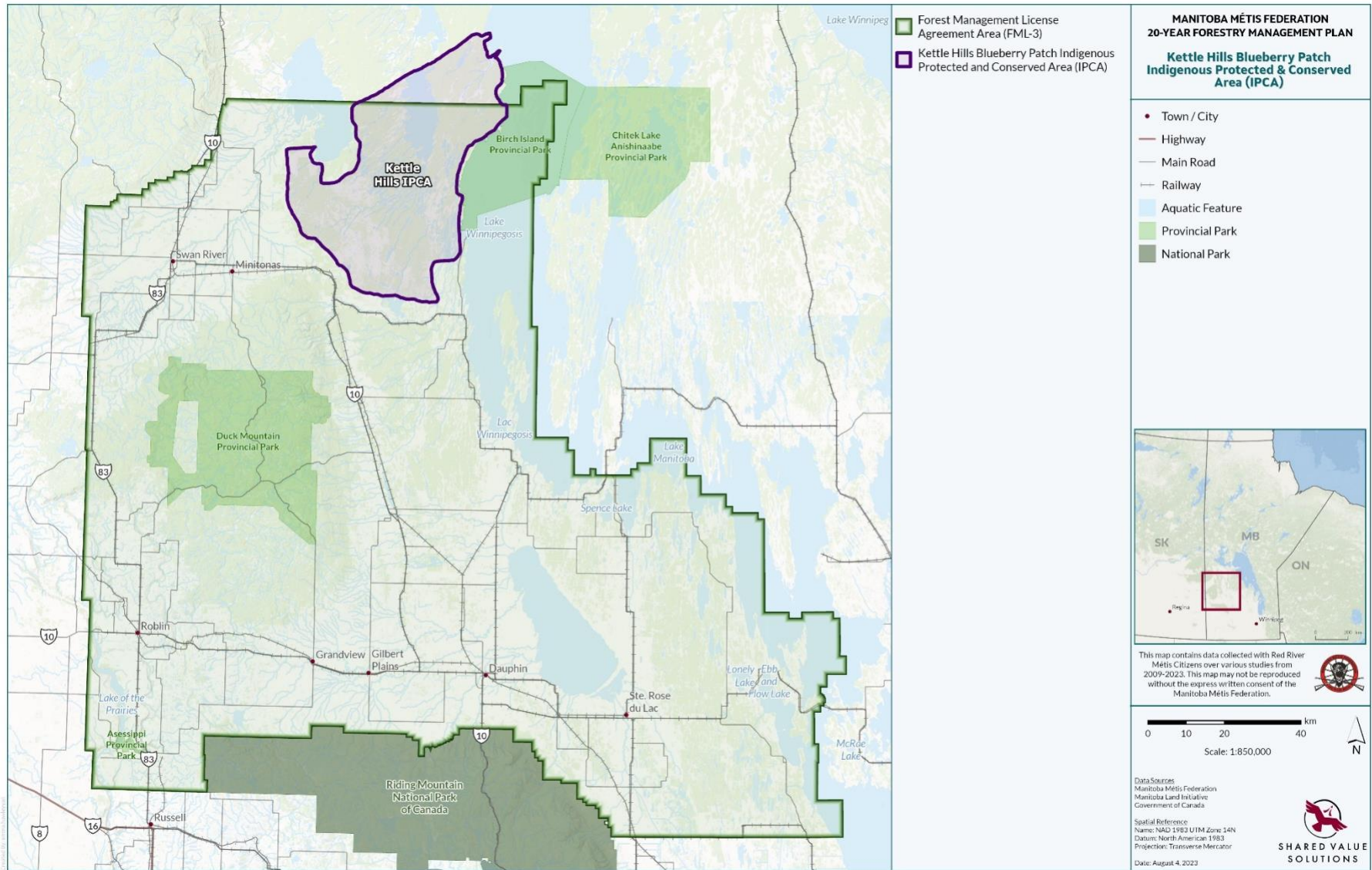


Figure 5. MMF Kettle Hills Blueberry Patch IPCA Area of Interest



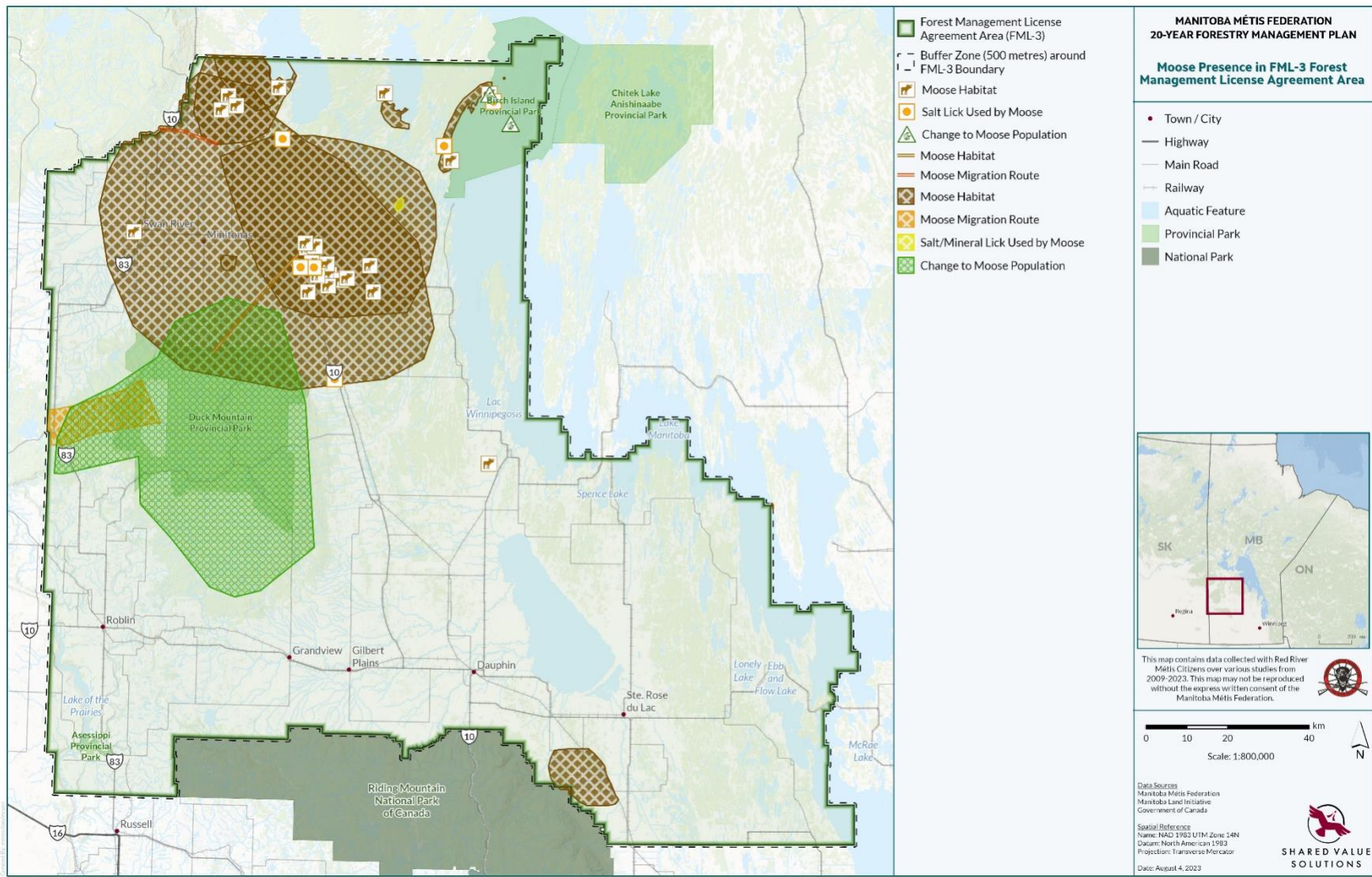


Figure 6. Red River Métis Ecological Knowledge Relevant to Moose Populations in FML#3 Area



5.2 Comments and Recommendations

Following the review of LP's 20-year Forest Management Plan for FML#3 and analysis of the comments received from Citizens at the community engagement meeting, the MMF would like to raise the below comments and corresponding recommendations for discussion with LP and the Government of Manitoba:

Comment 1: In Section 1.3.3 of the Plan, LP mentions that “best practices are in progress to assist with adapting to increasing climate variability and uncertainty.” The Plan also describes the climate change vulnerability assessment that has been completed through the Northern Prairie Forests Integrated Regional Assessment project. In Section 3.1.1.1 of the Plan, LP also mentions that the Climate Atlas of Canada uses two climate change scenarios for their predicted metrics. However, throughout the Plan it is not overly clear how the climate change scenarios have been incorporated into planning, whether greater amounts of disturbance on the landscape due to climate change have been incorporated into disturbance models for watershed limits, what specific best practices are being implemented in the Forest Management Plan for climate change adaptation, or how the operating plans will incorporate adaptive actions to reduce the forest ecosystem's vulnerability to climate change. Given the close connection between Red River Métis and the Lands and Waters, the MMF is concerned about the impacts of climate change to areas of cultural significance, species harvested, and overall ecosystem health.

Recommendation 1: The MMF requests that LP provide details on the specific actions they will take in their operating plans to implement climate change adaptation strategies, and how they have considered various climate change scenarios in the 20-year plan in light of changing and uncertain future climatic conditions (and in particular how climatic changes could compound impacts to moose populations). For example, Section 3.1.9.4.1 of the Plan mentions that the increased risks associated with climate change and fire suppression could result in large, infrequent catastrophic fires and that, “for the [Duck Mountain Provincial Forest], this may mean establishing firebreaks or controlling fuel build-up.” However, there is no explicit discussion of whether or how these practices will in fact be incorporated into the long-term planning for FML#3.

Comment 2: In Section 1.5 of the Plan, LP states that they are partnered with the Sustainable Forestry Initiative (SFI), and that “a critical component of the work of SFI is ongoing forest conservation research and continual improvement in forest management practices.” The MMF encourages LP to continue maintaining SFI Certification of the forests in FML#3, however they are curious on how LP will be shifting their forest management planning efforts to be in compliance with the new 2022 SFI Standards, and in particular Objective 8 of those standards.

Recommendation 2: The MMF requests that LP outline their commitment to Indigenous Relations and how they will meet the performance measures of Objective 8 in the 2022 SFI Standards. In particular, the MMF would appreciate a copy of the written policy of LP's commitment to recognizing and respecting the rights of Indigenous Peoples, including the Red River Métis, and how their program will work to recognize applicable legal frameworks such as the UN Declaration on the Rights of Indigenous Peoples.

Comment 3: In Figure 2.3, LP shows that insect defoliation by the eastern larch beetle was present from 2006 to 2019, resulting in significant mortality of larch trees and triggered additional monitoring for the pest. The MMF notes that the area of defoliation overlaps with the Kettle Hills Blueberry Patch IPCA (Figure 5).



Recommendation 3: The MMF would welcome dialogue with LP on opportunities for collaboration with monitoring, assessment, and mitigation of impacts from Eastern Larch Beetle in the area of FML#3 that overlaps with the MMF Kettle Hills Blueberry Patch IPCA.

Comment 4: In Section 2.5.3 of the Plan, LP states that “management decisions about the forest adjacent to riparian areas [...] focused on social, ecological, and economic criteria [to] create appropriate management prescriptions for riparian management areas.” It is not clear from this section of the Plan on how Red River Métis Knowledge was considered in making the management decisions affecting riparian areas.

Recommendation 4: Given the depth and breadth of Red River Métis Knowledge of the area (Figure 2 through Figure 4), the MMF requests to be meaningfully involved in providing input to contribute to informed management decisions for riparian areas within FML#3.

Comment 5: In Section 2.8.1.7 of the Plan, the description of the study results for “Moving riparian management guidelines towards a natural disturbance model: An example using boreal riparian and shoreline forest bird communities” indicate that “higher natural range of variability of overall post-fire bird communities compared to post-harvest communities emphasizes that harvesting guidelines currently do not achieve this level of variability.” However, there does not appear to be an explicit discussion of how LP is using these study results to adapt forest management practices to ensure an appropriate level of variability is achieved that more closely aligns with post-fire bird communities.

Recommendation 5: The MMF requests that LP provide details on how they are adapting their forest management approaches based on the study results, to ensure that their operations more closely align with post-fire conditions for bird communities.

Comment 6: In Table 3.2, LP presents Environment Canada’s temperature summary in Swan River for the years 2006 to 2017, however it appears as though the negative sign is missing from several of the winter temperatures.

Recommendation 6: The MMF recommends that LP edit Table 3.2 to include the negative sign where applicable, to ensure clear communication of data.

Comment 7: Section 3.1.10 of the Plan states that “Some of the mammals, birds, and fish are commercially or recreationally harvested. Many other species are harvested for domestic consumption by First Nations and others.”

Recommendation 7: Given the Red River Métis’ extensive history and connection to the FML#3 Area, the MMF request that the Red River Métis be appropriately included and described throughout the Plan, including in Section 3.1.10.

Comment 8: Throughout Section 3.1.10, LP describes the decline in moose populations in the Duck Mountain area in recent years. The Plan mentions that “the current condition of moose populations in the Duck Mountain is that the population is increasing, most likely due to the success of the 2011 to present conservation closure, which prohibits hunting of moose,” and “the current forest condition of moose habitat in the Forest Management License #3 area is not yet available, since quantifying moose habitat is in progress.” The MMF is also very concerned about the current state of the moose population of the area and was encouraged to see that the Moose Emphasis Scenario was chosen as the Preferred Management Strategy for the current proposed 20-year Forest Management Plan.



Recommendation 8: As demonstrated in Figure 6, Red River Métis hold a wealth of Traditional Ecological Knowledge related to the moose population in the FML#3 area, including the locations of migratory routes, salt licks, and important habitat areas. The MMF encourages LP to be leaders in the industry in seeing what else they can do operationally to help promote moose habitat, and therefore populations, in the area.

Comment 9: Table 4.10 of the Plan shares the MMF's concerns and responses related to the Forest Management Plan, however, only includes limited concerns and responses.

Recommendation 9: The MMF requests that LP update Table 4.10 to incorporate more recent concerns and responses that have been discussed through consultation, including this report, prior to finalization of the Plan.

6. Summary and Further Recommendations

In addition to the above comments and recommendations that directly relate to the content shared in the 20-year Forest Management Plan, the MMF has the additional following recommendations for LP that are more general in nature:

Recommendation 10: Given the mutual interest in supporting the forest ecosystems in FML#3, and the overlap between FML#3 and the Kettle Hills Blueberry Patch IPCA, the MMF requests meaningful collaboration with LP on the management of the forests within the overlapping area of interest. This could include the MMF collaborative decisions on harvest areas, appropriate buffers, providing approvals for harvest amounts above annual allowable cuts, input and monitoring of water crossings and new road construction locations, joint decision making on harvesting and silviculture, and collaborative efforts for research and monitoring.

Recommendation 11: The MMF is working towards establishing a protocol for Red River Métis Cultural Finds which outline guidelines for engaging with Red River Métis cultural heritage, discuss protocols for interacting with cultural heritage, and address what happens should protocols not be followed. The MMF requests that LP engage with the MMF regarding cultural artifacts.

Recommendation 12: The MMF Minister of Traditional Economies has a mandate, given by President Chartrand, to support the resurgence of Red River Métis traditional cultural practices and improve the financial well-being of those participating in Traditional Economic Activities. Given the importance of the areas within FML#3 to the vitality of these Traditional Economic Activities, the MMF requests that LP undertake collaborative economic planning with the MMF to ensure that Traditional Economies remain secure and thrive throughout the lifetime of the Plan.

The MMF looks forward to continuing discussions with LP and the Government of Manitoba on opportunities for sharing and collaboration, to ensure that the forest ecosystems in FML#3 area continue to thrive.



Appendix A: Community Engagement Survey

Louisiana Pacific 20-Year Forest Management Plan Survey

September 21, 2023

Today's Date: _____

Full Name: _____

Date of Birth: _____

Phone Number: _____

Email: _____

Mailing Address: _____

Are you an MMF citizen? Yes No

Do you hold a current MMF harvester card? Yes No

Please provide # _____

Do you hold a current MMF citizen card? Yes No

Please provide # _____

What MMF region do you reside in? _____

What local are you associated with? _____

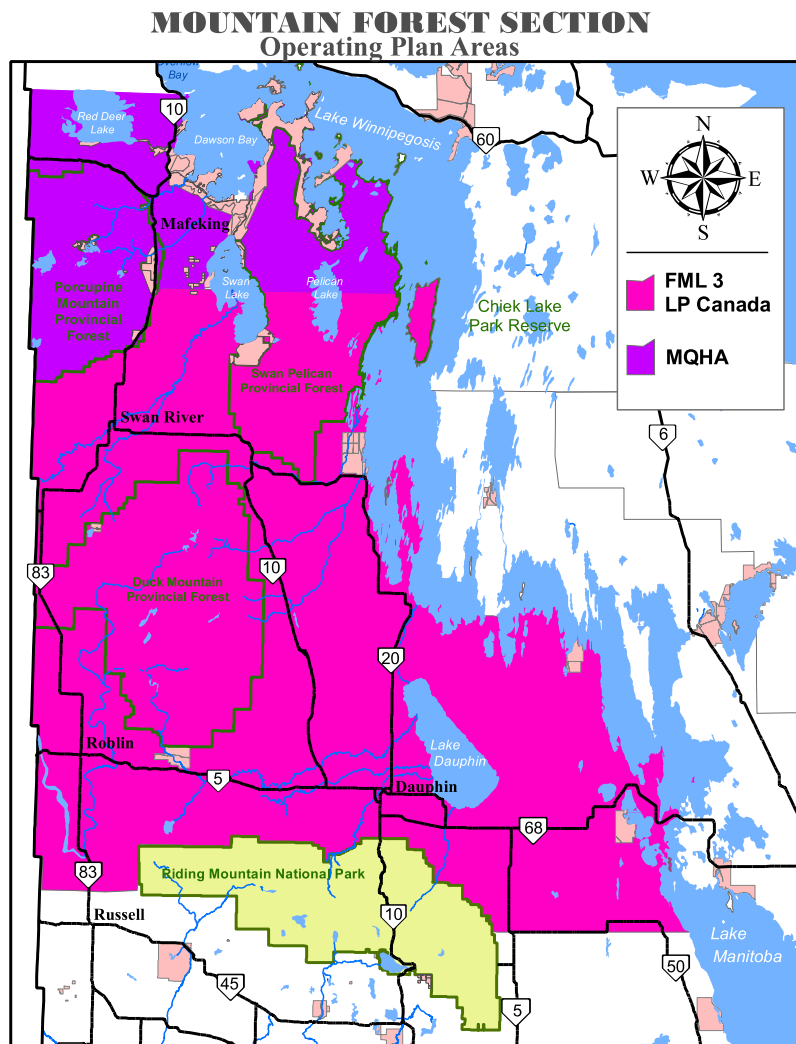


Project Background: Louisiana Pacific 20-Year Forest Management Plan for FML 3

Louisiana Pacific (LP) is a forestry services provider located in Swan River, Manitoba. LP is responsible for the forest management activities in Forest Management License Area 3, see map 1 below.

LP is in the process of developing a 20-Year Forest Management Plan which is a long-term strategic plan that will guide future 2-Year Operating Plans.

Forest management activities have the potential to impact Red River Métis harvesting rights and the MMF wants to hear Red River Métis comments, questions, concerns, and recommendations to mitigate or accommodate potential impacts.



Map 1: Forest Management License Area 3



Question 1:

Do you currently participate in land-based activities in FML 3? (e.g., hunting, fishing, berry picking, recreation)

- Yes, I currently use this area.
- No, I don't currently use this area.

If yes, please explain what types of activities you participate in.

Question 2:

Do you think the forestry activities will impact your Red River Métis harvesting rights within FML 3?

If yes, please explain how you feel you may be impacted.

Question 3:

What mitigation measures, values, or perspectives would you like to see incorporated in the 20-Year Forest Management Plan?

Question 4:

Have you observed ecological changes or know of places you feel are sensitive in FML 3?

Please explain below.



Question 5:

Is there anything else about this project area that you feel is important to share or tell people about?

