



Conservation and Water Stewardship

Climate Change and Environmental Protection Division
Environmental Approvals Branch
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File: 5433.00

May 17, 2012

Mr. Patrick T. McGarry, B.Sc. Hons., M.N.R.M.
Senior Environmental Assessment Officer
Licensing and Environmental Assessment
Transmission and Distribution Division
Manitoba Hydro
820 Taylor Avenue
Winnipeg, MB R3C 2P4

Dear Mr. McGarry:

Re: Bipole III Transmission Project Environmental Impact Statement

We have now completed our review of comments received from the public and the Technical Advisory Committee (TAC) with respect to the Environmental Impact Statement (EIS) for the Bipole III Transmission Project. Additional information is required to address the comments pertaining to the environmental assessment process under the Environment Act.

The following specific information is requested to provide clarification and address outstanding information requirements.

Required Additional Information:

1. Provide comments/information on the following, referring to the March 14, 2012 comments from the Wildlife and Ecosystem Protection Branch for context:
 - a. The preferred route between Mafeking and Birch River (east of PTH 10 and Swan Lake) bisects critical habitat for moose. The right-of-way should be relocated further west and run parallel to PTH 10 on the east side of the highway right-of-way. Provide an assessment of a new route through this area that does not cross critical moose habitat.
 - b. The proposed transmission line right-of-way through the known wintering area of the Wabowden boreal woodland caribou herd between PTH 373 and Highway 6 should be relocated. Provide an assessment for an alternate route north of the railway tracks at this location.

- c. The route should be relocated at least 800 meters from the boundaries of the Langruth and Whitemud watershed Wildlife Management Areas. Provide an assessment of the new location.
2. Provide comments/information on the following, referring to the March 19, 2012 comments from the Lands Branch for context:
 - a. More information is required with respect to access detours that will be needed outside the 66 metre right-of-way at locations where terrain is not favourable to facilitate vehicular travel within the right-of-way.
 - b. Confirm that hunting by project staff will be prohibited.
 - c. On page, 8-108, the EIS states that clearing in wolverine range will occur during winter when dens are non-active. Female wolverine usually den up in February and have young during the month of March. Discuss potential impacts and mitigation measures in relation to clearing and wolverine denning during the winter months.
 - d. Page 8-93, the potential residual impacts of access with respect to caribou harvest may have been underestimated in relation to the Cape Churchill coastal herd. Clarification is required regarding what kind of use will be minimized and how use will be minimized.
 - e. P. 8-87 – Provide more information on Coastal Caribou species as compared to woodland caribou.
 - f. Page 8-101, Summary of Residual Effects on Boreal Woodland Caribou, paragraph 8 – is Manitoba Hydro planning to develop range management plans for the Wabowden, Bog, and/or Reed Lake ranges? Wildlife is regulated under authority of the Province and Manitoba Conservation and Water Stewardship is responsible for developing range management plans.
 - g. Page 6-146, Table 6.3-6, Partridge Crop Hill Area of Special Interest (ASI), south of Nelson House, is within the Project Study area and should be included in this table. Does the omission of this ASI change the assessment of the project's impacts on ASIs?
 - h. The EIS states that existing collars from the Cape Churchill and Pen Island ranges will be monitored during construction. Does this involve supporting the present Conservation and Water Stewardship/Resource Management Board project that is now in progress?
 - i. Page 8-111 of the EIS states that mapping of marten habitat in the Bipole III Mammals Technical Report indicates a small amount of marten habitat is anticipated to overlap existing site access roads set to be used for the Project. This is incorrect. There is a strong potential for marten along the entire corridor within the Boreal Forest Region. What are the implications to the EIS? How was habitat for Moose, Caribou, Marten, and Beaver determined?
 - j. Are the locations of culturally and environmentally sensitive sites identified in the aboriginal traditional knowledge workshops and reports available to the Province for review?
3. Provide comments/information on the following, referring to the March 19, 2012 comments from the Sustainable Resource and Policy Management Branch for context:

- a. The Protected Areas Initiative (PAI) prefers the transmission line not bisect the contiguous blocks of undisturbed Crown land parcels which provide connectivity between the Westlake Wildlife Management Area (WMA) and the Alonsa WMA, and along the west side of Lake Winnipegosis and Lake Manitoba. Discuss the options and provide an assessment of alternative routing in this area.
 - b. The PAI prefers that the final preferred route provide a buffer of 1 mile from community pasture boundaries. Discuss the possibility of providing a 1 mile buffer in these locations.
4. Provide comments/information on the following, referring to the March 16, 2012 comments from Manitoba Infrastructure and Transportation for context:
- a. What is the impact to the other utilities at highway crossings?
 - b. Is there room to span PTH 75 at the Red River? The river is very close to PTH 75 and the river bank is unstable.
 - c. A portion of PTH 10, close to the eroded banks of the Red Deer River just south of the Red Deer River Provincial Park, may have to be relocated in the future due to further river bank erosion. The location of the tower structure near this area may need to be set back to accommodate future highway right-of-way relocation to the west.
 - d. Quarry mineral withdrawal in Townships 22-11W, 30-17W, 22-12W, 30-18W, 23-12W, 31-19W, 25-13W, 32-20W, 26-13W, 33-21W, 30-18W, 33-25W, 32-20W, 44-25W, 49-25W, and 45-25W will be affected by the proposed Bipole III transmission line. The resources in these townships are required for future construction and maintenance projects and will be sterilized by the proposed Hydro lines, as mining is not permitted under the lines.
5. Provide comments/information on the following:
- a. Chapter 8 - page 362, indicates spills will be reported to the local Natural Resource Officer. Spills should be reported to the Environmental Emergency Response number (204) 944-4888 pursuant to federal and provincial spill reporting regulations.
 - b. Draft Environmental Protection Plan (EPP) - Table 37. Manitoba Conservation and Water Stewardship must approve all remedial action plans before remediation is started.
 - c. The remedial action plan submission guideline is missing from Appendix D of draft EPP.
 - d. The right-of-way should be located away from the Forestry Branch Permanent Sample Plots (PSP) by at least 200 metres. If this buffer cannot be achieved then Manitoba Hydro should re-establish two new PSPs for each PSP physically damaged or damaged by the right-of-way being closer than 200 meters.
 - e. Discuss the potential impacts to groundwater from the coke bedding material for the ground electrodes.

6. Provide comments/information on the concerns regarding reliance on desktop studies, problems with desktop data, the green house gas life cycle analysis, wetlands, standards and best practices, aboriginal cultural heritage, and woodland caribou in the March 16, 2012 comments from Gaile Whelan Enns.
7. Provide comments/information on the concerns regarding the impacts of electric and magnetic fields in the January 25, 2012 comments from John Roschuk.
8. Provide comments/information on the following concerns expressed in the comments from Pam Pugh.
 - a. Health impacts to farmers working beneath the transmission lines.
 - b. Where are Bipole 4, 5, 6, and 9 going? How much more prime agricultural land will be lost?
 - c. The field in which Bipole is to be placed has had two major cyclones go through it.
 - d. The weeds that grow under the towers will have a negative effect on their Pedigreed Business.
 - e. To manage weeds, Pedigreed Seed farmers have to get close to hydro towers with their equipment, running the risk of hitting a tower and increasing liability.
 - f. Construction and maintenance vehicles for Bipole III will drive through their field and introduce foreign seeds.
 - g. A wind storm may knock a tower down onto the railway tracks and cause an environmental disaster.
9. Provide comments/information on the comments regarding alternatives to northern generation in the March 21, 2012 comments from the Green Party.
10. Provide comments/information on the following with regard to the March 16, 2012 comments from the Swan Lake First Nation (SLFN):
 - a. Investigations conducted subsequent to the SLFN preliminary TK Report have suggested that the Round Plain and Indian Gardens sites are larger than originally determined. The exact extent of the sites is not known and additional research and archeological analysis need to be completed to confirm the site's boundaries. Additional disturbance of these sites in any way would not be supported by SLFN.
 - b. SLFN requests further detail on mitigation measures for potential impacts to plants, plant communities, terrain, and soils during construction, operation, and maintenance of the transmission line.
 - c. The EIS states that the groundwater assessment was conducted on a regional scale. SLFN is concerned about potential impacts of the project to local groundwater and aquifers in SLFN's area of interest.
11. Provide comments/information on the following with regard to the March 16, 2012 comments from the Manitoba Metis Federation (MMF):
 - a. Explain whether or not the effects assessment on moose populations and Aboriginal traditional use of moose, both related to increased harvester access in Game Hunting Areas (GHA) 6, 6A, 7, 8, 11, 12 and 19A was considered in light of the closure of many

other GHAs to moose hunting in the central western and central eastern portions of the Province. Please advise if the conclusion regarding residual effects and cumulative effects would change if these factors were fully considered.

- b. Provide comments on the concerns expressed regarding the Cumulative Effects Assessment.
- c. Metis won't gather in areas that have been sprayed with chemicals. Will Manitoba Hydro consider non-chemical vegetation management in important gathering areas along the right-of-way?

The environmental assessment review process under the Environment Act will continue upon receipt of your response to the above requested information.

Yours truly,



Elise Dagdick, B.Sc.
Environment Officer
Environmental Approvals Branch

- c. Public Registries, File: 5433.00
Don Labossiere, Environmental Operations
Peter Boothroyd, Canadian Environmental Assessment Agency

