Manitoba

Conservation and Water Stewardship

Climate Change and Environmental Protection Division
Environmental Approvals Branch
123 Main Street, Suite 160, Winnipeg, Manitoba R3C 1A5
T 204 945-8321 **F** 204 945-5229
www.gov.mb.ca/conservation/eal

File: 5433.00
February 20, 2013

Mr. Terry Sargeant
Chair
Clean Environment Commission
305 – 155 Carlton Street
Winnipeg MB R3C 3H8

Dear Mr. Sargeant:

Re: Bipole III Transmission Project

The Environmental Approvals Branch (EAB) has reviewed the *Bipole III Transmission Project: Supplemental Environmental Assessment Report on Route Adjustments* submitted by Manitoba Hydro on January 28, 2013. As part this review, EAB solicited and considered comments on the report from the Technical Advisory Committee (TAC). The TAC comments are enclosed.

EAB has determined that the concerns raised by TAC during the review of the EIS can be addressed through licensing conditions.

The Supplemental Environmental Assessment Report indicates that the Alternate Final Preferred Routes (AFPRs) in GHA 14 (Moose Meadows) and in the Wabowden area address TAC's concerns relating to woodland caribou and moose regarding the Final Preferred Route (FPR), and that there are no other significant environmental effects associated with these alternate routes. The report also indicates that the AFPR in GHA 19A and 14A is not favourable due to substantial cultural and resource use along this route but that the FPR continues to be a preferred route through GHA 19A and 14A. At a meeting with EAB and the Wildlife Branch on February 6, 2013, Manitoba Hydro proposed additional mitigation measures that could be implemented to reduce impacts to moose in GHA 19A and 14A. Manitoba Hydro has committed to submitting a description of the proposed mitigation measures for this segment to EAB in the near future.

.../2

The information contained in the Supplemental Environmental Assessment Report, along with and subject to confirmation by Manitoba Hydro of the mitigation measures proposed for GHA 19A and 14A, is considered sufficient for the purposes of proceeding with the hearing for ongoing public review of the project. Accordingly, I recommend that the Clean Environment Commission proceed with the public hearings for this project.

Yours truly,

Tracey Braun

Tracey Braun, M.Sc.
Director
Environmental Approvals Branch

c. Public Registries File 5433.00
Patrick McGarry, Manitoba Hydro
Don Labossiere, Environmental Compliance and Enforcement

Att.

Dagdick, Elise (CON)

From: Kaita, Adara (CON) on behalf of +WPG1212 - Conservation_Circulars (CON)
Sent: February-20-13 10:12 AM
To: Dagdick, Elise (CON)
Subject: Bipole III - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

Hi Elise,

I have received comments from the Northeast Region. In addition to the comments below, please not the following.

There are no concerns with the adjusted route at Wabowden/Ponton. Forest Damage Appraisal on forest renewal areas and merchantable timber impacted will apply and the regional forester, Bruce Holmes (204-677-6642) is to be contacted.

- Adara

From: Kaita, Adara (CON) **On Behalf Of** +WPG1212 - Conservation_Circulars (CON)
Sent: February-19-13 10:21 AM
To: Dagdick, Elise (CON)
Cc: Hastman, David (CON)
Subject: Bipole III - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

Hi Elise,

The Sustainable Resource and Policy Management Branch and the Lands Branch submit the following comments. Please note that we have requested an extension until Wednesday, February 20th and we will be forwarding comments from the Northeast Region at this time.

Route Adjustment Supplemental Report:
4A7.1 Designated Protected Areas and Protected Areas Initiative
"Ongoing discussions with Manitoba Conservation PAI representatives to provide Manitoba Hydro with the permanent right to access, use and maintain the right-of-way for the Bipole III line and to ensure current as well as new issues are addressed."

It is requested that the "permanent right to access, use and maintain the right-of-way for the Bipole III" be located outside of the legally protected area boundary via the appropriate Crown land tenure.

Moose Meadows Area:
Please note that the preferred final route will impact lands coded for wildlife management. These wildlife management codes highlight the areas and habitat significant for Moose Management and comments from the Wildlife Branch will address these issues. In addition, Forestry Branch comments will address pending impacts that the preferred final route will have on A1-Forest management coded parcels.

GHA 19 A and 14A:
Final Preferred route will impact lands designated as Provincial Forest and authorization/approval from Director of Forestry Branch is required. The Final Preferred route will also impact parcels of Crown lands that have been coded for hay and grazing, which do not support further development. Additional comment from the Regional Lands Manager will be required.

Adara Kaita
Crown Land Programs and Policy Manager
Conservation and Water Stewardship
Box 25, 200 Saulteaux Crescent
Winnipeg, MB R3J 3W3
Cell: (204) 945-6301
F: (204) 948-2197

Manitoba

Memorandum

DATE: February 15, 2013

TO: Elise Dagdick
Environmental Approvals
Manitoba Conservation and Water Stewardship
1218 – 123 Main Street
Winnipeg MB R3C 1A5

FROM: James Duncan
Director
Wildlife Branch
Manitoba Conservation and Water Stewardship
Box 24, 200 Saulteaux Crescent
Winnipeg MB R3J 3W3

PHONE NO.: 945-7465

SUBJECT: Bipole III - Supplemental Environmental Assessment Report on Route Adjustments (File 5433.00)

Wildlife Branch has reviewed the *Supplemental Environmental Assessment Report on Route Adjustments* for the Bipole III Transmission Line Environmental Impact Statement (File 5433.00) and provides the comments below.

Wildlife Branch values the supplemental information provided in this report, especially with respect to information on moose and moose habitat use. This supplemental information was beneficial in understanding the line's impacts on wildlife. We recognize that Manitoba Hydro discussed measures to mitigate impacts on wildlife and advised that there are other community related impacts associated with the proposed alternative routes.

In the context of current serious moose population declines in western Manitoba, the Wildlife Branch has considered the contents of this report and formed the following specific comments:

1. Game Hunting Area 14 – "Moose Meadows" Adjusted Final Preferred Route

- Game Hunting Area (GHA) 14 is currently being managed under a moose hunting conservation closure. The closure is in place because of a precipitous decline in this moose population and suspends hunting for all First Nations, Metis and licensed hunters.
- The scientific literature, and previous Wildlife Branch experience, suggests that the development of either the Final Preferred Route (FPR) or the Adjusted Final Preferred Route (AFPR) will create human access and wolf predation challenges for the management of moose in GHA 14.
- The *Supplementary Report* indicates that considerably more high-quality moose habitat will be contained in the local study area and 66 m right-of-way of the AFPR vs. the FPR (Chapter 5-4, 4-25, Appendix 4.4A4-2). Although this information is valuable, the *Supplementary Report* does not discuss the extent of pre-existing access routes adjacent to these corridors. A high number of access routes already

exist adjacent to the AFPR, whereas very few access routes exist adjacent to the FPR.

- Habitat fragmentation and the development of new access routes into previously inaccessible regions has been considered a major contributor to the recent decline of moose populations in GHA's 18/18A/18B/18C, 13/13A, 14/14A, and the subsequent requirement to implement a moose hunting conservation closures.
- In reviewing this application, the Wildlife Branch needed to consider all available information relevant to moose management in western Manitoba, including habitat quality, habitat fragmentation, historical and current moose population densities, predation levels, local knowledge, and past effectiveness of access mitigation efforts.
- After considering all available wildlife information, Wildlife Branch notes that moose management concerns would be reduced by adopting the AFPR vs. the FPR in GHA 14, although the Branch acknowledges that Manitoba Hydro is proposing measures to mitigate FPR impacts.
- Whichever route is approved, the proponent is expected to collaborate with Wildlife Branch staff to implement mitigation strategies to further minimize all identified and potential impacts to moose in this portion of the local study area (GHA 14) (i.e. access management, brush management, tower placement, minimizing line-of-sight, line maintenance schedule, etc.).
- Whichever route is approved, the proponent is expected to collaborate with Wildlife Branch staff to implement wildlife mitigation monitoring in this portion of the local study area (GHA 14). This must include a pre and post moose monitoring component in the local study area that evaluates:
    - use of impacted habitat (Bipole corridor);
    - predation;
    - human access;
    - harvest.

2. Game Hunting Areas 19A/14A - Adjusted Final Preferred Route

- Wildlife Branch acknowledges that the *Supplementary Report* identified socio-economic concerns in the AFPR. The following comments provide the Branch's perspective only with respect to impacts to moose management, consistent with their role on the Technical Advisory Committee.
- The scientific literature, and previous Wildlife Branch experience, suggests that the development of either the FPR or the AFPR will create human access and wolf predation challenges for the management of moose in GHA 19A/14A.
- The *Supplementary Report* indicates that more high-quality moose habitat will be contained within the 66 m right-of-way in the AFPR vs. the FPR (Chapter 5-4, Appendix 4.4A4-2). Although this information is valuable, the *Supplementary Report* did not evaluate habitat fragmentation and new access potential resulting from either of these routes.

- Habitat fragmentation and the development of new access routes into previously inaccessible regions has been considered s major contributor to the recent decline of moose populations in GHA's 18/18A/18B/18C, 13/13A, 14/14A, and the subsequent requirement to implement a moose hunting conservation closures.
- In reviewing this application, the Wildlife Branch needed to consider all available information relevant to moose management in western Manitoba, including habitat quality, habitat fragmentation, historical and current moose population densities, predation levels, local knowledge, and past effectiveness of access mitigation efforts.
- Wildlife Branch notes that moose management concerns would be reduced by adopting the AFPR vs. the FPR in GHA 19A/14A, although the Branch acknowledges that Manitoba Hydro is proposing measures to mitigate FPR impacts.
- Whichever route is approved, the proponent is expected to collaborate with Wildlife Branch staff to implement mitigation strategies to further minimize all identified and potential impacts to moose in this portion of the local study area (GHA 19A/14A) (i.e. access management, brush management, tower placement, minimizing line-of-sight, line maintenance schedule, etc.).Whichever route is approved, the proponent is expected to collaborate with Wildlife Branch staff to implement wildlife mitigation monitoring in this portion of the local study area (GHA 19A/14A). This must include a pre and post moose monitoring component in the local study area that evaluates:
    - use of impacted habitat (Bipole corridor);
    - predation;
    - human access;
    - harvest.

3. Wabowden Woodland Caribou – Adjusted Final Preferred Route

- The scientific literature, and previous Wildlife Branch experience, suggests that the development of either the Final Preferred Route (FPR) or the Adjusted Final Preferred Route (AFPR) will create human access and wolf predation challenges for the management of woodland caribou in the region around Wabowden.
- After considering all available wildlife information, the Wildlife Branch does note that woodland caribou management concerns would be reduced by adopting the AFPR vs. the FPR in the region around Wabowden. Adopting the AFPR will minimize the development of new access sites, linear corridors, and habitat fragmentation through areas known to support woodland caribou habitat.
- The proponent is expected to collaborate with Wildlife Branch staff to implement mitigation strategies that further minimize all identified and potential impacts to moose in this portion of the local study area (Wabowden) (i.e. access management, brush management, tower placement, minimizing line-of-sight, line maintenance schedule, etc.).
- Wildlife Branch recognizes and supports the proponent's ongoing efforts in monitoring the woodland caribou population in this region. The Wildlife Branch

looks forward to collaborating with the proponent in developing an Environmental Monitoring Plan for woodland caribou in this region.

Please contact Jonathan Wiens, Habitat and Mitigation Specialist at (204) 945-7764 if you have any further questions.

Thank you.

James Duncan

Dagdick, Elise (CON)

From: Stibbard, James (MWS)
Sent: February-14-13 12:08 PM
To: Dagdick, Elise (CON)
Subject: Re: 5433.00 Manitoba Hydro Bipole III Route Adjustments

Ms. Dagdick,
I reviewed the above ntoed materials distributed on February 1, 2013, respecting proposed changes to the route of the Bipole III transmission line. The materials provided contained primarily details of potential effects to wildlife areas and contained no information on drinking water sources or systems along the route.
As such, based upon the information provided, ODW cannot comment on whether the proosed route changes would have any adverse effect upon any public or semi-public water system.
I trust this is satisfactory, but if you have any questions, please call.
Regards,

James Stibbard P. Eng.
Approvals Engineer
Office of Drinking Water
1007 Century Street
Winnipeg MB R3H 0W4
phone: (204) 945-5949
fax: (204) 945-1365
email: James.Stibbard@gov.mb.ca
website: www.manitoba.ca/drinkingwater

Dagdick, Elise (CON)

From: Janusz, Laureen R (MWS)
Sent: February-13-13 8:06 PM
To: Dagdick, Elise (CON)
Cc: Kitch, Ian (MWS); Macdonald, Don (MWS); Long, Jeff (MWS)
Subject: EAP 5433.00 Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments due Feb 15

Hi Elise,

The regional fisheries managers have reviewed the supplemental material at the Western, Northwest and Northeast Iteam meetings and have no fisheries concerns.

Laureen Janusz
Fisheries Science and Fish Culture Section
Fisheries Branch,
Manitoba Conservation and Water Stewardship
Box 20, 200 Saulteaux Crescent
Winnipeg, MB R3J 3W3

Phone: 204.945.7789
Cell: 204.793.1154
Fax: 204.948-2308
Email: Laureen.Janusz@gov.mb.ca

Manitoba

Memorandum

DATE: February 13, 2013

TO: Elise Dagdick
Environmental Officer
Manitoba Conservation
Suite 160-123 Main Street
Winnipeg MB

FROM: Gordon Hill
Impact Assessment
Archaeologist
Historic Resources
Branch
Main Floor 213 Notre
Dame Avenue
Winnipeg MB
R3B 1N3

PHONE NO: (204) 945-7730

SUBJECT: ENVIRONMENT ACT PROPOSAL

YOUR FILE: 5433.00

HRB FILE: AAS-12-5557

BIPOLE III TRANSMISSION PROJECT
SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT
ROUTE ADJUSTMENTS

I have reviewed the above-noted application for an Environment Act License. The Historic Resources Branch has concerns with regard to this project's potential to impact heritage resources.

Route adjustments in the Moose Meadows and GHA 19A and 14A areas require Heritage Resource Impact Assessments.

Under Section 12(2) of The Heritage Resources Act, if the Minister of Culture, Heritage, and Tourism has reason to believe that heritage resources or human remains are known, or thought likely to be present, on lands that are to be developed, then the owner/developer is required to conduct at his/her own expense, a heritage resource impact assessment (HRIA) and mitigation, if necessary, prior to the project's start.

The developer must contract a qualified archaeological consultant to conduct a Heritage Resources Impact Assessment (HRIA) of the proposed development location, in order to identify and assess any heritage resources that may be negatively impacted by development. If desirable, the Branch will work with the developer/land owners and its consultant to draw up terms of reference for this project.

If you have any questions please contact Brian.Smith@gov.mb.ca or at 204-945-1830.

C. Gordon Hill

Dagdick, Elise (CON)

From: Elliott, Jessica (CON)
Sent: February-12-13 11:13 AM
To: Dagdick, Elise (CON)
Subject: RE: Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

Parks and Natural Areas Branch has no comments to offer on Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00.

Jessica Elliott, M.E.Des.
Head, Park System Planning and Ecology
Parks and Natural Areas Branch
Conservation and Water Stewardship
Box 53, 200 Saulteaux Cres
Winnipeg MB R3J 3W3

phone: 204-945-4365
cell: 204-805-4084
fax: 204-945-0012

email: ***Jessica.Elliott@gov.mb.ca***

Before printing, think about the environment

Avant d'imprimer, pensez à l'environnement

From: Steele, Tania (CON)
Sent: February-01-13 2:01 PM
To: Schindler, Dennis (MAFRI); Kaita, Adara (CON); Labossiere, Don (CON); Molod, Rommel (CON); Streich, Laurie (CON); Duncan, James (CON); Wiens, Jonathan (CON); Elliott, Jessica (CON); Dojack, John (CON); Gilbertson, Mike (CON); Missyabit, Ron (CON); Gurney, Sharon (MWS); Phipps, Graham (MWS); Janusz, Laureen R (MWS); Stibbard, James (MWS); Matthews, Rob (MWS); Reimer, Geoff P (MWS); Cunningham, Neil (CON); Roberecki, Susan (HEALTH); Roberts, Tracy (HEALTH); +WPG574 - HRB (CHT); Allum, Brad (MIT); Shaler, Samantha (MLG); 'CEAAPrairieProjects@ceaa-acee.gc.ca'; Roberts, Wayde (CON); Armstrong, Mike (CON); +WPG969 - MIT Environmental Services Section (MIT)
Cc: Dagdick, Elise (CON); Braun, Tracey (CON)
Subject: Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

For your review and comment, following is a link to a document entitled "Bipole III Transmission Project: Supplemental Environmental Assessment Report on Route Adjustments." http://www.gov.mb.ca/conservation/eal/registries/5433bipole/index.html. This document was filed by Manitoba Hydro on January 28, 2013, in response to a November 9, 2012 request from Conservation and Water Stewardship (CWS) to provide additional assessment information on route adjustments in three locations:

- Wabowden Area;

Dagdick, Elise (CON)

From: Jacobs, Kevin (MWS)
Sent: February-07-13 3:19 PM
To: Dagdick, Elise (CON)
Cc: Gurney, Sharon (MWS)
Subject: RE: Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

Hello Elise,

In regard to the Bipole III supplemental Environmental Assessment Report on route adjustments I reviewed the document on behalf of Water Quality Management however I have no substantive comments at this time.

Regards,

Kevin.

From: Gurney, Sharon (MWS)
Sent: February-01-13 3:41 PM
To: Jacobs, Kevin (MWS)
Subject: FW: Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

Kevin:
For your review. Thanks very much.

Sharon

Sharon Gurney M.Sc.
Acting Manager
Water Quality Management Section
Manitoba Conservation and Water Stewardship
160 - 123 Main St.
Winnipeg, MB. Canada
R3C 1A5
Phone: 204-945-7114
Cell: 204-479-7114
Fax: 204-948-2357
Email: sgurney@gov.mb.ca

From: Steele, Tania (CON)
Sent: February-01-13 2:01 PM
To: Schindler, Dennis (MAFRI); Kaita, Adara (CON); Labossiere, Don (CON); Molod, Rommel (CON); Streich, Laurie (CON); Duncan, James (CON); Wiens, Jonathan (CON); Elliott, Jessica (CON); Dojack, John (CON); Gilbertson, Mike (CON); Missyabit, Ron (CON); Gurney, Sharon (MWS); Phipps, Graham (MWS); Janusz, Laureen R (MWS); Stibbard, James (MWS); Matthews, Rob (MWS); Reimer, Geoff P (MWS); Cunningham, Neil (CON); Roberecki, Susan (HEALTH); Roberts, Tracy (HEALTH); +WPG574 - HRB (CHT); Allum, Brad (MIT); Shaler, Samantha (MLG); 'CEAAPrairieProjects@ceaa-acee.gc.ca'; Roberts, Wayde (CON); Armstrong, Mike (CON); +WPG969 - MIT Environmental Services Section (MIT)
Cc: Dagdick, Elise (CON); Braun, Tracey (CON)
Subject: Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

Dagdick, Elise (CON)

From: Armstrong, Mike (CON)
Sent: February-05-13 1:15 PM
To: Dagdick, Elise (CON)
Cc: Roberts, Wayde (CON)
Subject: FW: Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

Hi Elise: Reviewed by NW IRMT, no concerns as route adjustment does not affect NW Region.

From: Steele, Tania (CON)
Sent: February-01-13 2:01 PM
To: Schindler, Dennis (MAFRI); Kaita, Adara (CON); Labossiere, Don (CON); Molod, Rommel (CON); Streich, Laurie (CON); Duncan, James (CON); Wiens, Jonathan (CON); Elliott, Jessica (CON); Dojack, John (CON); Gilbertson, Mike (CON); Missyabit, Ron (CON); Gurney, Sharon (MWS); Phipps, Graham (MWS); Janusz, Laureen R (MWS); Stibbard, James (MWS); Matthews, Rob (MWS); Reimer, Geoff P (MWS); Cunningham, Neil (CON); Roberecki, Susan (HEALTH); Roberts, Tracy (HEALTH); +WPG574 - HRB (CHT); Allum, Brad (MIT); Shaler, Samantha (MLG); 'CEAAPrairieProjects@ceaa-acee.gc.ca'; Roberts, Wayde (CON); Armstrong, Mike (CON); +WPG969 - MIT Environmental Services Section (MIT)
Cc: Dagdick, Elise (CON); Braun, Tracey (CON)
Subject: Bipole III review & comment - Supplemental Environmental Assessment Report on Route Adjustments File: 5433.00

For your review and comment, following is a link to a document entitled "Bipole III Transmission Project: Supplemental Environmental Assessment Report on Route Adjustments." http://www.gov.mb.ca/conservation/eal/registries/5433bipole/index.html. This document was filed by Manitoba Hydro on January 28, 2013, in response to a November 9, 2012 request from Conservation and Water Stewardship (CWS) to provide additional assessment information on route adjustments in three locations:

- Wabowden Area;
- Game Hunting Area (GHA) 14 (Moose Meadows Area); and,
- GHA 19 A and 14A.

Please review the report and submit your comments to Ms. Elise Dagdick at elise.dagdick@gov.mb.ca prior to February 15, 2013. All comments received will be considered in the public domain and will be posted on the public registry.

Comments also will be provided to the Clean Environment Commission for their consideration during the hearing process.

If you have any questions, please contact **Elise Dagdick at (204) 619-0709. All email comments will automatically go to Elise Dagdick.**

Environment Canada | Environnement Canada

Environmental Protection Operations
Prairie and Northern Region
Room 200, 4999-98 Ave. NW
Edmonton, Alberta
T6B 2X3

February 20, 2013

EC file: 4194-10-5/3081

Elise Dagdick
Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
Suite 160, 123 Main St.
Winnipeg, MB R3C 1A5

Via email: Elise.Dagdick@gov.mb.ca

Attention: Ms. Dagdick

RE: Bipole III Transmission Project – Manitoba Hydro

Environment Canada (EC) has reviewed the Bipole III Transmission Project Supplemental Environmental Assessment Report on Route Adjustments prepared by Manitoba Hydro (January 2013). EC would like to take this opportunity to provide specialist advice and/or expert information or knowledge on the proposal, with a focus on federal statutes, regulations, policy and associated program concerns as defined by EC's mandate.

Environmental Impact Statement (EIS): Boreal Woodland Caribou

EC recently released a draft Recovery Strategy for the Woodland Caribou Boreal Population in Canada. The Bipole III HVdc transmission line final preferred route overlaps with three herds identified as a "Self-Sustaining Local Populations" in this recovery strategy (Reed, Wabowden and Wapisu herds) and one herd identified as "As likely as not Self-Sustaining" and "Remaining Local Populations" (The Bog herd). Respectively, these herds have 74%, 72%, 76% and 84% of their range remaining as undisturbed habitat (Appendix F-1 and Appendix F-3b Draft Recovery Strategy).

The draft recovery strategy indicates that jurisdictions will need to show how, over time, they will manage the land to ensure that caribou range disturbance level does not jeopardize the recovery of boreal caribou. In the draft strategy, for Self-Sustaining Local Population herds, critical habitat is identified as 65% undisturbed habitat within the range of the local population. The draft strategy also states that for Remaining Local Populations where the amount of undisturbed habitat is 65% or more, the amount of critical habitat is 65% undisturbed habitat within the range of the Boreal population.

Manitoba Hydro has collaborated with Manitoba Conservation on a number of strategic monitoring and research initiatives to acquire current Boreal Woodland Caribou data (p. 8-88) and as a result of this monitoring "significant new information allowing for a more accurate characterization of local populations in the Project Study Area" is available (p. 8-89). The proponent has characterized Boreal Woodland Caribou use of the project

area by three herds (Reed, Wabowden and the Bog), and has identified core winter use and known and potential calving areas for each.

EC acknowledges that the "Preliminary Preferred Route selection was considered to be the optimal route from a caribou perspective" (p. 8-90), and that the transmission line route was selected to minimize "intersection with local populations, their calving and calf-rearing areas, core winter use areas, and/or other potential critical habitat" (p. 8-89) and to follow, "where possible, the existing linear development and disturbed areas" (p. 8-90).

EC also notes, however, that in the Wabowden range area, in order to "accommodate competing resource interests" the Final Preferred Route is "not a preferred alternative from the caribou SSEA perspective" (p. 8-90). In this area, the Final Preferred Route bisects a presently unfragmented core winter use area and known calving areas in an otherwise highly fragmented region (p. 8-97). The EIS indicates that "caribou in the Project Study Area show considerable fidelity to previously used calving areas in this area (Bipole III Caribou Technical Report)" (p. 8-83) and that "the expected residual effects [of the project on Boreal Woodland Caribou] relate primarily to potential increase in predation rates, especially in areas where the HVdc line bisects or intersects known core winter use areas and known calving areas" (p. 8-129).

EC concurs with the concerns noted by the proponent with respect to bisecting or intersecting known core winter use areas and known calving areas. EC encourages the proponent to consult with Manitoba Conservation in order to investigate other options that would avoid bisecting these key caribou area, as has occurred through the Route Adjustment Supplemental Report with respect to reducing the intersection of the preferred route with core winter use and calving areas in the Wabowden range.

EC notes that the proponent plans to implement mitigation measures including:

- winter construction,
- maintenance of natural low tree cover and development of natural vegetation corridors in core winter use areas and known and potential calving areas in Wabowden and The Bog ranges,
- access control where the transmission line bisects core use areas in the Wabowden range,
- limited development of snowpack trails in core winter areas,
- limiting recreational use and travel along the right-of-way in the core winter use areas and known and potential calving areas,
- rehabilitation of project staging areas, and
- long term monitoring of boreal caribou populations and wolves, with adaptive management plans.

In addition to these measures, EC recommends reduction of sight lines along the ROW, avoidance of late winter construction in core winter use and calving areas, and restoration of cleared areas (with natural low tree cover) along the ROW throughout caribou ranges. EC also recommends that, in addition to managing access within caribou habitats, that access management measures be applied within the Project area wherever possible in order to minimize access (and thus opportunities for movement of predators) into caribou habitat.

Route Adjustment Supplemental Report

EC's comments and recommendations previously submitted for the EIS also apply to the route adjustment supplemental report. EC recommends that the proponent review these comments and recommendations and apply them to the project including the route adjustments.

EC notes that the proponent is in consultation with Manitoba Conservation and Water Stewardship to reduce the intersection of the preferred route with core winter use and calving areas in the Wabowden range (Appendix 1A). EC acknowledges that the proponent has presented an adjusted final preferred route (AFPR) that no longer bisects core winter habitat in the Wabowden range (p. 4-22). The AFPR reduces the length of the Wabowden caribou evaluation range that is intersected, and parallels existing linear features over 92.5% of its length (vs. 41.6 % of the original final preferred route) (p. 4-21), reducing both fragmentation and new access into core winter habitat areas and potential calving areas (p. 4-22 - 4-23; 5-3). The AFPR does, however, increase the amount of route intersection with summer core use areas (including 2.1 km of non-parallel, new linear feature) (p. 4A-14).

EC recommends acceptance of a final routing option that minimizes or avoids the: bisecting of core winter areas, intersection with core wintering and calving areas, and disturbance in core summer areas that are utilized by boreal caribou.

EC looks forward to continued dialogue and co-operation with respect to the Project. EC may have additional questions and recommendations upon review of any additional information received. If you have any questions, please contact Lorna Hendrickson at (204) 983-1781.

Sincerely,

Amy Sanderson

(on behalf of)

Lorna Hendrickson
Head, Environmental Assessment South
Telephone (204) 983-1781
Facsimile (204) 983-0960
Lorna.Hendrickson@EC.gc.ca

cc:

Sarah James, EC
Peter Boothroyd, CEAA