

September 19, 2013

Client File No. 5433.00

Licence No. 3055

Ms. Tracey Braun  
Director  
Environmental Approvals  
Manitoba Conservation  
Suite 160, 123 Main Street  
Winnipeg, MB R3C 1A5

Dear Ms. Braun:

**RE: Bipole III Route Revisions Clause 8 Environment Act Licence 3055**

Clause 8 of the Bipole III licence requires Manitoba Hydro to make the route revisions in Recommendation 9.3 of the Clean Environment Commission Report of July 2013 unless there is compelling reasoning not to do so. Manitoba Hydro has recently reviewed the CEC recommendation to re-align the route to half-mile in cropland areas north of Sec 36-14-10W (bullet 8 in CEC recommendation 9.3). Manitoba Hydro believes there are compelling reasons not to re-route the FPR in this area.

- The area north of Sec 36-14-10W along the final preferred route (FPR) has scattered cropland parcels all the way to The Pas and is generally not in an intensive agriculture area. See attached maps.
- The occurrence of cropland in this area along the FPR is sporadic as the FPR generally tries where possible to avoid cropland areas. Of 1,033 land parcels along the route in this area only 102 (less than 10%) are privately held by 81 landowners and classed as cropland. The majority of this land and ownership is in construction zone C1 between Rorketon and Cowan.
- There is a high degree of acceptance of the FPR in this area as evidenced by the number of potentially affected landowners who have accepted the Bipole FPR. Potentially affected landowners are defined as those with agricultural cropland where the FPR is not on a half-mile alignment. Forty-five of the 49 affected landowners, representing 92%, have signed preliminary easements agreement with Manitoba Hydro for the Bipole route. There seems to be little to no concern over the route placement of the FPR on these lands in terms of effect on agricultural operations.
- Route changes to meet the CEC recommendation on the land of the 49 affected landowners (65 land parcels) would result in many route alterations for individual land parcels due to the non contiguous nature of cropland in this area. This would result in multiple new angle towers, and involve many new landowners and crown land parcels.

The right-of-way for the FPR successfully avoided cropland parcels on quarter sections for 32 of 81 private landowners with cropland.

Manitoba Hydro believes there is compelling rationale for the selected FPR.

- The current FPR in the area was chosen as a result of extensive assessment and public and Aboriginal engagement. There was a clear preference during Round 3 to select a route outside of prime agricultural areas including the Swan River Valley and the Intermountain region north of Dauphin. The route chosen is in lower valued agricultural areas with the occasional cropland parcels.
- The route selection method as provided in the EIS Chapter 7 documents the assessment, public engagement and eventual expert committee choice of route segments that resulted in the FPR. Potential constraints on route selection due to agricultural land use in the areas north of 36-14-10W were rated low to medium in the route selection matrix due to limited intensively cropped area.

Manitoba Hydro requests that EAB accept the above submission in regards to Licence clause 8 pertaining to the north of Sec 36-14-10W as compelling rationale to not implement the CEC recommendation 9.3 bullet 8.

Your timely attention to this request is appreciated.

Should you have any questions please do not hesitate to contact me at 204-360-4394.

Regards,

***Original signed by Shannon Johnson***

Shannon Johnson  
Manager  
Licensing and Environmental Assessment Department  
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R3M 3T1

Cc: P. Roberts, North-East Regional Director, MCWS

Attachments: 3