

**Quimet, Darrell (CON)**

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**From:** Molod, Rommel (CON)  
**Sent:** December-17-12 3:05 PM  
**To:** Quimet, Darrell (CON)  
**Cc:** Gilbertson, Mike (CON)  
**Subject:** Manitoba Hydro - Keeyask Transmission Project (5614.00)

Darrell,

The Air Quality Section have reviewed the above proposal and have no comment. Potential air quality concerns associated with the project are not expected to be significant and will be localized in nature and of short term duration. Thank you for the opportunity to review.

Rommel

**Rommel Molod**  
Manager, Air Quality Section  
Environmental Programs and Strategies Branch  
Manitoba Conservation and Water Stewardship  
1007 Century Street  
Winnipeg MB R3H 0W4  
T (204) 945-7047  
C (204) 451-5081  
F (204) 948-2420

EA Proposal - MB Hydro - Keeyask Transmission Project - File No. 5614  
Comments From NE REGION IRMT

The Northeast Region IRMT has reviewed the additional information and provided the following comments:

Comments from Pierce Roberts, NE Region Director

Section 2.5.4.1: (page 2-19)

*"Where access outside the right-of-way is necessary (e.g. bypass trails) and has not been identified in advance, supplementary approvals will be obtained from Manitoba Conservation and Water Stewardship (e.g. work permits and timber permits relating to activity on Provincial Crown lands).*

The requirement for a work permit is not limited to Provincial Crown lands. The Wildfires Act requires work permits for work on all lands within the wooded district including private land.

It may be possible to include provisions within the Environment Act Licence and work permit for construction of the development, to provide for bypass trails without requiring a separate work permit for each bypass. By the time this EAL is issued the Bipole III EAL will have been issued. The method of authorizing construction of bypass trails used for Bipole III will likely be repeated for this project.

Section 2.5.4.2: (page 2-21 - 2-22)

*"Selection, development and reclamation of new borrow sites will be undertaken in accordance with provincial regulations and with the approval of the local Natural Resources Officer and local government authorities."*

Administration of borrow areas falls within the purview of Manitoba Energy Industry and Mines..

Respecting Natural Resource Officer approval, this would be in the form of a work permit. As mentioned above it may be possible to include provisions in the EAL and work permit for construction of the development to provide for borrow areas without requiring a separate work permit for each borrow area.

Section 7.2.4.1 (page 7-19)

- *"A machine free zone of 7 m will be established from the high water mark of all waterbodies where harvesting or clearing machinery will not enter, other than to cross the stream.*

The EAL will likely require a 30 m machine free zone as with past transmission construction projects.

- *"Clearing will be conducted under favourable weather conditions. Operations will be postponed under adverse weather (i.e., storm events) to minimize potential sediment introduction into the aquatic environment.*

Elsewhere in the report, it states that clearing and construction will be limited to frozen conditions.

This mitigation measure seems to be referring to a rainstorm. A mild spell in winter toward the end of the frozen season would be a concern during construction but I wouldn't call this a storm event.

Page 7-23

There is reference to fording and spawning timing windows for stream crossings. If construction is to occur under frozen conditions these conditions should not be relevant.

7.2.11.1 (Page 7-71)

*"However data from the Bipole III Transmission Project suggests that caribou mortality due to predation is more common in burned habitat than on transmission line right-of-ways"*

The Bipole III project hasn't started yet so I am unclear as to how there can be data from the project. The effects of a linear features such as a transmission line provides an easier travel corridor for wolves, especially in winter if a snowmobile track exists to provide easy walking. The effect isn't necessarily that predation will occur within the ROW itself, however it provides the means for wolves to travel greater distances and hunt a larger area.

Page 7-75

*"The use of helicopters for maintenance activities on the transmission lines will be avoided near calving and rearing habitat from May 15 to June 30, to reduce effects of sensory disturbance on calving females and their young."*

This timing window seems reasonable; however does match the timing windows in appendix "F" for moose which is June 1<sup>st</sup> to August 31<sup>st</sup>. Most moose in this area calve between mid May and early June.

Page 7-76

*"The use of helicopters for maintenance activities on the transmission lines will be avoided near calving habitat from May 15 to June 30 to reduce effects of sensory disturbance on calving females and their young"*

Some caribou will have calves prior to May 15<sup>th</sup>. The avoidance window should be adjusted to May 1 to June 30. Additionally as an observation the timing window in appendix "F" for caribou is April 1 to July 31<sup>st</sup>. Another observation is that the timing window for moose should be more closely aligned to the timing window for caribou as the peak calving periods for both species in this area is likely within a couple of weeks. Appendix "F" has a three month variance between the two species.

I am not sure why the mitigation measure of placing moose crossing signage on the south access road is mentioned here. This measure should be considered for proposal for the south access road.

Section 7.3.1.1 (Page 7 - 85)

*"All fires must be extinguished prior to spring breakup."*

After March 31<sup>st</sup> a burning permit is required. You may want to change this to read "all fires must be extinguished by March 31<sup>st</sup>."

Comments from Bruce Holmes, NE Forestry Manager:

The Forestry Branch of MBC&WS will be assessing impacts to Forests and Timber Dues owing within FMU 86 and outside FMU 86 in the white zone, for the Keeyask Transmission Project.

## **Quimet, Darrell (CON)**

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**From:** Jacobs, Kevin (MWS)  
**Sent:** December-10-12 12:17 PM  
**To:** Quimet, Darrell (CON)  
**Subject:** Keeyask Transmission Project File: 5614.00

Hello Darrell:

On behalf of the Water Quality Management Section of Manitoba Conservation and Water Stewardship please find below comments regarding File 5614.00 Manitoba Hydro Keeyask Transmission Project.

This project pales in comparison to the size and scope of the Bi-pole III transmission project currently undergoing review. In general should the bi-pole III project be licensed many of the same conditions would be expected to be applied to this project regarding minimizing risk of impacts to surface water quality.

The proposed project includes 14 water crossings. It is during the construction phase of this project that effects to aquatic ecosystems would be most likely.

All reasonable measures should be taken to prevent sedimentation and erosion into surface water bodies. Any areas disturbed should be stabilized and be re-vegetated with a seed mix native to the area.

If any rock is required for use in or near a water body for example riprap, the proponent should ensure that it is clean and inert i.e. non- acid or alkali generating. The proponent will also have to ensure that if ammonium based explosives area used, residual ammonia from blasting operations does not leach into surface water.

For guidance on recommended clearing practices adjacent to water the proponent is encouraged to follow the recommendations within the document entitled Forest Management Guidelines for Riparian Management Areas written by the Forest Practices Committee of Manitoba Conservation and Manitoba Water Stewardship.

- Maximum buffers along watercourses and water bodies for water quality protection and protection of fish resources established by forest practices guidelines should be used. Buffer sizes should be increased above these maximums for areas known or thought to be more sensitive such as steep slopes. Any reductions of buffer sizes from recommended widths in forest practices guidelines need to be carefully considered and rationales documented.
- Concerning piles of brush, merchantable timber, or other vegetative waste: The license should ensure that any leachate generated from these piles is contained or directed well away from surface water.

Concerning temporary construction camps we recommend:

- The use holding tanks for sewage and grey water at field camps or any other staff housing area within these watersheds.
- Holding tank wastewater should be disposed at an approved wastewater treatment lagoon system;
- A policy of only using soaps, shampoos, detergents and other cleaning products that are phosphate-free or that have 0.5 % or less phosphorus content are used in camps or housing facilities;

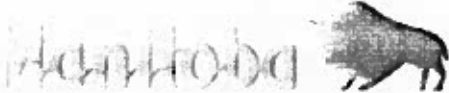
Other comments

- Fuel and oil storage areas should be located a minimum of 100 metres from any water body.
- The proponent will have to prevent oil, hydraulic fluids, coolant, paint, uncured concrete or concrete wash from entering any drainage course or water body

- If fertilization is used when re-establishing vegetation on exposed and excavated areas due to construction, it must only be in accordance with the *Nutrient Management Regulation* Under the Water Protection Act and then only the basic recommended amount of nitrogen and phosphorus needed to establish a healthy growth should be used to reduce leaching of excess nutrients to surface waters.
- No more fertilizer than requirements for a single season should be applied in a given year. The use of slow release formulations are also alternatives that should be considered;
- Regarding pesticide application, it was not clear if any herbicides will be used during ongoing maintenance of this transmission line. Generally preference would be for mechanical means of grubbing should there be any reasonable chance of pesticide entering surface water or wetlands.

Thank you for the opportunity to comment on this proposal.

*Kevin Jacobs, M.Sc.*  
*Senior Water Protection Officer*  
*Water Science and Management Branch*  
*Manitoba Conservation and Water Stewardship*  
*123 Main Street Winnipeg, Manitoba R3C 1A5*  
*Phone: 204 945 4304*  
*Fax: 204 948 2357*



**Infrastructure and Transportation**  
**Highway Planning and Design Branch**  
**Environmental Services Section**  
1420 - 215 Garry St., Winnipeg, MB R3C 3P3  
T (204) 819-4359 F (204) 945-0593

**December 18, 2012**

**Tracey Braun, M. Sc.**  
**Director, Environmental Approvals Branch**  
**Manitoba Conservation and Water Stewardship**  
123 Main St., Suite 160, Winnipeg, MB R3C 1A5

**RE: MB Hydro – Keeyask Transmission Project**  
**Client File No 5614.00**

**Dear Ms. Braun:**

**MIT has reviewed The Environment Act Proposal noted above and we do not have any concerns with the development as proposed.**

**Thank you very much for providing us the opportunity to review the proposal.**

**Sincerely,**

**Ryan Coultter, M. Sc., P. Eng.**  
**Manager of Environmental Services**

**Ouimet, Darrell (CON)**

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**From:** Stibbard, James (MWS)  
**Sent:** December-21-12 8:31 AM  
**To:** Ouimet, Darrell (CON)  
**Subject:** Re: 5614.00 Keeyask Transmission Line EAP

Mr. Ouimet,

I reviewed the Manitoba Hydro – Keeyask Transmission Line EAP looking for any issues respecting safety of drinking water systems or supplies arising from the proposal. No mention is made of drinking water systems in the EAP, however, there is one public water system, the Town of Gillam, downstream of the proposed development. The Town of Gillam gets its water supply from the Nelson River. There are no public water systems using groundwater anywhere in the project area. ODW has noted in previous reviews of the Keeyask GS EAP that the emergency response plans for the project should include contact information for the Gillam water treatment plant and a provision that, should any spill of toxic or other materials into the Nelson river occur, the Gillam water treatment plant operators should be notified immediately and we recommend this provision be repeated in the emergency response plan for this project. Apart from this point, ODW does not see any other cause for concern with this project respecting drinking water safety. 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](mailto:James.Stibbard@gov.mb.ca)

website: [www.manitoba.ca/drinkingwater](http://www.manitoba.ca/drinkingwater)

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## **Ouimet, Darrell (CON)**

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**From:** Elliott, Jessica (CON)  
**Sent:** December-20-12 1:24 PM  
**To:** Ouimet, Darrell (CON)  
**Subject:** Manitoba Hydro - Keeyask Transmission Project (CF 5614)

Parks and Natural Areas Branch has reviewed the draft licence filed pursuant to the environment act for the Manitoba Hydro - Keeyask Transmission Project (CF 5614). The Branch has no comments to offer.

**Jessica**

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

*phone: 204-945-4095*

*cell: 204-305-4084*

*fax: 204-945-0012*

*email: [Jessica.Elliott@gov.mb.ca](mailto:Jessica.Elliott@gov.mb.ca)*



**Before printing, think about the environment**

**Avant d'imprimer, pensez à l'environnement**



## **Ouimet, Darrell (CON)**

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**From:** Wiens, Jonathan (CON)  
**Sent:** December-18-12 2:30 PM  
**To:** Ouimet, Darrell (CON)  
**Subject:** Client File 5614.00

Hello Darrel,

With respect to Client File 5614.00, Wildlife Branch would like clarification as to why the proponent is not proposing to run the "Construction Power Line" adjacent to the "Generation Outlet Transmission Lines". A second transmission corridor, even for only temporary power supply, increases the environmental scope of the project, and results in a larger environmental footprint. Wildlife Branch would like more information on this portion of the project.

Jonathan Wiens, MSc  
Habitat Specialist  
Manitoba Conservation  
Box 24 - 200 Saulteaux Crescent  
Winnipeg, Manitoba, R3J 3W3  
Phone: (204) 945-7764  
Mobile: (204) 918-3420  
Fax: (204) 945-3077  
Email: [jonathan.wiens@gov.mb.ca](mailto:jonathan.wiens@gov.mb.ca)



January 7, 2013

Minister Gord MacKintosh  
Manitoba Conservation and Water Stewardship  
Room 330  
Manitoba Legislature  
Winnipeg, Manitoba

Ms Tracey Braun, Director  
Environmental Assessment and Licensing Branch  
Manitoba Conservation  
123 Main Street, Suite 60  
Winnipeg, Manitoba

Dear Minister and Director:

**Re: Manitoba Hydro Keeyask Transmission Project, File #5614**

These comments regarding the Manitoba Hydro Keeyask Transmission project emphasize Manitoba Wildlands ongoing concern regarding staged licensing. We also want to remind the Minister, that his government and political party clearly stated its opposition to staged licensing when in Opposition in the Manitoba Legislature. In 1999 and 2003, the New Democratic Party made commitments to stop staged licensing for environmental approvals of projects in Manitoba. At the same time, commitments were made to put an Environmental Commissioner or Auditor in place to monitor decisions about our environment.

**The Keeyask projects are perhaps the worst example since 2003 of staged licensing under the Manitoba Environment Act.** The close competitors would probably be ongoing forest operations licensing, and both McCains and Maple Leaf mills. Staged licensing carries many risks into decision-making; allowing only a narrow view of a part of the project, thereby blocking examination of the greater ramifications of the project in its entirety.

**It is hard to determine how many individual projects are involved with the greater Keeyask project.** Clearly we have three specific Keeyask projects under the Environment Act; infrastructure, generation, and transmission. There are also the various roads, and access roads – and the building of provincial highway routes by Manitoba Hydro, without clarity as to what will be decommissioned. It is also unclear as to whether there has been any consultation with affected communities or public information about these highway decisions related to the Keeyask projects. The highway and access roads are included in the Keeyask transmission EIS materials.

There is also the confusing situation regarding the Keewetinoook Converter Station, which is included in the Bipole III project – and apparently not in anyway related to Keeyask Generation



Station. Public impression is that Bipole III will carry the 'new green power' Manitoba Hydro would be producing from Keeyask and Conawapa generation stations.

**The Keeyask Generation Station EIS does not indicate that Bipole I will carry the new "green power".** The same is confirmed in the EIS for Keeyask Transmission. The Wuskwatim Generation and Transmission project EIS materials were filed, and reviewed at the same time. Both were part of the same proceedings and public hearings through the Clean Environment Commission. Yet the elements of the Keeyask project are separated into at least three projects, and filings. This means the reviews are separate, the information is separate, and the combined impact, environmental effects, and decisions do not take into account the whole project. Now the Keeyask transmission EIS indicates that transmission will go from the generation station, to an old converter station, and then down an older HDVC transmission line – Bipole I – to another former converter station, Dorsey Station. Why was this information not made available in the Bipole III hearings, or in the Keeyask Generation Station EIS ?

The status of the licences for recent transmission projects in Manitoba may need to be reviewed, and assessed before any further proposals for transmission projects are filed.

**It is long over due for Manitoba Hydro to clearly indicate to the public all the various transmission projects** it intends to seek licenses for. The recently released energy plan for Manitoba does not provide the kind of information necessary to allow Manitobans, owners and shareholders in Manitoba Hydro, to adequately respond to development intentions and participate in public reviews. In particular, the public needs full information about the transmission projects in place, being built and *how and when they will be connected to the hydro system.*

**Staged licensing enables the inclusion of incomplete information into an EIS,** can include pieces of other projects being licensed without complete information, and can lead to a weak basis for licensing decisions. When public money/ debt, public lands and waters, and public resources and services are being utilized for a project under the Environment Act, the highest standards should be in place at every technical and licensing step. This is not currently so. When self-assessment by a public utility is the basis for filing an environmental proposal, the public needs to see the full project scope beyond just what has been filed by the proponent. Staged licensing also allows the proponent to downsize or ignore existing, future, intended or potentially connected projects when providing filings for a 'new project'. Staged licensing also allows the proponent to separate environmental effects into different 'projects' thereby reducing or ignoring those effects.

**The Manitoba government standards for short transmission projects must be made available to the public.** The EIS and scoping document standards/guidelines for the Keeyask Transmission project were not made publically available.

This means that there is no ability to compare the EIS standards and content to the submitted Keeyask Transmission project EIS. Manitoba Conservation, and its predecessor Manitoba Environment, used to make such standards available. We suggest this be done immediately, as there are various transmission projects being submitted now and intended in the near future.

**We note that the study area, project area and project region terminology are used inconsistently in the Keeyask transmission EIS materials.** In addition, sections of the VECs are incomplete and incorrect. One example would be the use of dated sources for the endangered species content, without clearly stating the requirements regarding woodland caribou under MESA.

Manitoba Conservation must immediately make requirements of proponents regarding woodland caribou public so that public reviews have validity, and licensing decisions are consistent with Manitoba law.

**The transmission project scope for the preferred corridor is insufficient.** There is a small project area on the topside, or water side of the intended preferred transmission corridor, meaning that the self-assessment and EIS are incomplete.

**Inadequate public engagement by Manitoba Hydro** stands out in the EIS materials. A comparison of the public engagement information in the Generation and Transmission EIS filings, show that Manitoba Hydro took advantage of staged licensing for both of these projects. A special open house and discussion forum for the academic, and environmental community was held in Winnipeg for the combined Wuskwatim Generation and Transmission project. Nothing of that quality occurred for Keeyask.

#### **Manitoba Wildlands summary comments and recommendations:**

- Staged licensing of the Keeyask project(s) provides incomplete information, and an inadequate basis for assessment, reviews, and licensing;
- Clear public information regarding all existing, connected, and intended projects should be provided in the EIS for any Manitoba Hydro project;
- It should be noted that the Canadian Environmental Assessment Agency has a responsibility with regards to both Keeyask Generation and Transmission. The EIS Guidelines from CEAA have not been fulfilled, and EALB should cooperate with CEAA to make sure that they are fulfilled;
- All aspects of the Keeyasks projects should be completely available, together, with all records maintained online and on paper throughout the current sequence of Hydro projects;
- Clarity with respect to new green energy projects, Bipole III, the Keeyask project(s), and the existing and intended converter stations is needed immediately. This information should include all transmission lines and projects. (Manitoba Hydro indicates there will be as many as five new transmission lines for the new converter station in northern Manitoba.) Manitobans deserve clear information, not disconnected information from lack of energy planning and staged licensing;



- The recommendations of the Clean Environment Commission report regarding Wuskwatim Generation and Transmission projects should be reviewed and fulfilled, with transparency;
- The various lessons learned pertaining to improvements and required adjustments to infrastructure policies while constructing the Wuskwatim Transmission line project were acknowledged during the Bipole III hearings. These improvements/adjustments to the Wuskwatim transmission project that are being applied to the BP3 project, should be identified and acknowledged within the BP3 EIS.
- EALB should require a supplemental filing from Manitoba Hydro regarding this transmission project – and any other transmission projects in the system now – to make sure these adjustments and changes in Manitoba Hydro infrastructure policies from the Wuskwatim transmission project are being applied to all transmission upgrades and new projects;
- An analysis of the risks, additional work, confusion arising from multiple license and public registry files, and potential environmental effects resulting from staged licensing, needs to be undertaken by an independent office;
- All EALB guidance documents, and standards for types of proposals/ projects under the Environment Act should be made public, and added to the public registry file for all proposals; specifically for all transmission projects.
- The *reference* to the CEC for the Keeyask Generation project hearings should be amended to include; transmission, infrastructure and sustainability/ environmental effects of all existing, intended and connected projects;
- Every Manitoba Hydro project needs to undergo a thorough review that includes; public comments, TAC review, etc, with the results posted in the public registry file. All Manitoba Hydro projects need to be advertised, posted online etc beyond small local community notices;
- The public paper registry for all Keeyask files should be available together, and not limited to primary registry and northern locations. EALB needs to remember that all Manitobans are shareholders and owners of Manitoba Hydro, and thereby potentially affected by these licensing decisions.

**NOTE re VALIDITY OF REVIEW PROCESS** – The links to access the EIS for the Keeyask Transmission project were mostly not working on the EALB online registry prior to the deadline for comments on this project. This includes in the weekend leading up to and the day that is the deadline for review comments.

Yours sincerely

ORIGINAL SIGNED BY



**MANITOBA  
WILDLANDS**

565 - 167 Lombard Ave Winnipeg MB Canada R3B 0V3  
info@ManitobaWildlands.org Ph 204-944-9593  
www.ManitobaWildlands.org Fax 204-947-3076

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Gaile Whelan Enns,  
Director  
Manitoba Wildlands.

