



360 Portage Ave (17) • Winnipeg Manitoba Canada • R3C 0G8  
Telephone / N° de téléphone : 204-360-4773 • Fax / N° de télécopieur : 204-360-6138  
dbowen@hydro.mb.ca

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2018 11 07

Siobhan Burland Ross  
A/Director - Environmental Approvals Branch  
Manitoba Sustainable Development  
1007 Century Street  
Winnipeg, MB R3H 0W4

Dear Ms. Burland Ross:

**RE: KEYASK GENERATION PROJECT – NOTICE OF ALTERATION TO DECOMMISSION THE  
CONSTRUCTION PHASE GULL NESTING HABITAT  
ENVIRONMENT ACT LICENCE NO.3107, CLIENT FILE 5550.00**

Manitoba Hydro, in its delegated authority to manage construction of the Keeyask Generation Project on behalf of the Keeyask Hydropower Limited Partnership (KHLP), is requesting an alteration to Environment Act Licence No. 3107 to decommission the construction phase gull nesting habitat located on the south shore of William Smith Island (west) in the winter of 2018-19.

The KHLP committed to providing alternative nesting habitat for gulls during construction of Keeyask until impoundment of the reservoir, at which time a permanent constructed island would be available for gulls. This commitment was stated in the Environmental Impact Statement, Terrestrial Mitigation Implementation Plan, and in the responses to Information Requests from Environment Canada during the regulatory approval process.

The gull nesting habitat was constructed in the winter of 2014-15 and has been available to gulls for four nesting seasons. As outlined in the attached memo, project monitoring has shown that suitable alternate natural nesting habitat is currently available to gulls in the Project area and that gulls have not made use of the constructed habitat to date. Decommissioning the area in the winter of 2018-19 will also reduce the extensive decommissioning work required in winter 2019-20. Based on this, it is proposed to remove the constructed habitat a year earlier than originally planned.

If there are any questions or concerns with this request, please feel free to contact Jodine MacDuff at 204-250-1017.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Dave Bowen', with a long horizontal flourish extending to the right.

Dave Bowen, P. Eng, M.Sc  
Director, Keeyask Project  
Generation & Wholesale

Att.

Notice of Alteration Form



Client File No. : 5500.00	Environment Act Licence No. : 3107
Legal name of the Licencee: Keyeask Hydropower Limited Partnership	
Name of the development: Keyeask Generation Project	
Category and Type of development per Classes of Development Regulation: Energy Production and Waste Conversion                      Electrical generating facilities >100 MW	
Licencee Contact Person: Dave Bowen Mailing address of the Licencee: 360 Portage Avenue, 17th Floor City: Winnipeg                      Province: Manitoba                      Postal Code: R3C 0G8 Phone Number: (204) 360-4773    Fax:                      Email: dbowen@hydro.mb.ca	
Name of proponent contact person for purposes of the environmental assessment (e.g. consultant): Jodine MacDuff	
Phone: (204) 250-1017 Fax:	Mailing address: 360 Portage Avenue, 17th Floor Winnipeg, MB R3C 0G8
Email address: jmacduff@hydro.mb.ca	
Short Description of Alteration (max 90 characters): Decommission the construction phase gull nesting habitat in the winter of 2018-19.	
Alteration fee attached:    Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
If No, please explain: As per previous discussions with Darrell Ouimet.	
Date: 11/07/2018	Signature:  Printed name: Dave Bowen
<p>A complete Notice of Alteration (NoA) consists of the following components:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Cover letter</li> <li><input checked="" type="checkbox"/> Notice of Alteration Form</li> <li><input type="checkbox"/> 4 hard copies and 1 electronic copy of the NOA detailed report (see "<a href="#">Information Bulletin - Alteration to Developments with Environment Act Licences</a>")</li> <li><input type="checkbox"/> \$500 Application fee, if applicable (Cheque, payable to the Minister of Finance)</li> </ul>	
<p><b>Submit the complete NOA to:</b></p> <p>Director Environmental Approvals Branch Manitoba Sustainable Development Suite 160, 123 Main Street Winnipeg, Manitoba R3C 1A5</p> <p><b>For more information:</b></p> <p>Phone: (204) 945-8321 Fax: (204) 945-5229 <a href="http://www.gov.mb.ca/conservation/eal">http://www.gov.mb.ca/conservation/eal</a></p>	

Date: October 29, 2018

## MEMORANDUM

To: Carolyne Northover  
Environmental Licensing and Protection, Manitoba Hydro

Cc: Rachel Boone, Sherrie Mason

From: Robert Berger  
Wildlife Resource Consulting Services MB Inc.

**Re: Keeyask Generation Project (KGP) Gull Habitat Enhancement Area Evaluation**

### Background

Gulls have traditionally nested on islands at Gull Rapids, portions of which are within the Keeyask Generation Project (the Project) footprint and have been altered by Project construction. Nesting islands used by gulls are typically rocky, support little to no vegetation, have stable banks and have limited access for land predators. This type of habitat is uncommon in the area near the Project, especially on islands surrounded by natural rapids. Ring-billed gulls were the most abundant species of colonial waterbird observed during Project monitoring in 2015 to 2018.

Final Project development will result in the removal and/or degradation of approximately 2.7 ha of potential gull and tern breeding habitat. When mitigation measures for the loss of this breeding habitat were originally proposed in the EIS, it was anticipated that sensory disturbance from construction activities might prevent gulls and terns from nesting on their traditional nesting islands at Gull Rapids; additionally, there was uncertainty about how water levels in the Gull Rapids area would change during construction with commissioning of the spillway.

### Justification to Decommission the Gull Habitat Enhancement Area for 2019

The gull habitat enhancement area (see Map 1 for location) has been available to ring-billed gulls from 2015 to 2018 to provide an alternate nesting site during the Project construction period. As no gulls have used the gull habitat enhancement area during this time, the area appears to have had limited attractiveness to gulls.

It is hypothesized that the gull habitat enhancement area has not been used by gulls to date because: there is adequate suitable natural nesting habitat available elsewhere in the local study area (see Map 1 for nesting locations); sensory disturbance does not seem to be affecting the selection of nesting and congregation sites by gulls during construction (Map 2); and as of summer 2018 the traditional nesting islands at Gull Rapids continue to be available for nesting.

Between 2015 and 2018, Project monitoring has recorded 14 locations of gull colonies<sup>1</sup> near the Project site (i.e., between Birthday Rapids and Stephens Lake; see Map 1). Table 1 lists the number of ring-billed gull colonies between Birthday Rapids and Stephens Lake from 2015-2018, and the total number of colonies observed in the larger region during the Project monitoring. Overall, ring-billed gull numbers during Project construction have been very similar to those prior to construction.

Monitoring in 2017 (a year with exceptionally high spring water levels, which reduced the nesting habitat available at Gull Rapids) showed that while gulls still nested in the Gull Rapids area, they also shifted their nesting locations to previously unused areas. One island (site 683; see Map 1) approximately 12 km upstream of Gull Rapids, had been cleared of trees for the Project in the winter of 2015/2016. In 2017, new suitable habitat formed at site 683 and it was used by the local gull population for nesting. No gulls had been observed nesting or loafing on this island during the previous two years of Project monitoring.

Because other existing habitat, including the new natural island habitat temporarily created from recent reservoir clearing, appears to be more desirable for nesting than the constructed gull habitat enhancement area (as supported by the 2015-2018 monitoring data), decommissioning the constructed gull nesting habitat area one year earlier than initially planned would not limit the amount of suitable nesting habitat available to gulls near the Project site.

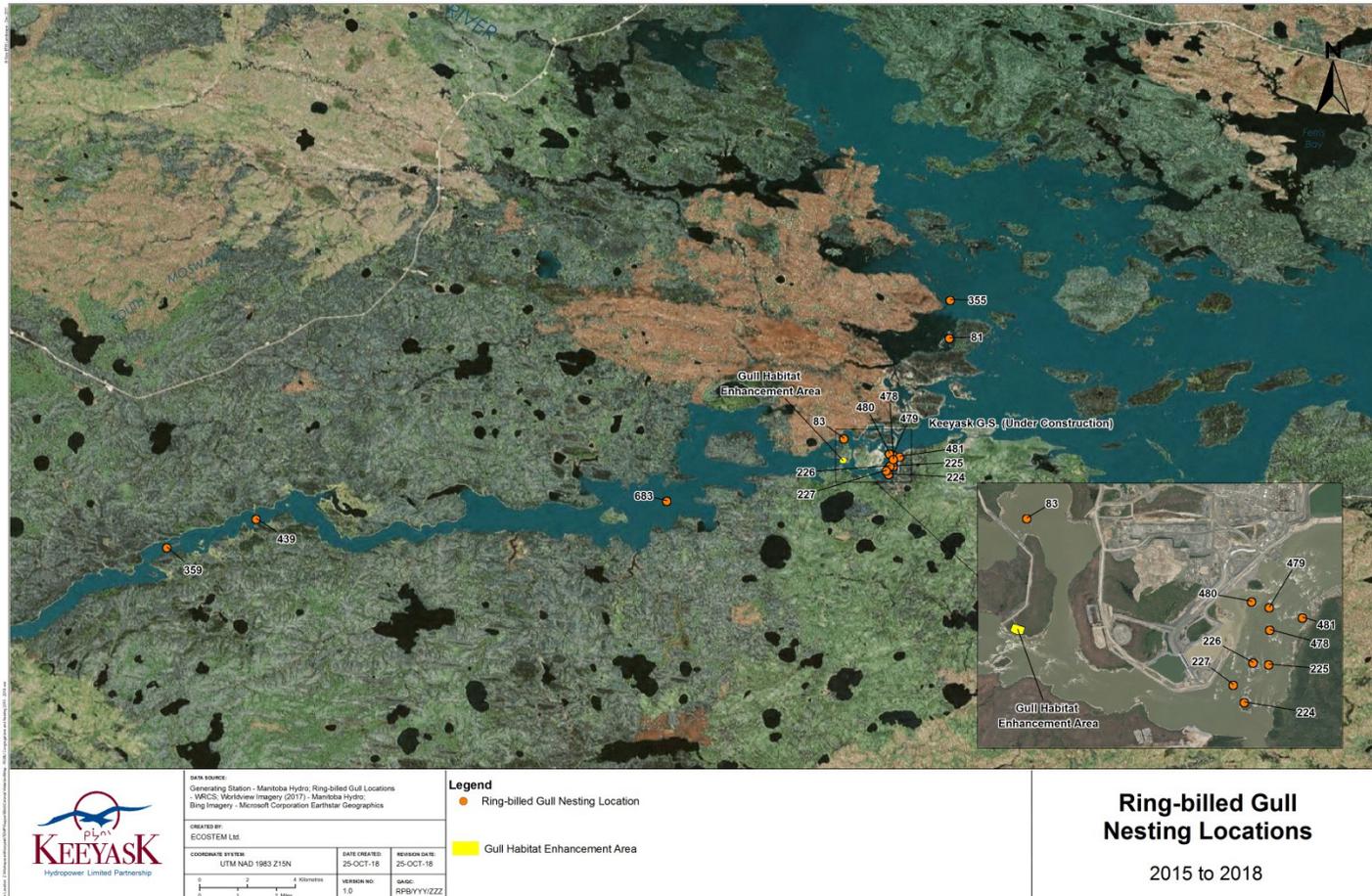
Following impoundment, a permanent gull and tern nesting island that is currently under construction at the Project site, will be available for gulls and terns during operation of the generating station.

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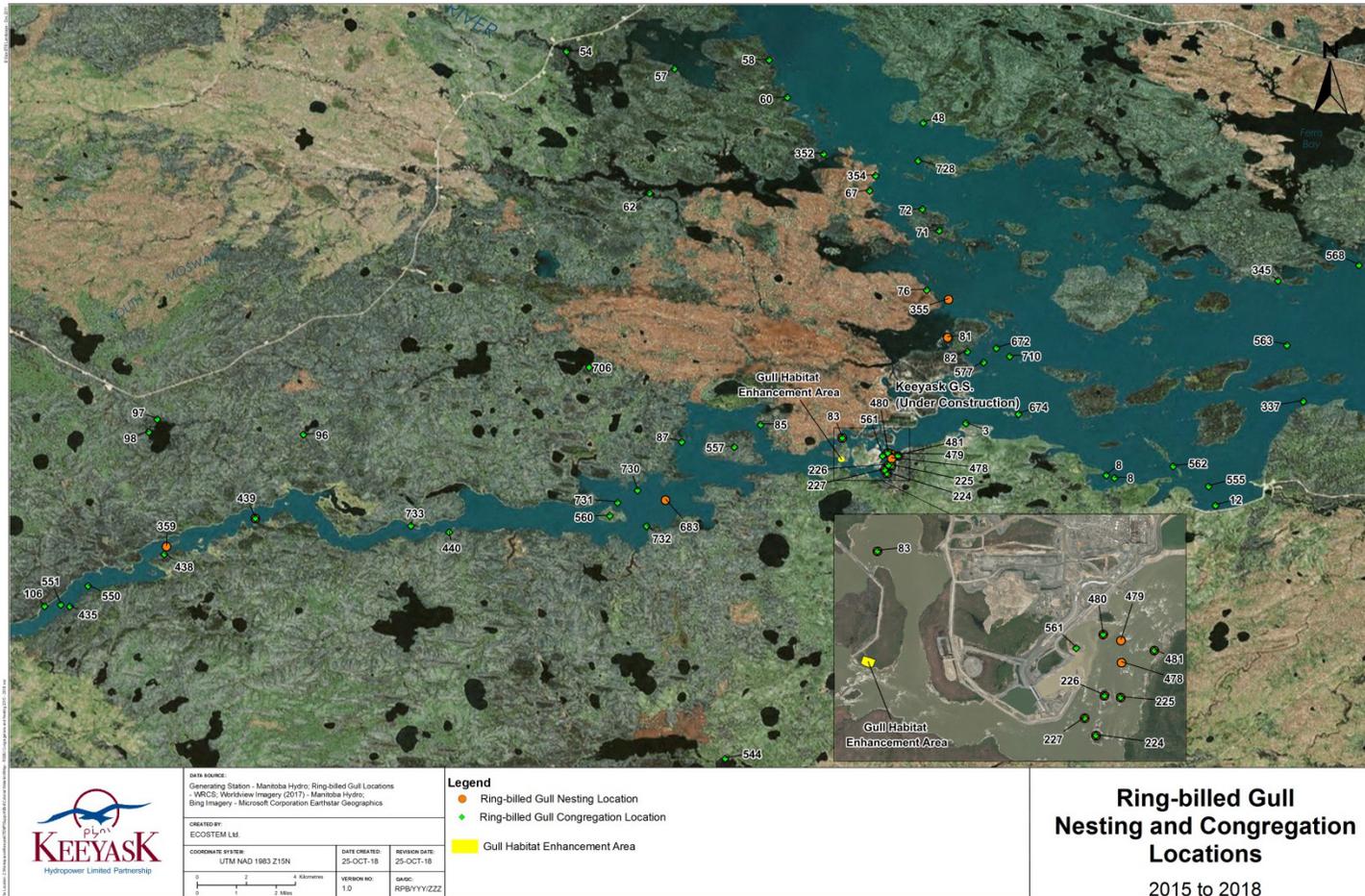
<sup>1</sup> Congregation - group of birds where nesting is not taking place  
Colony - group of birds where nesting is taking place

**Table 1: Number of ring-billed gull colonies in the Region and Local Area (defined by the extent shown in Map 1) by survey year**

	2015	2016	2017	2018	Total Colony Locations (All Survey Years)
<b>Local Area</b>	9	5	7	7	14
<b>Region</b>	19	17	10	15	44



Map 1. Ring-billed gull nesting sites near the Project site from 2015 to 2018.



**Map 2. Ring-billed gull nesting sites and congregation sites near the Project site from 2015 to 2018.**