Manitoba

Conservation and Water Stewardship

Environmental Stewardship 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: 5716.00

November 10, 2014

Shannon Johnson
Manitoba Hydro
820 Taylor Avenue
Winnipeg MB R3M 3T1

Dear Ms. Johnson:

Re: Pointe du Bois Transmission Project

The initial review of the proposal submitted pursuant to *The Environment Act* for the Pointe du Bois Transmission Project and comments received from the public and the Technical Advisory Committee (TAC) related to the proposal has been completed.

Additional information is required based on this review. Please address and provide detailed responses to the attached comments from the Crops Branch of Manitoba Agriculture, Food and Rural Development and the Wildlife Branch of Manitoba Conservation and Water Stewardship.

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

If you have any questions regarding this matter, please contact me at (204) 619-0709 or elise.dagdick@gov.mb.ca.

Yours truly,

"original signed by"

Elise Dagdick, B.Sc
Environment Officer

Att.

c: Public Registries

Dagdick, Elise (CWS)

From: Wilson, Brian (MAFRD)
Sent: July-17-14 10:30 AM
To: Dagdick, Elise (CWS)
Subject: RE: Review and comments request - MB Hydro - Pointe du Bois File: 5716.00

I have reviewed the Environment Act Proposal submitted by Manitoba Hydro on Pointe du Bois File 5716 on behalf of the Manitoba Agriculture Food and Rural Development.

The Environmental Proposal does indentify that there is agriculture land in the study area, however, the proposal does not provide any information on the crops grown in the area and does not discuss at all about any possible impacts on agriculture operations. While the majority of this project is not adjacent to agriculture land there does appear so to some agriculture land located adjacent to where construction is proposed.

Our department has indentified that biosecurity is an issue and that the movement of soils, which can result in the movement of soils borne diseases is a risk that must be mitigated. The movement of soils can happen during surveying, construction and maintenance operations. Our department is aware that Manitoba Hydro is working to develop and implement operating procedures to address this issue.

Since this issue was not identified in the EAP, we do want Manitoba Hydro to acknowledge that biosecurity is indeed a risk to the adjacent agriculture land and that they will follow procedures to minimize this risk.

Brian Wilson
Soils Suitability Specialist
Crops Branch
Manitoba Agriculture, Food and Rural Development

Wildlife Branch - Regional and Big Game Unit Comments
Manitoba Hydro Pointe du Bois Transmission Line Project
November 7, 2014

Our comments address the following general areas/topics:

- Manitoba Hydro's preferred route
- Manitoba Hydro's Assessments of Impacts
- Manitoba Hydro's wildlife inventories
- Mitigation
- Monitoring and Management

Manitoba Hydro's preferred Route:

The most effective way to mitigate impacts of a new transmission line on wildlife is to select a route that: a) avoids crossing remote areas with little or no existing linear corridors, b) remains as close as possible to existing roads and/or transmission lines; and; c) avoids areas important for the maintenance and/or recovery of listed, rare or priority species. In keeping with these principles, our preference is that the route follow the ROWs along PRs 520 and 511 as much as possible. Moose is a priority species in this area, and there are concerns about population sustainability, given the progressive moose declines experienced in SE Manioba over the last few decades. An intensive recovery program has been underway since 2010 to help rebuild the GHA 26 moose population to a sustainable level (the new transmission line will transverse the south portion of this GHA). As Manitoba Hydro acknowledges in their submission, moose are threatened by hunting, predation, and the transmission of pathogenic parasites related to the presence of white-tailed deer. Access corridors such as transmission lines can amplify these threats by providing access that enhances hunting efficiency, improving kill rates and offering travel routes for the incursion of white-tailed deer. Manitoba Hydro's final preferred route does not follow the existing PR ROWs; rather; the route crosses through two presently remote areas harboring capable moose habitat. While moose densities have been very low in this portion of GHA 26 over the last few decades, our information indicates increasing observations of moose throughout southern portions of the GHA in recent years. Any landscape disturbance that directly or indirectly increases moose mortalities may hamper or possibly negate the population recovery exhibited in these lower density areas thus far.

The project and associated ROW cross preferred habitat types for various non-game species and several species of conservation concern are included in the proponents review.

Manitoba Hydro's Assessments of Impacts

The proponent has done a good job of presenting the diversity of potential impacts on moose from transmission line construction and operations. However, in each case the proponent also attempts to minimize each of these potential impacts by stating that the overall impacts will be insignificant as only "*a few moose*" or "*small amounts of habitat*" will be affected. We believe that this view is overly-optimistic, and disagree with the statement on page 7-32 indicating "*increased access to a few individual moose and potential future moose harvest is expected to be small and limited to about 21 km of new access.*" Rather, we maintain that 21 km of new access is a long length of new access, and represents a potentially large threat in an area where moose densities are already low, particularly insofar as the new access traverses a presently remote area.

Manitoba Hydro's Wildlife Inventories.

There are references to "late winter April survey" and "August survey"; however; details on methods are not included, and it is not clear which data were collected from aerial surveys, vs ground surveys, vs both. We are questioning the results of any aerial surveys conducted at times of the year when visibility is compromised due to lack of snow cover and/or vegetation screening. We are requesting additional information so that we are able to properly review this section of the submission. For the detection of moose, deer, wolves and other similar species, winter surveys should be conducted in January and February (with a minimum snow-base of 25 cm) – this is standard methodology for most jurisdictions.

Mitigation Tables

A number of the tables make reference to mitigation occurring according to the "***Access Management Plan***" and/or the ***"Rehabilitation and Vegetation Management Plan";*** however, ***c***opies of these Plans were not included We understand that it is Hydro's intention to develop these plans; but, since the plans are not presented in the submission, we are unable to assess whether the mitigation the proponent may be considering will adequately mitigate the impacts of the development. e.g. PC-1.01 states that *"access roads and trails no longer required will be decommissioned and rehabilitated in accordance with the Rehabilitation and Vegetation Management Plan*". We cannot assess whether the proponent's intended mitigation will be adequate without knowing where and how access will be created, how these routed will be maintained, which of them will be identified for long-term use, and how decommissioning is to occur. Accordingly, we recommend that Manitoba Hydro be advised that they will be required to develop the aforementioned Plans in consultation and co-operation with the IRMT, in a manner agreeable to, and for the approval of the Director of Wildlife.

- **Wildlife Protection (EC-9):** The following statements should be revised to include additional detail:

  9.01 – Any injured or killed wildlife encountered on the transmission line ROWs and associated access roads/trails should be reported to CWS (not just those killed/injured by vehicles).

  9.02 – CWS should be advised as to where the bird diverters/aerial markers will be installed.

  9.03 – CWS should be consulted to determine how important wildlife habitats will be identified.

  9.09 - CWS should be notified if traps or **bait sites** are encountered.

  9.14 - CWS should be consulted to determine how important wildlife habitats will be identified.

  9.15 – CWS should be notified if artificial nesting structures are to be installed. Post-installation monitoring should occur to assess whether these structures are subsequently used.

9.16 – CWS should be consulted prior to erecting any wildlife warning signs.

9.18 – Will the proponent consider the provisions of Manitoba's draft No Net Loss Guidelines?

It is recommended that the following statements be added:

- New occurrences of any listed rare, threatened or endangered species will be documented and provided to CWS.
- Wildlife staff will be advised in advance of any aerial surveys or flights the proponent will be undertaking in the project area (justification - Wildlife staff may be conducting flights in the same area on concurrent days; therefore, communication on plans will help to ensure the safety of our respective staff).
- Mitigation strategies during construction and operation phases be reviewed and developed in co-operation with Wildlife Branch staff.
- The effectiveness of wildlife protection mitigation will be monitored and assessed through a Wildlife Monitoring Plan to be developed in consultation and co-operation with Wildlife Branch, which is agreeable to and approved by the Director.

Monitoring Plans

In view of the new access that will be created, and potential impacts on the moose population and other species, the proponent should be required to conduct monitoring to enable an assessment of effects. The monitoring plan should be developed in collaboration with Wildlife Branch, and should include, at minimum, annual aerial surveys encompassing an area 20 km on either side of the ROW where new access is created. Consideration should also be given to monitor human use of new access – more specifically, use of the ROW proper, as well as a means of getting to take-off points for accessing adjacent areas.