

Infrastructure and Transportation
Highway Planning and Design Branch
Environment Section
14th Floor – 215 Garry St., Winnipeg, Manitoba R3C 3P3
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January 3, 2012

Tracey Braun
Director, Environmental Assessment & Licensing Branch
Manitoba Conservation
123 Main St., Suite 160, Winnipeg, MB R3C 1A5

RE: Keeyask Hydropower Limited Partnership – Keeyask Generation Project
Client File No 5550.00

Dear Director Braun:

MIT has read the scoping document provided for the project noted above and found the information to be insufficient for review. Further details including, but not limited to, the following are needed to conduct a proper review on potential impacts to departmental roads pursuant to *The Highways Protection Act* and *The Highways and Transportation Act*:

- site map
- location specifics (Section-Township-Range, project components' proximity to departmental roads)
- access road and drainage ditch details superimposed on a map
- potential increase in vehicular traffic during construction and operation

Our Department would like to defer comments at the moment until more information is available. We would appreciate receiving a copy, if any, of the proponent's subsequent submission of an Environment Impact Statement/Assessment (EIS/EIA).

Thank you very much for providing us the opportunity to review the scoping document.

Sincerely,

Christopher Clary-Lemon, P. Eng., P. E.
A/Manager of Environmental Services

Ouimet, Darrell (CON)

From: Bezak, Dave (CON)
Sent: January-30-12 12:54 PM
To: Ouimet, Darrell (CON)
Cc: Molod, Rommel (CON)
Subject: FW: Keeyask Hydropower Limited Partnership - Keeyask Generation Project (5550.00)

Air quality-related comments on the above Environment Act proposal are noted below. Thanks. DB.

From: Molod, Rommel (CON)
Sent: January-30-12 12:05 PM
To: Bezak, Dave (CON)
Subject: Keeyask Hydropower Limited Partnership - Keeyask Generation Project (5550.00)

Dave,

The following are suggested to be included in the air quality assessment during the construction phase:

- Emissions estimate from the operation of the diesel engine generator set.
- Noise assessment is suggested to be included because of the use of explosives.
- If a portable concrete batching plant is to be operated during the construction phase, then its anticipated emissions should be included in the assessment.

Rommel

Rommel Molod
Air Quality Specialist
Climate Change and Environmental Protection Division
Manitoba Conservation and Water Stewardship
Suite 160 123 Main Street
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Ouimet, Darrell (CON)

From: +THO407 - Thompson CRP (MLG)
Sent: January-30-12 10:34 AM
To: Ouimet, Darrell (CON)
Cc: Shaler, Samantha (MLG)
Subject: Comments: Keeyask Generation Project - Scoping Document

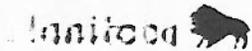
Darrell Ouimet:

Thompson Community and Regional Planning has reviewed the Keeyask Generation Project – Scoping Document.

The project is located in Unorganized Territory, near Stephens Lake, east of the Town of Gillam. Our office understands that the proposal is a scoping document intended to provide insight as to the information that will be included within the Environmental Impact Statement.

Manitoba Local Government requests that a detailed analysis be included regarding the impact on regional service centres, particularly the City of Thompson and the Town of Gillam. Section 4.2 Socio-Economic Environment alludes to the undertaking of compiling such data. The analysis should contain information for direct and indirect employment, housing and service implications for communities and work camps during the construction and operational phases. Consultation with municipalities regarding municipal service needs would be an asset to the Community and Regional Planning analysis.

Matthew Pawlow, B.U.R.P.I.
Community Planner



Local Government
Community and Regional Planning
206-59 Elizabeth Drive
Thompson MB R8N 1X4
Phone: 204-677-6700
Fax: 204-677-6879
Email: Matthew.Pawlow@mlg.mb.ca

Ouimet, Darrell (CON)

From: Elliott, Jessica (CON)
Sent: February-01-12 9:46 AM
To: Ouimet, Darrell (CON)
Subject: Keeyask Hydropower Limited partnership - Keeyask Generation Project Scoping Document (file 5550.00)

Parks and Natural Areas Branch has reviewed the Keeyask Hydropower Limited partnership - Keeyask Generation Project Scoping Document (file 5550.00). The Branch has no comments to offer.

Jessica

Jessica Elliott, M.E.Cas.
Parks and Natural Areas Branch
Parks and Natural Areas Branch
Box 53, 200 Sauteaux Cres
Montreal, QC H3R 3N3

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Before printing, think about the environment

Avant d'imprimer, pensez à l'environnement

Ouimet, Darrell (CON)

From: Wiens, Jonathan (CON)
Sent: January-17-12 11:56 AM
To: Ouimet, Darrell (CON)
Subject: 5550.0

WEPB has no wildlife related concerns with the proposal.

Jonathan Wiens, MSc
Habitat Specialist
Manitoba Conservation
Box 20 - 200 Saulteaux Crescent
Winnipeg, Manitoba, R3J 3W3
Phone: (204) 945-7764
Mobile: (204) 918-3420
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Ouimet, Darrell (CON)

From: Kaita, Adara (CON) on behalf of +WPG1212 - Conservation_Circulars (CON)
Sent: January-31-12 3:21 PM
To: Ouimet, Darrell (CON)
Subject: Scoping Document - Keeyask Hydropower Limited Partnership - File 5550

The Sustainable Resource and Policy Management Branch and the Lands Branch provide the following comments for the Keeyask Scoping Document:

- Please note that the Scoping Document does not provide much detail on management implications which might arise from the project. Recommendations for the EIS/EA include:
 - Plans for managing negative biodiversity impacts should be developed more fully in the EIS, including species management plans, habitat rehabilitation for borrow pits, and establishment of future protected areas. (see the Hydropower Sustainability Assessment Protocol (HSAP))
 - Under section 8 in the Scoping Document - Format of the EIA – add GIS data sharing (locations, points of rare species, etc with Conservation Data Centre) to make review of sites easier, and for future reviews and planning exercises.
 - Under Section 3.4.1 - Valued Ecological Components (VEC) for the Cumulative Effects Assessment - include a discussion on ecosystem integrity and connectivity issues as they relate to the targeted VECs as recommended under HSAP.

DATE: January 31, 2012

Memorandum

TO: Darrell Ouimet
Environment Officer
Environmental Assessment and
Licensing Branch
Manitoba Conservation and
Water Stewardship
123 Main Street, Suite 160
Winnipeg, Manitoba R3C 1A5

FROM: William Weaver, M.Sc.
Environmental Review Officer
Water Stewardship Division
Manitoba Conservation and
Water Stewardship
200 Saulteaux Crescent, Box 14
Winnipeg, Manitoba R3J 3W3

CC: Elaine Page
Wendy Ralley
Bob Harrison
James Stibbard
Rob Matthews
Laureen Janusz

TELEPHONE: (204) 945-6395
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SUBJECT: *ENVIRONMENT ACT PROPOSAL FILE: 5550.00*
KEYYASK GENERATION PROJECT
KEYYASK HYDROPOWER LIMITED PARTNERSHIP

The Water Stewardship Division of the Manitoba Department of Conservation and Water Stewardship has reviewed a Scoping Document for the Environmental Assessment of the Keeyask Generation Project, forwarded for comment on December 9, 2011.

- The Water Stewardship Division requires the following:
 - The proponent will be required to apply for an Interim Water Power Act Licence for this proposed development.
- The Water Stewardship Division recommends for an Environmental Impact Statement (EIS) to include the following:
 - Identify drinking water systems obtaining surface or ground water from the area of study of the proposed development. Identify all potential adverse effects of the proposed development on the aforementioned drinking water systems. An environmental protection plan needs to provide mitigation measures to protect source water for drinking water systems.
 - A cumulative effects assessment needs to include incremental environmental effects of routine operations and activities, construction

Date: January 31, 2012

Subject: Environment Act Proposal File No. 5550.00

Keeyask Generation Project - Keeyask Hydropower Limited Partnership

phase, decommissioning of work camps, and both point and non-point source discharges to surface water. A cumulative effects assessment needs to include inundation of cleared lands, and other zones of influence from construction and operation. The proponent must demonstrate cumulative effects by implementing techniques such as modelling or trend analyses. Modelling can quantify the cause and effect relationships between various factors such as inundation, soil erosion, sedimentation, increased turbidity, and decreases dissolved oxygen and general decreases in water quality. A cumulative effects assessment must also include future hydro generating projects.

- The long-term effects of climate change on the proposed development need to be addressed.
- Recent studies and monitoring show that the nutrient loading into Lake Winnipeg has been increasing dramatically in the past decades and water quality of the lake has been deteriorating. Increased nutrient loads in the lake may have adverse effects on water quality in the lower Nelson River, which may be exacerbated by the construction and operation of the proposed development.
- Given what is known of the proposed project timeline, there is limited potential to address any issues that have not already been considered by the proponent. It is the opinion of Fisheries Branch that scoping is occurring too late in this process for the Branch to have effective influence on the environmental studies that support the EIS. The process should be revised in the future to ensure meaningful dialogue can occur before the environmental studies are largely completed.
- In Section 2.5, fish passage is included among the alternative means of carrying out the project. Section 4.1.2.4 (Fish) includes a description of "short-term and long-term patterns of fish movements...". The discussion of fish movements should include: the degree to which fish movements will be affected, the potential consequences and mitigation. Since fish passage is presented as an alternative, the EIS guidelines should require a thorough discussion on the options considered and their respective implications.
- In section 4.1.3.1, intactness is included for the terrestrial ecosystem, however there is no similar section for the aquatic ecosystem. The EIS should include a discussion on the effects of the project both in terms of changes to the river's physical processes as well as the effect of

Date: January 31, 2012

Subject: Environment Act Proposal File No. 5550.00
Keeyask Generation Project - Keeyask Hydropower Limited Partnership

fragmentation (disruption of vertical, lateral and longitudinal connectivity) on the aquatic ecosystem.

- Section 2.6 describes programs to offset adverse effects. These programs are key components of the project mitigation. The EIS guidelines should require that their description and consideration within the EIS include: the degree to which these programs will change patterns of resource use in the area, the potential resource management implications and the identification of any potential resource use conflicts arising from these programs and their mitigation.
- Section 3.4 indicates that VECs will be used, but does not describe them. The use of VECs is acceptable, however it would have been preferable to identify the proposed VECs in the Scoping Document. Since most of the environmental studies have been completed, it is assumed that VECs were selected by the proponent some time ago. Fisheries Branch recommends that the proponent be asked to list the proposed VECs and their rationale for selection so that the VEC's and their rationale can be considered as part of the Scoping process prior to drafting the EIS Guidelines.
- Section 4.1.2 indicates that the EIS will present a comprehensive description of the existing aquatic environment. The EIS Guidelines should require that this description of the pre-project environment include metrics that are considered likely to change. The rigour of the baseline monitoring program and parameters monitored are critical to distinguish with some level of confidence, project effects from that of seasonal and yearly variation.
- Monitoring activity needs to run long enough after the project completion date to monitor adequately changes to VEC species such as Lake Sturgeon. The EIS guidelines should require that the proponent identify how long they intend to conduct their post monitoring on VECs and how their methodology supports studies of this length.
- The EIS Guidelines should require that in addition to descriptions (species composition and relative abundance) of the fish (small and large bodied) community, fish species that are VECs should include metrics that may be affected by the project such as age composition, growth rate and maturity rate.

Date: January 31, 2012
Subject: Environment Act Proposal File No. 5550.00
Keeyask Generation Project - Keeyask Hydropower Limited Partnership

- In addition to describing each of the individual components within the Aquatic Environment (Section 4.1.2) the EIS Guidelines should include a description of the relationship between these components to anticipate effects of potential shifts in lower trophic levels on resultant changes to higher trophic level species and monitor these shifts post project. Descriptions of anticipated changes should be based on literature, predictive modelling and subsequent model testing, validation and monitoring.
- The EIS Guidelines should require that throughout the EIS there be continuity from the description of the current environment, the expected changes, the monitoring that will be undertaken to confirm those changes, the mitigation measures proposed and the monitoring that be undertaken to confirm the successful implementation of the mitigation measures. These descriptions and their analyses should be quantitative wherever possible.
- Section 4.1.3.2 indicates that the distribution and abundance of invasive terrestrial plant species will be described. The EIS Guidelines should require a similar discussion of aquatic invasive species (AIS), both existing (e.g. smelt) and pending (e.g. zebra mussel, spiny water flea), and their implications for the aquatic environment. This should include any possible effects either with or without the project. It is anticipated that the pending introduction of AIS will complicate the review of post project monitoring and some discussion of the implications of these introductions on the long term monitoring program should be included in the EIS.
- The EIS Guidelines should include a requirement to describe how the proponent will prevent transfer of AIS through project work and monitoring activities.
- Section 5.1.1 addresses the criteria for determining the significance of project effects. As described in the Scoping Document, these are all encompassing. The EIS Guidelines should require that the criteria for determining the significance of project effects be fully described, including alternatives considered.
- The EIS Guidelines should include a requirement that the preferred mitigation method and alternatives be described for each project impact identified.

Date: January 31, 2012

Subject: *Environment Act* Proposal File No. 5550.00
Keeyask Generation Project - Keeyask Hydropower Limited Partnership

- With reference to Section 8.0 regarding the format of the EIS, Fisheries Branch recommends that the Department carefully consider the proposed format of the EIS. An EIS for a major project is a massive document. Ensuring that it is organized in a manner that allows for a thorough review by regulators is an essential step. The EIS for Wuskawtim GS was organized in a way that made the separate volumes relatively free standing, but accomplished this by replicating material throughout the volumes. In addition an EIS typically includes a massive amount of information on the existing environment. A large amount of this can be considered as background. Consideration should be given to organizing this into separate volumes or appendices. Ideally the major environmental effects, their monitoring and mitigation should be clearly described in volumes that include minimal other material. Since not all reviewers of the EIS may share this opinion, it may make sense to have key reviewers meet and consider how the organization of the EIS can be incorporated into the EIS guidelines to improve the clarity of the environmental review process.

William Weaver, M.Sc.

Prairie and Northern Region
344 Edmonton Street
Winnipeg, Manitoba R3C 0P6

January 20, 2012

Our File #: 7075-73-16
Your File #: 4554/MP-2008-028

Jim Morrell
Project Manager
Prairie Region
Canadian Environmental Assessment Agency
Suite 101, 167 Lombard Avenue
Winnipeg, MB R3B 0T6

Dear Mr. Morrell:

RE: KEYASK GENERATION PROJECT – KEYASK SCOPING DOCUMENT

Transport Canada (TC) has reviewed the Scoping Document issued by the Keyask Hydropower Limited Partnership on December, 2011, and submits the following comments.

Section 1.4.1 Canadian Environmental Assessment Act (pg 1-3)

The project is a "project" as defined in the *Canadian Environmental Assessment Act*. An environmental assessment is required by the two following triggers under the Law List Regulations: the *Fisheries Act* (Section 35(2)) and *Navigable Waters Protection Act* (Section 5[1][a]).

- The *Navigable Water Protection Act* has been amended and Section 5[1][a] no longer applies under the Act. Transport Canada recommends that the sentence be revised to reference (Section 5) of the *Navigable Waters Protection Act*.

Section 4.1.2.1 Aquatic Habitat (pg 4-2)

- Please include fish habitat compensation plans and any required infrastructure; including any impacts that the fish habitat compensation plan may have on navigation.

Section 5.1 Project Effects (pg 5-1)

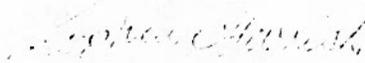
- Transport Canada recommends that the effects of changes to the environment should include the indirect effects to navigation.

Section 5.2 Cumulative Effects (pg 5-2)

- Transport Canada recommends that navigation be included in cumulative effects and which would also require the inclusion of effects to navigation in Section 3.4.

Should you have any questions please do not hesitate to contact me at (204) 983-5857 or Jo-Anne Foy, Superintendent, Major Project Management Office at (204) 984-7702.

Sincerely,


Sophia Garrick
Environmental Officer
Environmental Affairs