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Mr. Bruce Webb
Manitoba Conservation
Environmental Assessment and Licensing Branch
160 - 123 Main Street
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Dear Mr. Webb:

SUBJECT: Manitoba Hydro – Pointe du Bois Modernization Project

As agreed at the meeting of the Technical Advisory Committee (TAC) and Project Administration Team (PAT) with Manitoba Hydro and associated consultants, the following are the remaining comments from federal authorities on Manitoba Hydro's *Pointe du Bois Modernization Project Environment Act Proposal* (July 2007). The Proposal included the *Environmental Assessment Proposal Form* and the *Environmental Assessment Draft Scoping Document.* These are in addition to those already received and forwarded to you from Health Canada (letter of September 13, 2007).

General Comments:

1. These comments are intended to be incorporated into the cooperative assessment currently being conducted under the guidance of the *Canada-Manitoba Agreement for Environmental Assessment Cooperation* (the Agreement), with Manitoba Conservation as the Lead Party for the purposes of the assessment. Federal authorities are also preparing a parallel scoping document with specific consideration of the requirements of the *Canadian Environmental Assessment Act* (the Act) .

2. It would facilitate the federal review under CEAA if the scoping document contained the components following the example of the attached example scoping document. In particular sections related to the proposed scope of the project, factors to be considered in the environmental assessment, and proposed scope of the factors. Although Pointe du Bois is not a comprehensive study, the attached copy of the *Comprehensive Study Scoping Document for Lower Mattagami Hydroelectric Complex Redevelopment* may serve as a guide.

Specific Comments:

3. Notwithstanding the explanation provided by Manitoba Hydro at the TAC meeting, there is some concern that the title of the project is misleading.

"Modernization" of a power station may be inferred to mean refurbishment, repair or renovation of the old facility, when in fact a new power station is being proposed, with the old station being decommissioned. If there is concern that name change will also cause its own confusion (considering that all consultation to date has already been conducted under this name), perhaps the phrase 'New generating station and decommissioning of existing facility' could be added as a subtitle to more accurately reflect the true nature of the project.

4. Under Section 5.0 Project Description, the description of the project does not specifically include the removal and/or decommissioning of the existing structures (In the Environment Act Proposal Form, this is clearly identified.). In the scoping document, this is noted as one of many items in the list of variables that will describe the Project ("plans for decommissioning the existing generating station and associated facilities"). This should merit more specific consideration in the project description. Without a more specific inclusion, there appears to be some ambiguity throughout the document about whether references to 'decommissioning' refers to the eventual decommissioning of the new facilities, or whether it also refers to the decommissioning of the existing facilities as part of the current proposal (See for example, Section 8.2 and 9.2.2 "effects assessment process" and "Determination of Significance" where the EIS will include the "construction operation, and decommissioning' of the Project.) Note that both the decommissioning of the existing facilities and eventual decommissioning of the new facilities need to be considered (at an appropriate level of detail for each).

5. Under Section 5.0 Project Description, the "Associated infrastructure with the Project" does not include the temporary bridge across the intake channel that is mentioned on page 3 of the *Environment Act Proposal Form*, which states that, "During construction, a temporary vehicle access bridge will be required across the existing intake channel." As this bridge has the potential to negatively impact fish habitat, it should be included in the Project Description.

6. Under Section 5.0 Project Description, the list of variables that the Environmental Impact Statement (EIS) will use to describe the Project should also include:
    a. Proposed operating pattern, spillway operation, and hydrological changes (including water surface elevations and discharges) that can be expected with the new generating station and associated infrastructure. This information will be useful with regards to hydrologic frequency analysis and the associated hydraulic design work (primarily used for riprap design). It will also help in the monitoring of the effects of directing a larger volume of water through the power house.
    b. Location, composition, and duration of cofferdams used for dewatering during construction.
    c. Description of dewatering process (area to be dewatered, how long, time of year, technique for moving water around isolated site(s), fish salvage).

7. Under Section 6.0 Modernization Alternatives, the EIS should include a rationale for the proposed arrangement of the Project components. In addition to the two arrangements currently being considered by Manitoba Hydro, both of which will back-flood and/or dewater portions of the Pointe du Bois Falls, consideration should be given in the EIS to rebuilding the generating station and spillway on their existing sites.

8. Under Section 7.1.1 Climate/General Environment and 7.1.2 Water Regime, "climate change' is noted. It is not clear from these two brief notations how Manitoba Hydro plans to propagate climate change considerations throughout the environmental impact statement. The sensitivities of the project at all stages to climate parameters and their variability should be identified. The EIS must discuss impacts on the project associated with changes in climate parameters, and environmental impacts that may result.

9. Under Section 7.1.2 Water Regime, the EIS should provide information on the current hydrological regime at the site.

10. Under Section 7.1.3 Physiography and Landscape, the EIS should provide hydrographic information on the areas to be impacted by the project.

11. Under Section 7.2.1 Water and Sediment Quality, the water quality analysis should specifically characterize water chemistry of the Winnipeg River in the project area in order to form the basis for comparison of water quality during and after the new power generation facility has been built.

12. Under Section 7.2.2 Lower Trophic Levels, the EIS should provide information on habitat use by invertebrates in the areas to be impacted by the project, as well as species composition and distribution.

13. Under Section 7.2.3 Fish Communities and Fish Habitat, the EIS should provide information on habitat use by all fish species in the areas to be impacted by the project.

14. Under Section 7.4.5 Aboriginal Resource Use, the EIS should provide information on traditional Aboriginal harvesting, including hunting, fishing, trapping, and gathering in the areas to be impacted by the project.

15. Under Section 8.2 Effects Assessment Process, please note specifically:
    a. The EIS should outline the temporal and spatial boundaries appropriate for each factor under consideration.
    b. The effects of the Project on the environment must also be considered (including, but not restricted to those related to Climate Change as noted above).
    c. The environmental effects of accidents and malfunctions that may occur in connection with the project must also be considered.
    d. The draft scoping document refers to description of the effects of the Project on socio-economic environments. The EIS should also consider the *indirect* effects on socio-economic factors, where these are the result of a change in the environment. (Specifically, the EIS must include the factors noted in the definition of an 'environmental effect' provided in the *Canadian Environmental Assessment Act*).
    e. The effects of the project on navigation must be considered in the EA as environmental effects, considered as indirect effects on health and socio-economic effects. ("Navigation" means people's right to navigate and/or people's safety while navigating).
    f. The scoping document should more clearly note that the EIS will not only 'describe' potential effects, but also assess them.

g. Federally listed species at risk should be considered as a VEC.

16. Under Section 8.2.1 Mitigation and Residual Effects, the EIS should address the issues of fish habitat compensation and fish passage.

17. Under Section 8.3 Cumulative Effects Assessment, the EIS should define what is meant by the Study Area.

18. Under Section 9.0 Monitoring and Follow-up, please note specifically:
    a. Compliance monitoring and monitoring for verification of impact prediction are mentioned. This should include water quality monitoring for suspended solids within the study area, for shorter-term periods during construction.
    b. The EIS should also include effectiveness monitoring to assess effectiveness of mitigation measures and compensation.
    c. Emergency Response Plans (ERPs) should be developed in close consultation with local emergency response authorities. The EIS should assess the types of emergencies that may result from accidents and malfunctions and summarize the capacities of local emergency response and health facilities to respond to such events.

19. It is not clear whether a geotechnical study of the project area will be conducted/is required to determine the stability of the site near the old facility location.

If you have any questions or would like more information please contact me at (204) 984-7935 or by e-mail at: *wendy.botkin@ceaa-acee.gc.ca* .

Sincerely,

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Senior Program Officer

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Federal Contacts List

Project: **Pointe du Bois Modernization Project**
CEAA File No.: **MP2007-054**
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