



P.O. Box 815 • Winnipeg Manitoba Canada • R3C 2P4
Telephone / N° de téléphone : (204) 474-4334 • Fax / N° de télécopieur : (204) 474-4974
rkustra@hydro.mb.ca

2007 11 26

Ms. Tracey Braun, B.Sc.
Director
Environmental Assessment & Licensing Branch
Manitoba Conservation
Suite 160-123 Main Street
Winnipeg MB R3C 1A5

Dear Ms. Braun:

Pointe du Bois Modernization Project: Ref. No. 41702.101

Manitoba Hydro has reviewed the comments received by your Branch on the EAPF for the Pointe du Bois Modernization Project. Comments received and forwarded to us were from members of the Technical Advisory Committee. Please consider our response to those comments as follows:

Land Manager, Eastern Region, Manitoba Conservation

Comment: In the broad context of this document, the fisheries, fish habitat and the commercial and recreational resource use sections of the document appear to be comprehensive and should provide sufficient information in the EIS to provincial regulators for the review process.

Response: None

Policy Analyst, Ecological Services Division, Manitoba Water Stewardship

Comment: As noted in the Environment Act Proposal, this project will also require a licence under the Water Power Act.

Response: As required under The Water Power Act, Manitoba Hydro has notified Manitoba Water Stewardship of its intent to renew the Water Power Licence at the Pointe du Bois site and of its plan to rebuild the facility. This notification has initiated the process for licencing under The Water Power Act.

Comment: In the broad context of this document, the fisheries, fish habitat and the commercial and recreational resource use sections of the document appear to be

comprehensive and should provide sufficient information in the EIS to provincial regulators for the review process.

Response: None

Comment: There are general concerns about the overall siting of the new spillway and dam, as the proposed siting would impact water quality by flooding existing islands in this area. In addition to providing habitat for aquatic life and wildlife, this area is a significant source of dissolved oxygen to downstream areas of the river. The proposed siting is further downstream than the existing facility which would significantly impact aquatic life and wildlife in the area of the river between the proposed and existing dam/spillways.

Response: Manitoba Hydro has not yet made a decision on the axis configuration of the new facilities. Studies to address water quality, aquatic life and wildlife have been undertaken and the EIS will include assessment of the potential environmental effects associated with any flooding of the existing spillway rapids and islands, including effects on water quality and dissolved oxygen. The assessment will also include determination of the significance of the potential environmental effects.

Comment: The Environmental Impact Assessment ought to include a discussion on what measures will be taken to ensure no net increase in nitrogen and phosphorus to the Winnipeg River as a result of this proposed construction.

Response: Although sources of nitrogen and phosphorus associated with this project are minimal, the EIS will contain a discussion of this issue.

Comment: While the Draft Scoping Document indicates that information/inventory will be provided on numerous aspects of the aquatic environment, I strongly recommend in addition to that information, that environmental impacts be identified and planned mitigation measures also be provided for each environmental aspect of the Environmental Impact Statement.

Response: As outlined in section 8.0 of the Draft Scoping Document, the environmental assessment and EIS will include determination of environmental effects, mitigation of adverse effects and determination of the significance of residual adverse effects for all phases of the project – construction, operation, decommissioning.

Comment: While upgrading the existing facility appears not to be an option, there is no discussion in the Background section that considers rebuilding on the existing site.

Response: Section 1.2 Background of the Draft Scoping Document outlines the three principal alternatives and two ancillary alternatives that were considered. Two alternatives for upgrading – Renovate and Repair – were considered but not selected. As it is Manitoba Hydro's intent to continue to generate power at Pointe du Bois during modernization, rebuilding on the existing footprint is not feasible.

Comment: The Environment Act Proposal indicates that construction is planned for 2010. It is strongly recommended that the proponent begin water quality monitoring in 2008 and continue throughout the planning and construction phase of the proposal. Monitoring sites should include upstream, within and downstream of the existing sluiceway/spillway and dam under both ice cover and open water conditions. A full suite of water chemistry including nutrients should be included in the water quality analysis.

Response: Water quality monitoring upstream, within and downstream of the existing sluiceway/spillway and dam under both open water and ice cover conditions has been/will be carried out in 2006, 2007 and 2008. The samples collected have been analyzed for a full suite of water chemistry including nutrients. As outlined in section 9.0 of the Draft Scoping Document, monitoring will continue through the construction, operation and decommissioning phases of the project.

Comment: Page 5 notes, in a general way, the plan for water treatment and wastewater disposal. The statement does not clarify whether this is for the new facilities or for the construction camp or both.

Response: Appropriate water treatment and wastewater treatment and disposal will be provided for the new facilities and supporting infrastructure during construction.

Comment: Pursuant to the “Drinking Water Safety Act” and the “Drinking Water Safety Regulation, M.R. 40/2007” all public and semi-public water systems must have a permit to construct prior to construction and a licence to operate once construction is complete. The proponent should contact the Office of Drinking Water to confirm the specific requirements for this project relative to any proposed water treatment and supply systems.

Response: As outlined in section 2.0 of the Draft Scoping Document the EIS will outline regulatory and legislative approvals required for project implementation. All required permits, including a permit and licence for water treatment and supply will be obtained.

Impact Assessment Archaeologist, Historic Resources Branch

Comment: It is recommended that Manitoba Hydro contract an archaeological consultant to conduct a survey of the proposed generating station location, in order to identify and assess any heritage resources that may be negatively impacted by development. If desirable, the Branch will work with Manitoba Hydro and its consultant to draw up terms of reference for this project.

Response: A qualified archaeological consultant familiar with conducting a Heritage Resource Impact Assessment is part of the environmental assessment team retained by Manitoba Hydro. Initial work has been undertaken in 2007 and further work will be undertaken in 2008. The Heritage Resource Impact Assessment will be discussed with the Historic Resources Branch.

Resource Management Geologist, Mines Branch

Comment: The dam reconstruction will require sources of borrow fill and aggregate for the project. The mining of the resource will have an environmental foot print and should be included in the project evaluation.

Response: As outlined in section 5.0 of the Draft Scoping Document, borrow areas are associated infrastructure with the project and will be included in the project environmental assessment.

Comment: Valid mineral dispositions under the authority of The Mines and Minerals Act will be needed to extract aggregate material.

Response: As outlined in section 2.0 of the Draft Scoping Document the EIS will outline regulatory and legislative approvals required for project implementation. All required approvals, including mineral dispositions under The Mines and Minerals Act will be obtained.

Comment: Mines Branch has geological mapping that Manitoba Hydro may wish to use to help identify suitable construction material.

Response: Thank you.

Manitoba Infrastructure and Transportation

Comment: MIT has been contacted by the proponent and is working cooperatively with them on this project. Although the modernization of the Pointe du Bois dam does not impact MIT, the use of our highway network will be impacted: this project will require many heavily loaded trucks. The aged, poor condition of Provincial Road (PR) 313 in particular is a concern. The proponent is in discussion with MIT on how to best address the capability of the substandard roadway to accommodate these loads.

Response: Manitoba Hydro is working cooperatively with MIT to address action required on the capability of the access roads, including PR 313, to accommodate the traffic loads and volumes required for the project.

Manitoba Agriculture, Food and Rural Initiatives

Comment: I have reviewed the above noted proposal on behalf of MAFRI. There are no comments or concerns.

Response: None.

Regional Environmental Assessment Coordinator, Health Canada

Comment: The title of the project is misleading. Under the rebuild option chosen, the project proposes a *new* generating station constructed adjacent to the existing generating station. Construction of a new station would be followed by decommissioning of the old facility. Individuals, NGOs and stakeholder groups may chose not to participate in the consultation activities if they believe that the modernization is an upgrade of the present facility. A more accurate name may result in greater understanding and interest in the project and result in more effective public consultation.

Response: Section vi) of the EAPF and sections 1.1 and 5.0 of the Draft Scoping Document are clear that the modernization is building a new facility adjacent to the existing facility. The public and stakeholders were informed and consulted prior to the selection of the current proposal, further consultations have occurred since its selection, and more information and consultation is planned. The name of the Project has not been raised as a significant issue to date in the consultations with individuals, NGOs and stakeholder groups.

Comment: Section 9.0 indicates that Emergency Response Plans (ERPs) will be incorporated into the Monitoring and Follow-up Program. It is recommended that ERPs 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.

Response: General agreement with the recommendations.

Please do not hesitate to contact me should you wish to discuss any of our responses above.

Yours truly,

A handwritten signature in black ink that reads "Ryan Kustra". The signature is written in a cursive, flowing style.

R. Kustra
Manager
Major Projects Licensing Department
Power Projects Development Division
Power Supply

RK/bgs/207-1120.1.