Manitoba Hydro

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Mr. Bruce Webb
Manitoba Conservation
Environmental Assessment and Licensing Branch
160 - 123 Main Street
Winnipeg MB R3C 1A5

Dear Mr. Webb:

**Manitoba Hydro - Pointe du Bois Modernization Project**

I am responding to the December 3, 2007 letter to you from Ms. Wendy Botkin outlining additional comments from federal authorities on Manitoba Hydro's Pointe du Bois Modernization Project Environment Act Proposal (July 2007). We appreciate feedback from the regulatory authorities to better guide us in conducting the environmental assessment and preparing the EIS for the Pointe du Bois Modernization Project. The comments will also be useful to us in updating the Draft Scoping Document. Please consider the following response to the comments in the December 3, 2007 letter.

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).

   *Response: Manitoba Hydro welcomes guidance from federal authorities to ensure that the environmental assessment addresses the requirements of 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.

*Response: As noted in section 1.1 of the draft scoping document, the Comprehensive Study Scoping Document for Lower Mattagami Hydroelectric Complex Redevelopment was used for guidance in developing the Pointe du Bois draft scoping document and in our view key guidance items respecting scope of the project, factors to be considered in the environmental assessment, and scope of factors were incorporated, albeit not with those specific titles. Manitoba Hydro will revisit the sections of the Mattagami document noted above and adjust the Pointe du Bois draft scoping document as necessary.*

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 be 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 a 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.

   *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 and decommissioning 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. To address this federal concern we will sub-title the Project and it will now be referred to as the: Pointe du Bois Modernization Project: Construction of New Facilities at Present Site & Decommissioning of Existing Facilities.*

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 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).

*Response: The Project and environmental assessment includes three elements of decommissioning: the decommissioning of the existing facilities, the decommissioning of temporary construction infrastructure and facilities, and the preliminary concept for eventual decommissioning of the new facilities. The draft scoping document will be revisited to ensure that the three elements of decommissioning are incorporated in a clear and unambiguous manner.*

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.

   *Response: The temporary vehicle access bridge is part of the project and section 5.0 of the draft scoping document will be amended accordingly.*

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).

   *Response: These elements provide useful guidance with respect to detailing the Project Description component of the EIS. The scoping document was intended to provide overall general guidance and as such would not contain all the minute details to be addressed in the EIS. I note that this detail is not contained in the Mattagami scoping document. Cofferdam construction, dewatering, and station operation are addressed in a general way in section 5.0 of the Pointe du Bois draft scoping document. The EIS will contain Information on all of the listed variables.*

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.

*Response: As noted in section 6.0 of the draft scoping document, the EIS will include a description of the process undertaken to determine the final alignment and general arrangement of the Project components. 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. The EIS will include a discussion on the alternatives considered, including rebuilding on the existing site.*

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.

   *Response: The EIS will address effects of the project on climate change and the effects of climate change on the project.*

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

   *Response: The EIS will provide information on the Winnipeg River system operations throughout the year for various hydraulic conditions including those at the Pointe du Bois 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.

    *Response: The EIS will address the water regime at the Pointe du Bois site, including hydrographic information.*

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.

    *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.*

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.

    *Response: As noted in the lead-in paragraph to section 7.0 studies and activities have been and will be carried out in the base study areas defined for the physical, biological and socio-economic components of the environmental assessment. These base study areas, which will be defined in the EIS, include the areas affected by the project. Species composition and distribution are addressed in the studies undertaken.*

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.

    *Response: The EIS will provide information on fish habitat use by all fish species in the project area.*

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.

    *Response: As noted in section 4.0, the lead-in paragraph to section 7.0 and section 7.4.5, of the draft scoping document, the EIS will contain information on traditional Aboriginal harvesting.*

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.

*Response: These are useful guidance items to assist in the carrying out of the environmental assessment of the project. The EIS will provide sufficient information for both Canada and Manitoba to exercise their legislated mandate in respect of the Project. The environmental assessment will assess as well as describe the potential effects of the project. As noted in section 2.0 of the draft scoping document, the Navigable Waters Protection Act will be part of the regulatory framework for the project and navigation effects and mitigation will be part of the assessment. As noted in sections 7.0 and 8.2 of the draft scoping document, threatened and endangered species will be identified and VECs for the study areas will be determined and described.*

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

*Response: The environmental assessment will describe and assess potential effects, identify mitigation measures, and determine significance of residual effects of the Project on fish habitat. Through that process the need (if any) for fish compensation and/or fish passage will be determined and described.*

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

*Response: As noted in section 8.3 of the draft scoping document, the EIS will outline the approach and methods for the CEA in discussion with PAT and TAC. Spatial and temporal boundaries for the CEA will be determined as a result of that discussion. As noted in section 7.0 base study areas for the physical, biological and socio-economic components of the assessment will be defined and contained in the EIS.*

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.

*<u>Response</u>: As noted in section 9.0 of the draft scoping document, the monitoring and follow-up program would extend through the construction, operation and decommissioning phases of the project. The monitoring would be multi-media in nature, with an expected focus on the river environment. The adaptive management component of the monitoring and follow-up program is intended to determine the effectiveness of mitigation measures. With respect to emergency response plans, the intent would be to develop the plans in consultation with local authorities, and discussion with some of the authorities has already occurred in this regard. As noted in section 5.0 of the draft scoping document the EIS will contain plans to address accidents and malfunctions associated with the project implementation.*

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.

    *<u>Response</u>: Appropriate geotechnical study of the project site will be undertaken as part of the engineering component of the project.*

Please do not hesitate to contact me should you wish to discuss any of these matters further.

Yours truly,

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Manager
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