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2017 09 15

Tracey Braun
Director – Environmental Approvals Branch
Manitoba Sustainable Development
123 Main Street, Suite 160 (Box 80)
Winnipeg, MB R3C 1A5

Dear Ms. Braun:

**KEYYASK INFRASTRUCTURE PROJECT – ALTERATION REQUEST
REQUEST FOR CONTINUED USE OF START-UP CAMP AND DELAY OF DECOMMISSIONING
ENVIRONMENT ACT LICENCE NO. 2952 R, CLIENT FILE 5420.00**

Manitoba Hydro, in its delegated authority to manage construction of the Keeyask Generation Project on behalf of the Keeyask Hydropower Limited Partnership, is requesting to continue operation of the start-up camp and delay decommissioning until the completion of the Keeyask Generation Project.

Please see the attached for a description of the work and potential environmental effects.

If there are any questions or concerns with this request, please contact Jodine MacDuff at 204-360-5539.

Yours truly,


A handwritten signature in blue ink, appearing to read 'Dave Bowen'.

Dave Bowen, P. Eng, M.Sc
Director, Keeyask Project
Generation & Wholesale

Att.

Notice of Alteration Form



Client File No. : 5420.00	Environment Act Licence No. : 2952 R
Legal name of the Licencee: Keyeask Hydropower Limited Partnership	
Name of the development: Keyeask Infrastructure Project	
Category and Type of development per Classes of Development Regulation: Transportation and Transmission Two lane roads at new locations	
Licencee Contact Person: Dave Bowen Mailing address of the Licencee: 360 Portage Avenue, 17th Floor City: Winnipeg Province: Manitoba Postal Code: R3C 0G8 Phone Number: (204) 360-4773 Fax: Email: d Bowen@hydro.mb.ca	
Name of proponent contact person for purposes of the environmental assessment (e.g. consultant): Jodine MacDuff	
Phone: (204) 360-5539 Fax:	Mailing address: 360 Portage Avenue, 17th Floor Winnipeg, MB R3C 0G8
Email address: jmacduff@hydro.mb.ca	
Short Description of Alteration (max 90 characters): Continue operation of the start-up camp and delay decommissioning	
Alteration fee attached: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
If No, please explain: Previous conversations indicated fee was not required, will submit if requested.	
Date: 09/15/2017	Signature:  Printed name: Dave Bowen
<p>A complete Notice of Alteration (NoA) consists of the following components:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Cover letter <input checked="" type="checkbox"/> Notice of Alteration Form <input checked="" type="checkbox"/> 4 hard copies and 1 electronic copy of the NOA detailed report (see "Information Bulletin - Alteration to Developments with Environment Act Licences") <input type="checkbox"/> \$500 Application fee, if applicable (Cheque, payable to the Minister of Finance) 	<p>Submit the complete NOA to:</p> <p>Director Environmental Approvals Branch Manitoba Sustainable Development Suite 160, 123 Main Street Winnipeg, Manitoba R3C 1A5</p> <p>For more information:</p> <p>Phone: (204) 945-8321 Fax: (204) 945-5229 http://www.gov.mb.ca/conservation/eal</p>

Keeyask Infrastructure Project Request for Continued Use of Start-Up Camp and Delay of Decommissioning

Environment Act Licence No. 2952 R, issued for the Keeyask Infrastructure Project (KIP), included the construction and operation of the start-up camp, which was to be decommissioned upon the completion of the Phase 1 main camp. A request is being made to continue operation of the start-up camp and delay decommissioning until the completion of the Keeyask Generation Project or sooner if no longer required.

1.0 Description of Development

As outlined in the KIP Environmental Assessment Report, a temporary start-up camp was to be established to support construction of the North Access Road (NAR) and Phase 1 of the main camp (for location, refer to Figure 1). The start-up camp includes but is not limited to the following infrastructure: accommodations, kitchen and dining hall, water treatment plant, wastewater drain field and parking lot.

The start-up camp was planned to be decommissioned upon the completion of the Phase 1 main camp. To date, it has remained operational, supporting overflow from the Keeyask Generation Project (KGP) main camp (peak construction employment has exceeded original estimates) and other Manitoba Hydro construction projects, such as Bipole III Transmission Project have utilized the start-up camp to minimize environmental impacts. The parking lot is used by personnel working at Keeyask who arrive to site in personal vehicles, as only work vehicles are allowed past the start-up camp. The associated facilities also provide back-up in case issues arise at the main camp (e.g. water treatment plant, kitchen facilities).

The continued use of existing infrastructure by these projects is preferred over creating new impacts for lodging in an alternate location.

Existing Regulatory Approvals/Permits

In addition to the Environment Act Licence, the following approvals have been issued for the KIP:

- Water Rights Licence No. 2017-024 - The water supply for the camp is from two groundwater wells located approximately 300m south west of start-up camp.
- Small System Wastewater Facilities Certificates No. 2014-006 and 2014-007 for wastewater treatment and wastewater collection, respectively.
- Work Permit 2017-1-11-004 – A work permit will continued to be applied for on an annual basis.

2.0 Potential Environmental Effects and Mitigation

The following section summarizes potential environmental effects as a result of continued operation and delayed decommissioning of the start-up camp.

2.1 Groundwater

As per Licence condition 18 under schedule A, annual groundwater monitoring will continue. There are no additional anticipated adverse effects on the groundwater as a result of the continued use of the start-up camp.

2.2 Terrestrial Habitat

As no additional clearing is required for continued use of the start-up camp, there will be no additional loss of terrestrial habitat. However, continued use of start-up camp may lead to further introduction of new invasive and/or non-native plant species as well as spread of existing species already present. The following measures have been implemented at the Keeyask site, and will continue to be used to minimize the risk of introducing or spreading invasive and/or non-invasive plants:

- Contractors utilizing equipment and machinery more than 150km from the Project area are to wash equipment and machinery prior to transport to the Project area; and
- Areas that are rehabilitated using a seed mixture will be seeded with a mixture that only contains native and/or non-invasive introduced plant species.

Monitoring of invasive plant spread and control throughout the Keeyask site, including the KIP footprints, is performed on an annual basis under the KGP's Terrestrial Effects Monitoring Plan. The results from 2016/17 monitoring show that lamb's quarters, common dandelion, white and yellow sweet clover, and perennial sow thistle were the most common invasive/ non-native plant species present in the start-up camp footprint. Of these, white sweet clover and common dandelion were already present in the Keeyask region prior to KIP construction. Other invasive species which have been observed at start-up camp are scentless chamomile and Canada thistle.

Along with the preventative measures listed above, the following general control measures have been implemented during KGP construction:

- Applying herbicide in Project areas where invasive plants are most abundant, and are most likely to have vehicles or footwear pick up their seeds and carry them to other Project areas;
- Training site environmental staff to recognize invasive plants and on measures to eradicate them, such as hand-pulling plants of concern, followed by proper disposal; and
- Continued annual monitoring and further development of control measures, as needed.

Continued monitoring and implementation of control measures are anticipated to limit any potential effects on further invasive/non-native plant introduction and spread. Revegetation in the start-up camp area, which will aid in limiting the spread of these species of concern, will be delayed until decommissioning.

2.3 Socio-Economic

No additional adverse effects are anticipated with the continued use of the start-up camp.

With peak construction employment exceeding original estimates, additional accommodations above what is available at the main camp are required. Continued use of the temporary start up camp will allow for the majority of workers to be accommodated at site (as noted above, peak construction employment has exceeded original estimates). If additional accommodations are not provided at site, Gillam, Thompson, or temporary work camps would need to be used as an alternative. This would add additional traffic along PR 280, which is an ongoing concern for surrounding communities. It would also result an influx of people into the neighboring communities, which could result in negative worker interactions as well as an increase in demand/pressure on local infrastructure and services.

Continued use of the start-up camp provides additional business and employment opportunities for the Keeyask Cree Nations.

3.0 Summary

In conclusion, the proposed plan to continue the use and delay decommissioning of start-up camp is not anticipated to have any additional adverse environmental impact.

