

4	HC	AE SV 2	5-214 to 5-224	Socio-Economy	Gull eggs and plants. The HhRA does not assess plants or gulls eggs (identified by FN as important food source of concern during the workshop held to determine what they eat). Gull eggs and wild plants would not be expected to represent significant contributors to mercury exposure and therefore the final conclusions with respect to potential health risks are not expected to change based on this additional data. However, as local population who consume country foods have specifically identified these foods as important food sources, gull eggs and wild plants should be included in order to confirm the expectations that these foods are acceptable to consume. This information would also beneficially serve as baseline data for future Keyask HhRA and in the assessment of risk related to other hydro generation projects planned within the region (e.g. Conawap).	HC encourages the proponent to participate in the voluntary monitoring plans for gull eggs and plants to provide more comprehensive information on the potential adverse effects to these country foods.	HC-0004	HC advises that the species of interest to the KCCs be sampled locally. If the communities request monitoring of gull eggs, or if the consumption of bird eggs increases in the Keyask Cree Nation communities, HC advises the future consideration of monitoring of mercury levels in bird eggs. HC is available, upon request, to review monitoring reports of mercury and methyl mercury in plants and country foods.
5	HC	AE SV 2	5C-28 to 5C-29 and 8-6 to 8-7	Socio-Economy	Mercury in Ducks: In the HhRA mercury levels in waterbirds were used to represent mercury levels in waterbirds. The proponent shows data collected from hydroelectric project areas in Quebec to support this approach. The intent is to demonstrate that according to data from the Quebec projects, mercury levels in waterbirds can be estimated by the levels of mercury in fish with similar diets and similar feeding habits (E SV 2, section 5.0 - Wildlife and Mercury, Table 8-4). Waterbirds that were identified as food sources in the Keyask region are herbivorous/benthivorous and would have similar dietary patterns to whitefish. The HhRA recommends mitigation measures including monitoring mercury in waterfowl and waterbirds.	HC suggests that the future monitoring data should be assessed to determine whether consumption of waterbirds and waterfowl poses a health risk and implement mitigation measures if an unacceptable risk has been identified.	HC-0005	The EIS contains no baseline empirical data for mercury in ducks, but uses estimates based on whitefish. These estimates may carry a large margin of error. Health Canada suggests that the use of local data would improve confidence in predictions of mercury levels in ducks. HC is available, upon request, to review monitoring reports of mercury and methyl mercury in plants and country foods.
6	HC	AE SV 2	5C-59, 49	Socio-Economy	Mercury concentrations in fish from AEA offset lakes: The HhRA states "...measured mercury concentrations in fish from offset lakes (specifically identified by one of the Keyask Cree Nations) have indicated that certain fish from the various background lakes in the study area may have mercury concentrations that warrant consumption recommendations (issue concentrations of mercury above 0.2 ug/g)." HC notes that in Table 7-1, data report maximum mercury levels of 0.85, 0.71, and 0.61 ppm for walleye collected from Pelletier, Recluse, and Wasikawakwa Lakes from 2004-2006. Fish from these lakes are intended to provide traditional food source as indicated in the Adverse Effects Agreement Healthy Food Fish Program. In order to replace fish that may no longer be safe to consume as a result of increased methyl-mercury levels caused by the Keyask Project.	HC advises that the proponent monitor mercury concentration in fish from the offset lakes to mitigate potential risks to human health arising from use of offset lakes as a country food source as a result of the project. Communication products may be required for use of these lakes (e.g. consumption recommendations for sensitive subgroups of the population).	HC-0006	HC supports the comment to undertake future mercury sampling and analysis of fish from newly identified lakes to be used by the KCC. This data collection would provide further baseline data on mercury in these fish, and would assist in understanding the potential human health risk from consumption of those fish in the future. Regarding elevated mercury levels in certain fish species in the offset lakes, HC advises considering monitoring of the human consumption intakes of these fish, as this may lead to an elevated risk to human health. In order to better understand the risks of mercury, HC believes regular monitoring of mercury levels and catch volumes from the offset lakes is important and that the results of this monitoring be shared with stakeholders on an on-going basis.
7	HC	AE SV 2	7-45 to 7-22		Project Effects, Mitigation and Monitoring: HC understands that the proponent has proposed to monitor mercury in fish issue on an annual basis until maximum concentrations are reached, and every 3 years thereafter until concentrations are stable. HC does not have any objections to this approach; however, the EIS does not provide a clear determination of what constitutes "maximum concentration" and "stable". Mercury levels in fish are expected to steadily increase over a number of years, reach a maximum, and decline steadily thereafter but may fluctuate slightly over the course of this time. The number of years in which a decrease in mercury levels is observed to conclude that a maximum concentration has been reached, does not appear to have been determined. The EIS includes an outline of monitoring planned for the mercury in fish tissue. However, the detailed monitoring program that will be provided in the Aquatic Effects Monitoring Plan (AEMP) is not yet provided and is related to regulatory licensing with DFO and Manitoba Conservation.	HC advises that the proponent provide a clear determinant in the EIS of what will constitute a "maximum concentration" and "stable" condition at which point fish issue monitoring will be reduced to a frequency of every third year. When the AEMP is available for review, HC is able to provide advice regarding potential effects and review of additional HhRA to ensure fish consumption advisories remain protective of human health.	HC-0007	HC is satisfied with the explanation of "maximum concentration" and "stable" for post-project monitoring of mercury concentrations in fish. Draft Aquatic Effects Monitoring Plan HC was provided with a copy of the draft Aquatic Effects Monitoring Plan on October 29, 2012. HC has the following comments: Section 6.1.2.1.3 Parameters In the core monitoring of lake sturgeon, methyl mercury is not listed as a parameter that will be measured. Because draft risk communication products advise consuming lake sturgeon, please confirm that methyl mercury is included in the monitoring plan. Section 7.0 Mercury in Fish Flesh In section 7.2 Monitoring During Operation, HC advises that lake sturgeon be added to the large-bodied fish species that will be sampled for mercury concentrations. HC advises that all fish species that will be consumed be included in the monitoring plan (including lake sturgeon, cisco, rainbow smelt, lake trout, etc.). HC is available to review results of the AEMP, upon request.

8	HC	AE SV 2	5-106 to 5-107	Socio-Economy	Existing / Past Health Impacts from Mercury: There are three hydroelectric generating stations planned for the Nelson River (Wabegwan, Currybay under construction), Keeyask and Conawap. This area has been impacted by past hydroelectric development. The ES states: "Based on their experiences with previous hydroelectric development and through the Federal Ecological Monitoring Program (FEMP), the issue of mercury and human health became a primary concern for the KCMs in relation to the Keeyask Project." HC conducted biomonitoring (blood and hair) sampling for mercury from 1976 until 1990 from local people within this region. For the most part, people from this area tested within acceptable range, but approximately 2% tested in "greater risk" range (Wheately and Paradis, 1993). HC notes that many environmental assessments involving hydro projects, where mercury levels are known to increase in biota, have considered hair mercury analysis of local populations in order to determine if any potential increased dietary exposure may pose a risk. It is important to note that the FEMP was a result of Claim 18 in 1983, under the Northern Flood Agreement (NFA), which alleged that Canada, Manitoba, and Manitoba Hydro had not met a responsibility of the NFA "to implement a long-term coordinated ecological monitoring and research program that would allow evaluation of impacts on communities" that signed the NFA and belonged to the Northern Flood Committee. Reference: Wheately B. and Paradis S, Exposure of Canadian Aboriginal Peoples to Methylmercury, Water, Air, Soil Poll 1999; 80: 3-11.	HC suggests that the proponent consider the merit of conducting such analysis on the basis of whether it can adequately be confirmed that any increase in mercury exposure from the diet, based on empirical measurements in fish, would not have a significant impact on human health and report the results in the HIRMA. In the event where hair mercury analyses are conducted, HC is prepared to review the data and provide an opinion on the potential for adverse impacts with respect to human health.	HC-C008	HC notes that biomonitoring is a more precise and direct method for assessing actual impacts of mercury exposure. Should the KCMs choose to pursue voluntary community-led testing in their context, we advise that hair monitoring is more beneficial than blood biomonitoring for mercury, as it allows the evaluation over longer periods of time.
9	HC	AE SV 2	10-3	Response to ES Guidelines	This section states "The concept of using a precautionary approach has been an implicit foundation in the planning and design of the Project, using both technical science and aboriginal traditional knowledge (ATK)."	HC would like to inform the proponent of a biomonitoring initiative underway in Saskatchewan that may be considered to manage risk of traditional uses of land and potential impacts to human health resulting from the Project. The Alberta and Saskatchewan governments are looking to northern Saskatchewan to determine the impact of development on the health of people living in the north. Starting in August 2013, women in northern Saskatchewan who are pregnant have been asked to participate in a health biomonitoring study. Blood routinely drawn as part of their pre-natal health care is being tested for certain chemicals, including pesticides, lead and mercury. http://www.health.gov.sk.ca/biomonitoring-common-questions Should biomonitoring be undertaken by the proponent, as justified by previous biomonitoring results, it would be a means of identifying whether communication products are effective i.e., if consumption guidelines are being followed, or if populations are in the range of exposure that would pose unacceptable risk.	HC-C009	HC has no additional comments.
1	TC	PI SV	2-24 and 2-25	South Access Road Crossing	The south access road will cross the Burna River with culverts	Provide details regarding the conceptual design and construction methodology of this crossing.	TC-C001	Proponent response addresses information request.
1	EC	FE SV 1	5-24	Physical Environment	This section states the following: "In total, 23 granular and 16 rock samples from the Keeyask ES area were selected for laboratory testing. Samples were shipped to Maxam Analytics in Burnaby, BC, for testing in Spring 2010 (granular borrow samples, specific and bulk rock samples) and winter 2010-2011 (specific, and composite rock samples). The analysis requested for the granular materials included soluble metals using MEND guidelines for water-extractable metals (MEND 2000). The requested analyses on the rock samples included total sulphur, sulphate, neutralization potential and metal content using standard Maxam methods and quality assurance and quality control procedures (Sobeke et al., 1978; MEND 1993)."	EC notes that results of the rock assessment are not shown. In addition, as indicated by the Proponent, the requested analysis on the rock samples included total sulphur, sulphate, neutralization potential and metal content, but this list does not include acid potential. EC requests that the Proponent provide the result of the static and kinetic tests.	EC-C001	Proponent response addresses information request.
2	EC	PE SV 1	5-24	Physical Environment	In this section, the Proponent states that: "With respect to the quarry rock, there are a number of different indicators for the generation of acidic drainage and therefore a weight-of-evidence approach is typically applied. Using this approach, the assessment of the Keeyask rock samples concluded that the risk of acidic drainage is low."	EC requests that the Proponent: • clarify what the following statement implies: "assessment of the Keeyask rock samples concluded that the risk of acidic drainage is low". Since no results of the rock assessment are provided, EC is unsure if this statement implies that the rocks are non acid generating (NAG) or that the neutralizing potential/acid potential ratio (NAP/AP) is greater than 3 or uncertain (between 1 and 2). • confirm that any borrow materials or quarry rocks that would be used for construction as well as road construction do not show the potential to generate acid.	EC-C002	Proponent response addresses information request.

3	EC	R-FIS Guidelines	4-7	Aquatic Environment	This section outlines that the powerhouse unit will contain electrical and mechanical equipment, including ventilation systems, domestic and fire water systems, cranes, water and wastewater treatment systems, compressed air, and oil storage facilities.	EC-0003	Propponent response addresses information request.
4	EC	R-FIS Guidelines	6-216	Aquatic Environment	This section outlines the following: Total organic material released into the reservoir is predicted to be highest in the large bays on the north and south sides of the new reservoir... These effects are considered large in magnitude, medium in geographic extent, medium term in duration and continuous.	EC-0004	Propponent response addresses information request.
5	EC	AE SV 2	2-44	Aquatic Environment	This section states the following: 'Wastewater effluent, including concrete processing wastewater, will not be directly released to a waterbody unless it has been treated to meet applicable provincial and federal effluent licenses, authorizations and permits.'	EC-0005	Propponent response addresses information request.
6	EC	AE SV 2	2-44	Aquatic Environment	This section proceeds to outline the following: 'Wastewaters from concrete processing (i.e., concrete batch plant effluent) will be initially discharged to a two-cell settling pond to reduce TSS prior to discharge to the lower Nelson River and apply end-of-pipe discharge criterion of less than 25 mg/L for TSS... TSS currently ranges (on average) between 15 and 18 mg/L in the Keapak area and discharge of the concrete batch plant effluent or aggregate wash water is predicted to cause a negligible change in TSS in the Nelson River.'	EC-0006	Propponent response addresses information request.
7		AE SV 2	2-135	Aquatic Environment	Table 2-11 outlines that water treatment plant backwash will be treated if required, such that TSS will be less than 25 mg/L prior to discharge to the receiving environment.	EC-0007	The Propponent does not clarify which other discharge parameter will be considered as part of the treated back wash water quality objectives.
8	EC	R-FIS Guidelines	6-209 6-211 6-294	Terrestrial Environment	Section 6.3.7.2 states that Cofferdam designs, construction methodology and sequencing have been developed to minimize erosion and sediment inputs during construction. For example, fine cofferdam material exposed to erosion (waves, flow) would be covered with rock to prevent erosion. The residual construction effects associated with shoreline and erosion processes are expected to be small in magnitude, medium in geographic extent, short-term and sporadic during the construction period. Similarly section 6.3.7.2 states that: Shoreline erosion will depend the amount of additional 7 to 8 km ² (2.7 to 3.0 m ²) during the first 30 years of operation due to mineral bank erosion and residual degradation... The term in duration, Table 6-19 outlines mitigation measures to reduce TSS and erosion during construction and operation. Construction Mitigation includes: Measures to control sediment releases; and Management measures to maintain inputs at levels that are not harmful to aquatic life. Operation Mitigation includes: No mitigation required.	EC-0008	Propponent response addresses information request.
9	EC	R-FIS Guidelines	6-214	Terrestrial Environment	This section outlines the following: 'As noted in the Shoreline Erosion section (Section 6.3.7.1), cofferdam designs, construction methodology and sequencing have been developed to minimize the introduction of sediment into the water. For example, cofferdam removal would be done "in the dry" as much as reasonably practical to prevent sediment entering the water.'	EC-0009	Propponent response addresses information request.

10	EC	R-EIS Guidelines	6-214 6-13	Aquatic Environment	Section 6.3.8.1 outlines the following: A Sediment Management Plan will be in place during construction and will describe where monitoring is to be done and what actions might be taken if suspended sediment increases beyond specified thresholds... Monitoring of suspended solids and turbidity will be done at several locations upstream and downstream of the Project as part of physical environment monitoring plan (see Chapter 8). Monitoring under the Sediment Management Plan would only be in place during construction and is separate from the physical environment monitoring. Table 6-3 also describes the monitoring regime for managing sediment and maintaining water quality.	The information provided in chapters 6 and 8 does not specifically outline where sampling and monitoring will take place along the Nelson River and what actions might be taken if suspended sediment increases beyond specified thresholds. EC requests that the Proponent: • Provide more details in the Sediment Management Plan which includes, but is not limited to, proposed sampling locations (illustrated on a site plan, relative to proposed infrastructure), number of sampling locations, sampling and monitoring frequency, sampling parameters, type of samples to be collected, time of year sampling will take, and sampling methods; detailed erosion and sedimentation prevention strategies, measures that will be used for reservoir preparation, best practices, and identify linkages to adaptive management, as required for a comprehensive Sampling Management Plan; • Identify mitigation measure to be taken in the event of water quality exceedances. These details should be provided for each phase of the project (construction, operation and decommissioning).	EC-0010	Proponent response addresses information request.
11	EC	PE SV 2	7-37	Aquatic Environment	Erosion of peatlands will result in the transportation and sedimentation of peat materials in the reservoir. The Proponent has identified peat transport zones and estimated volumes of material that would be mobilized over timelines up to 30 years. The ES predicts some 1.3 million tonnes of peat within the reservoir, of which 10,000 to 13,000 tonnes are expected to travel downstream after Year 1 if no peat management measures are implemented.	EC requests that the Proponent identify the peat management measures that will be undertaken, how peat inputs, behaviour and effects will be monitored over the operation of the project, and what and when adaptive management actions will be used as a contingency should effects be detected.	EC-0011	Proponent response addresses information request.
12	EC	PE SV 1	6-56 7-35 9-6	Aquatic Environment - Peatlands	As peatland is flooded, floating peat mats will rise up with the rising water, and may be mobile within the reservoir. Organic sedimentation is expected to occur beyond the modeled 30 year horizon, but at reduced rates. The peat mats are predicted to sink to the bottom in some cases, and become overlain with silt. Predictions have been made regarding the effects on dissolved oxygen levels, due to decomposition of the organic material. Other changes to water quality may be associated with the addition of the peat materials.	EC requests that the Proponent: • Describe the potential for further changes to the water chemistry in the reservoir, such as a drop in pH, concomitant increase in metals, increased color due to organic matter • Confirm if "worst case" volumes of peat addition have been taken into account with respect to estimating mercury methylation • Provide estimates of depth of labeled to be covered	EC-0012	Proponent response addresses information request.
13	EC	PE SV 2	7-43	Aquatic Environment - TSS	Real time monitoring of TSS will be done using turbidity as a surrogate. This is a commonly accepted practice, as it provides immediate data for management response. However, the relationship between TSS and turbidity must be determined on a site-specific basis, and be calibrated and validated as the project proceeds.	EC requests that the Proponent revise the sediment management plan to include a section that details monitoring of turbidity and TSS, including development of the regression model, calibration with field data, and ongoing validation and QA/QC.	EC-0013	Proponent response addresses information request.
14	EC			Aquatic Environment	Background TSS is estimated to average 10-20 mg/L.	EC requests that the Proponent describe the dataset and method used to determine the background value of 20 mg/L.	EC-0014	Proponent response addresses information request.
15	EC	R-EIS Guidelines	p. 8-34	Aquatic Environment	Monitoring is described in general terms in Table 8-3. In addition, presentations made by the Proponent described proposed construction phase monitoring. In presentations on the proposed monitoring (April 11, 2012), it was proposed that there would be 3 sites for construction monitoring with thresholds set for mitigation actions to be taken. The sites include an upstream location (Site 1), downstream location (Site 2) and site near the outflow of Stephens Lake (Site 3). Turbidity will be monitored as a proxy for total suspended solids (TSS) and be compared to thresholds: increases at Site 2 of 25 mg/L above Site 1 for 1 hour would trigger investigation; increases of 200 mg/L above Site 1 would trigger mitigation action, and increase at Site 3 of 25 mg/L above Site 1 would trigger action.	Concerns with the proposed monitoring have been identified: The proposed sites allow for a considerable area of Stephens Lake to experience elevated TSS before triggering action. Monitoring Site 2 is sited well below the construction activity, and should be closer to the area of disturbance. Changes to Site 3 as proposed would mean that most or all of Stephens Lake had elevated TSS and turbidity. EC requests that the Proponent provide further clarification of the proposed monitoring. EC requests that the Proponent develop a monitoring plan that identifies the effects associated with construction and operation of the proposed facility and planned mitigation. The plan should describe the sites to be monitored, timing, how comparisons to baseline will be drawn, identify thresholds that will trigger action, and provide details of how the field monitoring will be done, including quality assurance/quality control measures.	EC-0015	No further issues on the distance of sampling from the actual site if safety is a concern. In the response provided to CEAA-0011 the Proponent lists the following plans they will be providing in the first and second quarter of 2013. EC requests a copy of these plans for further review when they are made available.

16	EC	PD SV	2-37 6-76 8-9	Aquatic Environment	The Proponent acknowledges that there will be increases in mercury associated with the reservoir impoundment, and states that there is no mitigation available. Levels are predicted to rise for a period of time before stabilizing then declining over the order of three decades. Maximum concentrations do not appear to be provided.	EC-0016	Proponent response addresses information request.
17	EC	R-SIS Guidelines	p. B-34	Aquatic Environment	The proposed monitoring includes sampling of fish for gill histology. If peak sediment inputs exceed target levels, EC suggests that non-lethal techniques be investigated for use in evaluating the effects of elevated TSS on fishes; detection of effects associated with exceeding TSS thresholds may also be approached in a tiered fashion.	EC-0017	Proponent response addresses information request.
18	EC	R-SIS Guidelines	p. 6-362	Terrestrial Environment	The Proponent has not included a discussion or impact assessment regarding these risks associated with lightning and collision; could find no reference to these in the SIS.	EC-0018	EC requests that the Proponent clarify what lightning will be used for the powerhouse building and communication tower. EC also has a particular interest in project effects on migratory birds and requests the opportunity to review the monitoring reports. In order to minimize the risk of avian collisions and fatalities, EC recommends that any lightning used on the communications tower at night be limited to white (preferable) or red flashing LED or strobe lights, and be the minimum in number, intensity, and frequency of flashes required for aircraft safety. EC also recommends that Manitoba Hydro avoid the use of floodlights and other intense light sources at the base of the tower, or on the powerhouse building, especially those left on all night. With respect to any necessary security lighting on ground facilities (including buildings) and equipment, EC recommends that the lighting be as minimal as possible, and be down-shielded to keep light within the boundaries of the site. Consideration could also be given to turning these lights off at night during migration, and during bad weather. Finally, EC recommends that the proponent regularly monitor and document the level of avian mortality that occurs near the communications tower.
19	EC	R-SIS Guidelines	p. 6-362	Terrestrial Environment	In this section the Proponent has proposed the following mitigation in response to the loss of gull and tern breeding habitat: "Deployment of artificial gull and tern nesting platforms (e.g., reef rafts), breeding habitat enhancements to existing islands (e.g., predator fencing or placement of suitable surface substrates), and/or development of an artificial island, or a combination of these measures, will be implemented to off-set the loss of gull and tern nesting habitat at Gull Rapids and areas upstream."	EC-0019	As the proponent has indicated in their response, detail about the mitigation measures to offset the loss of gull and tern nesting habitat at Gull Rapids and areas upstream are limited at this time. EC requests the opportunity to review detailed plans (complete with design, placement, development, and implementation information for each proposed mitigation measure) as they are developed. With respect to the Artificial Nesting Platforms, EC recommends that the developed plan 1) address the recommendations in the studies cited, and their implementation for this project; and 2) include plans to maintain the rafts and make any necessary repairs to the platforms prior to each breeding season. To the extent possible, EC recommends constructing platforms such that the total available area for nesting waterbirds is equivalent to the area of the natural islands that will be lost, such that equivalent breeding populations might be maintained.
19	EC				EC requests that the Proponent provide additional information regarding each mitigation measure (i.e., for artificial nesting platforms, island enhancements, or development of artificial islands) including information regarding the design, placement, development and implementation of each measure. EC also requests that the Proponent identify the decision-making process by and situations in which they would choose to a) deploy an artificial nesting platform, b) enhance an existing island, c) develop an artificial island, or d) implement a combination of these measures.	EC-0019 continued	With respect to the Nesting Island (or Peninsula) Enhancements downstream, EC recommends that the developed plan address the expected variability of the water level below the Generation Station, and provide the rationale behind enhancing nesting sites downstream if the variation in water level will be greater than would occur naturally during the breeding season. Terns and other waterbirds often nest at sites that are only a few inches to a couple of feet above water and frequent changes to the water level during the breeding season may render this mitigation option futile. EC also recommends that the plan address the feasibility of fencing off portions of land to limit predator access, and describe any plans to monitor and maintain the fencing. Colonial nesting birds have an innate preference for sites that mammalian predators cannot access, and it would be preferable to work with islands. However, maintaining the fencing and ensuring that it did not become a hazard to breeding colonial species or other wildlife would require frequent monitoring and maintenance throughout the year. With respect to the proponent's response regarding the development of Artificial Nesting Islands, EC questions how monitoring annually during the first 3 years of operations will confirm the necessity and feasibility of these nesting islands. More specifically, EC is unsure how the construction could take place prior to filling the reservoir considering monitoring will only occur after operation has commenced. EC requests that the proponent provide clarification.

20	EC	R-ES Guidelines 6-196 6-197 6-198	Physical Environment	The emissions estimates are compared to the total Manitoba road transport emissions. Comparing all of Manitoba to the emissions generated at the project site don't appear to match in scale.	EC requests that the Proponent provide an explanation as to why a provincial scale was used for comparison with this project.	EC-0020	Proponent response addresses information request.
21	EC	PE SV 1 3-9 3-11	Physical Environment	This section states that: "The maximum potential daily loading due to Keeyask road transport for each reported air contaminant is "small in comparison" to daily emission loadings derived from total emissions reported to MPM (2009) for all road transport activities in Manitoba." Also, by using table 3-4-2, EC calculated that the estimated total SO _x , NO _x & PM emissions from the project are 13.3%, 1.6% and 1.4% respectively of the total Manitoba road transport emissions.	EC requests that the Proponent provide further clarification on the criteria being used to determine the definition of a "small" in this context.	EC-0021	Proponent response addresses information request.
22	EC	PE SV 1 3-11 3-12	Physical Environment	This section further states that: "Annual emissions associated with dam and facility construction are estimated to be highest for NO _x at 382 tonnes per year; however, this is still less than 1% of the annual NO _x loading estimate for road transport within the entire province. This is true for the number of tonnes, but both PM ₁₀ and SO _x emissions have a higher percentage when compared to the 2009 emissions for MB road transport of 1.0% and 0.2% respectively."	EC requests that the Proponent provide clarification as to why they did not develop mitigation measures for SO _x emissions.	EC-0022	Proponent response addresses information request.
23	EC	PE SV 1 3-12	Physical Environment	This section states that: "Acceptable dust-control measures will be used on the roadway, as necessary, to limit the amount of airborne dust."	EC requests that the Proponent provide the criteria that will be used to determine when the dust-control measures will be implemented and whether or not they be included in the EMP.	EC-0023	Proponent response addresses information request.
24	EC	PE SV 1 3-19	Physical Environment	This table lists the magnitude of air quality impacts during construction as "moderate", but in the preceding sections of text the magnitude is determined to be small.	There appears to be contradicting statements throughout this section on the magnitude of air quality impacts during construction of the Project. EC requests that the Proponent provide clarification on the prediction of air quality impacts during the construction phase.	EC-0024	Proponent response addresses information request.
25	EC	PE SV 1 3-20	Physical Environment	This section states that: "Project effects on noise and air quality related to construction are considered to be moderate in magnitude and medium in their spatial extent from construction sites, and therefore, confined to localized areas within the study area. Consequently, noise and air monitoring programs are not planned for the Project."	EC requests that the Proponent revise their EIS to include temporary air monitoring programs during the construction phase of the Project.	EC-0025	Proponent response addresses information request.