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January 28, 2015

Elise Dagdick
Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
Suite 160, 123 Main Street
Winnipeg, MB R3C 1A5

Dear Ms. Dagdick:

Re: File 5716.00 Pointe du Bois Transmission Project

This letter is in response to your letter of November 10, 2014, requesting additional information on the above project.

Required Additional Information:

1. Since this issue was not identified in the EAP, we do want Manitoba Hydro to acknowledge that biosecurity is indeed a risk to the adjacent agriculture land and that they will follow procedures to minimize this risk.

RESPONSE: Manitoba Hydro acknowledges that biosecurity is indeed a concern and we will follow our Agricultural Biosecurity Policy Standard Operating Procedures for Biosecurity on Agricultural Land (Transmission Business Unit).

2. Manitoba Hydro's Preferred Route: Our preference (Wildlife Branch) is that the route follow the ROWs along PRs 520 and 511 as much as possible.

RESPONSE: Manitoba Hydro met with the Integrate Resources Management Team (IRMT) on September 27, 2013 to present and discuss the preferred route. No issues / concerns were raised at that meeting. The IRMT requested additional time to review the route. Manitoba Hydro provided a shapefile for the final preferred route on October 18, 2013. No comments were received from the IRMT regarding the route.

Chapter 4 of the Environmental Assessment Report outlines the routing process. Many factors were considered during the process including various biophysical and socioeconomic factors. Although the route does not parallel the highways discussed in the comment from Wildlife Branch it does minimize potential impacts to wildlife through avoidance of the large intact wilderness areas (intactness was one of the factors in the model), avoidance of rare habitat types (priority habitats was one of the factors in the model) and routing through common habitat types (common habitat was a factor in the model).

In addition, linear infrastructure (highways and transmission lines) was also included in the model as an opportunity for routing.



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However, there were also social components and public input to routing including minimization of routing near developed areas (cottage subdivisions etc.), and certain land use categories including Wildlife Management Areas and Provincial Parks.

Routing along PR 520 and 511 would increase routing near cottage developments, increase routing through Provincial Park and would increase costs (increased length and increased corner towers).

The goal of the routing process was to minimize impacts to people and the environment with consideration to engineering aspects (cost, access, constructability etc.).

3. Manitoba Hydro's Assessments of Impacts: Wildlife Branch maintains that 21 km of new access is a long length of new access and represents a potentially large threat in an area where moose densities are already low.

RESPONSE: Potential effects of the proposed project on moose related to increased access are considered not significant because:

- The proposed route avoids large intact core areas;
- New access is limited to within one kilometer of existing roads and trails; and
- Rough topography and large wetlands will limit potential access effects.

4. Manitoba Hydro's Wildlife Inventories:

QUESTION: There are references to "late winter April survey" and "August survey"; however; details on methods are not included, and it is not clear which data were collected from aerial surveys, vs ground surveys, vs both. We are questioning the results of any aerial surveys conducted at times of the year when visibility is compromised due to lack of snow cover and/or vegetation screening. We are requesting additional information so that we are able to properly review this section of the submission.

RESPONSE: A systematic aerial survey for large ungulates (i.e., moose, white-tailed deer) and predators (i.e., gray wolf) in the Project Study Area was completed on April 8, 2013. The survey was conducted during high visibility weather and 100% ground snow cover conditions.

The August 23, 2013 aerial survey was to validate sensitive sites. Any wildlife sightings listed during this survey were incidental.

5. Mitigation Tables: Wildlife Protection (EC-9): The following statements should be revised to include additional detail (list provided in comment).

STATEMENT: 9.01 – Any injured or killed wildlife encountered on the transmission line ROWs and associated access roads/trails should be reported to CWS (not just those killed/injured by vehicles)



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RESPONSE: This mitigation measure was added “Any injured or killed wildlife encountered on the transmission line ROWs and associated access roads/trails will be reported to Manitoba Conservation and Water Stewardship.”

STATEMENT: 9.02 – CWS should be advised as to where the bird diverters/aerial markers will be installed.

RESPONSE: After investigations of potential high bird traffic areas are conducted the CEnvPP Mapbook will indicate where Bird Diverters or aerial markers will be installed.

STATEMENT: 9.03 – CWS should be consulted to determine how important wildlife habitats will be identified

RESPONSE: The submission of the CEnvPP for approval is the primary mechanism Manitoba Hydro’s uses to consult with CWS and appreciates any feedback on important wildlife habitat known to CWS.

STATEMENT: 9.09 - CWS should be notified if traps or bait sites are encountered.

RESPONSE: General Mitigation Measure 9.09 reworded: “Manitoba Conservation and Water Stewardship will be notified if animal traps or bait sites are encountered and must be removed for project activities.”

STATEMENT: 9.14 - CWS should be consulted to determine how important wildlife habitats will be identified

RESPONSE: The submission of the CEnvPP for approval is primary mechanism Manitoba Hydro’s uses to consult with CWS and appreciates any feedback on important wildlife habitat known to CWS.

STATEMENT: 9.15 – CWS should be notified if artificial nesting structures are to be installed. Post – installation monitoring should occur to assess whether these structures are subsequently used.

RESPONSE: Manitoba Conservation and Water Stewardship will be notified when artificial nesting structures are installed as part of the established permitting process for required nest removals.

STATEMENT: 9.16 – CWS should be consulted prior to erecting any wildlife warning signs

RESPONSE: Manitoba Hydro will indicate in the Access management plan that “where high density areas and known crossings are identified by wildlife monitoring wildlife warning signs may be installed only after notifying Manitoba Conservation and Water Stewardship”



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STATEMENT: 9.18 – Will the proponent consider the provisions of Manitoba’s draft No Net Loss Guidelines?

RESPONSE: Manitoba Hydro will adhere to any applicable legislation associated with No Net Loss.

STATEMENT: It is recommended that the following statements be added: New occurrences of any listed rare, threatened or endangered species will be documented and provided to CWS

RESPONSE: A new general mitigation measure has been added (EC-9.23), it reads “New occurrences of any listed rare, threatened or endangered species will be documented and provided to Manitoba Conservation and Water Stewardship.”

STATEMENT: Wildlife staff will be advised in advance of any aerial surveys or flights the proponent will be undertaking in the project area (justification Wildlife staff may be conducting flights in the same area on concurrent days; therefore, communication on plans will help to ensure the safety of our respective staff).

RESPONSE: No addition was required to the General Mitigation Table as Manitoba Hydro uses qualified, safe aircraft vendors that follow standard federally mandated air traffic control measures to mitigate any safety risks with wildlife staff or any other aircraft operating in the vicinity. This will mitigate the safety concerns.

STATEMENT: Mitigation strategies during construction and operation phases be reviewed and developed in co-operation with Wildlife Branch staff.

RESPONSE: Manitoba Hydro will follow standard practices in the development of mitigation strategies and develop a monitoring plan designed to determine the effectiveness of these strategies.

STATEMENT: The effectiveness of wildlife protection mitigation will be monitored and assessed through a Wildlife Monitoring Plan to be developed in consultation and cooperation with Wildlife Branch, which is agreeable to and approved by the Director of Wildlife.

RESPONSE: Manitoba Hydro will conduct the monitoring requirements to be identified by project licence conditions.

6. Monitoring Plans: The proponent should be required to conduct monitoring to enable an assessment of effects. The monitoring plan should be developed in collaboration with Wildlife Branch and should include at minimum annual aerial surveys encompassing an area 20 km on either side of the ROW where new access is created.



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RESPONSE: Manitoba Hydro will develop a monitoring plan in consultation with Wildlife Branch but is not currently considering annual aerial surveys based on the effects assessment presented in the EA Report.

In closing, should you require more information or have any questions, please contact me at 360-4394.

Yours truly,

Shannon Johnson, Manager
Licensing & Environmental Assessment Department,
Transmission Planning & Design
Transmission