



Environment
Canada

Environnement
Canada

Environmental Protection Operations
Prairie and Northern Region
Room 200, 4999-98 Ave. NW
Edmonton, Alberta
T6B 2X3

February 13, 2013

EC file: 4194-10-5/3185
CEAA file: 4554/MP-2008-028

Jim Morrell
Project Manager
Canadian Environmental Assessment Agency
101-167 Lombard Ave
Winnipeg, MB R3B 0T6

Via email: Jim.Morrell@ceaa-acee.gc.gc.ca

Attention: Mr. Morrell

RE: Keyask Generation Project – Addendum to SIR #2 Submissions

Environment Canada (EC) is providing an addendum to the SIRs submitted for the Keyask Generation Project (KGP), dated December 20, 2012. EC has the following additional comments/concerns regarding the effects to caribou:

Previously Submitted KGP Caribou Comments:

The EIS describes three groupings of caribou for the Regional Study area: 1) barren-ground caribou from the Qamanirjuaq herd; 2) coastal caribou from the Cape-Churchill and Pen Islands herds; and 3) "summer resident caribou" (which "could be coastal caribou, [boreal] woodland caribou, or a mixture of both"; p. 6-130) (p. 6-127).

There are 6 populations of woodland caribou in Canada: Northern Mountain population, Southern Mountain population, Boreal population, Forest-Tundra population, Atlantic Gaspésie population, and the insular Newfoundland population. With the exception of the barren-ground caribou, EC considers the caribou in the project area to be part of the "forest-tundra" population, which are not SARA-listed and have not been assessed.

EC notes that the project will result in the permanent loss of some primary calving and rearing complexes ("clusters of islands in lakes or islands of black spruce surrounded by expansive wetlands or treeless areas (peatland complexes)" (p. 6-131)) for the summer resident caribou (p. 6-367, 6-372), as well as 6825 ha of physical winter habitat for the Qamanirjuaq, Cape-Churchill and Pen Island herds (p. 6-366). Additionally, sensory disturbances associated with construction and operation are expected to result in additional loss of effective habitat (p. 6-367, p. 6-372), and increased access to the project area could increase mortality due to predation (p. 6-368, 6-372).

EC encourages the proponent to consult with Manitoba Conservation to identify any plans to manage undisturbed caribou habitat in the project area.



EC acknowledges the proponent plans to implement mitigation measures including minimizing blasting from May 15 to June 30 (p. 6-370); implementing an access management plan, including locked gates at the north and south dykes from May 15 to June 30, as well as during other sensitive times determined through monitoring (p.6-371); rehabilitating temporarily cleared and excavated materials placement areas to native habitat; blocking and revegetating project-related cutlines and trails within 100m of the project footprint (p. 6-374); and long term monitoring of caribou and predators in the project area (p. 8-23, 8-26). **In addition to these measures, Environment Canada recommends the reduction of sight lines along the access trails, and the continual restoration of project-related cleared areas, cutlines, trails, etc. as they are no longer in use. EC also recommends that the proponent develop additional mitigation measures (e.g., mitigation of noise, light, smells, vibrations; reduction of vehicle speeds, etc.) to minimize harassment of caribou in the project area, particularly from late winter to late spring and early summer, as this will be a stressful period for all of the caribou in the project area.**

Addendum

In addition to the previous comments provided by EC regarding caribou in the project area, EC notes that the southwest corner of the Regional Study Area overlaps with parts of two ranges of boreal woodland caribou as delineated in the Final Recovery Strategy: Wapisi (MB8) and Manitoba North (MB9). While it does not appear that the project will have any direct effects on these herds, there is potential for indirect effects on these SARA-listed species. The effects analysis in the EIS appears to focus on project effects on the non-SARA-listed caribou (the migratory ecotype of woodland caribou and the barren ground caribou), and predominantly on caribou in the local study area.

The EIS report states the following regarding the potential impact on boreal caribou: "Because changes to intactness will be negligible, effects on caribou will likely be negligible. The Project will not contribute to measurable changes in caribou intactness of the RSA." (p. 6-370)

It is not clear from the information provided however, what indirect effects on boreal woodland caribou may occur (e.g., sensory disturbances, loss of habitat, habitat degradation, increased access, indirect mortality, etc.), or the nature of cumulative impacts on boreal woodland caribou when considered with all other foreseeable projects in the area. Additionally it is unclear how the proponent has determined effects for boreal woodland caribou specifically, to be "negligible".

EC suggests that the proponent provide clarification on the above points.

EC also encourages the Canadian Environmental Assessment Agency to discuss the potential for indirect effects on boreal woodland caribou with both the proponent and provincial caribou experts.

EC looks forward to continued dialogue and co-operation with respect to the Project. EC may have additional questions and recommendations upon review of any additional information received. If you have any questions, please contact me at (306) 780-6401.



Environment
Canada

Environnement
Canada

Sincerely,

(original signed by)

Lynne Quinnett-Abbott

Environmental Assessment Coordinator

Telephone (306) 780-6401

Facsimile (306) 780-6466

Lynne.Quinnett-Abbott@ec.gc.ca

cc:

Sarah James, EC
Kristina Farmer, CEAA