

October 29, 2013

Client File No. 5433.00

Licence No. 3055

Ms. Tracey Braun
Director
Environmental Approvals
Manitoba Conservation
Suite 160, 123 Main Street
Winnipeg, MB R3C 1A5

Dear Ms. Braun:

RE: Bipole III Transmission Project (Licence 3055) – Licence Condition 52

Manitoba Hydro (MH) is providing for your review, our current understanding of Clause 52 of the Bipole III licence and our approach to compliance.

Licence clause 52 states:

To ensure no net loss of wetlands, the Licencee shall, during construction and maintenance of the Development, maintain a minimum 30 meter riparian buffer zone immediately adjacent to wetlands and the shoreline of lakes, rivers, creeks, and streams. Within the riparian buffer zone:

- a) trees that must be removed shall be cleared using only low impact methods including hand clearing;*
- b) all existing low growth vegetation such as grasses, shrubs, and willows shall be maintained;*
- c) the application of herbicides shall be prohibited; and*
- d) any affected wetland area will be restored, replaced or offset as approved by the Director to ensure no net loss of wetlands.*

Firstly MH is committed to environmental protection and meeting all licencing requirements for this project and recognizes the ecological importance of wetland and riparian areas on the landscape. The use of the term wetland as defined in the *Environment Act* licence requires some review along with the application of the prescribed measures under this clause. While we accept the definition of wetlands and the concept of “no net loss” of wetlands, MH’s approach is discussed here to facilitate compliance with the licence clause.

Wetland is defined in the licence as:

“wetland” means land that is saturated with water long enough to promote wetland or aquatic processes as indicated by poorly drained soils, hydrophytic vegetation, and various kinds of biological activity which are adapted to a wet environment. They are generally less than approximately 2 metres in depth (National Wetland Working Group 1997).

The definition is quite broad and would include many wetland classifications including bogs, fens, marches, and swamps. This is consistent with the additional definition provided in the licence for bog which states: “*“bog” means a peat-covered wetland*”. Manitoba Hydro will review its current wetland inventory and classification system to make sure it is consistent with the licence definition.

The inclusive nature of the term wetland would apply to a large area of the northern portion of the Bipole III route. The right-of-way (ROW) will cross many kilometers of peat-covered bog and other wetland landscapes. To address the licence condition there are a number of identified mitigation measures that would ensure minimal effect to these wetland environments including:

- Winter clearing and construction from construction zone C1 and north.
- No shear blading over permafrost zones (usually peat bog land cover).
- Allowing natural vegetation to re-establish on the ROW in wetland and permafrost zones.
- Bogs and fens will not generally require full ROW width clearing and will retain vegetation that does not exceed Manitoba Hydro clearance requirements, except for the tower footprints, access trails, helicopter landing areas, etc. Low impact methods of clearing would be used for 30 m surrounding wetland edges per clause 52 a.
- Clearing maps will be prepared to indicate clearing method to be applied on the ROW and will include the location of wetlands and riparian zones where selective clearing methods are to be applied. The maps will be provided to clearing contactors and enforced by on-site environmental inspectors.

No Net Loss of Wetland Plan (NNLW)

Manitoba Hydro will develop a NNLW plan for the Bipole III Transmission Project that meets the requirements of clause 52. To do this accurately will require a wetland inventory along the route, mapping and delineation of buffer zones, review of mitigation measures and assessment of any change in structure or function of wetlands affected. The plan will consider restoration and replacement options.

Several sites on the Bipole III Transmission Project will remove areas of wetland. For the most part these will be confined to tower footprints on the transmission line right-of-way. In addition, the Keewatinoow Converter and Construction Power station sites and associated infrastructure may permanently remove wetland cover types. The NNLW plan will address the instances of permanent loss where restoration is not an option and review approaches to replacement or offset. The NNLW plan will be developed and provided to you for approval by May 2014. Clearing in winter 2013/14 construction zones which may include AC Collectors, Keewatinoow Converter Station, N1, N2, N3, C1, and C2 will more accurately delineate areas of effect for consideration in the NNLW.

Manitoba Hydro trusts the above approach and timeline are acceptable to Manitoba Conservation and Water Stewardship.

Should you have any questions or require further clarification please do not hesitate to contact me at 204-360-4394.

Regards,

Original signed by Shannon Johnson

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Attachments: 0