



April 20, 2018

Shannon Johnson
Manager
Licensing and Environmental Assessment Department
Manitoba Hydro
820 Taylor Ave.
Winnipeg MB R3M 3T1

Dear Shannon,

The Wildlife Society - Manitoba Chapter, Nature Manitoba, and Bird Studies Canada are a few of Manitoba's premier science-based wildlife and nature organizations representing wildlife professionals, naturalists, scientists, professors, managers, biologists, educators, and planners. On behalf of our respective organizations, we would like to acknowledge Manitoba Hydro's commitment to environmental protection throughout various generation and transmission projects across the province. That being said, we would also like to express concern about the proposed Birtle Transmission Project and routing decisions that have been made due to financial and societal pressures, rather than for environmental reasons.

As explained in the Environment Act Proposal submitted to the Province of Manitoba's Environmental Approvals Branch in February 2018, during the route selection process, **"the primary driver was the high cost difference between the routes" (Appendix A – Page A-39)**. The EAP also contains numerous statements about landowner preference for avoidance of private land. The apparent weight attributed to these factors resulted in the selection of a route that traverses Spy Hill-Ellice Community Pasture in western Manitoba. This is despite extensive wildlife-related concerns expressed by Manitoba Sustainable Development's Wildlife and Fisheries Branch and local Indigenous communities (as explained within the EAP), and a letters submitted by both Nature Manitoba and Bird Studies Canada during the public consultation period.

As Nature Manitoba and Bird Studies Canada pointed out in their letters, this area contains extensive tracts of high quality mixed-grass prairie, supporting Manitoba's highest concentration of federally and provincially listed chestnut-collared longspur and Sprague's pipit (Bird Studies Canada, 2015 - 2017 data). These provincially significant concentrations of globally threatened species (IUCN) has culminated in an Important Bird Area nomination submission to the IBA Program of Canada (Manitoba Important Bird Areas Program, unpublished document). Manitoba Hydro's 2017 field data presented in the EAP Biophysical Technical Report confirms the important concentration of these species within Spy Hill-Ellice pasture.

We acknowledge that minor alterations were made during the later stages of the process to follow treed areas and avoid larger sections of prairie; however, this level of route mitigation will not ensure that all

impacts are alleviated. The proposed project will still increase the amount of edge throughout the area, resulting in a loss of functional habitat for grassland species; increase the amount of perching habitat for birds of prey and brood parasites; and risk the introduction and/or spread of non-native and invasive species. We'd also like to point out that although the portion that traverses the pasture is short in length, the EAP Biophysical Technical Report appears to show higher ungulate (moose, elk, and white-tailed deer) densities within the project survey area than in other transmission line development areas where extensive concerns were recently expressed, and mitigation and monitoring has been employed.

Our organizations believe that in an increasingly developed world, the preservation of wildlife habitat is of critical importance, especially in regards to endangered species. We'd like to take this opportunity to direct you to The Wildlife Society's position statement on *Energy Development and Wildlife* (attached - http://wildlife.org/wp-content/uploads/2014/05/PS_EnergyDevelopment3.pdf). As stated within, **"Responsible management of energy projects on public lands include activities that sustain fish and wildlife habitat, protect environmental and ecological values, and provide for recreational use and aesthetic considerations"**. Manitoba Hydro's self-develop environmental assessment process is in line with many of TWS's recommendations, including scientific monitoring, evaluation, and adaptive management; however, we feel strongly that this project falls short in the avoidance category.

As a leader in the provincial and national energy industry, we respectfully request that Manitoba Hydro reference Policy 6 – **"Encourage energy developers to explore operations that will improve terrestrial and aquatic wildlife habitats and/or enhance wildlife populations."** Manitoba Hydro should consider how the potential impacts of this project will be offset within the project area or elsewhere regionally. The Ellice-Archie and Spy Hill-Ellice ecosystem's intactness and relatively low levels of development are irreplaceable within the Manitoba landscape; however, there should still be an attempt to replace the high-quality habitat that will be impacted by this project.

In summary, we remain concerned about the level that species at risk and sensitive site information was incorporated into the routing process. We look forward to learning more about how Manitoba Hydro plans to mitigate and offset the potential impacts of this project. We thank you for your attention and request that you contact us if our organizations can assist with this project's environmental protection program going forward.

Sincerely,



Michel Leclaire,
The Wildlife Society,
Manitoba Chapter



Jack Dubois
Nature Manitoba



Dr. Christian Artuso
Bird Studies Canada

cc: Honourable Rochelle Squires, Minister of Sustainable Development

Attachment: [TWS Position Statement – Energy Development]