

Technical Review Socioeconomic Information Gaps: The Keeyask Generation Project

Submitted by

Manitoba Métis Federation

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Prepared by



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TABLE OF CONTENTS

	PAGE
1.0 INTRODUCTION.....	4
2.0 THE KEYASK PROJECT	4
2.1 Overview of Keeyask Project.....	4
2.2 Foundation of Review.....	5
3.0 SOCIOECONOMIC.....	5
3.1 High Level Gap Analysis.....	5
3.2 Detailed Concerns	8
3.2.1 General.....	8
3.2.2 Economy	15
3.2.3 Population, Infrastructure and Services.....	27
3.2.4 Personal, Family, and Community Life.....	32
3.2.5 Resource Economy	34
4.0 CLOSURE	36
5.0 LITERATURE CITED	36

Acronyms

AEA	Adverse Effects Agreement
ATK	Aboriginal Traditional Knowledge
CDP	Career Development Partnership
CEA	Cumulative Affects Assessment
CEAA	Canadian Environmental Assessment Agency
CEC	Clean Environment Commission
CNP	Cree Nation Partners
DNC	Direct Negotiated Contracts
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPP	Environmental Protection Plan
FLCN	Fox Lake Cree Nation
GS	Generating Station
HNTEI	Hydro Northern Training and Employment Initiative
HRWHQM	Habitat Relationships and Wildlife Habitat Quality Models
IR	Information Request
JKDA	Joint Keeyask Development Agreement
KCN	Keeyask Cree Nations
KHLP	Keeyask Hydropower Limited Partnership
KIP	Keeyask Infrastructure Project
LSA	Local Study Area
MB	Manitoba
MCWS	Manitoba Conservation and Water Stewardship
MH	Manitoba Hydro
MHSP	CNP Moose Harvest Sustainability Plan
MIT	Manitoba Infrastructure and Transportation
MMF	Manitoba Métis Federation
MSES	Management and Solutions in Environmental Science
R to EIS	Response to EIS Guidelines
RSA	Regional Study Area
SEMP	Socio-economic Monitoring Plan
SE SV	Socio-economic Supporting Volume
SLRMA	Split Lake Resource Management Area
SV	Supporting Volume
TCN	Tataskweyak Cree Nation
TEMP	Terrestrial Effects Monitoring Plan
TE SV	Terrestrial Environment Supporting Volume
TLU	Traditional Land Use
TLUKS	Traditional Land Use and Knowledge Study
VEC	Valued Environmental Component
WLFN	War Lake First Nation
YFFN	York Factory First Nation

1.0 Introduction

The Manitoba Métis Federation (MMF) requested that Management and Solutions in Environmental Science Inc. (MSES) review and assess the analyses and results of the Environmental Impact Statement (EIS) of the Keeyask Generation Project (the Project) proposed by the Keeyask Hydropower Limited Partnership (KHLP or the Partnership) consisting of Manitoba Hydro, Tataskweyak Cree Nation (TCN), War Lake First Nation (WLFN), York Factory First Nation (YFFN), and Fox Lake Cree Nation (FLCN); collectively referred to as the Partnership).

For the purpose of developing the Round 1 Information Requests (IRs), MSES reviewed all components of the Project EIS relating to socio-economics and culture. Relevant EIS documents include:

- Response to EIS Guidelines
 - Socioeconomic Environment and Resource Use (372 Pages)
- Supporting Volumes
 - Project Description & Socioeconomic Environment (1743 Pages)

MSES provided Round 1 IRs in May 2013. The Partnership provided responses to the Round 1 IRs in July 2013 in a report titled *Responses to Information Requests – CEC [Clean Environment Commission], Round 1* (KHLP 2013a). MSES reviewed this document and relevant referenced documents, as necessary, and provided Round 2 IRs in July 2013. The Partnership provided responses to the Round 2 IRs in August 2013 in a report titled *Responses to Information Requests – CEC, Round 2*. For the purpose of developing this final report, we completed a review of Manitoba Hydro's *Responses to Information Requests – CEC, Round 2* (KHLP 2013b) and relevant referenced documents. Additional efforts were made to review draft reports provided by the Partnership subsequent to receipt of Round 2 IR responses. This report identifies gaps that were found to be still outstanding after our technical review and after the response by the Partnership to our Round 1 and 2 Information Requests.

2.0 The Keeyask Project

2.1 Overview of Keeyask Project

The Project includes the development of a 695 megawatt hydroelectric generating station (GS) at Gull (Keeyask) Rapids on the lower Nelson River in northern Manitoba. The Project will have an average annual production of 4,400 gigawatt-hours of electricity (power to approximately 400,000 homes) and energy produced by the GS will be sold to Manitoba Hydro for distribution. Permanent associated infrastructure includes: north and south access roads, cofferdams, tower spur, rock groins, communication tower, boat launches, a portage, borrow areas and associated roads. Temporary associated infrastructure includes: a main camp, work areas, landfill, water and sewage treatment facilities, explosives magazine, cofferdams, ice boom, borrow areas and associated roads, and placement areas for excess excavated materials. The closest nearby communities include Split Lake and Gillam, Manitoba (MB).

2.2 Foundation of Review

The foundation of our review centred on how the proponents determined significance of an impact. Significance was determined based on the assumption that mitigation will be successfully and effectively implemented. Therefore, it is critical to measure whether or not mitigation actually works as predicted. For that reason, follow-up and monitoring programs must be credible and objective.

Impact predictions, no matter how solid or robust, need to be tested during monitoring and follow-up programs (Morrison-Saunders and Arts 2004). To help improve our confidence in the predictions made, we highlight potential gaps in the baseline data and requirements for additional information to enable a better understanding of the effectiveness of mitigation measures. Our gap analysis is aligned with the EIS Scoping Document on p. 7-1: “*The monitoring programs will determine effects of the Project, including: whether they are consistent with the analysis in the environmental impact assessment; whether they assess the effectiveness of remedial measures; and whether they allow for adaptive management and mitigation measures to be implemented if unforeseen impacts occur*” (KHLP 2011). However, we understand that sometimes baseline information cannot be collected and a qualitative prediction must be made. Moreover, we understand that most predictions are made with some degree of uncertainty, no matter how good the baseline information may be, and decisions must be made in light of that uncertainty (Burgman et al. 2005). For that reason, the Government of Canada (2003) provides guidelines on the application of scientific rigor to reduce uncertainty in decision making. In our review we highlight the gaps in the scientific foundation required to make informed decisions.

For the ongoing comparison with baseline data and for the detection of effects that were not predicted, the most fundamental necessity is that both the baseline and the monitoring information must be quantifiable. For a useful follow-up and monitoring program, testable questions must be developed (Burns & Wiersma 2004, Canadian Environmental Assessment Agency (CEAA) 2009). Because of this fundamental necessity to provide certainty in the future environmental management of the proposed Project, we build the majority of our identified gaps on the need to develop testable questions for future monitoring programs. We also note that in order to measure the effectiveness of mitigation, the expectations of what effective mitigation would be must be clearly defined. We think that discussions which aim at gaining clarity on follow-up and monitoring programs are of utmost importance for the effective management of Project impacts.

3.0 Socioeconomic

3.1 High Level Gap Analysis

For the purposes of the environmental assessment of the Keeyask Generation Project, there are gaps in the socioeconomic impact assessment that stem from the following factors:

- I. Identification of the Métis as a Distinct Aboriginal Group:
The Métis in the Local Study Area were not identified as a distinct and separate Aboriginal group, one which may experience Project effects distinctly and separately from other Aboriginal groups.

2. Opportunities for Métis Involvement in the Assessment Process:

As a result of not being identified as a distinct Aboriginal group in the Local Study Area, the Métis were not provided opportunities for involvement in the assessment process equivalent or similar to those provided to the Keeyask Cree Nations (KCNs).

By contrast, as Partners in the Project, each of the KCNs were provided their own assessment and evaluation process in addition to the “government process”. The KCNs process can be summarized as follows:

- The KCNs requested to determine and present their own evaluation of the environmental impacts of the Project on their own community. This was agreed to in the “Keeyask Environmental and Regulatory Protocol”, which was reached in 2001.
 - It was established to guide KCN involvement in the assessment process, and the preparation of the EIA required under the CEAA and Manitoba Environment Act with the two different processes.
 - Each community led the consultations with their respective Members.
 - For all components of the assessment, study methods for collecting, organizing and evaluating information were compatible with each other and capable of being integrated into the EIS.
- The KCNs process has been underway for more than a decade, supported by Manitoba Hydro, and has “assisted the KCNs to understand the Project and its impacts on their communities and Members and to determine the conditions under which they would support the Project” (Response to EIS Guidelines p.1-9).
- Each of the KCNs defined and presented their own evaluations of the Project based on their worldview of the environmental effects on their communities. (See the Keeyask Cree Nations Environmental Evaluation Reports).
- Each of the KCNS made an independent decision to support the Project.

The gaps in the socioeconomic impact assessment, resulting from the above factors, are as follows:

1. Identification and Assessment of Métis-specific Project Effects:

As described above, the Métis were not identified as a distinct Aboriginal group in the Local Study Area, who might experience project impacts distinctly from other Aboriginal groups. There are therefore gaps in the socioeconomic impact assessment in terms of the identification and assessment of potential Métis-specific project effects.

2. Mitigation of Métis-specific Project Effects:

As Métis-specific effects have not been identified and assessed, it is anticipated that they will go unmitigated.

By contrast, as Partners in the Project, the KCNs have established mechanisms for the mitigation and offsetting of Project effects, including:

- The Joint Keeyask Development Agreement (JKDA). Negotiated between 2002-2008, it shaped the terms of the Partnership, and addressed KCNs potential income

opportunities, training, employment, business opportunities, as well as involvement in the Partnership's environmental and regulatory affairs.

- Adverse Effects Agreements (AEAs). The objectives and contents of the AEAs are described in the EIS as follows:

“The AEAs between Manitoba Hydro and the individual KCNs were designed to address and resolve known present and anticipated Project adverse effects. Within each agreement, a set of cultural and AEA offsetting programs were developed which deal directly with the potential adverse effects of the Project on culture and spirituality. Programs agreed upon in the AEAs deal with traditional lifestyles, Cree language, land and/or environmental stewardship, access programs that provide replacement opportunities to access resources, wellness counseling and a cultural sustainability program that can assist in maintaining cultural success and tempering Project effects. The AEAs provide an opportunity to reconcile differing world views by addressing and acknowledging the need for continued stewardship of the land, culture and spirituality that binds the KCNs to their environment.

Each of the AEAs differs among the communities; however, most of the programs will be in place by the start of construction. During the construction phase, the AEA programs will be ongoing to minimize the loss of use of the Project site. In addition, the AEAs will actively engage the mechanisms of cultural transmission, stewardship and spirituality within the communities. AEA programs will also proactively engage the health and wellness of the communities to promote employment and business opportunities, and increased country food usage; and offer the return to cultural sharing practices. During the operation phase, AEA programs will continue to address physical changes to the landscape, inter and intra cultural and community interactions and long-term employment and business goals” (Response to EIS Guidelines p.6-491).

The specific mitigation and offsetting measures contained in each of the AEAs are not available to the Métis. There is, therefore, outstanding concern regarding the lack of assessment of Métis-specific Project effects and the extent to which any such effects will be effectively managed in the absence of specific mitigation and offsets such as those contained in the AEAs.

It should be noted that, throughout the Round 1 and Round 2 IR Responses, the Partnership refers to the recent agreement between MMF and Manitoba Hydro (MH) on a work plan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative.

The Partnership anticipates *“...that these studies will assist in understanding the nature of the Métis community in the Keeyask region and any potential effects that may be experienced as a result of developing the Project.”* Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes

provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited in scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs. Accordingly, it would be unfair if the findings of these preliminary studies are interpreted to be more comprehensive than they actually are, and if the results are evaluated against KCN information, which was gathered and documented over several years, through an extensive assessment and involvement process.

In order to meet the requirements of the EIS Scoping Document, the Partnership must assess effects on the Manitoba Metis as a distinct Aboriginal group with documented traditional use in the Keeyask Study Area. This must be done in collaboration with the Metis community – as a collective – in order to fully understand their perspective in relation to significance of impacts, similar to the assessment process conducted with and by the KCNs. These collective impacts cannot be addressed through mitigation measures designed for non-KCN Aboriginal and non-Aboriginal individuals living in the Keeyask Study Area.

While the Partnership states that that it is “committed to considering any additional information provided on the use of lands and resources by any Métis community...” and is “...committed to further dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available,” the EIS is currently deficient with respect to assessing the Project’s impacts on the Metis community. It is recommended that this effects assessment, in collaboration with the MMF, be undertaken prior to any recommendation to the Minister or licensing of the Project.

3.2 Detailed Concerns

3.2.1 General

MMF-IR-023 CEC Rd 2 MMF-0062	<i>Socio-economic Assessment Methods – Spatial Boundaries and Assessment of Effects</i>	
EIS Volume #: R to EIS R to EIS Socio-economic Supporting Volume	Chapter/Section #: Chapter 5, Section 5.2 Chapter 6, Section 6.6 Section 1, Introduction	Pages #(s): p. 5-1, 5-6 p. 6-426 p. 1-18
<p><i>EIS Scoping Document Reference:</i></p> <p>3.5 Spatial and Temporal Boundaries. <i>Spatial boundaries (i.e. the study areas) will be established for the Project effects assessment. Study areas may vary between various environmental components, as appropriate. The EIS will explain the rationale used to determine the study area for various environmental components.</i></p> <p>5.1 Project Effects. <i>The EIS will identify the potential positive and adverse environmental effects of the Project. Measures to mitigate potential effects that are technically and economically feasible will be identified. Potential effects that remain after the application of mitigation will be considered to be potential residual effects.</i></p>		
<p><i>CEAA EIS Guidelines Reference:</i></p> <p>6.2.2 Spatial Boundaries. <i>Study boundaries must be defined taking into account (where applicable) the spatial extent of potential environmental effects, traditional and local knowledge, current and proposed land use by</i></p>		

Aboriginal groups and ecological, technical and social and cultural considerations...

The proponent must take into account public comments when establishing study areas and is advised to consult with federal and provincial departments and agencies, local government and Aboriginal groups to confirm the spatial boundaries used in the studies.

Preamble

The original IR asked the Partnership to explain why the Métis were not identified as a distinct Aboriginal group in the Local Study Area, and accordingly not provided the opportunities for involvement in the assessment process and evaluation of effects as were provided to each of the KCNs.

Specifically, the original IR asked the Partnership to explain the criteria that were used to define the KCNs as “*in-vicinity*” and the criteria used to exclude the Métis, particularly those who reside in the Local Study Area, from being defined as “*in-vicinity*”, and further, to explain why the Métis were not identified as a distinct Aboriginal group in the Local Study Area. The Partnership responded that the Local Study Area includes “...*the people and communities in the immediate vicinity of the Project that have the greatest potential to experience socio-economic effects as a result of the development and operation of the Keeyask Generation Project*” and identifies these as the Town of Gillam, the City of Thompson, and the communities of Split Lake, Ilford/War Lake, Fox Lake/Bird, and York Landing, the last four of which represent the home communities of the four KCNs. The Partnership does not satisfactorily explain why the Métis were not identified as a distinct Aboriginal group in the Local Study Area for the purposes of the socioeconomic assessment, stating that to the extent there are Métis (or other Aboriginal residents) in the Local Study Area, they will be included in the assessments of effects of the Project on “*people in the Local Study Area*” and also “*captured in the total and Aboriginal populations (where available) identified for each Local Study Area community.*” In the filed socioeconomic assessment, there has been no assessment of Métis-specific Project effects and there remains no understanding of how Project effects might be experienced by the Métis, as a distinct Aboriginal group in the Local and Regional Study Areas.

The original IR asked the Partnership to explain why Métis-specific effects were not also identified and assessed, and why the Métis were not provided an evaluation process equivalent to that provided to the KCNs. The Partnership does not satisfactorily respond to the request, but refers to the recent agreement between MMF and MH on a work plan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative. Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the

socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

MMF-IR-024 CEC Rd 2 MMF-0063	<i>Socio-economic Assessment Methods – Mitigation of Effects</i>	
EIS Volume #: R to EIS R to EIS	Chapter/Section #: Chapter 4, Section 4.3.3 Chapter 6, Section 6.6.2	Pages #(s): p. 4-15 p. 6-430
<i>EIS Scoping Document Reference:</i> 5.1 Project Effects. <i>The EIS will identify the potential positive and adverse environmental effects of the Project. Measures to mitigate potential effects that are technically and economically feasible will be identified. Potential effects that remain after the application of mitigation will be considered to be potential residual effects.</i>		
<i>CEAA EIS Guidelines Reference:</i> 9.1 Assessment Methodology. <i>The consideration of views from the public and Aboriginal groups, including perceived changes attributed to the Project, must be recognized and addressed in the assessment method.</i>		

Preamble

Despite the fact that there are Métis residing in the Local Study Area, the Métis were not identified as a distinct Aboriginal group in the Local Study Area, and Métis-specific effects have not been identified and assessed. There is thus concern that these effects will go unmitigated. In contrast, the KCNs were provided extensive opportunities for involvement in the assessment process, and each of the KCNs negotiated an AEA with Manitoba Hydro “...as a proactive approach... ..to address known and foreseeable adverse effects their traditional knowledge was telling them would occur” (R to EIS, Section 6.6.2, p.6-430). The AEAs include mitigation and offsetting programs that are intended to provide replacements and opportunities to offset unavoidable adverse effects of the Project (R to EIS, Section 4.3.3, p.4-15).

To better understand the assessment process provided to the KCNs, the original IR asked the Partnership to explain the timing of negotiation of the AEAs (CEC Rd I MMF-024a) and the information from the environmental and socioeconomic assessment (in addition to traditional knowledge and past experience) upon which the content of the AEAs was based (CEC Rd I MMF-024d). The Partnership described the extensive process provided to the KCNs; some of them began their environmental evaluation of the project in 1999, AEAs were completed for all KCNs in 2009, and the EIS was completed and filed in 2012. As described in the Partnership’s

response to CEC Rd I MMF-024d, the content of the AEA was informed by the environmental assessment information as well as information specific to each of the KCNs that was gathered and documented through the extensive assessment and evaluation opportunities provided to the KCNs.

To better understand the assessment process provided to the Métis, the Partnership was asked to describe the efforts that were undertaken to gather and document Métis past experiences with hydro development and Métis traditional knowledge, with the same purpose of addressing “*known and foreseeable adverse effects*” on the Métis (CEC Rd I MMF-024e). The Partnership responded that Métis individuals in the Project Study Area would have had the opportunity to participate in the Keeyask Public Involvement Program, through which opportunities were provided for potentially affected or interested parties to learn about the project and to express concerns. Other efforts include Manitoba Hydro’s review of existing literature (regarding Métis resource use) and the more recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative. The Partnership anticipates “*...that these studies will assist in understanding the nature of the Métis community in the Keeyask region and any potential effects that may be experienced as a result of developing the Project.*”

To better understand the extent to which adverse Project effects on the Métis will be mitigated, managed, or offset, the Partnership was asked whether it intended to negotiate an Adverse Effects Agreement with the Métis (Follow-up Questions CEC Rd I MMF-024b and 024c). The Partnership responded that it cannot be confirmed at this time whether an AEA will be entered into with the MMF. When asked why an AEA was not negotiated with the Métis (CEC Rd I MMF-024g), the Partnership responded that the KCNs “*have significant knowledge about their communities and the broader Study Area*” and that “*based on this knowledge, and years of study to document the existing socioeconomic environment... ...the Partnership is not aware of any Métis community in the vicinity of the project or of any potential project impact that is specific to the Métis*”. When asked to demonstrate how impacts on the Métis, as a distinct Aboriginal group in the Local Study Area, will be effectively mitigated without consideration of the Métis as a distinct Aboriginal group and without the measures and offsets provided in the AEA (CEC Rd I MMF-024h), the Partnership responded that “*based on existing studies of the project area and the experience and expertise of the KCNs, ...the Partnership does not currently have any knowledge of how the Métis, as a distinct group of people in the study area, would be affected any differently by the Keeyask Project than the general population.*”

Given the extensive information gathered and documented for each of the KCNs, information upon which each of the AEAs is based, it is not surprising that the extent of Métis-specific information gathered and documented to date is not adequate to provide an equivalent basis for discussion of an AEA with MMF. The Partnership refers again to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative, and states that “*through this work, there will be a better understanding by all parties regarding Métis current and historical presence in the study area...*”. Further, the results are expected to contribute to a better understanding of how the Keeyask

Project may or may not impact the Métis. Until the studies are complete, however, Manitoba Hydro cannot comment what measures will be taken to address Métis-specific effects.

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs. This identification and assessment of Métis-specific effects is critical to ensure that Métis-specific Project effects are adequately mitigated and that the effectiveness of mitigation can be measured and adjusted, as required.

MMF-IR-025 CEC Rd 2 MMF-0064	<i>Socio-economic Assessment Methods – Effects Monitoring</i>	
EIS Volume #: R to EIS	Chapter/Section #: Chapter 8	Pages #(s): 8-1, 8-3, 8-6, 8-27 to 8-33.
<p><i>EIS Scoping Document Reference:</i> 7.0 Environmental Monitoring, Management and Follow-up. <i>The EIS will describe a preliminary outline of an environmental protection program for monitoring and managing the effects of the Project on the biophysical and socio-economic environments arising from the construction, operation, and decommissioning of the Project. ... The monitoring programs will determine effects of the Project, including: whether they are consistent with the analysis in the environmental impact assessment; whether they assess the effectiveness of remedial measures; and whether they allow for adaptive management and mitigation measures to be implemented if unforeseen impacts occur.</i></p>		
<p><i>CEAA EIS Guidelines Reference:</i> 12.2 Follow-up Program. <i>The EIS shall describe the proposed follow-up program plan in sufficient detail to allow independent judgment as to the likelihood that it will deliver the type, quantity and quality of information required to reliably verify predicted effects (or absence of them) and to confirm both the EA assumptions and the</i></p>		

effectiveness of mitigation.

The EIS must provide the following:

...a description of the roles and responsibilities for the program and its review process, by both peers, Aboriginal groups, and the public...

Preamble

The EIS refers to the Socioeconomic Monitoring Plan (SEMP) that will be developed by the Partnership, with the KCNs playing a central role (R to EIS, Chapter 8.0, p.8-27). In the original IR, the Partnership was asked to explain whether, and how, the Métis will be involved in the development and implementation of the SEMP, given that there are Métis residing in the Local Study Area. The Partnership does not wholly (or satisfactorily) explain why the Métis will not be involved in the development and implementation of the SEMP, but provides a link to the draft SEMP filed with regulators on June 28, 2013.

The original IR also asked how the SEMP will identify unanticipated Métis-specific Project effects. The Partnership responded that to the extent there are Métis (or other Aboriginal residents) in the Local Study Area, they will be included in the assessments of effects of the Project on “people in the Local Study Area” and also “captured in the total and Aboriginal populations (where available) identified for each Local Study Area community.” As such, the Partnership claims that socioeconomic monitoring of Project effects would capture effects to the Métis (and other Aboriginal residents) in the Local and Regional Study Areas. Current plans to monitor Métis-specific Project effects are limited to Employment and Training opportunities, during construction only, to the extent that individuals self-identify as Métis.

The Partnership was then asked if the SEMP (and monitoring of Métis-specific Project effects) would be revised to include monitoring of any Métis-specific Project effects that are identified in the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative. The Partnership responded that it is “...committed to considering any additional information provided through the MMF-led studies...” and is “...committed to further dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available.”

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Detailed and accurate baseline data is necessary in order to test the accuracy of predicted effects and the effectiveness of mitigation measures. Without Métis-specific baseline data, it will be impossible to measure the effects of the project on the Metis community, and there is therefore outstanding concern that these effects will go unmeasured and unmitigated. Presently, with the exception of Employment and Training, there are no plans to monitor potential Métis-specific effects. As a result, and given the lack of Métis-specific baseline data, it is not anticipated that the SEMP will identify Métis-specific effects, nor the effectiveness of existing mitigation in

addressing such effects, such that existing mitigation can be adjusted or new mitigation developed and applied.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

When detailed information is available, the SEMP must be revised to include monitoring of any Métis-specific Project effects.

MMF-IR-026 CEC Rd 2 MMF-0065	<i>Public Involvement</i>	
EIS Volume #: R to EIS Supporting Volume - Public Involvement	Chapter/Section #: Chapter 3, Section 3.4.1.3 Appendix IA – Public Involvement Plan	Pages #(s): p. 3-2, 3-3 p. IA-7
<i>EIS Scoping Document Reference:</i> 3.3.1 – Public Involvement – Aboriginal People. <i>The EIS will describe the consultation and involvement processes with the Keeyask Cree Nations (KCN), other First Nations, and Métis related to the environmental assessment.</i>		
<i>CEAA EIS Guidelines Reference:</i> 7.2 Aboriginal Consultation. <i>The proponent will actively solicit Aboriginal concerns from groups other than the Keeyask Cree Nations during the course of the EA. The proponent will examine opportunities to mitigate the adverse effects of the Project on Aboriginal groups’ current use of lands and resources for traditional purposes and other Aboriginal interests.</i>		

Preamble

The original IR asked how the Métis would have been engaged differently by Manitoba Hydro if they had been defined and considered as “in-vicinity” to the Project. The rationale for this request lies in the apparent distinction, with regard to public involvement, between the KCNs and the Métis residing in the Local Study Area communities. This distinction is evident in the Public Involvement Plan, which is described as applying to “potentially affected Aboriginal people”

but defines these as “beyond the in-vicinity First Nations, other Aboriginal people (First Nation, Métis, and Inuit people) who may be affected by the Project...” (Public Involvement SV, Appendix 1A, p.1A-7). The Partnership does not wholly explain how the Métis would have been engaged differently had they been considered “in-vicinity”, equivalent to the KCNs, and states that the Métis have been provided the same opportunities to participate in the Public Involvement Program as all other residents in the Study Area, including the “in-vicinity” First Nations.

The focus of MMF concerns is not the opportunities made available through the Public Involvement Program, but rather, the two-tiered approach to involvement and assessment that is based on the “in-vicinity” distinction. The MMF is of the opinion that the Public Involvement Program alone is insufficient to identify, document, assess, and mitigate potential Métis-specific Project effects.

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

3.2.2 Economy

MMF-IR-027 CEC Rd 2 MMF-0066	<i>Employment and Training – Educational Attainment</i>	
EIS Volume #: R to EIS	Chapter/Section #: Chapter 6, Section 6.2.3.5.2	Pages #(s): p. 6-144
<i>EIS Scoping Document Reference:</i> 4.2.1 – Economy: “The EIS will describe... ..The regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment,		

unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services).”

5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”

CEAA EIS Guidelines Reference:

8.3.1 Economy. The EIS will describe the following attributes in the relevant study area(s):

- the regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services);
- a profile of key resource use sectors potentially affected by the Project (see Land and Resource Use), with an emphasis on the commercial sectors; and
- cost of living.

PREAMBLE

The Partnership was asked to provide information on the current levels of educational attainment of the Métis population in the Local and Regional Study Area communities. The Partnership responded that to the extent there are Métis (or other Aboriginal residents) in the Local and Regional Study Areas, they will be included in the assessment of effects of the Project “on people” in the Local and Regional Study Areas and also “captured in the total and Aboriginal populations (where available) identified” for each Local Study Area community and the Regional Study Area. The EIS distinguishes between and compares, for example, the KCNs to Northern Aboriginal Residents, the Regional Study Area, and Manitoba (Table 3A-3, Appendix 3A, SE SV), and also compares the Local Study Area communities of Gillam and Thompson to Northern Aboriginal Residents, the Northern Region, and Manitoba, (Tables 3A-8 and 3A-12 respectively, Appendix 3A, SE SV). By contrast, information regarding the educational attainment levels of the Métis population is not provided. This information would be useful to better understand the potential Métis labour force, and would be necessary if the Partnership (or the Métis) intended to monitor and measure changes in the levels of educational attainment for the Métis, particularly if these changes are to be attributed to the Project.

The Partnership was then asked if the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative would be used to gather and document Métis-specific baseline data (including information regarding current levels of educational attainment for the Métis in the Local Study Area), to identify potential adverse and positive Métis-specific effects, and whether the Partnership would develop new, or adjust existing, mitigation as necessary to address such effects. The Partnership responded that it is “...committed to considering any additional information provided through these studies...” and is “...committed to further dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available.”

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs.

As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs. Métis-specific baseline information regarding Educational Attainment must be gathered, presented, and included in the effects assessment.

MMF-IR-028 CEC Rd 2 MMF-0067	<i>Employment and Training – Skills Pertinent to Project Construction Employment</i>	
EIS Volume #: R to EIS	Chapter/Section #: Chapter 6, Section 6.2.3.5.2	Pages #(s): p. 6-145, 6-146
<p><i>EIS Scoping Document Reference:</i></p> <p>4.2.1 – Economy: “The EIS will describe... ..The regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services).”</p> <p>5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment..”</p>		
<p><i>CEAA EIS Guidelines Reference:</i></p> <p>8.3.1 Economy. The EIS will describe the following attributes in the relevant study area(s):</p> <ul style="list-style-type: none"> • the regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services); • a profile of key resource use sectors potentially affected by the Project (see Land and Resource Use), with an emphasis on the commercial sectors; and • cost of living. 		

Preamble

The Partnership was asked to provide information on the current (i.e. proposed construction start of 2014) levels of skills by occupational category, as well as the estimated levels of skills by occupational category for construction end (i.e. 2021) for the Métis population in the Local and Regional Study Area communities.

The Partnership responded that to the extent there are Métis (or other Aboriginal residents) in the Local and Regional Study Areas, they will be included in the assessment of effects of the Project “on people in these Study Areas” and also “captured in the total and Aboriginal populations (where information available) for these Study Areas”. While information is provided for skills by occupational category for the communities of Gillam and Thompson, with each of these compared to Northern Aboriginal Residents, the Regional Study Area, and Manitoba (Tables 3A-9 and 3A-13 respectively, Appendix 3A, SE SV), information regarding levels of skills by occupational category for the Métis population is not provided. This information would be useful to better understand the potential Métis labour force, and would be necessary if the Partnership (or the Métis) intended to monitor and measure changes in the levels of skills and employability of the Métis in the Study Areas, particularly if these changes are to be attributed to the Project.

The Partnership was then asked if the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative would be used to gather and document Métis-specific baseline data (including information on the potential labour force, as well as current levels of skills by occupational category for the Métis in the Local Study Area), to identify potential adverse and positive Métis-specific effects, and whether the Partnership would develop new, or adjust existing, mitigation as necessary to address such effects. The Partnership responded that it is “...committed to considering any additional information provided through these studies...” and is “...committed to further dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available.”

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and

3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs. Métis-specific baseline information regarding levels of skills by occupational category must be gathered, presented, and included in the effects assessment.

MMF-IR-029		<i>Employment and Training – Training Initiative</i>	
CEC Rd 2 MMF-0068			
EIS Volume #: R to EIS Socio-economic Volume	Supporting	Chapter/Section #: Chapter 6, Section 6.2.3.5.2 Section 3.3.1.1	Pages #(s): p. 6-140 Table 3-2, p. 3-20
<p><i>EIS Scoping Document Reference:</i></p> <p>4.2.1 – Economy: “The EIS will describe... ..The regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services).”</p> <p>5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”</p>			
<p><i>CEAA EIS Guidelines Reference:</i></p> <p>8.3.1 Economy. The EIS will describe the following attributes in the relevant study area(s):</p> <ul style="list-style-type: none"> • the regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services); • a profile of key resource use sectors potentially affected by the Project (see Land and Resource Use), with an emphasis on the commercial sectors; and • cost of living. 			

Preamble

The Hydro Northern Training and Employment Initiative (HNTEI) was developed and implemented as a pre-project training initiative to prepare Aboriginal northerners to participate in the construction employment and business opportunities available from northern hydroelectric development (R to EIS, Section 6.2.3.5.2, p.6-140). As a result of the initiative, 91 members of MMF completed courses or programs, out of 149 MMF members enrolled.

In response to the request to provide information on the number of Métis estimated to be employed on the Keeyask Project as a result of participation in this initiative, the Partnership responded that estimates of Métis employment in Keeyask project construction are included in the estimates provided “for Aboriginal residents in the Study Area”. With regard to employment during operations, the Partnership referred to the 2004 Career Development Partnership

(CDP) Program between Manitoba Hydro and the MMF, which aims to have 100 Métis employed in permanent positions by 2014, with 64 Métis presently employed through this program, and states that “it is possible that some of these individuals may be hired into operational jobs at the Keeyask Generation Project.”

In response to Round 2 Follow-up Questions, the Partnership describes measures currently in place that will assist in achieving the goal of 100 Métis permanently employed (i.e. in operations positions) by Manitoba Hydro by 2014. However, with regard to Keeyask project construction employment, the Partnership was asked how Métis employment will be monitored without Métis-specific estimates of participation in Project construction employment. The Partnership responded that Métis employment associated with Keeyask will be monitored during both construction and operation, on the basis of self-declarations made by individuals.

Without estimates (which are different than established targets) of potential Métis participation in Keeyask Project construction employment, there remains a lack of information regarding (a) the potential benefit to Métis employment and employability, and (b) how these effects will be monitored and measured, particularly if they are attributable to the Keeyask Project.

Recommendations

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Métis-specific labour force information be gathered, presented, and included in the effects assessment.

The Partnership provide estimates of potential Métis participation in Keeyask project construction and operations.

MMF-IR-030 CEC Rd 2 MMF-0069	<i>Employment and Training – Labour Force</i>	
EIS Volume #: R to EIS R to EIS	Chapter/Section #: Chapter 6, Section 6.2.3.5.2 Chapter 6, Section 6.6.3.1.1	Pages #(s): p. 6-141, 6-142 p. 6-433
<p><i>EIS Scoping Document Reference:</i></p> <p>4.2.1 – Economy: “The EIS will describe... ..The regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services).”</p> <p>5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”</p>		
<p><i>CEAA EIS Guidelines Reference:</i></p> <p>8.3.1 Economy. The EIS will describe the following attributes in the relevant study area(s):</p> <ul style="list-style-type: none"> the regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional 		

centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services);

- a profile of key resource use sectors potentially affected by the Project (see Land and Resource Use), with an emphasis on the commercial sectors; and
- cost of living.

Preamble

The Partnership was asked to provide information on the potential labour force of the Métis (a) in the Local Study Area communities, equivalent to the potential labour force information documented and presented for the KCNs, Gillam, and Thompson, and (b) in the Regional Study Area. The Partnership responded that to the extent there are Métis (or other Aboriginal residents) in the Local and Regional Study Areas, they will be included in the assessment of effects of the Project “on people” in the Local and Regional Study Areas and also “*captured in the total and Aboriginal populations (where available) identified*” for each Local Study Area community and the Regional Study Area. While information is provided regarding the labour force of residents of each of Gillam and Thompson, with each of these compared to Northern Aboriginal Residents, the Regional Study Area, and Manitoba (Tables 3A-6 and 3A-7 respectively, Appendix 3A, SE SV), Métis-specific labour force information is not provided.

The Partnership was then asked if the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative would be used to gather and document Métis-specific baseline data (including information on the labour force of the Métis in the Local Study Area), to identify potential adverse and positive Métis-specific effects, and whether the Partnership would develop new, or adjust existing, mitigation as necessary to address such effects. The Partnership responded that it is “...committed to considering any additional information provided through these studies...” and is “...committed to further dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available.”

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Lastly, the Partnership was asked whether Métis labour force participation rates in Project employment will be monitored as part of the SEMP. The Partnership responded that Métis employment during both construction and operation of the Keeyask Project will be monitored on the basis of self-declarations made by individuals.

Without Métis-specific baseline information regarding labour force, there is a lack of understanding regarding (a) the potential benefit to Métis employment and employability, and (b) how these effects will be monitored and measured, particularly if they are attributable to the Keeyask Project.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Métis-specific labour force information be gathered, presented, and included in the effects assessment.

MMF-IR-031		<i>Employment and Training – Levels of Employment and Hiring Targets</i>
CEC Rd 2 MMF-0070		
EIS Volume #: R to EIS Socio-economic Supporting Volume	Chapter/Section #: Chapter 6, Section 6.6.3 Section 3 - Economy	Pages #(s): p. 6-434, 6-435 p. 3-98, 3-125
<p><i>EIS Scoping Document Reference:</i></p> <p>4.2.1 – Economy: “The EIS will describe... ..The regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services).”</p> <p>5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”</p>		
<p><i>CEAA EIS Guidelines Reference:</i></p> <p>8.3.1 Economy. The EIS will describe the following attributes in the relevant study area(s):</p> <ul style="list-style-type: none"> • the regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services); • a profile of key resource use sectors potentially affected by the Project (see Land and Resource Use), with an emphasis on the commercial sectors; and • cost of living. 		

Preamble

The EIS provides estimates of project construction employment for the KCNs. In addition, the JKDA includes targets for KCN employment during construction (of the Keeyask Project) as well as during operations (with Manitoba Hydro and not limited to operations of the Keeyask Generation Project). The original IR requested estimates of project employment, during construction and operations, for Métis residing in both the Local and Regional Study Areas. The Partnership responded that to the extent there are Métis (or other Aboriginal residents) in the Local and Regional Study Areas, they will be included in the assessment of effects of the Project “on people in these Study Areas” and also “captured in the total and Aboriginal populations (where information available) for these Study Areas”. The Partnership referred to sections of the EIS that provide estimates of Aboriginal participation in project employment, but estimated levels of participation in project employment, during construction and operations, for the Métis in the Local and Regional Study Areas, is not provided.

The Partnership referred to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative. The Partnership anticipates “...that these studies will assist in understanding the nature of the Métis in the Keeyask area, and any potential effects that may be experienced as a result of developing the Project.” When asked if the results of the studies would also be used gather and document Métis-specific baseline data, including potential labour force data for the Métis in the Local Study Area such that levels of Métis participation in project construction and operations employment could be estimated, and whether the Partnership would develop new, or adjust existing, mitigation as necessary to address such effects, the Partnership responded that it is “...committed to considering any additional information provided through these studies...” and is “...committed to further dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available.”

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

The original IR also asked why no targets were established for Métis participation in construction and operations employment. The Partnership responded, differentiating between the EIS (which does not set employment targets) and the JKDA (which sets employment targets for the KCNs), to explain why no targets are established for Métis participation in construction and operations employment.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Métis-specific labour force information be gathered, presented, and included in the effects assessment.

The Partnership provide estimates of potential Métis participation in Keeyask project construction and operations.

MMF-IR-032 CEC Rd 2 MMF-0071	<i>Employment and Training – Hiring Preferences</i>	
EIS Volume #: R to EIS	Chapter/Section #: Chapter 6, Section 6.6.4.1.1	Pages #(s): p. 6-450
<p><i>EIS Scoping Document Reference:</i></p> <p>4.2.1 – Economy: “The EIS will describe... ..The regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services).”</p> <p>5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”</p>		
<p><i>CEAA EIS Guidelines Reference:</i></p> <p>8.3.1 Economy. <i>The EIS will describe the following attributes in the relevant study area(s):</i></p> <ul style="list-style-type: none"> • <i>the regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services);</i> • <i>a profile of key resource use sectors potentially affected by the Project (see Land and Resource Use), with an emphasis on the commercial sectors; and</i> • <i>cost of living.</i> 		

Preamble

To address potential in-migration to, and crowding in, the Local Study Area communities, KCN Members will qualify for Project hiring preferences “...regardless of their home address within the province of Manitoba...” (R to EIS, Section 6.6.4.1.1, p. 6-450) and as such, would not need to move to communities in the Local Study Area. This measure has implications for the Métis in terms of hiring preferences, and the Partnership was asked whether KCN Members residing outside the Local Study Area would be given employment preference to equally qualified Métis

residing within the Local Study Area. The Partnership responded that, for open-tendered contracts, KCN Members residing in Manitoba and Northern Aboriginal Residents (including Métis) residing in the Regional Study Area both fall within the first hiring preference, and would be selected on the basis of their qualifications.

As a result of the Direct Negotiation Contracts (DNCs), each KCN is entitled to give first preference to its own members. The Partnership confirmed that DNCs are a provision of the JKDA for the KCN partners only, and as such, will not be extended to the MMF.

Concerns remain regarding the extent of Métis participation in project employment, particularly for those Métis residing in the Local Study Area.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Métis-specific labour force information be gathered, presented, and included in the effects assessment.

The Partnership provide estimates of potential Métis participation in Keeyask project construction and operations.

MMF-IR-033 CEC Rd 2 MMF-0072	<i>Business Opportunities</i>	
EIS Volume #: R to EIS R to EIS	Chapter/Section #: Chapter 6, Section 6.2.3.5.2 Chapter 6, Section 6.6.3.2	Pages #(s): p. 6-146 p. 6-438 to 6-442
<i>EIS Scoping Document Reference:</i> 4.2.1 – Economy: “The EIS will describe... ..The regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services).”		

5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”

CEAA EIS Guidelines Reference:

8.3.1 Economy. The EIS will describe the following attributes in the relevant study area(s):

- the regional economy, in particular local Aboriginal and non-Aboriginal communities and the regional centre, with an emphasis on the labour force, employment, unemployment, income, and education and training, and with a profile of local business capacity (e.g., goods and services);
- a profile of key resource use sectors potentially affected by the Project (see Land and Resource Use), with an emphasis on the commercial sectors; and
- cost of living.

Preamble

The EIS presents information about the capacity of existing businesses to participate in opportunities that may arise from the Project, and concludes that “...the majority of business opportunities in the Local Study Area are expected to flow to the KCNs through DNCs” (R to EIS, Section 6.6.3.2, p. 6-439).

The original IR requested that the Partnership describe the efforts that were undertaken to determine the presence and capacity of Métis-owned businesses in the Local Study Area communities and the Regional Study Area that could participate in opportunities to supply services to the Project, and further, to provide information on the number of Métis-owned businesses that provide goods or services needed by the project, and an estimate of the extent to which such businesses could anticipate providing such goods and services to the Project. The Partnership responded that the baseline analysis of businesses in the Local Study Area included Aboriginal and non-Aboriginal businesses. Information on Métis-owned businesses has therefore not been gathered and documented, and is not provided. Further, as business opportunities available to the Métis will be contracted via an open tender process. The Partnership confirmed that DNCs are a provision of the JKDA for the KCN partners only, and as such, will not be extended to the Métis.

Without information on Métis-owned businesses, there is a lack of understanding regarding (a) the potential benefit to Métis businesses, and (b) how these effects will be monitored and measured, particularly if they are attributable to the Keeyask Project. The Partnership referred to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative. The Partnership anticipates “...that these studies will assist in understanding the nature of the Métis in the Keeyask area, and any potential effects that may be experienced as a result of developing the Project.” When asked if the results of the studies would also be used gather and document Métis-specific baseline data, including information on potential and existing Métis-owned businesses, the Partnership responded that it is “...committed to considering any additional information provided through these studies...” and is “...committed to further dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available.”

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Baseline information regarding Métis-owned businesses be gathered, presented, and included in the effects assessment.

3.2.3 Population, Infrastructure and Services

MMF-IR-034		<i>Population</i>	
CEC Rd 2 MMF-0073			
EIS Volume #:	Chapter/Section #:	Pages #(s):	
R to EIS	Chapter 6, Section 6.2.3.5.3	p. 6-148 to 6-151	
R to EIS	Chapter 6, Section 6.6.4.1	p. 6-449 to 6-451	
Socio-economic Supporting Volume	Section 4 – Population, Infrastructure and Services	p. 4-34, 4-97	
<i>EIS Scoping Document Reference:</i>			
4.2.2 – Population, Infrastructure, and Services: “The EIS will describe the following attributes in the relevant study area(s): Existing population distribution and demographics, ...”			
5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”			
<i>CEAA EIS Guidelines Reference:</i>			
8.3.2 Population, Infrastructure, and Services. The EIS will describe the following attributes in the relevant study area(s):			
<ul style="list-style-type: none"> • existing population distribution and demographics; including for each of the Aboriginal groups, and 			

Preamble

Using Statistics Canada 2006 Census data, the EIS provides the populations of (1) the KCNs combined, including on- and off-reserve Members, (2) Gillam, and (3) Thompson. The EIS also provides population projections to understand population growth both with and without the project. While the EIS provides the percentages of the self-identified Aboriginal population in each of Gillam and Thompson, it does not present information regarding the Métis population in the Local Study Area communities or the distribution of the Métis population in the Local and Regional Study Areas. As population is “*a supporting topic that leads to an understanding of changes to housing, infrastructure and services*”, Métis-specific population information would contribute to a better understanding of how the Métis residing in the Local Study Area communities might experience impacts as a result of changes in population. The original IR requested the Partnership to provide estimates of the Métis population in the Local and Regional Study Area communities. Estimates of Métis population in the Local Study Area communities and Regional Study Area have not been provided. The Partnership responded that to the extent there are Métis (or other Aboriginal residents) in the Local and Regional Study Areas, they will be included in the assessment of effects of the Project “*on people*” in these Study Areas, and also “*captured in the total and Aboriginal populations (where information available)*” for these Study Areas.

The Partnership referred to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative. The Partnership anticipates “*...that these studies will assist in understanding the nature of the Métis in the Keeyask area, including overall population, and any potential effects that may be experienced as a result of developing the Project.*” When asked if the results of the studies would also be used to reassess potential impacts on Métis in the Local and Regional Study Areas, and to identify new, or adjust existing, mitigation as required, the Partnership responded that it is “*...committed to considering any additional information provided through these studies...*” and is “*...committed to ongoing dialogue with the MMF so that it can determine how best to incorporate this new information into planning and development processes for the Keeyask Generation Project, once it is available.*”

Even with the recently agreed upon work plan and budget for the Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative, these studies are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

- I. Summarize available baseline and identify gaps in the existing baseline;

2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Baseline information regarding Métis population in the Local Study Area communities and Regional Study Area be gathered, presented and included in the effects assessment.

MMF-IR-035 CEC Rd 2 MMF-0074	<i>Housing</i>	
EIS Volume #: R to EIS R to EIS	Chapter/Section #: Chapter 6, Section 6.2.3.5.3 Chapter 6, Section 6.6.4.2	Pages #(s): p. 6-152, 6-153 p. 6-453 to 6-455
<i>EIS Scoping Document Reference:</i> 4.2.2 – Population, Infrastructure, and Services: “The EIS will describe the following attributes in the relevant study area(s): Existing infrastructure and services of Aboriginal and other in-vicinity communities, including... ...housing/accommodation supply...” 5.1 – Project Effects: “Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”		
<i>CEAA EIS Guidelines Reference:</i> 8.3.2 Population, Infrastructure, and Services. The EIS will describe the following attributes in the relevant study area(s): <ul style="list-style-type: none"> • existing infrastructure and services of Aboriginal and other communities, in vicinity including: <ul style="list-style-type: none"> ○ housing/accommodation supply; 		

Preamble

The EIS predicts the residual effects of Project construction on housing in the KCNs communities, Gillam, and Thompson to be adverse, in terms of the demand that will be created for housing, particularly temporary housing, during construction, and in the context of current levels of housing availability (R to EIS, Section 6.6.4.2, p. 6-453).

As there are Métis residing in the Local Study Area communities, it is necessary to understand how adverse impacts on housing during construction might be experienced by the Métis. (To understand the magnitude of this impact, it is necessary to understand the size of the Métis populations in the Local Study Area communities. MMF-IR-034 requested the Partnership to provide an estimate of the Métis populations in the Local Study Area communities). The original IR requested the Partnership to (a) predict how the Métis population in the Local Study Area communities, particularly Gillam, could be anticipated to experience adverse effects on the availability of housing during construction, and (b) identify measures to address the potential

Métis-specific adverse effects on housing, and the party or parties responsible for their implementation.

The Partnership responded that increased demand for housing in Gillam and Thompson would be limited to short-term demand by the Project labour force requiring temporary accommodation, and that to the extent there are Métis (or other Aboriginal residents) in the Local Study Area, they will be included in the assessment of effects of the Project “*on people in the Local Study Area*”.

The Partnership also referred to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative. Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

As there are Metis residing in the communities in the study area (i.e. Thompson and Gillam), there are still outstanding concerns that they will directly experience the predicted adverse effects on housing, both cost and availability. Further, the lack of Metis-specific effects assessment results in concerns that these effects will go unmitigated, and will not be captured in follow-up programs as presently planned.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Information regarding effects on the availability and affordability of housing in the Local Study Area communities, particularly in Thompson and Gillam, and particularly as these effects might be experienced by the Métis, be gathered, presented, and included in the effects assessment.

MMF-IR-036 CEC Rd 2 MMF-0075	<i>Infrastructure and Services</i>	
EIS Volume #: R to EIS R to EIS	Chapter/Section #: Chapter 6, Section 6.2.3.5.3 Chapter 6, Section 6.6.4.3	Pages #(s): p. 6-153 to 6-156 p. 6-455 to 6-459
<p><i>EIS Scoping Document Reference:</i></p> <p>4.2.2 – Population, Infrastructure, and Services: <i>“The EIS will describe the following attributes in the relevant study area(s): Existing infrastructure and services of Aboriginal and other in-vicinity communities...”</i></p> <p>5.1 – Project Effects: <i>“Based on the description of the Project... ..and the existing environment... ..the EIS will identify the effects of the Project on the environment...”</i></p>		
<p><i>CEAA EIS Guidelines Reference:</i></p> <p>8.3.2 Population, Infrastructure, and Services. <i>The EIS will describe the following attributes in the relevant study area(s):</i></p> <p><i>existing infrastructure and services of Aboriginal and other communities, in vicinity including:</i></p> <ul style="list-style-type: none"> ○ <i>housing/accommodation supply;</i> ○ <i>water and sewer infrastructure;</i> ○ <i>transportation infrastructure;</i> ○ <i>education;</i> ○ <i>emergency services;</i> ○ <i>social services; and</i> ○ <i>public health infrastructure and health and social services that may be relied upon during Project construction and operation.</i> 		

Preamble

The EIS describes existing infrastructure and service delivery in the KCNs, Gillam and Thompson (R to EIS, Section 6.2.3.5.3, p. 6-153 to 6-156), and predicts residual effects of Project construction on the infrastructure and services of the Local Study Area communities to be adverse (R to EIS, Section 6.6.4.3, p. 6-458). To address adverse effects, mitigation measures are provided for Local Study Area communities (R to EIS, Section 6.6.4.3, p. 6-458). As well, new infrastructure and services are included in the AEAs negotiated between each of the KCNs and Manitoba Hydro (R to EIS, Section 6.6.4.3, Table 6-45, p.6-457).

As there are Métis residing in the Local Study Area communities, it is necessary to understand how adverse impacts on infrastructure and service delivery might be experienced by the Métis in those communities. (To understand the magnitude of this impact, it is necessary to understand the size of the Métis populations in the Local Study Area communities. MMF-IR-034 requested the Partnership to provide an estimate of the Métis populations in the Local Study Area communities). The original IR requested the Partnership to (a) predict how the Métis in the Local Study Area communities, particularly Gillam, might be anticipated to experience adverse effects on infrastructure and services during construction, and (b) identify measures to address the potential Métis-specific adverse effects on infrastructure and services, and the party or parties responsible for their implementation.

The Partnership responded that to the extent there are Métis (or other Aboriginal residents) in the Local Study Area, they will be included in the assessment of effects of the Project “on people

in the Local Study Area”, and further, that appropriate mitigation and monitoring measures it believes are appropriate are identified and included in the EIS.

The Partnership also referred to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative.

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

As there are Metis residing in the communities in the study area (i.e. Thompson and Gillam), there are still outstanding concerns that they will directly experience adverse effects as a result of increased demand on existing infrastructure and services. Further, the lack of Metis-specific effects assessment results in concerns that these effects will go unmitigated, and will not be captured in follow-up programs as presently planned.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Information regarding effects on Infrastructure and Services in the Local Study Area communities, particularly in Thompson and Gillam,, and particularly as these might be experienced by the Métis, be gathered, presented, and included in the effects assessment.

3.2.4 Personal, Family, and Community Life

MMF-IR-037	<i>Personal, Family, and Community Life – Mitigation of Effects</i>	
CEC Rd 2 MMF-0076		
EIS Volume #:	Chapter/Section #:	Pages #(s):

R to EIS	Chapter 6, Section 6.6.5.1 – Governance, Goals and Plans	p. 6-465 to 6-468
R to EIS	Chapter 6, Section 6.6.5.2 – Community Health	p. 6-468 to 6-473
R to EIS	Chapter 6, Section 6.6.5.3 – Mercury and Human Health	p. 6-473 to 6-478
R to EIS	Chapter 6, Section 6.6.5.6 – Culture and Spirituality	p. 6-490 to 6-497
<p><i>EIS Scoping Document Reference:</i> 4.2.3 – Personal, Family and Community Life: <i>The EIS will describe the following attributes in the relevant study area(s): public safety; travel, access and safety; aesthetics; health status and health issues; culture and spirituality; governance, goals and plans.</i></p>		
<p><i>CEAA EIS Guidelines Reference:</i> 8.3.3 Personal, Family and Community Life. <i>The EIS will describe the following attributes in the relevant study area(s):</i></p> <ul style="list-style-type: none"> • <i>public safety;</i> • <i>travel, access and safety;</i> • <i>aesthetics;</i> • <i>health status and health issues;</i> • <i>culture and spirituality; including for each of the Aboriginal groups, and</i> • <i>governance, goals and plans.</i> 		

Preamble

Some of the VECs used to assess the effects of the Project on personal, family and community life in the Local Study Area include (1) Governance, Goals and Plans, (2) Community Health, and (3) Mercury and Human Health. In the discussion in the EIS for each of the VECs, there is no identification or description of the Project effects on the Métis in the Local Study Area communities. The original IR asks the Partnership to explain how adverse impacts (on personal, family and community life VECs) on the Métis population residing in the Local Study Area communities will be (a) identified, and (b) managed, particularly in the absence of an AEA (and mitigation and offset programs included in the AEA) between Manitoba Hydro and the Métis.

With regard to the identification of effects, the Partnership referred to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative.

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

As there are Metis residing in the communities in the study area (i.e. Thompson and Gillam), there are still outstanding concerns that they will directly experience adverse effects as a result

of increased demand on existing infrastructure and services. Further, the lack of Metis-specific effects assessment results in concerns that these effects will go unmitigated, and will not be captured in follow-up programs as presently planned. In terms of the management of effects, the Partnership confirms that there are no mitigation or offsetting programs that apply only to the Métis, but all people (including Métis) resident in the Local Study Area “...are included in mitigation programs that are not restricted to specific group.”

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Information regarding effects on Personal, Family, and Community Life VECs be gathered, presented, and included in the effects assessment.

3.2.5 Resource Economy

MMF-IR-039 CEC Rd 2 MMF-0077	<i>Resource Economy</i>	
EIS Volume #: R to EIS	Chapter/Section #: Chapter 6, Section 6.6.3.5 – Resource Economy	Pages #(s): p. 6-446 to 6-449

Preamble

The EIS evaluates the effects of the Project on the “cash and in-kind income and livelihood” of resource users in the KCNs communities, and concludes that these are expected to be neutral during construction and operations as a result of mitigation. “Losses of in-kind income from reduced domestic resource use in the vicinity of the Project are expected to be mitigated by the AEA offsetting programs that provide access to resource harvesting at alternative and unaffected locations as well as to healthy fish for consumption in communities” (R to EIS, Section 6.6.3.5.1, p.6-447).

The EIS does not include an assessment of the impacts of the Project on the resource economy (i.e. the cash and in-kind income and livelihood) of the Métis. Despite the fact that there are Métis residing in the Local Study Area, the Métis were not identified as a distinct Aboriginal group in the Local Study Area, and Métis-specific effects have not been identified and assessed. There is thus concern that they will go unmitigated. The Partnership is relying on the AEA's to mitigate impacts to the KCNs, which has implications for the Métis, with whom Manitoba Hydro has not negotiated an AEA. As such, no mitigation is in place to address the adverse economic effects anticipated by the Métis as a result of changes in their resource use.

The original IR (MMF Rd 1 IR 039) asked the Partnership to explain what information was used to arrive at the conclusion that "...there is no evidence to date of effects on members of the Manitoba Métis Federation..." particularly in the absence of studies identifying the effects of the Project on resource use by the Métis. The Partnership did not wholly respond to the question (MMF Rd 2 IR 077), but referred to the recent agreement between MMF and MH on a workplan and budget to undertake a Métis-specific TLUKS, Socioeconomic Impact Assessment and historical narrative.

Even with the recently agreed upon work plan and budget for the Métis-specific studies, these efforts are not comparable to the assessment and evaluation processes provided to the KCNs. As a result, it is anticipated that the outcomes of the Métis-specific studies will, understandably, be limited scope and depth, in comparison to the assessment opportunities and studies undertaken by the KCNs.

The original IR also asked the Partnership how impacts on the resource economy of the Métis will be identified and managed, particularly in the absence of an AEA with the Métis, and the lack of mitigation and offset programs that are included in the AEA's. In follow-up questions, the Partnership was asked whether it intended to negotiate an AEA with the Métis to mitigate and offset impacts, including those on the resource economy. The Partnership responded that it cannot be confirmed at this time whether an AEA will be entered into with the MMF. As the Métis were not identified as a distinct Aboriginal group in the Local Study Area, and not provided equivalent opportunities for involvement in the assessment process, Métis-specific effects have not been identified and assessed and there is concern that they will go unmitigated.

Recommendations

The work plans and budgets for the MMF-led TLUKS, Socioeconomic Impact Assessment and historical narrative be considered preliminary in scope, budget, and content. With regard to the socioeconomic assessment, within the limits of the current budget and schedule, the study has been used to:

1. Summarize available baseline and identify gaps in the existing baseline;
2. provide a preliminary description of some of the potential impacts of the Keeyask Project as these may be experienced by the Métis in the vicinity of the Project; and
3. outline the extent of time and effort that would be required to fill the gaps in the existing baseline, as well as the steps required for a more extensive assessment (including mitigation) of potential Métis-specific effects.

The Partnership undertake an effects assessment of the Project on the Metis as a distinct Aboriginal group, as required by the EIS Scoping Document. This assessment should be undertaken in collaboration with the MMF in order to properly understand the significance of the effects to the Metis community, similar to the assessment process undertaken with KCNs.

Information regarding Métis-specific Project effects on the Resource Economy be gathered, presented, and included in the effects assessment.

4.0 Closure

The review of the socioeconomic components of the EIS for the Keeyask Generation Project reported herein presents the conclusions arrived at by MSES. Given our comments herein, we hope to gain further clarification on several details of the EIS to facilitate future deliberations by the MMF about the rigor of predictions and the ability of validating the predictions and effectively mitigating impacts of the Project on Métis traditional livelihoods.

5.0 Literature Cited

Burns, D. A. & G.B. Wiersma. 2004. Conceptual basis of environmental monitoring systems: a geospatial perspective. In: Environmental monitoring (Ed. by Wiersma, G. B.), pp. 1-35. Boca Raton, Florida: CRC Press.

Canadian Environmental Assessment Agency (CEAA). 2009. Operational Policy Statement, Adaptive Management Measures under the *Canadian Environmental Assessment Act*. © Her Majesty the Queen in Right of Canada, 2009. Catalogue No.: 978-1-100-12062-1; ISBN: En106-83/2009E-PDF

Clean Environment Commission (CEC). 2013. Report on Public Hearing – Bipole III Transmission Project June 2013.

Government of Canada. 2003. A Framework for the Application of Precaution in Science based Decision Making about Risk. Privy Council Office, Government of Canada, Ottawa, ON, 2003. National Library of Canada. ISBN 0-662-67486-3; Catalogue number CP22-70/2003

Keeyask Hydropower Limited Partnership (KHLP). 2011. Scoping Document for the Environmental Assessment of the Keeyask Generation Project. December 2011.

Keeyask Hydropower Limited Partnership (KHLP). 2013a. Keeyask Generation Project Environmental Impact Statement. Responses to Information Requests – CEC, Round 1. July 2013.

Keeyask Hydropower Limited Partnership (KHLP). 2013b. Keeyask Generation Project Environmental Impact Statement. Responses to Information Requests – CEC, Round 2. August 2013.

Morrison-Saunders and Arts. 2004. Assessing Impacts, Handbook of EIA and SEA Follow-up. Erthscan