



Ungulate Information Gaps: Keeyask Generation Project

Presentation to the Manitoba Clean Environment Commission

Presentation

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On Behalf of Manitoba Metis Federation

Topics: overview

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Significance of impacts from a Metis perspective needs to be determined.

Uncertainty surrounding predicted Project and regional impact on caribou herds.

Inadequate mitigation of Project impacts on moose.

Need additional information to understand effectiveness of mitigation measures for ungulates.

Topic: Significance of Impact

Key Findings:

Regulatory Significance: “... in accordance with the EIS Guidelines. It does not indicate that the regulators agree in advance with what is submitted...”

Do the Metis agree in advance with the criteria used for determining significance?

“There is an implicit need to identify...tolerance for risks...” (GoC 2003)

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Topic: Significance of Impact

Key Findings:

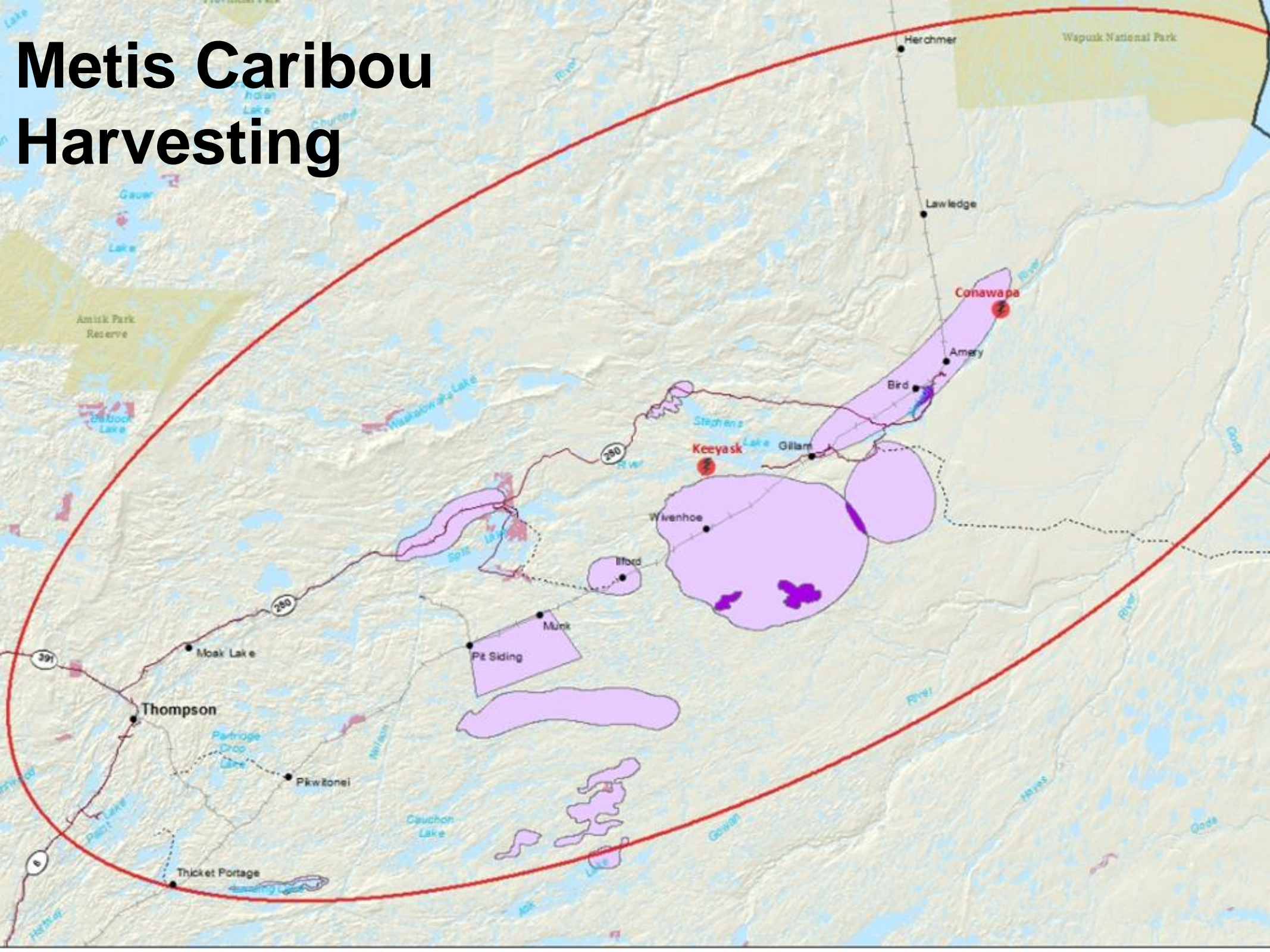
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Regulatory significance may not present a transparent picture of potential impacts.

Significance should be determined with Metis input.

Metis Caribou Harvesting



Topic: Summer Resident Caribou

Key Findings:

Calving and rearing habitat model development and validation is unclear.

- Is island size important or not?

Habitat availability may be overestimated >
Impacts may be underestimated > Uncertainty in impact predictions > Uncertainty in effectiveness of mitigation.

Need clarification on analyses.

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Topic: Summer Resident Caribou

Key Findings:

Power analysis shows data insufficient for monitoring calving and rearing habitat use

- Significant changes in habitat use not detected 1/3 of time.
- Risk that some project impacts will not be detected > Adaptive management may not be triggered > Impacts could go unmitigated.

Additional baseline data required.

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Topic: Summer Resident Caribou

Key Findings:

Population may or may not have stable or positive growth with the Project based on intactness measure.

- Intactness – degree of subdivision of habitat
- Methods from Environment Canada Recovery Strategy (2012)

High uncertainty in impact prediction.

Need to understand Metis tolerance of risk.

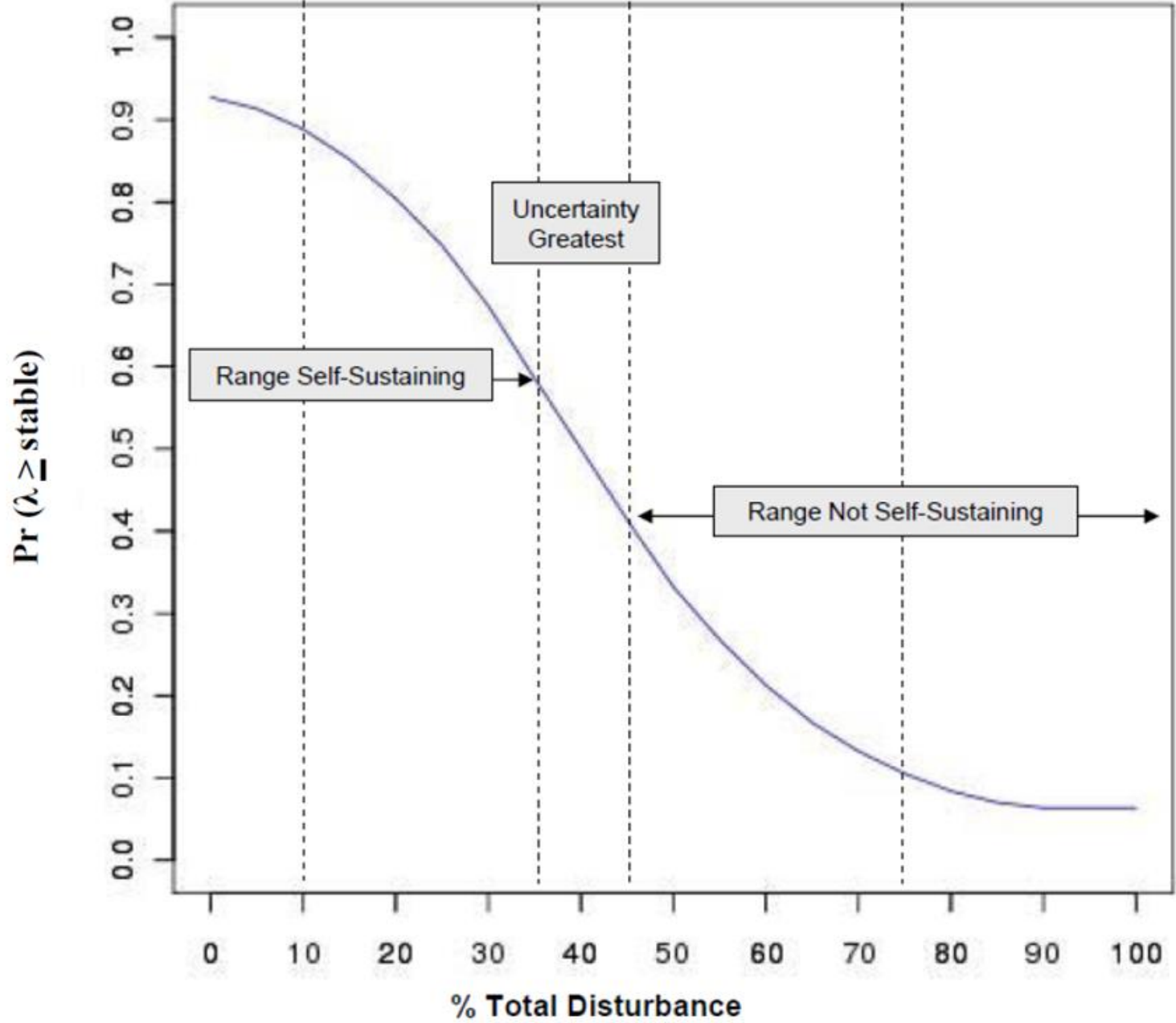
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RISK	Very Low	Low	Moderate	High	Very High
LIKELIHOOD	Very Likely	Likely	As Likely as Not	Unlikely	Very Unlikely

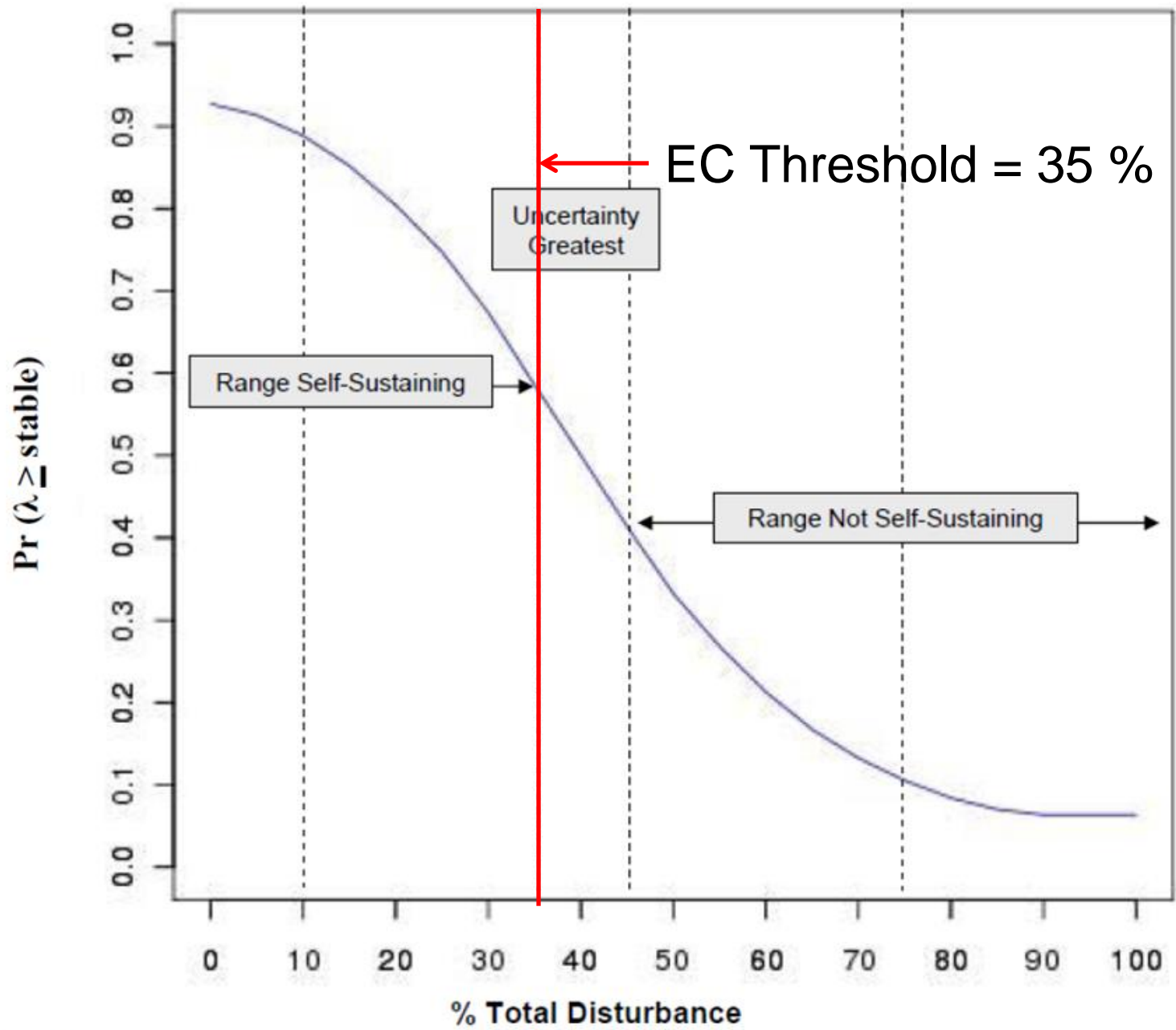


MANAGEMENT SCENARIO	Conservation	Restoration
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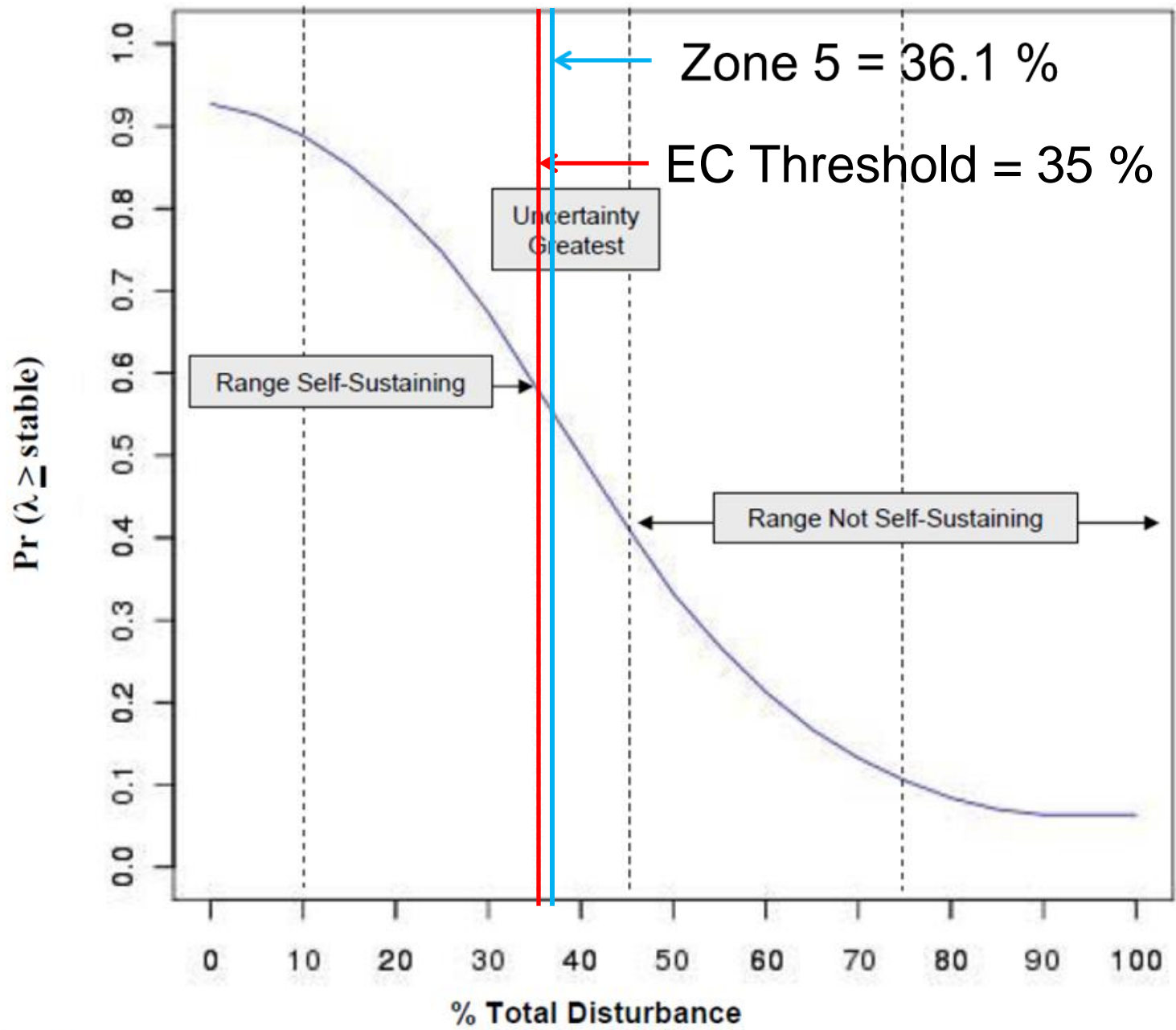


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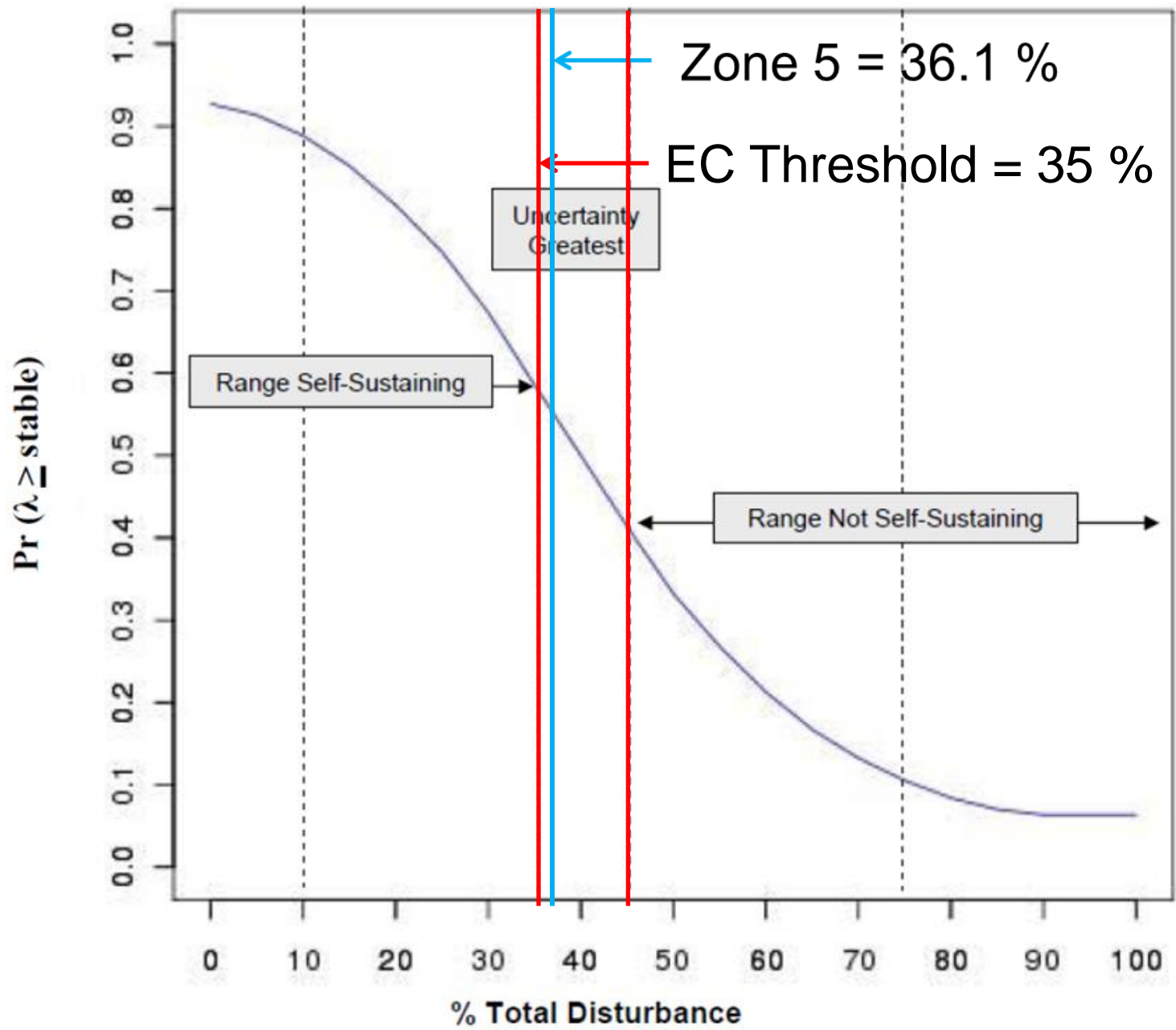
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MANAGEMENT SCENARIO	Conservation	Restoration
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Topic: Summer Resident Caribou

Key Findings:

Knowledge not available now for development of effective mitigation measures

- Assume caribou will cross transmission lines.
- Acknowledge avoidance poorly understood.
- Need results of long-term monitoring (Scurrah and Schindler 2012).
- Need status of caribou management initiatives.
- Need to understand Metis tolerance of risk.

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Topic: Summer Resident Caribou

Key Findings:

EIS Benchmarks	Concerns
Calving and Rearing Habitat for Summer Resident Caribou	Baseline data insufficient
	Model development and validation unclear.
Linear Features	Extent of summer resident caribou avoidance of linear features not well understood
Intactness	May or may not be sustainable (<65% undisturbed remains)
	Mortality tolerance of population unknown

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Topic: Caribou

Key Findings:

Uncertain if local caribou distribution/abundance returned to pre-disturbance conditions.

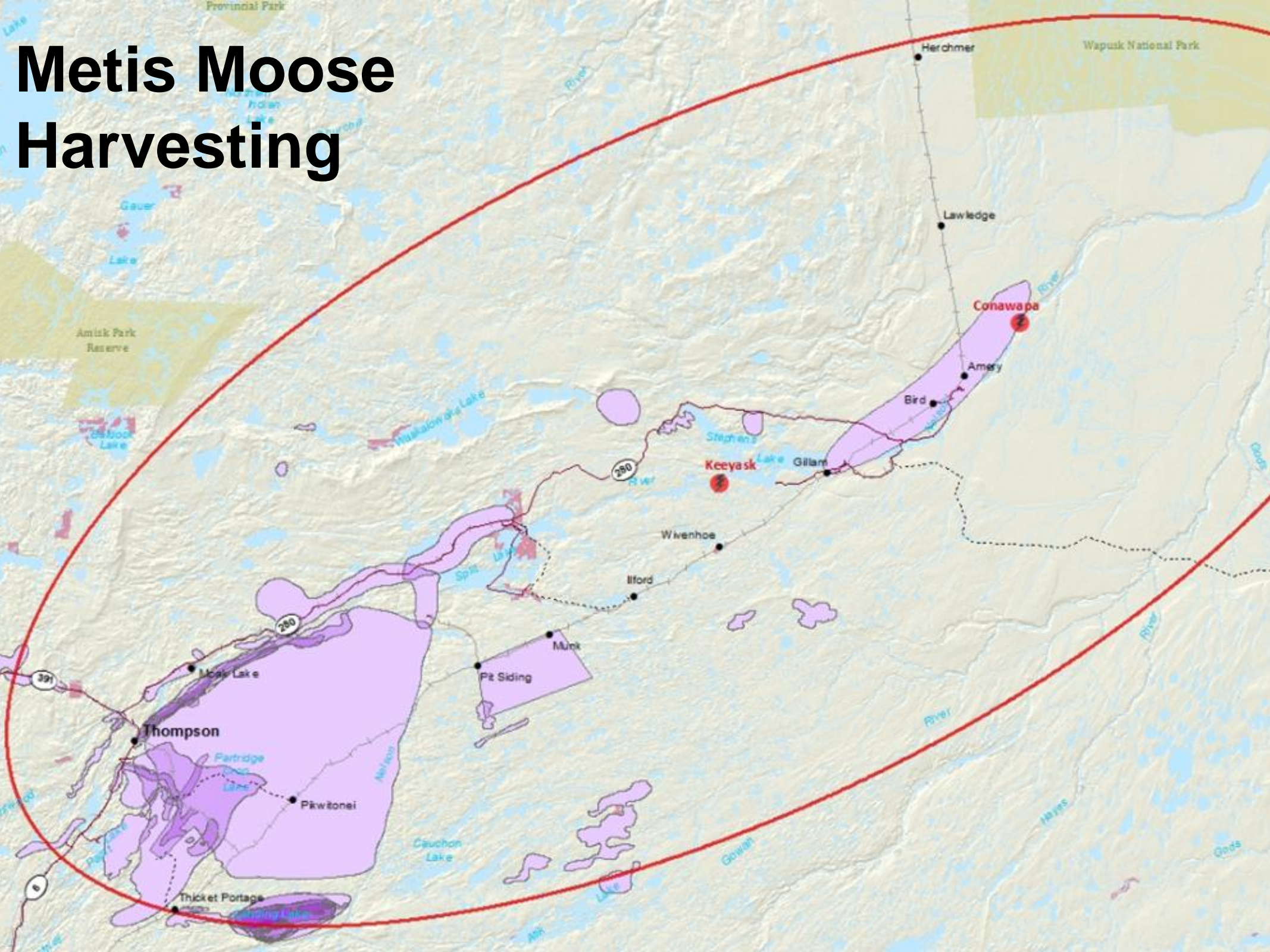
Expectations that caribou will return to Project area in long-term not well supported.

Reliant on future monitoring to reduce uncertainty.

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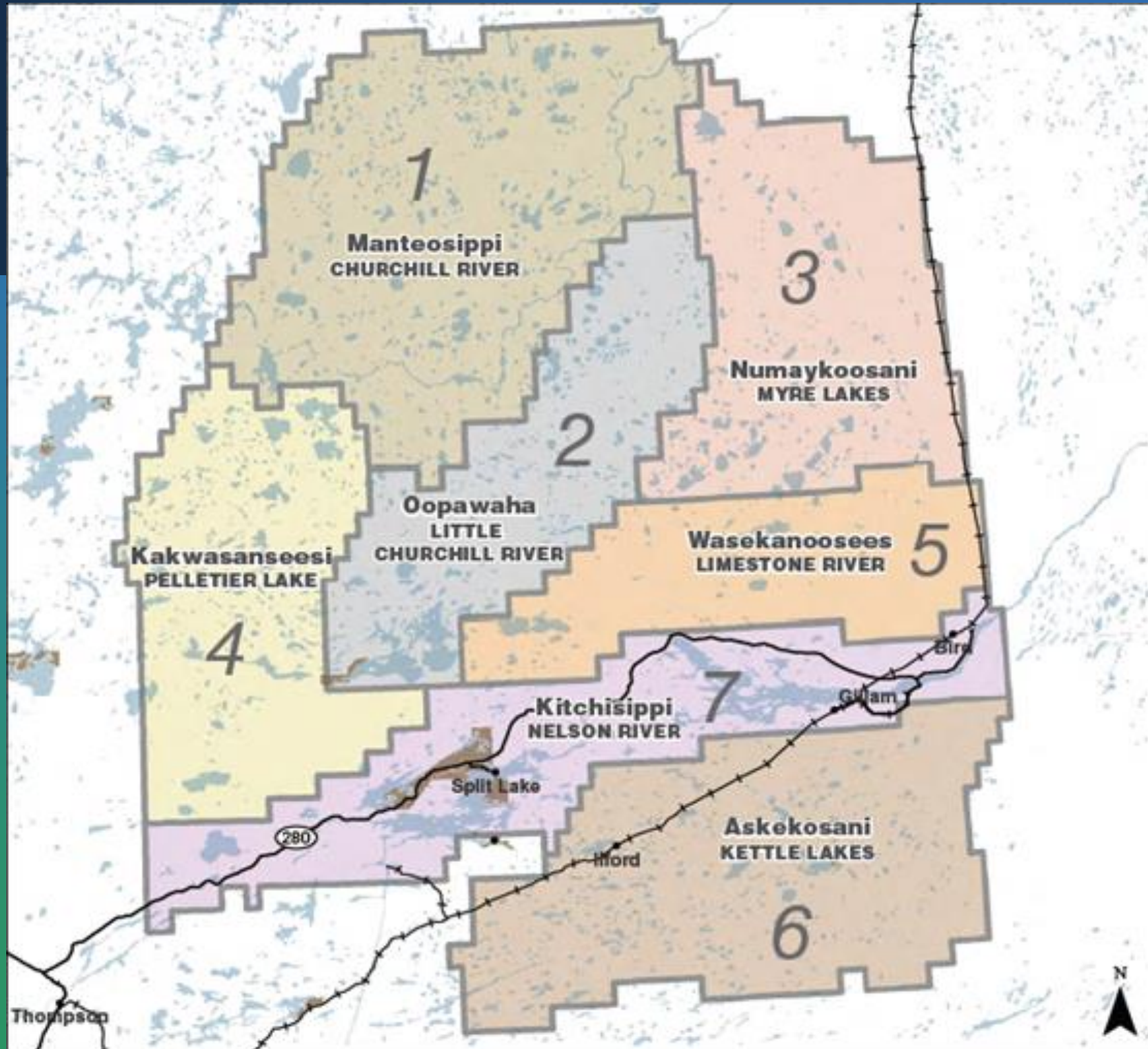
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Metis Moose Harvesting



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Topic: Moose

Key Findings:

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Metis moose harvest information needs to be incorporated into Moose Harvest Sustainability Plan.

- Harvest underestimated > overestimate sustainable harvest > unintentional overharvest.

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Habitat		Planned Fish Egress Channel
Habitat		Potential Bird Island Habitat
geon Habitat		Potential High Quality Wetlands
Habitat		Keeyask Principal Structures
ye Spawning Habitat		Initial Flooded Area (159 m)

**Biophysical Environmental
Mitigation Areas
General Locations**

Topic: Moose

Key Findings:

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Mitigation needed to mitigate impact of roads on moose – off-system marsh

- Need signage,
- lower night-time speed limits,
- monitoring.

Topic: Ungulates

Key Findings:

Support CEC recommendation from Bipole III hearing:

“Manitoba Hydro, in cooperation with the Manitoba Government, conduct a Regional Cumulative Effects Assessment for all Manitoba Hydro projects and associated infrastructure in the Nelson River subwatershed; and that this be undertaken prior to the licensing of any additional projects in the Nelson River subwatershed after the Bipole III Project.”

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Topic: Follow-up and Monitoring

Key Findings:

Mitigation and monitoring strategies still undetermined.

Not available yet:

- *Terrestrial Mitigation Implementation Plan*
- *Keeyask Vegetation Rehabilitation Plan*

MCWS mitigation – not described for roads (operations), during reservoir clearing and blasting.

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Topic: Follow-up and Monitoring

Key Findings:

Not clear if Metis will have opportunity to develop community-specific ATK monitoring program similar to Keeyask Cree Nations.

CEAA operational policies require:

- Metis should be involved in the design and implementation of a follow-up program.
- Metis should contribute to the planning, design and implementation of adaptive management.
- Important to understand communities interests.

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Thank-you.