

**Presentation to  
Manitoba Clean Environment Commission  
Keeyask Hearing**

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[Check against delivery]

My name is Will Braun. I work for the Interchurch Council on Hydropower, on whose behalf I am presenting. Thank you for the chance to be part of this hearing.

The purpose of the Interchurch Council on Hydropower is to monitor the situation at the northern end of the transmission lines and to advocate for fair treatment of lands and people affected by the Manitoba Hydro system.

Our council includes official representatives of the Catholic, Lutheran, Mennonite and United churches. These are also our funders. We also have unofficial representatives from the Anglican church.

Our work is rooted in a 40-year history of interchurch involvement in hydro issues.

We are entirely non-partisan. We have no direct financial or political stake in hydropower. We speak only as citizens and users of electricity.

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I will make four main points. These points will stretch the terms of reference you have been given. My fourth point will argue that such stretching is essential.

I will provide specific recommendations along the way.

First point: Keeyask, if built, would not be an isolated, stand-alone project and should not be reviewed as such. The northern hydropower system is designed and operated as a single integrated whole. Keeyask would plug directly into that larger system.

It would rely directly on Churchill River Diversion (CRD). This massive project redirects three quarters of the flow of Manitoba's second largest river through a

man-made channel and along a diversion route into the Nelson River, a few hundred kilometres away, where Keeyask would be situated.

According to the Manitoba Hydro website, CRD "increases the power producing potential of the lower Nelson [River] by as much as 40 percent."

Up to 40 percent of the water flowing through Keeyask would be from the Churchill River.

The storage capacity in Southern Indian Lake, part of the diversion scheme, would also benefit Keeyask, as the battery-like storage of water is a key element of Manitoba's hydro system.

Keeyask would likewise rely directly on Lake Winnipeg Regulation which alters flows on the Nelson River system, and it would benefit from the Cedar Lake Reservoir.

Churchill River Diversion, Lake Winnipeg Regulation and the Cedar Lake Reservoir are integral aspects of the proposed Keeyask project. All the modelling of Keeyask functioning and viability most surely incorporates these projects.

Keeyask is not so much a *new dam* as an *expansion* of the existing hydro system. It is an expansion of Churchill River Diversion and Lake Winnipeg Regulation.

To assess its environmental impact in presumed isolation is to defy reality.

Of course, this argument approaches the realm of regional cumulative effects assessment, to which I will return in my conclusion.

So my first point is that Keeyask would plug directly into the larger hydro system.

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Second point: that system is an environmental mess. Manitoba Hydro's northern system causes severe, widespread and ongoing ecological damage.

Manitoba Hydro's operations dramatically and, in many cases, drastically alter the four largest rivers in the province: the Nelson, the Churchill, the Winnipeg and the Saskatchewan. Hydro operations also affect three of the five largest lakes in the province: Lake Winnipeg, Southern Indian Lake and Cedar Lake.

Many smaller rivers and lakes are also affected.

Last year we sent a photographer—Matthew Sawatzky—and a Cree elder—Ellen Cook, a member of Misipawistik Cree Nation and the co-chair of our council—to four hydro-affected communities. I want to share 10 of the photos they gathered.

[photos]

Keeyask is an expansion of the system depicted here. It cannot be isolated from the rest of the system or from the damage. These would be, in a sense, the impacts of Keeyask.

We recommend that you visit these waterways, if you have not already. Spend a few days out on the water—not just in the communities—Southern Indian Lake, the Churchill River below Missi Falls, Split Lake, Sipiwesk Lake, Cedar Lake.

Give the environment itself a first hand voice in this process.

You are the Manitoba Clean Environment Commission. It would seem very unusual, in our view, for you to make determinations about hydropower in Manitoba without first hand experience of the waterways in question.

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Third point: the hydro narrative in Manitoba largely ignores the environmental reality that I have just shown you.

The popular narrative as we see in public communications from Hydro and Government says that hydro is "a clean source of renewable... energy that will reduce the use of fossil fuels in central North America."

I would suggest that the popular hydro narrative is relevant here both because Hydro has brought it up—the words I just read were Ken Adams', spoken here on Oct 21—and because CEC reports inform the public narrative.

Is hydro clean, as advertised? We have pushed the provincial government for the criteria they use to make this determination. We have received no clarification from them.

It appears to be a simple assertion. Presumably, the implication is that dams are environmentally preferable to coal-fired generation. But just because dams don't have smokestacks does not mean they are clean.

Is hydropower renewable? Many American jurisdictions have clear criteria for renewable energy. Wisconsin counts only power from Manitoba dams built after 2010 as renewable. Minnesota counts only power from dams smaller than 100 megawatts as renewable. Federal legislation introduced recently in the U.S. would likewise exclude almost all hydro in Manitoba.

In these cases, untested assertions are put aside in favour of thoughtful consideration of the environmental costs and benefits of dams. They clearly do not consider large dams clean.

Yet our government and utility officials stick to their assertions. These assertions, we argue, put branding ahead of environmental reality and thus impede public debate about energy, climate and clean environment.

Therefore, we suggest that you include in your final report, two simple non-licensing statements and one related non-licensing recommendation.

First statement: Hydropower produced in Manitoba is low-carbon energy but is not accurately described as clean, particularly in the absence of a comprehensive cumulative effects assessment.

Second statement: Manitoba Hydro's generation system causes significant environmental harm over a large area. These damages are not confined to the past. They are, in many cases, ongoing.

Recommendation: that the provincial government establish clear criteria for renewable energy, along with rationale for those criteria.

Allow me a further comment regarding public narrative. The hydro narrative in Manitoba also says exported hydropower displaces fossil fuel powered generation and greenhouse gas emissions in the U.S.

The notion is that Manitoba is an environmental leader with respect to climate change and energy policy, and that Keeyask sits on this leading edge. Last February, Premier Selinger was in Washington D.C. where he spoke about hydropower exports to the U.S. as a huge part of the "solution" to climate change.

What he didn't mention in positioning us as a climate change leader is that Manitoba didn't even come close to meeting its own legislated GHG emission targets.

He didn't mention that Manitoba Hydro has very significantly scaled back its commitment to energy efficiency measures, falling far behind industry leaders.

Is Manitoba really a leader on climate change and energy policy? Should we be patting ourselves on the back?

Is the underlying objective behind Keeyask—is the driving impulse—to address continental GHG emissions?

Dams do not reduce GHG emissions per se. They increase energy supply. Apart from a demonstrated continental commitment to dramatically reduce emissions (and energy demand), the case for hydro as a climate solution is, for the utility, a rather convenient truth. Hydropower can't be part of the climate change solution if there is no solution.

As a province we need to move beyond PR if we hope to have sound public policy, *and* if we hope to have credibility outside the province, where the conversation tends to be more nuanced and sophisticated.

Energy consumption and climate change pose a giant challenge to humanity. Is our most creative response to pour 870,000 tonnes of cement into a river, affecting some 14,000 hectares, and blaze a 1,500-kilometre transmission corridor?

Is the best we can do to revive supply side mega-projects first dreamed of decades ago, while cutting energy efficiency programs, and simply accepting endless growth in energy demand?

Are we going to use these justifications to dam all our rivers and then find emissions and demand are still growing?

As I understand it these macro-environmental issues, oddly and perplexingly, do not belong here (though Hydro has raised them). They belong in the PUB NFAT hearing. That brings me to my final point.

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The most difficult part of preparing this presentation was trying to figure out what fits within the terms of reference.

According to the strictures of the regulatory process, some of the points I have made probably don't fit. Some of the points don't actually fit *anywhere* within the so-called public process. Not the Bipole III hearing, not the NFAT hearing, not this hearing.

That is a problem. Somehow the whole regulatory and public process—with its piecemeal scoping and narrow view of cumulative effects—appears to sidestep what our group considers the most important considerations.

It is hard to have confidence in the overall regulatory regime in this province—partly because it is fragmented up into individual projects and different reviewing bodies; partly because the province refuses to look at the overall northern project or the overall expansion plan; and partly—if you'll allow me to name the elephant in the room—because the provincial government clearly decided long ago that it will push Keeyask through regardless of what the PUB or CEC recommends.

They've spent hundreds of millions on the project already. Heavy equipment has been on the ground for over a year.

A Pimicikamak representative suggested to you last month that hydropower expansion in this province is a runaway train. In our view, that assessment is particularly troubling and particularly apt.

The decide-first-review-later order of public and regulatory process undermines the integrity and relevance of what you do. We urge you to recommend to the minister that future reviews be held at a much earlier, more meaningful, stage in the process.

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All of that said, now the provincial government has endorsed the concept of regional cumulative effects assessment by accepting the non-licensing recommendations in your Bipole III report.

We join our voice with those calling for a regional cumulative effects assessment prior to final decisions regarding Keeyask.

There is a lot to assess, and then address.

We believe such an assessment must include the entire northern hydropower system—once and for all—something which you recently acknowledged has never been undertaken, and is not included in the Keeyask EIS.

An assessment must also be independent and clearly *seen* to be independent. The days of Hydro assessing itself are over. This is Canada in the twenty first century.

Further to that, I note Recommendation 7.7 from the 2004 CEC Wuskwatim Final Report.

In relation to final Water Power Act licences for CRD and LWR—which are still outstanding nine years later—the CEC recommended that an operational review of the projects be undertaken.

We urge you to re-state this recommendation. An operational review of the northern hydropower system could identify ways that Manitoba Hydro could manage water flows and levels in less damaging ways. For instance, it could ensure stable and appropriate water levels during key spawning and nesting seasons in particular areas.

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In conclusion, the CEC's 2004 Wuskwatim Final Report made some strong and forward-thinking recommendations. But it boiled down to four words: "will not be significant"—that is, "the adverse effects" of the project "will not be significant."

If this review boils down to those same words, we will be dismayed. Hydropower is complex. We need to grapple with those complexities.

Let us not forget that dams themselves are no favour to the environment. The moose and beaver do not stand on the shore applauding as the bulldozers roar and the dynamite goes off.

As a province we need to acknowledge the ongoing impacts of the hydropower system. We need to grapple with the fact that Keeyask would plug into an environmental disaster. We need to test the assertions and assumptions that drive the clean energy narrative.

You are uniquely positioned to assist in that regard. We need you to provide

leadership.

Thank you.



Severe shoreline erosion on Southern Indian Lake. This sort of shoreline slumping – a common scene on Southern Indian Lake – is caused by the Churchill Diversion project which permanently floods the lake by about 3 meters.



Hydro-affected shoreline on Southern Indian Lake. As much as 40 percent of the water that would flow through Keeyask would come from here. Keeyask would plug directly into CRD.



The dried up bed of the Saskatchewan River near Grand Rapids, Manitoba. The water that used to flow here is now diverted through the Grand Rapids Generating Station. The Grand Rapids themselves are no more.



The Grand Rapids Generating Station holds back a 30-metre high wall of water in Cedar Lake, which has been turned into a reservoir. The dam permanently floods 115,000 hectares of land (according to information provided by Manitoba Hydro). This photos shows flooded shoreline.



Flooding on the Cedar Lake reservoir causes ongoing shoreline erosion that dumps thousands of trees into the water. These trees collect along shorelines, pictured. Again, Keeyask would plug into this larger northern hydropower system and benefit from water storage in the Cedar Lake reservoir, which functions in part as water storage for the Nelson River system.



The accumulation of wood debris on the shore of Cedar Lake makes shoreline access difficult for people and animals. This sort of scene is common on hydro-affected waterways.



Hydro-affected shoreline on Split Lake, just upstream of the proposed Keeyask site. This is what "clean" hydropower looks like at the northern end of the transmission line.



More hydro-affected shoreline on Split Lake. Hydro impacts are severe, widespread and ongoing.





A trapper's cabin on Split Lake that has been abandoned due to ever-advancing shoreline erosion. This is part of the system that Keeyask would become a part of.



Hydro-affected shoreline on Split Lake. This is part of the present hydro reality in northern Manitoba.

