

manitoba wildlands

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Comments – MFA Supplemental Filing January 2005

January 7, 2005

To: Mr. Trent Hreno
Manitoba Conservation
Land Approvals

From: Gaile Whelan Enns
Director, Manitoba Wildlands

Cc: Mr. Dan McNaughton, CEAA
Cc: Public Participants, Manitoba Floodway Expansion Project
Attachment

**Re: Manitoba Wildlands Comments –
Manitoba Floodway Authority (MFA) Proposed Floodway Expansion
Project EIS Supplementary Filing (November 29, 2004)**

Manitoba Wildlands' comments on the Manitoba Floodway Authority (MFA) Proposed Floodway Expansion EIS Supplementary Filing can be divided into three categories:

- A. General Comments on the Supplementary Filing
- B. Comments Regarding Sections 1.0 – 12.0 of the Supplementary Filing
- C. Comments Regarding Sections 13.0 of the Supplementary Filing

**A. General Comments Regarding the MFA Proposed Floodway Expansion Project
EIS Supplementary Filing**

Our overarching comment on these materials is that none of the Sections of the Supplemental Filing directly or specifically address Manitoba Wildlands' EIS review comments. We have noted this in correspondence to MFA officials (and copied to provincial and federal lead Project Administration (PAT) representatives) (see attached memo of January 2, 2004) and we feel that the lack of response to our organization, and absence of specific and detailed responses to comments by other public participants and Technical Advisory Committee (TAC) representatives is a significant and serious deficiency. (For more detail on this issue – see Part C. of this document)

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This supplemental filing is an inadequate and unacceptable response on the part of the MFA and is dismissive of public (and TAC) review of the EIS and participation in the review process. Clarity as to the nature of Sections 1 – 12, as additional EIS materials, for public comment and review was lacking when filed. Also if Section 13 is the whole response from the proponent to all PAT, TAC, and public comments and requests for additional information regarding the project then the standard for assessment steps under Manitoba's Environment Act has fallen significantly.

In addition, the approach taken by the MFA ignores established procedures and format for responses to EIS review and requests for information; as per the Wuskwatim EIS review process, and other proposals under Manitoba's Environment Act. The proponents in the Wuskwatim process provided spreadsheets that systematically addressed comments made by each public participant or TAC reviewer.

Since none of Manitoba Wildlands' EIS review comments (with the exception of five comments identified by the PAT in its correspondence to the proponent of November 2, 2004 – see Part C. of this document for details) have been addressed by the proponent in this supplementary filing, we wish to formally reiterate that the EIS issues we raised are outstanding and include comments regarding:

- Public Policy and Regulatory Framework
- Biodiversity / Species
- Water Quality
- Climate Change
- The Study Region
- Ecological Baseline
- Protected Areas
- The project plan and information in General

Many of our EIS review comments were echoed by other reviewers (other public participants, and/or TAC reviewers). Manitoba Wildlands review comments are consistent with our comments on the draft EIS Guidelines, our appeal of those Guidelines, the final EIS Guidelines for the project, and our identification of elements in the Guidelines and EIS contained in our description of technical activity for our submission for participant funding.

We expect the proponents to address this “oversight” and we expect to receive notification of when detailed responses to our EIS review comments (and those of other public participants and TAC representatives) will be forthcoming. We also request

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notification of the timing for the proponent's response to this document (for January 7, 2004 deadline) and the comments within.

In addition to failing to provide detailed and specific responses to our EIS review comments, it is clear that Manitoba Wildlands' comments were not considered by the MFA in preparing the supplemental filing, even where our specific comments was relevant to a response provided to comments in PAT Table 1 or 2. All previous work product from us as mentioned above is available to the proponent, and filed in the public registry.

We question whether the proponents even examined our EIS review comments, aside from perhaps those identified in Table 2 of PAT correspondence. In many instances, the opportunity existed to incorporate a response to Manitoba Wildlands comments in a response to one of the information requests indicated in the PAT Tables. The MFA has instead reiterated statements from the Proposed Floodway Expansion EIS that Manitoba Wildlands had indicated were incomplete, unsupported, or otherwise required additional information.

As stated in our January 2, 2004 memo, no detailed Table of Contents to aid in navigation of material was provided to accompany the supplemental filing. In particular, the task of determining the contents of Section 13.0 and reviewing this Section (which should have been simple and straightforward) was an arduous task. (See January 2, 2004 memo for detailed concerns regarding Table of Contents, organization of the information).

The open disregard for public policy regarding protected areas in Manitoba contained in the EIS and continued by the proponent is surprising, and telling. We can assess and comment in an area where we are most knowledgeable. We do wonder why the Floodway Authority would be comfortable with this and other significant gaps and deficiencies in these EIS products.

B. Comments regarding Sections 1.0 – 12.0 of the MFA Proposed Floodway Expansion Project EIS Supplementary Filing

Section 13.0 TAC Table 2 #2 (pg. 15) states that Sections 1 – 12 of the Supplementary Filing are information identified for Supplementary Filing by the MFA

Field inventory charts and detail provide little analysis or assessment. There is no connection to public policy or the regulatory framework regarding species. Most

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surprising in methodology is that, given the natural region and ecosystem type for the full scope of the project area, no search for tall grass prairie species, or remnants appears to have been conducted. The proponent needs to clarify its approach regarding The Species at Risk Act, the Manitoba Endangered Species Act, and potential environmental impacts to known ranked, and at risk Manitoba species. We need to take a once done summer inventory from 2004 for what it is, especially in the most wet, and cold summer in decades. Potentially this inventory is not a strong example for an average summer.

Proponents sometimes confuse the issue as to the scope of the project impacts and the project area. That is a risk with this EIS. A sample inventory as per our comments above does not answer important questions regarding the project area, as a whole. What is the proponent's plan regarding advance and ongoing species inventory prior to construction? What is the proponent's plan when endangered and listed species present themselves during construction? What will the proponent do if class A or class B tall grass prairie remnants are located in the path of the construction of the project? We would suggest that these same questions apply to the limited archeological survey conducted by the proponent.

C. Comments Regarding Section 13.0 of the MFA Proposed Floodway Expansion Project EIS Supplementary Filing

Section 13.0 of the MFA Proposed Floodway Expansion Project EIS Supplemental Filing purports to respond to TAC and public review comments. Upon detailed review of the first part of Section 13.0 – TAC (Technical Advisory Committee), Manitoba Wildlands has determined that only those comments identified by the PAT in Tables 1 & 2 attached to its November 1, 2004 correspondence to the MFA have been responded to in the supplemental filing. Of the 22 comments in Table 1 and 47 comments in Table 2 (total: 69), only five of these specifically address issues raised by Manitoba Wildlands in our 33-page submission of review comments regarding the Proposed Floodway Expansion EIS. A similar situation exists regarding EIS review comments provided by other public participants, as well as comments and requests for information from federal and provincial TAC members.

We have written to the MFA (January 2, 2004 memo) and expressed our disappointment in this regard. We expect the MFA to address those concerns raised in our January 2, 2005 memo as well as our comments here. We expect that our comments on the EIS *AND*

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our comments on the supplementary filing will be addressed by the MFA. The same should be true for all other public participants' comments and requests for information. All future response to requests for information by TAC and PAT members must be made available, and kept public in the public process under Manitoba's Environment Act.

In general, Manitoba Wildlands the TAC Table 1 responses in Section 13.0 of the Supplemental Filing avoid, in several instances, responding to the information requests by the PAT regarding fulfillment of EIS Guidelines. Our assumption, in reviewing this material, is that the PAT would not be making the request for additional information if a deficiency of some sort had not been identified. We provide some specific comments on selected responses by the MFA below.

We have not reviewed in detail the responses to the Department of Fisheries and Oceans (DFO) or Industry Canada (IC) comments in Section 13.0, and instead chose to focus attention on the responses to TAC comments. As a result, we will not be providing specific comments on MFA responses to DFO or IC information requests.

Specific comments (in italics) on MFA responses to individual information requests in Section 13.0 are provided below. These are not comprehensive, and are intended to highlight some deficiencies in the MFA responses to information requests and identify some areas requiring additional information. This in addition to our request for the MFA to fully respond our EIS review comments.

Selected Comments on Responses to TAC Table 2

(Note – responses identified as pertaining to Manitoba Wildlands' comments are indicated by blue text)

Re: TAC Table 2 #1 – pg. 6-13

“An erratum should be provided addressing errors and discrepancies in the EIS, including those identified in public and technical comments.”

Pages in the Erratum are not numbered, but numbering in the pdf doc indicates the Erratum begins on pg. 6 and concludes on pg. 13

The Erratum does not indicate the party that identified the error/discrepancy. Impossible to determine without detailed comparison which errors/discrepancies were identified by MW.

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*The response includes a map on pg.13 (**Areas of Special Designation – Regional Study Area**) that indicates ecodistricts and “Areas of Special Designation” (Ecological Reserves, Special Conservation Areas, Wildlife Management Areas, Provincial Parks). This map does not indicate protected lands as distinct from lands within designations that are not protected from development (Titled Figure 7.2-1). There is no Area of Special Designation definition or category in Manitoba public policy or the regulatory regime regarding crown land. Manitoba does have several hundred-crown land designations, in several types. EIS Guidelines are clear, and this is deficient. Perhaps the proponents or their advisors do not know what a protected area is.*

Re: TAC Table 2 #11 – pg. 33-34

“Clarification is needed respecting flood return periods and historic floods.”

The information provided does not address the original comments by NRCan (TAC), which relate to flood magnitudes and implications of a greater than 1- 100 year, or 1~700 year flood.

Re: TAC Table 2 #14 – pg. 39

“Clarification is required concerning temporary roads for construction access.”

Detours affecting the public are not planned as part of the project, with the “possible exception of the PTH 44 bridge crossing. This crossing may require a temporary detour structure adjacent to the existing structure, and this decision will be finalized during detailed design.”

Re: temporary access for construction, no details in terms of routing are given except to state that “Any temporary construction access will be contained within the existing floodway channel right-of-way or Manitoba Transportation and Government Services right-of-way” and will be “removed and restored to original condition, including re-vegetation as required, in accordance with the re-vegetation plan that will be developed as part of the Construction Phase Environmental Protection (CPEP) Plan.”

All details are relegated to the CPEP plan.

Re: TAC Table 2 #24 – pg. 59

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“Information is required concerning the development of pre and post construction monitoring for aquatic invertebrates.”

The MFA defends its conclusions in the EIS – the sampling method yielded no predictive results, but feel that “it is highly unlikely that any invertebrate sampling effort conducted in the Low Flow Channel (which typically experiences many annual environmental extremes of low and high flows, variable oxygen levels, changing water chemistry, etc.) will yield scientifically valid results regardless of the sampling or survey effort. For this reason the EIS acknowledges this issue as an information deficiency, but recommends against attempt to resolve it.” However, no sources or expert opinions are referenced to support this conclusion.

Re: TAC Table 2 #27 – pg. 65-69

“Information on climate change is needed in the context of comments from Natural Resources Canada (reviewer #1, Section 5.8.3.3.2) and others (NRC, NRAC-18, MW).”

The response provided in the MFA Supplementary Filing does not address Manitoba Wildlands’ concerns about sources for climate change information adequately. For example, the proponent quotes the Government of Manitoba Climate Change Action Plan (which in this case is a secondary source for the information regarding climate change scenarios) instead of quoting the direct source of the information. This is contrary to basic scientific writing protocols to identify sources directly, or at the very least quote the original source with the caveat “as stated in ‘such and such’”. In addition, in Section 1.1 Use of Fossil Fuels for Vehicles the proponents use 2001 information for total yearly emissions for CO2. It would be useful to have more recent information (2003?). If unavailable, this should be stated.

It is still our opinion that the climate change literature regarding modeling and scenarios contains other studies and information relevant to the Manitoba situation that has not been examined by the proponent. (See presentation by Elizabeth May to the Clean Environment Commission Wuskwatim hearings available at <http://energymanitoba.org/presenters.htm>)

Although the proponents have conducted their analysis based on the CEAA General Guidance for Practitioners, we would also like to strongly encourage the MFA to review and provide information based on the document Incorporating

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Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners prepared by The Federal-Provincial-Territorial Committee on Climate Change and Environmental Assessment (November 2003)
http://energymanitoba.org/presentations/E_May_support_doc.pdf

The MFA also does not provide any comparison (or state that one was not available) in terms of GHG emissions for other projects where large amounts of earth are moved.

The MFA has chosen to dismiss Manitoba Wildlands' recommendations related to designing the project with objective of making the project carbon neutral, and fails to explain whether and how the project is in compliance with Government of Manitoba policy on Climate Change. The proponents skirt this issue by stating that they feel that the project will not compromise Manitoba government's commitments to deal with Climate Change and Kyoto. This is a different issue from compliance.

No strategy to minimize GHG emissions is discussed (also in Manitoba Wildlands' comments). No specific Manitoba emissions and carbon data is provided with the proponents claims regarding Manitoba emissions.

Why not provide emissions for the transportation sector for a year in Manitoba, and indicate what the effect of this project's transportation emissions will be? The same could be done for earth moving and sand and gravel sector, etc. Why are we not seeing information regarding the primary greenhouse gases, and about carbon loss?

Also absent from the response in the Supplementary Filing is an analysis of the total impacts of all phases of the project in terms of climate change - i.e. quantification of GHG emissions and carbon losses or gains for all phases in comparison (including which are ongoing and which are temporary and for how long) with totals for Manitoba and some sort of justification from literature in terms of significance. The proponents also have not addressed questions regarding the loss of trees (not just vegetation). Personal communications indicate that some areas adjacent to the existing Floodway are "forested". Loss of forest is significant in emissions, and loss of carbon.

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Both Manitoba and Canada public policy with respect to climate change should be part of this assessment. TAC members are entitled to thorough answers to their comments. In particular, in the public interest, we view the Floodway Expansion project an opportunity for both Manitoba and Canada to show that such projects can be carbon neutral. When and where else do we start making significant public works carbon neutral, if not with this project?

Re: TAC Table 2 #33 – pg. 83

“Information is needed respecting fish mortality associated with each project component, including the inlet control structure, outlet structure, low flow channel, Seine River syphon, drop structures and drains.”

Refers to DFO/MFA-S-19 and DFO/MFA-S-34.

Interesting to note that on the one hand the proponent indicates that “No existing information regarding fish mortality with respect to the Inlet Control Structure, Outlet Structure, Seine River syphon, drop structures and drains was available, and the public information program did not note any observations of fish mortalities potentially associated with the above components.” This sentence directly after this states “The Inlet Control Structure, Seine River syphon and the area’s drains are not anticipated to be substantively altered by the Project; therefore no Project-related changes in fish mortality are anticipated.”

If one assumes that the Floodway Expansion is also an opportunity to improve in any way possible on the existing Floodway, it would make sense to perhaps evaluate fish mortality resulting from the operation/use of the existing components noted above. It could be argued that simply stating that fish mortality won’t change because the Floodway Expansion project is not anticipated to alter these structures is an inadequate and inappropriate approach/philosophy for an EIS. Perhaps the proponents are unaware that no permanent environmental license exists for the current Floodway. Perhaps the proponents are assuming that there are no environmental effects from the existing Floodway.

In other words, just because the existing project causes damage (and continues to do so / was never subject to an EA process), doesn’t mean it is ok for this to continue (which was essentially also the central argument in the Wuskwatim review.)

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Re: TAC Table 2 #35 – pg. 87

“Information is required respecting the effect of construction dewatering on fish habitat.”

Indicates that information is not available until final design completed – will be addressed in EPP and HADD developed in consultation with DFO. “The potential effects of site-specific dewatering on the adjacent fish communities, primarily in the Low Flow Channel, are anticipated to be manageable and fully mitigable.”

This response essentially avoids the issue. Question – when will final design be completed? Why has an EIS been submitted and licenses applied for if final design incomplete? (Manitoba Wildlands asked this question in EIS review comments). It is also of some importance to identify just how many elements of the EIS and project plan are not yet available, AND to make sure they are publicly available. We would appreciate knowing when – in advance of the Manitoba hearings – they will be available.

Re: TAC Table 2 #40 – pg. 97

“Information is needed on water quality impacts during the active operation mode of floodway operation.”

The response refers to benefits, however the original comments by the Water Quality Branch specifically asked the proponents to address the issue of negative impacts of the Floodway on water quality. This is not part of the response.

Re: TAC Table 2 #41 – pg. 99

“A rationale for conclusions on the water quality impacts of recreational use of the floodway channel is required. (WQM)”

The MFA maintains that the level of recreation activity on the Floodway is minimal and the “existing water quality impacts of existing recreation are judged to be relatively low in the EIS.”

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Issue: the MFA in its response to this issue states, “Various proposals for recreational use have been submitted to MFA. These are not included in the Project and are therefore not assessed in the EIS. No assessment of significance of recreation impact has been included in the EIS.”

If proposals for recreational use have been received, by the MFA, does this not indicate that some of these proposals are likely to go forward, and therefore, the impacts should be assessed as part of the cumulative effects assessment?

Does the proponent decide what is part of a Project? The EIS filings to date are full of assumptions that the proponent decides a variety of things, and can leave out of assessment, or out of the exchange of technical information, other things. Does the proponent, when it is a public/ government entity, assessing itself, and licensing itself - also decide whether there are environmental effects and impacts? What information should be made available? Whether to respond to review comments and requests for information?

Re: TAC Table 2 #42 – pg. 101

“Information on the rationale for conclusions on ice jamming is required. The study referenced in the Executive Summary (page 10) should be provided.”

Proponent indicates that study was completed prior to submission of EIS and a summary of results was incorporated into the EIS. However, proponent ignores request for full study to be provided.

Re: TAC Table 2 #43 – pg. 103

“Clarification is required concerning effects boundaries.”

This response does appear to better define the Flood Study Region. It doesn't however, address the contradictions noted in Manitoba Wildlands's comments on the EIS concerning the statement “Project effects on the biophysical environments (physical, aquatic, and terrestrial) and heritage resources during construction and most years of operation are typically restricted to the site footprint area (the expanded right-of-way and any other required land acquisition areas) and certain other areas located adjacent to specific elements of the Project.” The erratum provided earlier in Section 13 also does not address this and other concerns noted by Manitoba Wildlands.

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Re: TAC Table 2 #46 – pg. 111

“Information is needed regarding public policy and the regulatory framework affecting the project.”

Response states:

The regulatory framework affecting the Floodway Project is outlined in Section 1.5 and Appendix 1E of the EIS (see also TAC/MFA-S-3). In addition, public policy applicable to the Floodway Project includes but is not limited to:

- 1. Principles of Sustainable Development as outlined in "Towards a Sustainable Development Strategy for Manitobans".*
- 2. The Land and Water Strategy as contained in "Applying Manitoba's Water Policies".*
- 3. Rio Conference and International Agreements on Biodiversity.*
- 4. Government-adopted policies regarding wildlife, such as those described in "A Wildlife Policy for Canada" (Wildlife Ministers Council of Canada. 1990. A Wildlife Policy for Canada. Canadian Wildlife Service, Environment Canada). (These describe strategies for conservation of wildlife and their habitat.)*
- 5. Fisheries policies such as the "No Net Loss" policy.*
- 6. Policies listed under The Planning Act, such as those related to: general development, agriculture, water and shoreland, recreational resources, flooding and erosion, provincial highways.*

No new information has been provided in the above response to address comments provided by Manitoba Wildlands. Specifically, the proponent has not:

- indicated how the project is in compliance with the strategy and policies above*
- included the Manitoba Water Strategy and described how the project is in compliance with a reflects the principles contained within this policy*
- addressed the issue of the 'recycling' of work product noted (i.e. the appearance of the reference to the Wuskwatim Generation Project in Volume 2, Appendix 1E, Section 1.2.6 Other (pg. 1E-31)), except to correct the "error" in the erratum*
- justified the statement made in Volume 1, Chapter 1 Introduction, Section 1.6 Effect of the Guidelines on EIS Organization and Content "[t]he proposed Project is consistent with Manitoba's Water Policies*

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Manitoba Wildlands continues the work of WWF Canada and CNF for establishment of Manitoba Protected Areas.

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regarding water quality, conservation, use and allocation, water supply, and education.” as noted

- *provided justification for the statement in the Executive Summary, which indicates that the proposed project is consistent with Manitoba’s Water Policies, and also the natural lands and special places policies.*
- *addressed the absence of any discussion of the Action Plan for a Network of Special Places for Manitoba. (January 2000 – January 2003)*
- *addressed comments regarding the level of representation of enduring features that currently exists in the natural regions affected by the proposed project (including the absence of maps)*

We respectfully request that the proponents refer to the original comments (4 pages) section regarding the public policy and regulatory framework submitted by Manitoba Wildlands as part of overall comments on the Proposed Floodway Expansion EIS and provide responses to ALL comments within. The section is easily identified in the Table of Contents that accompanies Manitoba Wildlands’ EIS Comments document.

Perhaps a reminder is warranted. Manitoba’s public policy and regulatory framework for protected areas is contained within the proponents’ own identification of policies with which the EIS claims to comply.

Selected Comments on Responses to TAC Table 1 – Fulfillment of EIS Guidelines

Re: TAC Table 1 Guidelines – 2.3.1 and 2.3.2 (note this is miss-stated in the Supplementary Filing as Table 1 #47) – pg. 115-116

“The project’s purpose, need and objectives should be clearly stated. Additional information is needed regarding alternatives that were considered and opportunities for enhancing environmental benefits. (also see p. 7, section 5.2 and p. 16, and 17, sections 7 and 9) Information is needed on Kyoto Accord implication of the project.”

The proponents reference various sections of the existing EIS in response to the first four items above. However, if the PAT considered the EIS adequate in this regard, it would not have requested additional information. The MFA has not adequately responded on the subjects of purpose, need, objectives and alternatives.

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Regarding opportunities for enhancing environmental benefits and the Kyoto Accord, other parts of the Supplemental Filing are referenced.

Re: TAC Table 1 Guidelines – 6.4.3 – pg. 145-146

“A discussion is needed of domestic, commercial and recreational fisheries and the clam fishery. Commercial and recreational waterway use should also be discussed.”

Discussion is provided but (strangely) does not take place in the context of the project.

Re: TAC Table 1 Guidelines – 6.5 – pg. 147

“Archaeological sites and culturally important sites in the study area should be described. A ranking of sites should be provided.”

Ranking of three sites identified in the EIS is provided.

Interesting quote –

“The heritage resource assessment did not include all archaeological or culturally important sites in the Red River Valley that may be affected by a large flood event for two reasons:

- The number of entries would be voluminous (likely hundreds or thousands of entries).*
- Temporary inundation by floodwaters is not an adverse effect on heritage resources.”*

We request that the proponents provide further justification, sources for information in second bullet.

Re: first bullet – this is not a valid reason for not providing the information unless the second bullet is indeed a valid point supported by a credible source.

Re: TAC Table 1 Guidelines – 7.0 – pg. 149-150

“Additional information is needed regarding public health and safety.”

Proponents stand by the information provided in the EIS. Summarize this in the response. Not clear why no new information provided.

Re: TAC Table 1 Guidelines – 10.0 – pg. 161-166

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“Additional information is required with respect to indicators and methodologies in the sustainable development assessment.”

In responding to this information request, the proponents have simply reiterated EIS content and referred to sections of the EIS. We would once again point out that perhaps this is not adequate, and suggest that the PAT in noting that more information was required actually expected that additional content and discussion would be forthcoming.

The MFA defends its assessment of sustainable development in the EIS and notes consistencies between provincial, national and CEAA approaches to sustainable development. Perhaps specifics need to be provided with relation to Manitoba’s Lands and Water Strategy, and Sustainable Development Principles and Guidelines.

Below Manitoba Wildlands has provided some examples of areas in which the response could use improvement.

Regarding its sustainable development assessment, the MFA states that “We also sought guidance from Manitoba’s Water Policies” and then references a 2001 discussion paper that preceded the current Manitoba Water Strategy, without referencing the 2003 document (giving the impression that the discussion paper represents the most recent policy document). This is not only problematic in and of itself, but it also indicates that the proponents have either ignored or failed to review repeated and specific references in Manitoba Wildlands’ comments on the EIS to the absence of any mention of the 2003 Manitoba Water Strategy.

The proponents also indicate with respect to the environmental indicator Biodiversity in Habitat Conservation that “Natural lands, protected lands, and enduring features were considered in the assessment (EIS Sections 5-8). The EIS concluded that there would be no effect on protected lands because the effects would be restricted to the project site (i.e., footprint). Supporting information is provided in Table 7C-IV and Figure 7.2-1 (Appendix 7C) of the EIS.”

Manitoba Wildlands would respectfully dispute the above statements. (No verification is provided, and other statements about crown land designations contradict.) We suggest that the proponents have not presented adequate information regarding protected areas to be able to arrive at such a conclusion.

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We would refer the MFA to our EIS comments in terms of guidance as to additional information to provide. We would also note that these comments with respect to protected areas (along with most of Manitoba Wildlands' EIS comments) have not been addressed by the proponents in this supplemental filing.

A simple statement: By Manitoba's own assessment regarding enduring features and protected areas, the natural regions where Winnipeg and the Floodway/Expanded Floodway are located do not have the completed protected areas network in place. We suggest that the proponents visit the relevant government web pages. The same mapping is available on our web site.

We also wish to raise concerns about the MFA statement "Climate change was discussed extensively in the EIS (Section 5) and also in response TAC/MFA-S-27" that addresses the environmental indicator Air Quality. Please see our comments in this document regarding TAC/MFA-S-27 and also our EIS comments regarding Climate Change.

Manitoba Wildlands provided comments in its review of the Proposed Floodway Expansion EIS. These comments have not been addressed either in the response to this particular information request, or elsewhere in the Supplemental Filing.

Re: TAC Table 1 Guidelines – 12.0 – pg. 167

"Maps needed showing zones of effects on land and water use and habitat areas."

The proponents defend their text descriptions of effects in the EIS. They also state that "Since the zone of effect is dependent on the factor in question, maps were not produced for the zone of each effect due to the fact that this would require numerous maps with overlapping zones and would confuse the message provided in the EIS."

However, the information request was not for a justification of why maps were not provided, but for the proponents to provide maps. We suggest that it may be possible to provide a map for each chapter of the EIS that indicates the (multiple) zones of effects for the various effects described in that particular chapter.