MODEL CLASS SCREENING REPORT FOR OPERATION AND MAINTENANCE OF ELECTRICAL POWER DISTRIBUTION FACILITIES IN BANFF NATIONAL PARK

Final Report

Aquila

HIGHWOOD Environmental Management

MODEL CLASS SCREENING REPORT

FOR
OPERATION AND MAINTENANCE
OF
ELECTRICAL POWER DISTRIBUTION FACILITIES
IN
BANFF NATIONAL PARK

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Prepared for:

Aquila Networks Canada

Prepared by:

Highwood Environmental Management Limited

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LIST OF ACRONYMS

Agency	The Canadian Environmental Assessment Agency
ATV	All terrain vehicle
BMP	Best Management Practices
BNP	Banff National Park
CCA	Chromated Copper Arsenate
CEAA	*Canadian Environmental Assessment Act*
CPR	Canadian Pacific Railway
CSA	Class Screening Area
CSPR	Class Screening Project Report
DFO	Department of Fisheries and Oceans
ELC	Ecological Land Classification
ENGO	Environmental Non-governmental Organization
FEAI	Federal Environmental Assessment Index
IPM	Integrated Pest Management
MCSR	Model Class Screening Report
OCA	Outlying Commercial Accommodation
OCR	Oil Circuit Reclosure
Penta	Pentachlorophenol
POLs	Petroleum, Oil and Lubricants
PM	Particulate Matter
RA	Responsible Authority
RAP	Restricted Activity Permit
RoW	Right of Way
TCH	TransCanada Highway
VEC	Valued Ecosystem Component

1.0 INTRODUCTION

Aquila Networks Canada (Aquila) operates and maintains power distribution facilities in Banff National Park (BNP). Aquila must meet a number of federal legislative requirements and Parks Canada policy requirements when they conduct these activities. One of the legislative requirements is the *Canadian Environmental Assessment Act* (CEAA), which stipulates that certain operations in National Parks must undergo environmental screenings before approvals are issued, including excavation and vegetation removal. Aquila operations in BNP that require environmental screenings under CEAA are extensive, and the majority of these activities are routine, repetitive operations with highly predictable and mitigable impacts.

Therefore, Parks Canada, as the Responsible Authority (RA), initiated the preparation of this Model Class Screening Report (MCSR) in order to simplify the screening process, to meet the requirements of CEAA, and to ensure standardized high quality screenings. The MCSR covers CEAA requirements pursuant to the ongoing operation and maintenance activities of Aquila power distribution facilities in BNP. Only routine projects associated with the operation and maintenance of distribution facilities that are owned and operated by Aquila are addressed in the MCSR. Not all of these projects are considered 'triggers' that require environmental screenings under the Act. However, many of these activities and projects require assessment under Parks Canada policy. Therefore, for completeness, all routine actions and projects undertaken by Aquila during the operation and maintenance of their distribution facilities are included in this MCSR. In this way, all potential environmental effects from Aquila activities are identified and mitigated through appropriate management practices.

Table 3.1 indicates which projects are triggered by CEAA and which projects require assessment under Parks Policy. A glossary of terms found in this report is provided in Appendix A.

1.1 Class Screening and the Canadian Environmental Assessment Act

CEAA was brought into force in 1995 to ensure that federal authorities consider the environmental consequences of projects before they are undertaken and before irrevocable decisions are made. The Act applies to projects where there is a federal decision or responsibility, whether as a proponent, land administrator, source of funding or regulator (issuance of permit or licence).

The vast majority of projects subject to the Act are assessed through a screening. Screenings are self-directed assessments, where the federal department or agency involved is responsible for the environmental assessment. Anticipating the large number of projects likely to be screened, Section 19 of the Act provides the Canadian Environmental Assessment Agency (Agency) with a mechanism for projects to undergo a class screening. Further, Section 19 of the Act provides the Agency with the authority to declare, upon request by an RA, that a project be used as a model for conducting screenings of other projects within the same class. The class screening report can be used as this model. The class screening process under the Act generally applies to projects that are routine, have predictable and mitigable environmental effects and have characteristics in common, such as project type, location, proponent, time periods and/or effects.

Class screening is a two-part process consisting of two reports:

- The **Model Class Screening Report (MCSR)** sets out an environmental assessment process for projects within the class. The MCSR typically includes the rationale for the projects included in the class, the scope of those projects and the factors to be considered in determining the environmental effects of projects, typical environmental effects, mitigation measures and follow-up and monitoring requirements. A MCSR also describes the process and procedures under which future projects will be assessed, including responsibilities, documentation requirements, amendment mechanism and public consultation requirements.

- The **Class Screening Project Report (CSPR)** is the project-specific screening report prepared in accordance with the procedures outlined in the MCSR. These reports contain additional site-specific information to supplement the information contained in the MCSR. CSPRs build upon the information contained in the MCSR and together with the MCSR provide the basis for meeting the requirements of the Act.

1.2 Model Class Screening Report and Electrical Distribution Facilities Operation and Maintenance Projects in Banff National Park

Aquila operation and maintenance projects are appropriate for class screenings as most of these projects are routine and repetitive and have predictable environmental impacts that are readily mitigated. The class screening process facilitates the review of these potential environmental effects that are known to be associated with the class of projects, while at the same time focusing on important site-specific effects through the preparation of an individual CSPR.

Development of a MCSR can also help streamline project approval processes through the incorporation of other information requirements for federal approvals into the screening process described in the MCSR. Streamlining and simplifying the environmental assessment and approval process for operation and maintenance activities for distribution line facilities in BNP can be achieved in the following ways:

- The MCSR defines the roles and responsibilities to be followed by the RA (Parks Canada) and the project proponent (Aquila) in preparing a CSPR. This planning process will ensure that the potential environmental effects and mitigation measures of projects within the class are considered in a consistent and efficient manner during project planning, screening, approval and implementation. Regulatory standards (both provincial and federal) and the experience of utility companies with the operation and maintenance of distribution facility projects have been used to identify potential environmental impacts and standard environmental mitigation practices;

- The MCSR presents a compilation of information on distribution facility operation and maintenance in BNP. This information includes descriptions of:
  - Environmental conditions including detailed ecological constraint mapping;
  - Activities involved in the operation and maintenance of distribution facilities;
  - The range of typical environmental effects;

  - The range of standard environmental mitigation practices, residual and cumulative impacts that may result;
  - The significance of these effects; and
  - Follow-up and monitoring that may be required.

- Many routine projects may be approved after the project proponent completes a simple CSPR;

- The information provided in the MCSR will reduce the amount of work that is required to prepare a CSPR;

- The development of the MCSR involved the public and government stakeholders (see Section 2.0) thus the consultation requirements during the preparation of the CSPR may be reduced (Section 4.0); and

- The MCSR can outline federal permits and other approvals required for distribution facility operation and maintenance projects.

1.3 Organization of the Model Class Screening Report

The MCSR is organized as follows:

- Section 2.0 describes how the class screening process for routine operation and maintenance projects was designed.

- Section 2.0 describes the public consultation process during the development of the MCSR, as well as how the public will be involved during its use and implementation.

- Section 3.0 defines the need/purpose of maintenance projects, and the scope of the activities covered in the MCSR (e.g., operation and maintenance activities).

- Section 3.0 outlines the current federal and provincial permits and approvals required for the operation and maintenance of distribution facilities in BNP.

- Section 4.0 presents an environmental assessment of operation and maintenance projects in BNP that includes a description of the environment, environmental effects, standard environmental mitigation practices, cumulative environmental effects, and follow-up and monitoring.

- Section 5.0 outlines the procedures and process to be used to prepare a CSPR.

- Section 5.0 describes the process through which the MCSR is implemented on individual projects, including a summary of the roles and responsibilities of the proponent and the RA when preparing the CSPRs under the MCSR.

- Section 6.0 outlines a procedure for amending the MCSR after experience has been gained with its operation and effectiveness.

2.0 DEVELOPMENT OF THE MODEL CLASS SCREENING REPORT

2.1 Purpose of the Model Class Screening Report

Distribution facility operation and maintenance projects undertaken by Aquila in BNP have a generally predictable range of potential environmental effects, and utilize a standard suite of mitigation and impact management measures. The MCSR has been prepared in order to streamline and simplify the environmental assessment process for these projects. The MCSR and the CSPR process provided in this document will ensure the consistent consideration of the environmental effects of distribution facility operation and maintenance projects in BNP and of the application of appropriate environmental mitigation practices.

2.2 Development of the Model Class Screening Report

The MCSR was developed by Aquila in consultation with Parks Canada, the Agency, and other interested departments. Parks Canada is the only RA. Figure 2.1 illustrates the steps that were followed to develop the MCSR. Each of the steps is briefly described below.

2.2.1 Definition of the Project Class

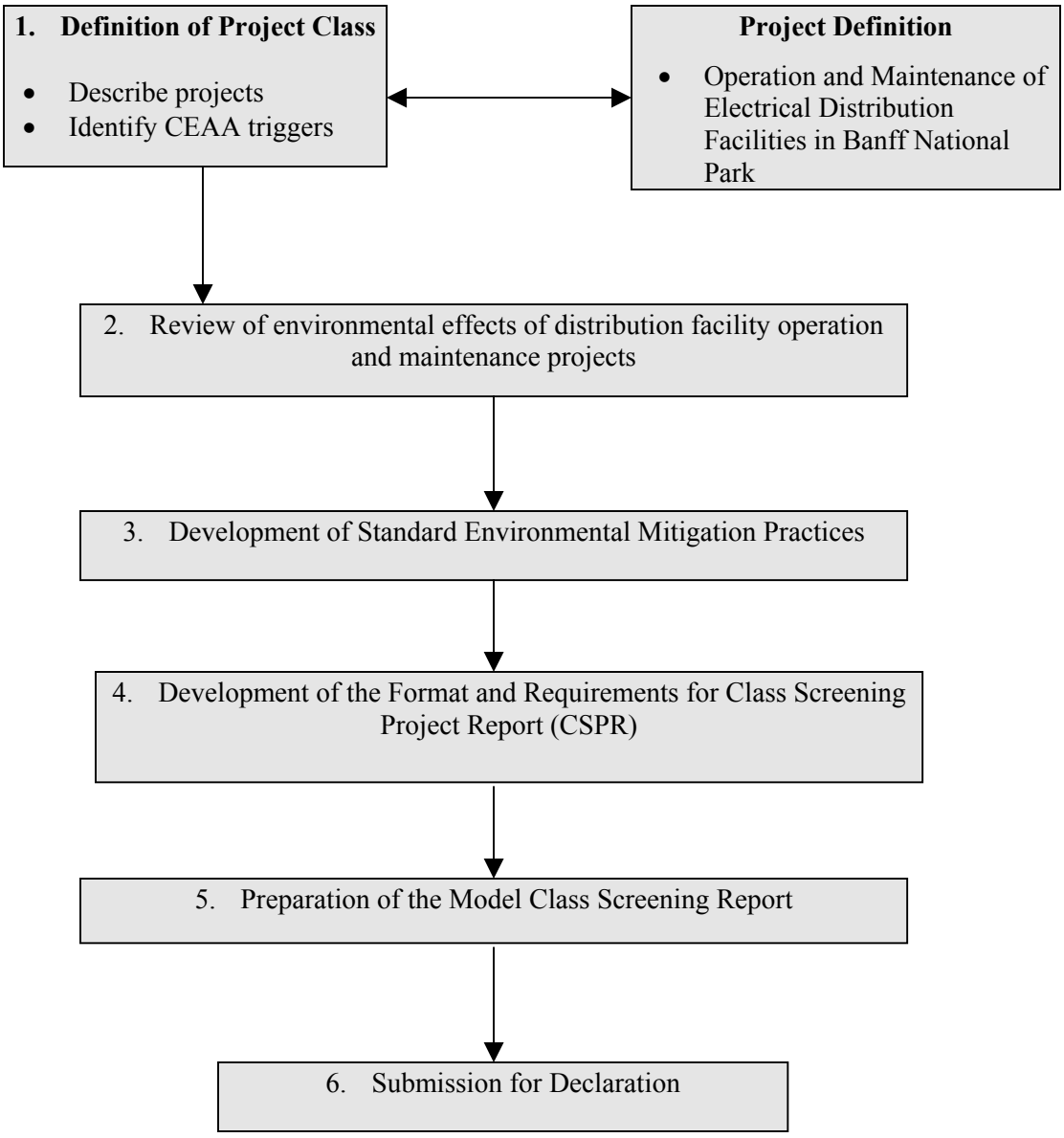
The first step in the development of the MCSR was to review distribution facility operation and maintenance projects currently undertaken in BNP to determine if they may be amenable to and benefit from a class screening approach; and, to determine the appropriate types of projects and their associated activities that are to be included in the MCSR.

Class screening applies to projects that are:

- Relatively routine or repetitive;
- Usually result in environmental effects that are well understood and predictable; and,
- The environmental effects can be mitigated using accepted methods such that significant environmental effects are unlikely to occur.

The project definition in this MCSR is ‘the operation and maintenance of electrical distribution facilities in Banff National Park’.

Figure 2.1 Developing the MCSR for Distribution Facilities in Banff National Park



2.2.2 Review of the Environmental Effects of Distribution Facilities Operation and Maintenance Projects

The second step of the process was to conduct a review of the environmental effects of the projects that are covered by the MCSR. The purpose of this review was to identify:

- The potential environmental implications of the projects;
- The standard and accepted mitigation practices that would be used to eliminate or reduce environmental effects; and,
- Environmental effects that remain following mitigation (residual effects) and determination of project significance.

The process for assessing the environmental effects associated with projects undertaken by Aquila in BNP is described in Section 4.3.

2.2.3 Develop Standard Environmental Mitigation Practices

The third step in the development of the MCSR builds on the results of the second. In this step, standard environmental mitigation practices applicable to projects in BNP that are covered by the MCSR were identified and described. The standard environmental mitigation practices are intended to incorporate accepted environmental mitigation practices and standards from North America.

The practices are intended to incorporate provincial and federal regulatory requirements, criteria and guidelines, and standard best management practices. Other mitigation measures reflect elements that are regulated by provincial and municipal authorities. Several documents were used to identify appropriate mitigation practices for the MCSR, including:

- Environmental Protection Guidelines for Electrical Transmission Lines, Conservation and Reclamation Information Letter 95-2 (AENV 1995).
- Guide 22 Guidelines Respecting an Application to Construct or Alter an Electrical Transmission Line (AEUB 1981).
- Parks Canada Integrated Pest Management Directive 2.4.1.
- Proceedings from the Fifth and Sixth International Symposiums on Environmental Concerns in Rights-of-Way Management (Doucet *et al.* 1993; Williams *et al.* 1997).
- The Effects of Linear Development on Wildlife: A Review of Selected Scientific Literature. (Jalkotzy *et al.* 1998).
- Best Available Methods for Common Leaseholders Activities (Axys 1998).

Full references are provided in Section 7 for all documents used to identify environmental mitigation practices.

2.2.4 Development of the Screening Process and the Format and Requirements of the Class Screening Project Reports

The fourth step in developing the MCSR was to identify and outline the process through which screenings of distribution facilities operation and maintenance projects in BNP would be completed. This involved examining the results of Steps 1, 2 and 3 and incorporating those results in the screening process. Once the screening process was determined, the requirements and format for the CSPR were identified.

Ecological constraint mapping was used to identify environmentally sensitive sites. The most appropriate environmental mitigation practices for those sensitive sites were then incorporated into the MCSR. Recognizing that the environmental setting at each project location could be different, the CSPR forms provide the process to identify site-specific conditions and to identify the most appropriate environmental mitigation practices. Together with the MCSR, the CSPR contains all of the information required by the Act for a screening. Standard information remains documented in the MCSR and is not required to be reproduced in a CSPR. Also refer to Section 5.0.

2.2.5 Prepare the Model Class Screening Report

In this step, the results of all of the previous steps were brought together to form the MCSR. The MCSR describes:

- The types of projects covered by the class under CEAA and/or Parks Canada policy;
- The typical environmental settings in which these kinds of projects are located;
- Typical environmental effects associated with these projects; and
- Standard mitigation practices that would be applied.

The MCSR also includes the CSPR process and method for site-specific application of the MCSR.

2.2.6 Submission of the Model Class Screening Report For Declaration

The final step in the development of the MCSR is its submission to the Agency for declaration in accordance with the requirements of the CEAA.

2.3 Other Department Consultation

Section 12 (3) of CEAA states that every federal authority that is in possession of specialist or expert information or knowledge with respect to a project shall, on request, make available that information or knowledge to the RA.

Other expert federal departments were consulted during development of the MCSR, including Environment Canada and the Department of Fisheries and Oceans. Consultation with other federal departments ensured that appropriate environmental mitigation practices were included in the MCSR, and that environmental issues associated with the operation and maintenance of distribution facilities were identified.

2.4 Public Consultation

A public consultation program was pursued in the development of this MCSR, which included the following components:

- Consultation with the Agency and Parks Canada occurred throughout the Class Screening process to ensure all the requirements of CEAA and the management initiatives in the Park were addressed in the MCSR.

- Key stakeholders were identified;

- A public meeting was held in Banff on March 27, 2001. Notification for the meeting appeared in the local newspaper and special interest groups received written invitations. To facilitate meaningful consultation, Environmental Non-governmental Organizations (ENGOs) were provided with a written project description outlining the goals of the Class Screening process in relation to Aquila activities in BNP. Hand-out materials were provided at the public meeting and representatives from the Agency, Parks Canada, Aquila and Highwood Environmental Management were available to answer questions following a short presentation. A copy of the public notice, project description, ENGO contact list and handout materials are provided in Appendix B.

- Preliminary project descriptions, impact assessment, standard mitigation practices and constraint mapping were put on display at BNP for a 14 day review following the public meeting. Special interest groups were contacted to make certain they were aware that the materials were available for review;

- Comments received by key stakeholders were considered, and where appropriate, incorporated into the MCSR;

- Contacts were made with potential RAs, federal authorities, other expert departments and the proponent. These contacts served to identify key environmental issues associated with the operation and maintenance of distribution facilities and to ensure that required environmental standards are captured in the MCSR; and

- Government stakeholders were involved in reviewing and commenting on various drafts of the MCSR.

- The Final Draft of the MCSR was put out for a 14-day public review period in BNP before it was submitted to the Agency.

- There was an additional mandated 30 day review period to comment on the report once it was submitted to the Agency, before they consider declaration of the MCSR.