

Brandon Dispatchable Capacity Project

Response to Summary of Issues

Transmission and Distribution
Environment and Engagement Department

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Land acknowledgment

Manitoba Hydro has a presence across Manitoba – on Treaty 1, Treaty 2, Treaty 3, Treaty 4 and Treaty 5 lands – the original territories of the Anishinaabe, Anishininew, Cree, Dakota, and Dene peoples and the National Homeland of the Red River Métis. Manitoba Hydro also acknowledges the ancestral lands of the Inuit in northern Manitoba. We acknowledge these lands and pay our respects to the ancestors of these territories who have stewarded the land since time immemorial, and to those who continue to care for the land. We acknowledge the impacts of our projects and operations on the lands and waters across Manitoba. The legacy of the past remains a strong influence on our relationships with the Indigenous nations today and we are committed to working collaboratively to strengthen and improve our relationships with Indigenous peoples and nations

The project site for the proposed combustion turbine and transmission interconnection components of the Brandon dispatchable capacity project is located near the boundary of Treaty 1 and Treaty 2. These treaties overlap with the original territories of the Anishinaabeg, Anishininewak, Ininewak, and Dakota Oyate and the National Homeland of the Red River Métis.

We acknowledge these Nations who have occupied and cared for these lands for thousands of years and continue to do so. We also acknowledge their longstanding cultural and spiritual connections with the lands and waters. On this project, we remain committed to developing and maintaining meaningful and mutually beneficial relationships with Indigenous nations involved throughout the project and beyond. Through this we recognize the importance of learning and considering the unique perspectives and insights these nations share as we move forward together in a spirit of truth, reconciliation and collaboration.

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1.0 Introduction

Manitoba Hydro submitted an initial project description of the Brandon dispatchable capacity project, French and English summaries, and associated data, to the Impact Assessment Agency of Canada (IAAC) in June 2026.

The IAAC conducted a comment period from June 29, 2026, to July 19, 2026, to invite participants to provide their perspective on any issues that they consider relevant in relation to the project.

On July 28, 2026, the IAAC published their summary of issues in response to the comments received during the comment period.

Manitoba Hydro has prepared this document to respond to the summary of issues, as well as provide an update to IAAC on project progress in relation to the identified issues.

1.1 Approach to response to summary of issues

Manitoba Hydro understands the summary of issues document provides the key issues within federal jurisdiction that IAAC considers necessary to support decision-making on whether an impact assessment is required, under section 16 of the *Impact Assessment Act*.

The responses will focus predominantly on existing legislative and regulatory frameworks, specifically, how the provincial environmental assessment process under the *Environment Act (Manitoba)* (C.C.S.M. c. E125) will satisfy all federal requirements.

Section 2 provides direct responses to each of the key issues identified, including existing legislative and regulatory frameworks under which the issues will be addressed as well as Manitoba Hydro best practices, policies, and standards that will be applied to the project.

Section 3 provides a high-level summary of how the concerns and/or recommendations, outlined in appendix I of the summary of issues, will be addressed as part of the project.

1.2 Update on the project

Manitoba Hydro understands that IAAC is currently not requiring Manitoba Hydro to submit a detailed project description.

Manitoba Hydro is of the view that there are no scope or design aspects of the project that have changed significantly from what was presented in the initial project description to justify the need for a detailed project description.

This section highlights updates to the project and the assessment/engagement process.

Since the submission of our initial project description, we are pleased to provide the following updates regarding project advancement and ongoing engagement activities.

1.2.1 Environmental assessment

Based on discussions with Manitoba Environment and Climate Change's Environmental Approvals Branch in late 2025, Manitoba Hydro will submit two environmental licensing applications under The *Environment Act* (Manitoba), each supported by a separate environmental assessment (EA) report.

One application will address the combustion turbine plant and transmission interconnection components, while the other will address the natural gas pipeline component owned and operated by Centra Gas Manitoba Inc., a wholly owned subsidiary of Manitoba Hydro.

Manitoba Hydro anticipates filing an environmental assessment report as part of the notice of alteration for the expansion of the Brandon Combustion Turbine Plant in early September 2026.

As previously indicated in the initial project description, the combustion turbine plant and transmission interconnection components are considered an alteration to the existing Brandon Combustion Turbine Plant which consists of two simple cycle combustion turbine (SCCT) units and is operated per *Environment Act* Licence No. 2497R.

Manitoba Hydro anticipates filing an environmental assessment report as part of an application for a provincial license for the proposed pipeline in early October 2026.

1.2.2 Ongoing engagement

On July 31, 2026, Manitoba Hydro completed its second round of engagement on the project. To date, Manitoba Hydro has received a total of 139 survey responses from the first and second rounds of engagement. The responses and

feedback are currently being reviewed for incorporation into the EA report being compiled for the natural gas pipeline component of the project.

Manitoba Hydro continues to actively engage with Indigenous audiences and interested parties on the project as the development of the two EA reports, and associated mitigation measures and environmental protection plans, is still underway.

We trust that these updates demonstrate our ongoing commitment to transparent communication, meaningful engagement, and compliance with all regulatory requirements.

1.2.3 Public Utilities Board review

Pursuant to the provisions of The Manitoba Hydro Act (C.C.S.M. c. H190) noted below, the Manitoba Public Utilities Board (PUB) is conducting a public regulatory review of the project both as a component of the integrated resource plan (IRP) and as required for a proposed major new natural gas generating facility (i.e., the Brandon dispatchable capacity project)¹. Public hearings under this process commenced on July 27, 2026, and are anticipated to conclude on September 4, 2026.

On February 2, 2026, in accordance with subsection 38.1(4) of The Manitoba Hydro Act, the Lieutenant Governor in Council referred Manitoba Hydro's 2025 IRP to the PUB for its review and recommendations pursuant to Order in Council No. 12/2026.

In accordance with subsection 16(3) of The Manitoba Hydro Act, which requires Manitoba Hydro to obtain approval for major new facilities, the Lieutenant Governor in Council also referred the proposed development of the three combustion turbines at the Brandon Generating Station location (i.e., the Brandon dispatchable capacity project) to the PUB for its review and recommendation regarding the needs for, or alternatives to, the proposed development.

The IRP is built on thousands of hours of modelling, analysis and evaluation, using data-driven insights to guide planning decisions. It was shaped by feedback from Manitoba Hydro customers and interested parties including governments, Indigenous organizations, and environmental non-governmental organizations.

¹ See applications before the Public Utility Board at <https://www.pubmanitoba.ca/v1/proceedings-decisions/appl-current/2026integratedresourceplan.html>.

The IRP considered 21 different resources options including wind generation, solar photovoltaic generation, battery storage, and alternative fuels. The IRP recommends a balanced portfolio that includes wind generation, battery storage, customer side solutions and combustion turbines.

The primary objective of the IRP is to arrive at a recommended development plan, which is a portfolio of resources that meets the evolving energy needs.

As part of the review process, Manitoba Hydro has filed dozens of exhibits, responded to four rounds of information requests from seven different intervenors as well as the PUB and their independent expert consultants and is currently engaged in public hearings.

2.0 Response to summary of issues

Manitoba Hydro is of the view that any potential adverse effects from the project within federal jurisdiction, including direct or incidental adverse effects, would be addressed through existing federal and provincial legislative and regulatory frameworks. These include but are not limited to:

Federal statutes, namely:

- *The Fisheries Act* (R.S.C. 1985, c. F-14)
- *The Species at Risk Act* (S.C. 2002, c. 29)
- *The Migratory Birds Convention Act* (S.C. 1994, c. 22)
- *The Canadian Navigable Waters Act* (R.S.C. 1985, c. N-22)

As well as numerous provincial statutes such as:

- *The Environment Act* (C.C.S.M. c. E125)
- *The Heritage Resources Act* (C.C.S.M. c. H39.1)
- *The Endangered Species and Ecosystems Act* (C.C.S.M. c. E111)
- Others identified in section 4.3.2 of the Initial Project Description

Generally, the key issues mentioned in the summary of issues relate to potential adverse effects of the project that will be assessed provincially under *The Environment Act*.

As described in section 4.3.2.2 of the initial project description, the review under *The Environment Act* is a public process and is sufficiently broad to assess impacts under federal jurisdiction.

The Environment Act subsection 1(2) defines “environment” very broadly as:

- a) air, land, water, or
- b) plant and animal life including humans.

This scope is sufficiently broad to capture effects under federal jurisdiction such as migratory birds, fish, fish habitat, species at risk, and navigable waters.

The *Environment Act* also specifically requires the provincial Director or Minister to consider the amount of Green House Gas emissions when considering a proposed project (s. 12.0.2).

Given the existing Brandon Combustion Turbine Plant, a Class 3 development licensed under the *Environment Act* (*Environment Act* Licence No. 2497R), the

addition of the proposed three new SCCTs and new transmission interconnections is considered an alteration to the existing development.

Based on Manitoba Hydro's initial discussions regarding the project with the Environmental Approvals Branch, the project is deemed to be a major alteration, and the notice of alteration for the project must be filed through the submission of an Environmental Act Proposal.

Further, as an electrical generating facility with a generating capacity greater than 100 MW (per the provincial Classes of Development Regulation (M.R. 164/88) of the Environment Act), like the existing Brandon Combustion Turbine Plant, the proposed three SCCT units (combined capacity of 750 MW) constitute a Class 3 development.

The transmission interconnection component involves the construction and operation of 138-kV and 230-kV transmission lines which constitute a Class 2 development under the provincial Classes of Development Regulation.

However, based on discussions about the project with the Environmental Approvals Branch, a standalone Environment Act Proposal is not required for the transmission interconnection component of the project given the total short length of the proposed transmission lines (less than 5 km).

The assessment of effects associated with the transmission lines will be included in the EA report for the proposed SCCT plant component.

The natural gas pipeline component consists of the construction and operation of an approximately 30 km long, 20-inch nominal pipe size steel pipeline. The pipeline constitutes a Class 2 development under the Classes of Development Regulation, and Manitoba Hydro's wholly owned subsidiary, Centra Gas Manitoba Inc., is the proponent for this component. Since an *Environment Act* Proposal is required for the pipeline, a separate EA report will be prepared and filed for this component.

For major notices of alteration and proposals under the *Environment Act*, Manitoba Hydro must prepare a detailed EA report describing potential environmental effects of the project for submission to the Environmental

Approvals Branch in accordance with the Province's Information Bulletin and regulations².

If a licence is issued, in accordance with the statutory obligations of the director and minister, the licence will contain such specifications, limits, terms and conditions, or requirements for such modifications as the minister (or director) deems necessary to ensure effective environmental management³.

As described more specifically below, Manitoba Hydro expects that licences or amended licences issued for the project will contain sufficient terms and conditions to mitigate potential adverse effects related to the key issues in the summary of issues.

2.1 Fish and fish habitat

2.1.1 Potential effects to fish and fish habitat

Issue: Concern regarding potential effects to fish and fish habitat, including from construction related activities such as noise, in-water works, horizontal direction drilling and water withdrawals.

Response: Currently, Manitoba Hydro withdraws water from the Assiniboine River via a water intake immediately north of the Brandon Generating Station, to support operation of the existing two SCCTs under a water use licence issued by the Province of Manitoba in June 2021.

Manitoba Hydro's existing water use licence authorizes withdrawals from the Assiniboine River, which would provide sufficient water to support operation of both the existing two SCCTs and the proposed three SCCTs, if required.

However, Manitoba Hydro's intention is to eliminate the need for river water withdrawals by transitioning to treated wastewater supplied by the City of Brandon's Water Reclamation Facility, located approximately 2.5 km east of the Brandon Generating Station.

To support this transition, Manitoba Hydro has been working with the city since January 2026 to establish a treated wastewater supply agreement. Assuming

² Province of Manitoba Information Bulletin – Environment Act Proposal Report Guidelines (June 2023) available online at https://www.gov.mb.ca/sd/pubs/environmental-approvals/eap_report_guidelines.pdf; Licensing Procedures Regulation (M.R. 163/88)

³ The Environment Act, CCSM c. E125, s. 11(1)(a), s. 12 (7)(a)

this agreement is finalized, the project would not require any in-water works or additional withdrawals from the Assiniboine River.

Furthermore, because treated wastewater is also planned to replace river water currently used by the existing SCCTs (Units 6 and 7), implementation of the project would result in an overall reduction in future water withdrawals from the Assiniboine River. At this time, Manitoba Hydro will revisit the license and determine if there is any future requirement to withdraw from the river and therefore maintain this license.

Construction of the natural gas pipeline is another project activity that poses potential for effects to fish and fish habitat due to pipeline construction across streams and the Assiniboine River.

As mentioned in Section 1.2.1, Manitoba Hydro is undertaking an environmental assessment for the pipeline, with the resulting EA report anticipated to be submitted to the provincial Environmental Approvals Branch in Fall 2026. Fish and fish habitat is one of 10 valued components on which the assessment of potential effects due to the pipeline is focused.

An estimated 10 stream crossings are anticipated for the pipeline. A technical data report documenting detailed findings of desktop and field surveys of these stream crossings is being compiled and will be included as an appendix of the pipeline's EA report.

The EA report will identify the anticipated water crossings in the pipeline footprint, summarize findings from fish and fish habitat-focused desktop reviews and fieldwork studies conducted for the project, outline mitigation measures, and any proposed follow-up monitoring for fish and fish habitat.

In pursuit of minimizing effects on fish and fish habitat the pipeline will be installed using horizontal directional drilling (HDD) at stream crossings.

Manitoba Hydro will develop a project specific construction environmental protection plan (CEnvPP) which will include mitigation tables for:

- Clearing
 - Riparian buffers
 - Sensitive sites
- Directional drilling
 - Frac out contingency
 - Water withdrawal (Freshwater Intake end of pipe fish screen guidelines)

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- Erosion and sediment control
- Fish protection
 - Species at Risk protection
- Hazardous materials
 - Contractor specific hazardous substances management plan
- Petroleum products
 - Spill containment and response
- Water crossings
 - Access and riparian buffer measures

The CEnvPP will also include management plans designed to protect fish and fish habitat such as:

- Erosion protection and sediment control plan which contains ground protection measures, buffer zones, avoidance of sensitive areas, and use of bioengineering techniques
- Clearing plan which outlines riparian buffers

The CEnvPP will be developed in time for tender of the project and will be included as part of the contract for construction of the project.

It will draw from industry best practices including federal guidance documents, e.g., Fisheries and Oceans Canada's measures to protect fish and fish habitat and/or standards and codes of practice for managing risks of harmful effects to fish and fish habitat.

2.1.2 Project's water source

ISSUE: Concern about the project's water source, quantify anticipated water demands during construction and operation, and assess associated impacts on fish and fish habitat, other aquatic species and vegetation, and Section 35 rights of Indigenous Peoples.

RESPONSE: As previously mentioned in Section 2.1.1, Manitoba Hydro anticipates using treated wastewater from the City of Brandon as a water source to support operation of the proposed and existing SCCTs. The use of treated wastewater would not involve any in-water work as part of this project.

As the treated wastewater would also supply water for operation of the existing two SCCTs, there will be no need for continued water withdrawals from the Assiniboine River, allowing cessation of water withdrawals from the river and retirement of the existing water intake, piping, and pumps.

As mentioned in Section 2.1.1, should Manitoba Hydro not be able to use treated wastewater from the City as a water supply for the SCCTs, Manitoba Hydro's existing licensed water withdrawal from the Assiniboine River (up to 28 MLD) would be sufficient to support operations for both the existing and proposed SCCTs (design estimate of 15.3 MLD).

However, a new water intake on the Assiniboine River would be needed, and design and construction details of the new water intake would be required and need approval pursuant to the *Fisheries Act*.

Should a new water intake be needed, Manitoba Hydro will apply for a Fisheries Act authorization including a description of the work affecting fish and fish habitat, details on the existing fish habitat and offsetting measures if required.

As described in section 2.4.1 below in greater detail, Manitoba Hydro has not been delegated the legal duty to consult with Indigenous nations about potential impacts to Aboriginal and treaty rights for this project. However, Manitoba Hydro is undertaking project engagement and an environmental assessment process that includes the assessment of potential effects on rights-based activities.

Within the environmental assessment for the pipeline component of the project, Manitoba Hydro is assessing potential effects of the pipeline on harvesting, including rights-based hunting, fishing, trapping, and gathering.

The assessment will rely on feedback shared through project engagement and be informed by the fish and fish habitat, vegetation and wetlands, and wildlife and wildlife habitat assessment conclusions.

2.1.3 Summary of response for fish and fish habitat

Considering the outlined provincial EA process, limited potential for effects to fish and fish habitat through the proposed project activities, as determined in the environmental assessment reports, and Manitoba Hydro's proposed mitigation measures, the provincial EA process can adequately address the summarized issues related to fish and fish habitat.

Based on the above information, as well as that contained in the initial project description, Manitoba Hydro anticipates that potential effects to fish and fish, including species at risk, such as the Mapleleaf mussel, will be negligible.

2.2 Indigenous current use of lands and resources for traditional purposes

2.2.1 Effects of the natural gas pipeline on land use

ISSUE: Concern regarding potential effects of the natural gas pipeline, including effects to wildlife, species at risk and Indigenous Peoples' current use, access, sites of cultural importance, and socio-economic conditions.

RESPONSE: As outlined in previous sections, Manitoba Hydro is undertaking a standalone environmental assessment of the natural gas pipeline component of the project.

The ongoing assessment of potential effects of the pipeline focuses on 10 biophysical and socio-economic valued components, which may be renamed or grouped differently in the final EA report. These valued components are:

- 1) Vegetation and wetlands (including species at risk)
- 2) Wildlife and wildlife habitat (including species at risk)
- 3) Water resources (including surface and groundwater)
- 4) Fish and fish habitat (including species at risk)
- 5) Harvesting and important sites (including Indigenous Peoples' current use of the area, access, and sites of cultural importance to Indigenous Peoples)
- 6) Land and resource use (i.e., non-Indigenous Peoples' land and resource use)
- 7) Infrastructure and community services
- 8) Human health and community well-being
- 9) Commercial agriculture
- 10) Employment and economy

The assessment of project effects on human health and community well-being, as well as employment and economy, both apply a gender-based analysis plus (GBA+) approach to provide understanding of how different groups, including Indigenous peoples, may be affected by the project.

To minimize potential effects on wildlife and species at risk, standard industry best practices, avoidance measures, and project-specific mitigation measures outlined in the environmental protection program will be implemented during construction, operation, and maintenance activities.

These measures include identifying, mapping, and delineating environmentally sensitive wildlife features, such as mineral licks and stick nests, and establishing appropriate buffers or setbacks to protect them.

In addition, site rehabilitation plans will focus on restoring natural conditions and will include measures for erosion and sediment control, management of non-native and invasive plant species, and restoration of wildlife habitat.

As part of ongoing project engagement, Manitoba Hydro will continue to seek feedback from engaged First Nations and the Manitoba Métis Federation on current use of the project area for traditional purposes, as well as important sites that may be impacted by project activities along the route for the natural gas pipeline.

The mechanisms for receiving this feedback may include Nation-led studies and engagement activities, workshops facilitated by Manitoba Hydro, and nation-specific meetings.

Manitoba Hydro is open to receiving feedback on current use of the project area and sites of cultural importance in whichever ways are appropriate for each Nation.

Information shared with Manitoba Hydro through project engagement is being used to inform the development of the environmental assessment, and associated mitigation measures and environmental protection plans currently being developed.

2.2.2 Mitigation and residual effects

ISSUE: Concern regarding mitigation measures and anticipated residual effects of the project on Indigenous Peoples' current use of lands and resources for traditional purposes, physical and cultural heritage, and sites and things of historical, archaeological, paleontological, or architectural significance.

RESPONSE: As previously mentioned, important sites are included in the valued components on which the assessment of project effects being undertaken by Manitoba Hydro is focused.

Important sites are intended to be inclusive of heritage resources as defined and protected by Manitoba's *Heritage Resources Act*, as well as a broad range of cultural sites and features understood to be important to First Nations peoples and Red River Métis citizens in the project area.

In addition to the assessment of effects under the *Environment Act*, Manitoba Hydro will conduct two heritage resources impact assessments (HRIA) to identify and evaluate any heritage resources that may be adversely affected by project development.

One HRIA will encompass the immediate vicinity of the Brandon Generating Station, including the project development area for the proposed SCCT plant building and transmission lines. The second HRIA will encompass the vicinity of the natural gas pipeline right-of-way. Reports documenting both HRIAs will be submitted to the provincial Historic Resources Branch for review.

The HRIA serves as a mitigation measure to identify and avoid, as much as possible, important sites prior to construction start. Specific mitigation measures will be developed for any features identified during the HRIAs and included in the CEnvPPs for the SCCTs and transmission lines, and natural gas pipeline.

For each project, Manitoba Hydro develops a CEnvPP as part of the project's environmental protection program to provide construction contractors and environmental staff with general and specific environmental protection information for project components during construction.

The CEnvPP will document environmentally sensitive sites, including sites of cultural or spiritual importance, that require protection during construction of the project. Feedback from engagement will inform the identification of environmentally sensitive sites within the project area.

As part of the CEnvPP, a cultural and heritage resources protection plan⁴ will be developed and implemented during construction to mitigate any cultural or heritage resources encountered during construction, which is a standard practice across Manitoba Hydro projects.

To date, potential direct effects of the project on important sites have been reduced by the location of the project, including the routing of the transmission lines on predominantly developed lands, desktop reviews, and submission of screening requests to Historic Resources Branch to determine the nature and scope of potential HRIA requirements.

Manitoba Hydro anticipates residual project effects on important sites to be most pronounced during the construction phase as this phase of the project will involve the greatest amount of ground-disturbance within the proposed development area.

Manitoba Hydro's understanding of anticipated residual project effects on important sites may be refined following completion of the HRIA, implementation

⁴ See Manitoba-Minnesota transmission project [cultural and heritage resources protection plan](#) for example

of mitigations from the Historic Resources Branch, or additional feedback shared through ongoing project engagement.

As part of ongoing project engagement, Manitoba Hydro will continue to seek feedback from engaged First Nations and the Manitoba Métis Federation on current use of the project area for traditional purposes as well as important sites that may be impacted by project activities.

Manitoba Hydro is actively engaging First Nations and the Manitoba Métis Federation on identifying areas of concern related to heritage in the project area through engagement circles, individual meetings and discussions, and nation-specific studies, and is actively providing opportunities to participate in fieldwork activities related to the HRIA.

Information shared with Manitoba Hydro through project engagement will be used to inform the ongoing environmental assessment and proposed mitigation measures, as well as the CEnvPP that will be developed for the project.

2.2.3 Effects to wildlife

ISSUE: Concern regarding potential effects on wildlife, including biodiversity, movement and habitat, species of cultural importance, migratory birds, and any resulting impacts on Indigenous traditional practices.

Response: As mentioned in section 2.2.1, the environmental assessment that Manitoba Hydro is undertaking for the natural gas pipeline includes wildlife and wildlife habitat as one of the valued components on which the assessment of potential project effects is focused.

This assessment includes consideration of some aspects noted in the issue (e.g. biodiversity, movement habitat, species of cultural importance and migratory birds).

Another valued component being included in the environmental assessment for the pipeline is harvesting and important sites which considers aspects related to species of cultural importance and potential impacts on Indigenous traditional practices.

Through harvesting and important sites, potential effects of the pipeline on harvesting, including rights-based hunting, fishing, trapping, and gathering of traditional plants, medicines, and other natural materials will be assessed.

The assessment of potential effects to rights-based harvesting relies on feedback shared through project engagement and is also informed by the assessment

conclusions for other valued components representing the harvested resources on which rights-based harvesting depends (i.e., wildlife and wildlife habitat, fish and fish habitat, and vegetation and wetlands).

For the development areas associated with the combustion turbine and transmission interconnection components, Manitoba Hydro does not anticipate interactions between project activities and harvesting activities given the following:

- predominantly developed project site (i.e., vicinity of the Brandon Generating Station and Cornwallis Station) and its surrounding area which are primarily zoned for industrial land use
- the project site's existing and operational heavy industrial use
- existing access restrictions to the project site
- anticipated use of treated wastewater from the City of Brandon to support operation of the existing and proposed SCCTs

As a result, Manitoba Hydro does not anticipate the combustion turbine plant and transmission line components of the project to result in changes in access to areas used for rights-based activities by First Nations peoples and Red River Métis citizens.

To date, Manitoba Hydro has not heard specific concerns during project engagement about potential effects on harvesting related to the combustion turbine and transmission interconnection components of the project.

As part of ongoing project engagement, Manitoba Hydro will continue to seek feedback from engaged First Nations and the Manitoba Métis Federation on rights-based activities practiced in the project area and on harvested resources, such as harvested wildlife species, that may be affected by the project.

Feedback received prior to the completion and submission of the two EA reports currently being developed will be used to inform the effects assessment and mitigation measures, and subsequent construction environmental protection plans.

2.2.4 Summary of response for Indigenous current use of lands and resources

Considering the outlined provincial EA process, limited potential for effects to Indigenous current use of lands and resources through the proposed project activities, and Manitoba Hydro's proposed mitigation measures, the provincial EA

process can adequately address the summarized issues related to Indigenous current use of lands and resources.

2.3 Indigenous Peoples' health and well-being or economic conditions

ISSUE: Concern about the potential effects on Indigenous Peoples' health, social, and economic conditions, including baseline socioeconomic status, mitigation measures, and opportunities and benefits to Indigenous Peoples.

Response: Manitoba Hydro is undertaking two environmental assessments, the results of which will be documented in two EA reports that will be submitted to the provincial Environmental Approvals Branch.

As previously mentioned, one environmental assessment and associated EA report will be for the combustion turbine plant and transmission line components of the project while the other environmental assessment and associated EA report will be for the natural gas pipeline.

Both environmental assessments include human health and community well-being and employment and economy as valued components on which the environmental assessment is focused. They both apply a gender-based analysis plus (GBA+) approach to inform understanding of how different groups, including Indigenous peoples, may be affected by the project.

Manitoba Hydro anticipates that there will be positive residual effects on employment and economy, including increased employment and business opportunities because of the project. In pursuit of enhancing the positive residual effects of the project on Indigenous Peoples' economic conditions:

- Manitoba Hydro will contact First Nations and the Manitoba Métis Federation prior to project start-up, to provide details about the upcoming project and associated training, employment, and business opportunities.
- Manitoba Hydro will continue to meet with First Nations and the Manitoba Métis Federation to discuss multiple projects in the region to support longer-term employment and business opportunities.
- Contract measures will promote opportunities for Indigenous people and businesses including training, employment and business opportunities
- Manitoba Hydro will collaborate with the contractors through the contracting process to promote participation of Manitoba businesses in the project.
- Contractors may be required to submit an Indigenous On the Job Training plan covering both designated and non-designated trades, applicable across all

project scopes. Manitoba Hydro will include Indigenous content as a tender evaluation criterion for construction contracts to incentivize the use of Indigenous labour, subcontractors, and suppliers.

- Manitoba Hydro offers pre-placement programs for Indigenous candidates who do not meet the minimum academic qualifications of our power line technician program or our power electrician training program.
- To assist with costs for training and to help Indigenous Manitobans prepare for opportunities on the project, Manitoba Hydro offers a project bursary to help Indigenous job seekers overcome barriers with funding given for training and education, as well as equipment, personal protective equipment, and tools.
- Manitoba Hydro will establish employment targets to be applied across most contracts for the project.
- Hiring will take place with the assistance of community employment coordinators and through employment fairs in Indigenous communities.

Manitoba Hydro is continuing to work with First Nations and the Manitoba Métis Federation to build relationships and support economic opportunities on the Brandon dispatchable capacity project.

In July 2026, a letter was sent out to engaged First Nations and the Manitoba Métis Federation sharing information on procurement opportunities on the different scopes of work for the project with specific information being shared about potential business opportunities related to the generation scope of work and the opportunity to provide a list of Indigenous businesses that can be shared with potential contractors to explore subcontracting, supply, and partnership opportunities. A similar approach is anticipated for the additional scopes of work related to the transmission interconnection and natural gas pipeline.

Based on feedback received through project engagement to-date and additional potential feedback from ongoing engagement activities, Manitoba Hydro is also exploring additional training, employment and business opportunities on the project for First Nations peoples and Red River Métis citizens, such as employment fairs to bolster Manitoba Hydro's existing job-seeker database for projects. This approach would also apply to all scopes of work associated with the project.

2.3.1 Summary of response for Indigenous Peoples' health and well-being or economic conditions

Considering the outlined provincial EA process, limited potential for adverse effects to Indigenous Peoples' health and well-being through the proposed project activities, and Manitoba Hydro's proposed mitigation measures, the provincial EA process can adequately address the summarized issues related to Indigenous Peoples' health and well-being.

Manitoba Hydro intends to maximize Indigenous Peoples' economic participation in the project by proactively communicating opportunities, supporting training and workforce development, and encouraging the use of Indigenous workers, businesses, subcontractors, and suppliers through contract requirements and hiring initiatives.

Manitoba Hydro anticipates that the residual effects on economic employment and economy will be positive and for human health and community well-being will be negligible following the application of mitigation measures.

2.4 Indigenous Peoples' rights

2.4.1 Section 35 rights

ISSUE: Concern regarding the process for assessing the project's impacts on Section 35 rights of Indigenous Peoples.

RESPONSE: Provincially, the Province of Manitoba's Department of Environment and Climate Change, the Crown entity responsible for project-related decisions under *The Environment Act*, and therefore under Canadian law, holds the duty to undertake Section 35 Crown consultation with Indigenous nations and to assess the potential for the project to impact Aboriginal and treaty rights.

Although Manitoba Hydro is a Crown corporation, the province has not delegated the legal duty to consult with Indigenous nations about potential impacts to rights for this project to Manitoba Hydro, either by legislation or other instrument.

Instead, Manitoba Hydro is undertaking project engagement, rather than s.35 consultations per se, and our environmental assessment process focuses on assessing the potential effects of the project on rights-based activities, rather than on rights themselves.

Rights-based activities are those that the Courts have expressly recognized would potentially be constitutionally protected under Section 35 of the Canadian Constitution Act, 1982.

Manitoba Hydro's assessment of potential project effects on rights-based activities is predominantly informed by feedback and Indigenous knowledge shared by engaged nations through Manitoba Hydro's project engagement process.

Manitoba Hydro's project engagement process is separate from the Section 35 Crown-Indigenous consultation process that will be initiated by the Province of Manitoba as part of their regulatory review and decision-making process for the project.

However, Manitoba Hydro understands that the Province of Manitoba may rely on information gathered through our project engagement process to help inform their Section 35 consultation process for the project.

Therefore, Manitoba Hydro has planned and is implementing an engagement process intended to support the provincial Crown-Indigenous consultation process. This includes gathering and assessing feedback related to rights-based activities and to components of the environment that support the ability to undertake rights-based activities (e.g., wildlife, fish, vegetation, important sites).

2.4.2 Section 35 rights – project effects

ISSUE: Concern regarding the potential effects to Section 35 rights of Indigenous Peoples from effects to vegetation, wildlife and wildlife habitat, fish and fish habitat, areas of importance, and water quantity and quality.

RESPONSE: As noted in section 2.4.1 above in greater detail, Manitoba Hydro has not been delegated the legal duty to undertake s.35 consultations with Indigenous nations about potential impacts to Aboriginal and treaty rights for this project.

However, Manitoba Hydro is undertaking project engagement and an environmental assessment process that includes the assessment of potential effects on rights-based activities.

Manitoba Hydro has identified 'harvesting and important sites' as a valued component for the environmental assessment being undertaken for the pipeline component of the project. This valued component is intended to consider the diverse ways by which different cultural groups may practice rights-based

activities, as well as locations and features of the land of heritage or cultural value.

The assessment of potential effects to harvesting and important sites relies on feedback shared by Indigenous nations through project engagement and is also informed by the assessment conclusions for other valued components representing aspects of the environment which support and influence the ability to undertake rights-based activities.

For example, Manitoba Hydro's understanding of potential project effects on harvested resources will consider conclusions related to predicted project effects on wildlife and wildlife habitat, fish and fish habitat, and vegetation and wetlands.

Similarly, to understand potential effects on cultural experiences, Manitoba Hydro will consider conclusions related to human health and community well-being (e.g., noise, air quality).

As part of ongoing project engagement, Manitoba Hydro will continue to seek feedback from engaged First Nations and the Manitoba Métis Federation on how rights-based activities are practiced in the project area and how they may be affected by project activities.

2.4.3 Cumulative effects

ISSUE: Concern regarding how the project's contribution to cumulative effects on Indigenous Peoples' rights will be assessed and how Indigenous Knowledge will be incorporated into the assessment.

RESPONSE: As noted in section 2.4.2 above in greater detail, Manitoba Hydro has not been delegated the duty to consult with Indigenous nations regarding potential impacts to Section 35 rights. The Province of Manitoba holds the legal duty to consult with Indigenous nations and to assess the potential for the project to impact Section 35 rights, which may include potential for cumulative effects on Indigenous Peoples' rights.

Within the two environmental assessment reports that Manitoba Hydro will be submitting to Manitoba Environment and Climate Change for the project, anticipated cumulative effects on the applicable valued components of the environment are assessed.

Manitoba Hydro has incorporated and will continue to incorporate information shared by Indigenous nations through project engagement to inform the

environmental assessment process related to cumulative effects, including cumulative effects on rights-based activities. This may include feedback shared at engagement circles, individual meetings with Indigenous nations, and available Indigenous knowledge studies.

As part of ongoing project engagement, Manitoba Hydro will continue to seek feedback from engaged First Nations and the Manitoba Métis Federation, including feedback related to cumulative effects.

2.4.4 Summary of response for Indigenous Peoples' rights

Considering the outlined provincial EA process, which includes s.35 consultation, limited potential for adverse effects to Indigenous Peoples' health and well-being or economic conditions through the proposed project activities, and Manitoba Hydro's proposed mitigation measures, the provincial EA process can adequately address the summarized issues related to Indigenous Peoples' health and well-being or economic conditions.

3.0 Response to Appendix I – other comments, advice, and recommendations

In addition to the Summary of Issues, the IAAC provided additional comments, advice, and recommendations for consideration by the proponent. The following sections provide further information on these topics to support the IAAC with their continued evaluation of the proposed project.

3.1 Alternatives to the project

Manitoba Hydro's 2025 integrated resource plan⁵ is built on thousands of hours of modelling, analysis and evaluation, using data-driven insights to guide planning decisions.

It was shaped by feedback from Manitoba Hydro customers and interested parties including governments, Indigenous organizations, and environmental non-governmental organizations.

Modelling and analysis from the 2025 integrated resource plan identified six potential resources to meet demand in the recommended development plan's 10-year timeframe, with natural gas fueled SCCT's being one of the recommended resources.

As outlined in our IRP submissions to the PUB⁶, Manitoba Hydro monitors and maintains an inventory of electricity generation resource options, including utility scale generation (e.g., wind, solar photovoltaic), enhancements to existing generating stations, distributed generation, and energy efficiency (demand side management) measures. These all form part of the modelling and analysis conducted as part of the IRP.

In accordance with subsection 38.1(1) of *The Manitoba Hydro Act*, Manitoba Hydro submitted, for approval by the Lieutenant Governor in Council, its 2025 Integrated Resource Plan which includes the proposed project.

On February 2, 2026, in accordance with subsection 38.1(4) of *The Manitoba Hydro Act*, the Lieutenant Governor in Council referred the 2025 IRP to the Public Utilities Board ("PUB") for its review and recommendations regarding the needs

⁵ [Integrated Resource plan](#)

⁶ [Appendix 6 – Resource Options](#)

for, or alternatives to, the proposed development. A public hearing on this matter is currently underway.

3.2 Provincial environmental assessment process

In Manitoba, the *Environment Act* outlines the environmental assessment and licensing process for developments that have the potential to pose impacts to the environment including impacts to human health. The review process is undertaken by the Environmental Approvals Branch, who are the primary point of contact and issuing authority for Environment Act Licences within the province. For this project, Manitoba will be providing two regulatory submissions to the Environmental Approvals Branch:

- A Notice of Alteration to Environment Act Licence 2497R (Class 3), in pursuit of approval for the construction, operation, and decommissioning of the combustion turbine plant and transmission line components of the project
- An application for a Class 2 Environment Act Licence in pursuit of approval for the construction, operation, and decommissioning of an approximately 30 km long natural gas pipeline

As described above in Section 2.0, Manitoba Hydro is of the view that any potential adverse effects from the project within federal jurisdiction, including direct or incidental adverse effects, will be adequately addressed through existing federal and provincial legislative and regulatory frameworks.

Manitoba Hydro has extensive experience in environmental assessment and successful environmental protection planning and implementation of major project developments in recent years, including several transmission lines, four pipelines, as well as Keeyask generating station⁷.

If approved, Manitoba Hydro expects that the licences or amended licences issued for the project will contain terms and conditions that will sufficiently mitigate potential adverse effects related to the key issues identified in the summary of issues.

⁷ [Completed major projects](#)

3.2.1 Provincial information requirements for environmental assessment reports

Provincial guidance for EA report content requires the consideration of potential project effects on the environment including aspects that fall under federal jurisdiction, e.g., fish and fish habitat, species at risk, migratory birds, and effects to Indigenous Peoples.

In the Government of Manitoba (2023)'s Information Bulletin – Environment Act Proposal Report Guidelines⁸, the following information is indicated as typical of EA reports' description of environmental and human health effects of proposed developments:

“Potential impacts of the development on the environment, including, but not necessarily limited to:

- impact on biophysical environment, including wildlife, fisheries, surface water, groundwater, and forestry resources;
- type, quantity and concentration of pollutants (emissions, effluents and solid wastes) to be released, and the technologies proposed to contain or treat the waste streams;
- information on the storage, transportation and disposal of any hazardous wastes that may be produced
- identification of any storage of gasoline or associated products (e.g. diesel fuel, used oil, heating oil, aviation gas, solvents, isopropanol, methanol, acetone, etc.);
- impact on heritage resources
- socio-economic implications resulting from environmental impact; and
- climate change implications including a greenhouse gas inventory calculated according to guidelines developed by Environment Canada

Potential impacts of the development on human health and safety, including, but not necessarily limited to:

- *potential impact on human health and safety resulting from any release of pollutants, including a human health risk assessment.*

⁸ Government of Manitoba. 2023. Information Bulletin – Environment Act Proposal Report Guidelines. Available online at https://www.gov.mb.ca/sd/pubs/environmental-approvals/eap_report_guidelines.pdf.

Potential impacts of the development on Indigenous communities, including, but not necessarily limited to:

- direct impacts on communities in the project area;
- resource use, including hunting, fishing, trapping, gathering, etc.;
- cultural or traditional activities in the project area.

As elaborated in subsequent sections, Manitoba Hydro's approach to the assessment of potential project effects is intended to satisfy the provincial requirements outlined above, and identifies mitigation measures, in pursuit of minimizing residual project effects including those that fall under federal jurisdiction.

3.2.2 Valued components

Manitoba Hydro's environmental assessment approach was developed through a review of provincial and federal regulations, current environmental assessment practices, experience undertaking assessment of similar projects, site visits, and consideration of feedback received from regulators, First Nations and their members, the Manitoba Metis Federation and Red River Métis citizens, landowners, interested parties and the public during project engagement.

Through these processes, Manitoba Hydro has identified the following valued components on which the assessment of project effects for the natural gas pipeline is focused (previously outlined in Section 2.2.1)

- Vegetation and wetlands (including species at risk)
- Wildlife and wildlife habitat (including species at risk)
- Water resources (including surface and groundwater)
- Fish and fish habitat (including species at risk)
- Harvesting and important sites (including Indigenous Peoples' current use of the area, access, and sites of cultural importance to Indigenous Peoples)
- Land and resource use (i.e., non-Indigenous Peoples' land and resource use)
- Infrastructure and community services
- Human health and community well-being
- Commercial agriculture
- Employment and economy

Manitoba Hydro has also identified the following valued components on which the assessment of project effects for the combustion turbine plant and transmission line components will be focused:

- Atmospheric environment (i.e., noise and air quality)

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- Water resources (including groundwater and surface water)
- Wildlife and wildlife habitat (including migratory birds and species at risk like Little Brown Myotis, Northern Leopard Frog, Western Tiger Salamander)
- Important sites (including anticipated Indigenous Knowledge-based identified cultural sites and areas of importance for historical and current use)
- Infrastructure and community services
- Employment and economy
- Human health and community well-being (including potential effects from air quality and noise)

For each of the two environmental assessments, the assessment of potential project effects for each valued component follows a standard framework, covering the following:

- Scope of the assessment
- Existing conditions
- Assessment of project effects
- Assessment of cumulative effects
- Determination of the significance of project and cumulative effects
- Prediction confidence
- Follow-up and monitoring
- Sensitivity to future climate change scenarios

Each of Manitoba Hydro's two EA reports will also include an assessment of cumulative effects for each valued component, as applicable, a discussion of effects that may occur because of environmental changes and hazards acting on the project, and an assessment of the environmental outcomes of potential accidents and malfunctions that might occur in connection with the project.

Manitoba Hydro believes that concerns associated with the effects of the project will be appropriately addressed by the provincial EA process.

3.2.3 Environmental protection planning

Each of the two EA reports will include an environmental protection program chapter that will describe Manitoba Hydro's framework for environmental protection planning and implementation.

The environmental protection program outlines roles and responsibilities and includes details of the comprehensive integrated environmental inspection program which complies with regulatory approvals and meets corporate environmental objectives.

The program includes environmental inspectors onsite during construction activities.

A key piece of Manitoba Hydro's environmental protection planning is the project-specific construction environmental protection plan (CEnvPP) which will be developed prior to the start of construction.

Manitoba Hydro will develop two CEnvPPs, one for each EA report. Each CEnvPP will include mitigation measures developed based on provincial and federal regulatory guidance documents, engagement feedback, Indigenous Knowledge, and environmental best practices.

Manitoba Hydro will also utilize feedback from engagement to support the inclusion of additional mitigation measures not already identified by Manitoba Hydro.

It should also be noted that Manitoba Hydro takes a conservative approach when considering the presence of species at risk, species of conservation concern, and species of cultural importance when developing project plans.

Manitoba Hydro assumes the presence of species, rather than their absence, and develops regulatory submissions including the environmental assessment, and associated CEnvPP and mitigation measures in line with this approach.

By taking this approach, Manitoba Hydro works to protect vulnerable and culturally important species that have the potential to be present in the project area but may not have been identified in baseline studies.

Specific concerns, provided as feedback during project engagement, were identified in comments related to accidents and malfunctions, erosion, avian and fish species, and potential impacts to their habitats, as well as impacts on cultural and heritage resources, and water resources including wetlands. Manitoba Hydro acknowledges these concerns and will make efforts to provide opportunities for continued engagement on the CEnvPPs for this project, and, where applicable, develop additional mitigation measures to include in the two CEnvPP.

Sensitive wildlife species and their habitat features, setback and buffer requirements, and sensitive timing windows will be outlined in the CEnvPP

Examples of CEnvPP components on other recently licensed Manitoba Hydro projects, intended to address similar concerns, include the following:

- Emergency preparedness and response
- Sensitive timing windows

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- Buffers and setbacks
- Avian protection documents
- Reptile and amphibian protection document
- Species of concern contingency measures
- Biosecurity management plan
- Erosion and sediment control plan
- Cultural and heritage resources protection plan

Any identified mitigation measures will be included in the CEnvPP.

Considering the anticipated use of treated wastewater from the City of Brandon to support operation of the SCCTs as well as use of HDD to install the pipeline at water crossings and other mitigation measures, Manitoba Hydro does not anticipate any in-water works or project activities that could affect fish and amphibians, and their habitat.

Should this change, Manitoba Hydro will contact Fisheries and Oceans Canada, Transport Canada, and additional interested parties to acquire the appropriate licensing and permitting requirements, and apply appropriate mitigation as required.

3.2.4 Climate resilience

To meet the provincial requirement to describe climate change implications, including a greenhouse gas (GHG) inventory (see Section 3.2.1), Manitoba Hydro's dedicated subject matter expert teams are conducting separate climate change and GHG assessments for the project.

Based on the project's ongoing climate assessment, there is reasonable agreement among simulations that the future climate for the project area will be warmer than historic conditions for both global warming level (GWL) scenarios.

There is also reasonable agreement that there will be more precipitation, on average, during winter and spring seasons for the +1.19°C GWL scenario.

For the +2.69°C GWL scenario, which is associated with a far future time horizon, there is agreement that there will be increased precipitation annually and for winter, spring and fall with decreases in summer. Although there is also some agreement regarding changes in other climatic variables (e.g., reduced mean annual wind speeds), there is generally lower scientific confidence regarding these changes.

As part of each valued component's assessment of potential project effects in the two EA reports, we are including a discussion of the valued component's sensitivity to future climate considering the climate change assessment's predicted future climate.

The climate change assessment considers several climate hazards, namely extreme rain, overland flooding, extreme temperature, freeze-thaw cycles, snow and near 0°C precipitation, fires, and storms/extreme weather.

As part of the climate assessment content included in each EA report, a table informed by multidisciplinary experts identifies climate-related hazards and summarizes the design responses and mitigation measures being implemented to enhance the project's resilience to climate change.

Considering the implementation of the design responses and mitigation measures, the residual effects of climate-related hazards are deemed low and can be managed through established response procedures.

3.2.5 Greenhouse gas emissions

The Brandon dispatchable capacity project is part of Manitoba Hydro's 2025 Integrated Resource Plan's recommended development plan (RDP). The RDP provides recommendations to meet Manitoba's electrical energy and capacity needs through 2035.

As the project is intended to operate within Manitoba's integrated energy network, modelled operational greenhouse gas (GHG) emissions will be presented at a system level and on both an annual and cumulative basis.

GHG emissions data related to the RDP were presented in Section 5.10 of Appendix 7.2⁹ of Manitoba Hydro's 2025 Integrated Resource Plan Report as well as various information requests¹⁰.

The recommended development plan considered the impacts of reliability, cost, environmental and socio-economic benefits. The plan meets the global objectives of the 2025 IRP to enable a net-zero grid by 2035, supports a pathway to a net-zero economy by 2050, and aligns with Manitoba's Affordable Energy Plan.

⁹ [Modelling & Analysis Results](#)

¹⁰ [MH 2025 Integrated Resource Plan and Major New Facilities](#)

Building on GHG emission analysis undertaken for Manitoba Hydro's 2025 Integrated Resource Plan, the GHG assessment of the recommended development plan (RDP) evaluated the GHG impacts of the RDP (which includes the project's natural gas combustion turbines) against a range of baseline scenarios.

This assessment considered all relevant lifecycle GHG impacts of RDP components, including construction and operational impacts, both within and beyond the physical boundaries of the project.

The GHG assessment applied standard GHG Project Accounting methods, referencing both the GHG Protocol's Project Protocol for GHG Accounting and Guidelines for Grid-Connected Electricity Projects as well as National Standard of Canada CAN/CSA-ISO 14040 (Environmental management – Life cycle assessment – Principles and framework), CAN/CSA-ISO 14044 (Environmental management – Life cycle assessment – Requirements and guidelines), and CAN/CSA-ISO 14064-2 (Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements).

For the combustion turbine plant and transmission line components of the project, the total cumulative considered life cycle GHG emissions (up to 2035) are estimated to be 92,000 tonnes of carbon dioxide equivalent (t CO₂e) with the construction and operation phases accounting for approximately 55% and 45% of the anticipated GHG emissions from the project.

Cumulative construction and operational GHG emissions from the project combine to represent approximately 11% of the total cumulative GHG emissions of the RDP by 2035.

3.2.5.1 Air emissions

As part of the environmental assessment of the proposed combustion turbines, an air dispersion modelling assessment was conducted with the objective of assessing the effects on ground-level concentrations for key substances of interest resulting from project emissions and compared to applicable Manitoba ambient air quality criteria (MAAQC), adopted by Manitoba Environment and Climate Change.

The air quality assessment shows that maximum predicted ground-level concentrations for all substances of interest associated with emissions from all

modelling scenarios are less than the MAAQC for all relevant averaging periods (ranging between 0.01% and 61% of the MAAQC).

In addition, a noise assessment was conducted to quantify the existing acoustic environment (i.e., baseline sound level) and noise effect from the operation of three new SCCTs at the “most affected” noise receptors within the regional assessment area (RAA).

The noise assessment results are compared to the applicable noise thresholds of the Province of Manitoba noise guidelines and Health Canada federal noise guidance.

The assessment results indicate that the predicted operational noise levels associated with the project meet provincial, sleep disturbance, and low frequency noise thresholds.

The results were used to evaluate the potential for community annoyance, and the results indicate noise effects below the recommended thresholds.

3.2.6 Continued engagement

Manitoba Hydro continues to engage with First Nations peoples and Red River Métis citizens, landowners, and other identified interested parties, and is committed to ongoing engagement throughout the project lifecycle.

Manitoba Hydro will continue to build, establish and maintain relationships with engaged audiences as the project progresses.

Engagement activities have focused on sharing project information, building an understanding of the need and scope of the project, and gathering feedback to inform routing, mitigation measures, ongoing engagement, and regulatory submissions.

A range of engagement opportunities have been offered to date, including in-person open houses, virtual information sessions, online surveys, one-on-one meetings, and two Indigenous Engagement Circles.

The Indigenous Engagement Circles are a series of collaborative discussions between and among nations and Manitoba Hydro to gather feedback to contribute to route selection, the environmental assessment, mitigation measures, and the environmental protection plan for the project.

The Indigenous Engagement Circles are also intended to provide an opportunity to promote learning and strengthening connection as a group, hear consistent project information, and hear each other’s values, interests and concerns.

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These events have provided detailed information on current and historic land use in the project region to inform route selection and siting, support the assessment of potential project effects for each of the valued components, and identify areas for consideration in the HRIA.

Manitoba Hydro is actively planning additional Indigenous Engagement Circles on this project and continues to provide other engagement opportunities to provide input into the environmental protection plan and proposed mitigation measures.

Manitoba Hydro is actively engaging First Nations and the Manitoba Métis Federation on the HRIA and is working to understand areas of cultural importance to these audiences through providing supports for nations to conduct desktop heritage surveys and participate in on-site heritage fieldwork.

Project engagement with First Nations and the Manitoba Métis Federation thus far has identified cultural sites and areas of importance for historical and current use along the Assiniboine River, at Brandon Hills, and within the City of Brandon, which are informing the assessment of the project's effects on important sites, a valued component for the two EA reports that are being compiled for the project, as well as the HRIA and relevant mitigation measures that will be set out in the CEnvPP.

As part of Manitoba Hydro's commitment to meaningful engagement on the project, Manitoba Hydro continues to offer funding support to nations engaged on the project who wish to undertake items such as nation-specific knowledge studies, technical reviews or rights-based assessments, and continues to invite nations to share additional ideas or opportunities to participate in a way that is meaningful to them.

Based on these ideas or opportunities, Manitoba Hydro can adapt the engagement plan for the project to accommodate a nation's specific engagement preferences and unique engagement needs.

3.3 Project permitting

Manitoba Hydro has a project screening process that screens projects against potential permits, licenses etc. This process is conducted during project planning and identifies the detailed information on which permits and licences are required as well as other criteria for consideration including land use designations, requirements for vegetation and wildlife timing windows during construction, an

overview of the business management procedures and contractor environmental responsibilities to be implemented during construction, and more.

Should any part of a project potentially require a permit, this is flagged in this initial project screening process.

Manitoba Hydro will follow all requirements of the Canadian Navigable Waters Act. It is anticipated that crossings of navigable water channels will be buried and therefore the Minor Works Order will apply. Information describing the proposed activity and its location will be posted on the registry.

If project activities are in or near water and may affect fish or fish habitat, Manitoba Hydro will determine the applicability of Sections 32, 33 of the Fisheries Act and subsection 58(1) of the Species at Risk Act.