

Clean Environment Commission
305-155 Carlton Street
Winnipeg, MB R3C 3H8
Ph: 204-945-7498

Written submission to the Clean Environment Commission – Lake Winnipeg Regulation
Winnipeg River Property Owners Association

Dear Commissioners,

I am providing this written submission on behalf of the Winnipeg River Property Owners Association. We are a group of citizens who own homes and properties along the bank of the Winnipeg River directly downstream from the Powerview Hydro Dam and Generating Station. Some of us have lived here for generations and we have seen our shorelines eroding and slipping at unprecedented rates since the 1970's when the dam was modified for higher efficiency. Our homes and are situated directly facing the outpour of the turbines and spillway of the dam, in the direct path of the turbulent waters coming from the dam. This flow is altered from it's natural state prior to the dam, both in terms of direction and velocity, and the effect on our properties is relentless and rapid loss of the banks, with slippage and erosion creeping ever closer to all of our homes.

Our properties lie just outside Manitoba Hydro's boundary limits of responsibility for shoreline management, as established under the MB Water Licensing Act when the original dams along the Winnipeg River were built early in the 20th century. Interestingly, home owner owners affected similarly just upstream from us, within Manitoba Hydro's "boundary" have been given compensation in the form of buy outs for their homes at market value.

We contend that the impacts of Manitoba Hydro's activities at the dam do not magically stop at a point artificially determined decades ago, prior to enhancements to the dam's efficiency. This is very plainly evident to anyone living in the area, in surface aerial photos, presented to the Commission on March 11 (Maurice Desautels) and March 18 (Angela Enright) and (Dr. Jon Jerrard) during the Commission's public hearings.

We recommend that part of the Clean Environment Commission's review of the environmental, community and human impacts of Manitoba Hydro's Lake Winnipeg water level regulation be consideration of all environmental and human impacts and review of its policies and boundary limits in view of the present-day situation,

The Energy Council of Canada, of which Manitoba Hydro is a member, believe that the use of energy to produce goods and services, and the production and delivery of energy for those purposes must be managed sustainably.

Manitoba Hydro is also a member of the Canadian Electricity Association (CEA), which in 2009 implemented an industry-wide sustainability initiative called the Sustainable Electricity Program. The program is meant to address three components of sustainability: environment, society and the economy. Manitoba Hydro itself, even prior to the implementation of industry wide program, adopted their own Sustainable development Policy (1993), with 13 guiding principles based on the Manitoba Round Table on Environment and the Economy. Manitoba Hydro contends that 13 guiding principles represent “a guiding influence for Hydro’s decisions, actions, and day-to-day operation”.

Hydro further contends that the Corporation “will apply the principles of sustainable development in all aspects of its operations... and will endeavor to meet the needs of the present without compromising the ability of future generations to meet their needs”

Specifically, under the guiding principle of *Stewardship of the Economy and the Environment*, Manitoba Hydro acknowledges “its responsibility as a caretaker of the economy and the environment, meeting the needs of present and future Manitobans in a manner that ensures the long term integrity and productivity of our economy our environment, our natural resources, and safeguards human health”.

Under the guiding principle, of *Integration of Environmental and Economic Decisions*, Manitoba Hydro promised to “treat technical, economic and environmental factors on the same basis in all corporate decisions”. Our experience questions whether this means consistent treatment or equitable treatment?

Under the principle of *Prevention and Remedy* Hydro promises to “address adverse environmental effects of Corporate activities that cannot be prevented by endeavoring, wherever feasible, to restore the environment to pre-development conditions or developing other beneficial uses through rehabilitation and reclamation, striving to replace the loss with substitutes that would enhance the environment and/or associated resource uses while offsetting the type of damage experienced, and making monetary payments for compensable damages in a fair, equitable and timely basis”

Manitoba Hydro’s Environmental Management Policy further speaks to the issue of lands, plants and animals affected by its operations, acknowledging that “the generation and transmission of electricity involves extensive use of land resources to provide sites and materials for facilities and activities” and indicating that Hydro, where practical, rehabilitates and reclaims damaged environments”. Lastly, Manitoba Hydro’s Waterways Management Program clearly states Manitoba Hydro implements initiatives with regard s to impacted waterways, including shoreline stabilization.

Hydro's focus upon environmental issues with a sense of social responsibility and belief in giving back to the community where environmental assets have been diminished for the express purpose of creating electricity should be evident. Unfortunately in non-aboriginal communities and along the Winnipeg River they are sadly lacking where nothing more than lip service is shared.

Further, we appeal to the Canadian Electricity Association and the Energy Council of Canada, to urge the Province of Manitoba and Manitoba Hydro, one of its Crown Corporations, to abide by and operate at the standards stated within MB Hydro's Environmental Management Policy and its guiding principles ensuring adherence to social responsibility and environmental stewardship mission statements.

(Excerpt) *Manitoba Hydro is committed to protecting the environment by:*

- *Preventing or minimizing any adverse impacts on the environment and enhancing positive impacts*
- *Continually improving our Environmental Management System*
- *Meeting or surpassing regulatory, contractual and voluntary requirements*
- *Considering the interests and utilizing the knowledge of our customers, employees, communities and stakeholders who may be affected by our actions*

We recommend that as a condition prior to Lake Winnipeg licensing to Manitoba Hydro, the Clean Environment Commission confirm:

1. Removal of arbitrarily established water licensing boundary limits which are incongruent with current operational realities and its impacts
2. That Manitoba Hydro accepts social and environmental responsibility for all adverse impacts and collateral damages arising as a consequence of their operations along the Winnipeg River and at its mouth at Lake Winnipeg.
3. Manitoba Hydro guarantee shoreline protection, stabilization and remediation, or satisfactory alternative compensation in light accumulated damages against affected properties and property owners along the Winnipeg River.
4. That a comprehensive environmental assessment be undertaken so as to preclude a repeat of environmental oversight and accountability such as the one which currently exists along the Winnipeg River.

In summary, we, the Winnipeg River Property Owners Association, sincerely hope that our plight will be given serious consideration as the Clean Environment Commission deliberates and delivers its report to the Minister with respect to issuance of Final License to Manitoba Hydro, at a broader level.

Sincerely, on behalf of the Winnipeg River Property Owners Association,

Friederike Ballantyne

Cc:

Graham Campbell, President
Energy Council of Canada
Suite 608-350 Sparks St
Ottawa, Ontario K1R 7S8
Tel: (613) 232-8239 ext 601
Fax: (613) 232-1079
E-Mail: graham.campbell@energy.ca

The Honourable Serio Marchi, President and CEO
Canadian Electricity Association
275 Slater Street, Suite 1500
Ottawa, Ontario
Canada K1P 5H9
Email: marchi@electricity.ca
Telephone: 613 230 9263
Fax: 613 230 9326

Please address phone calls, replies or correspondence to:
Winnipeg River Property Owners Group
C/o Angela Enright 204.679.0729
Email: angela1enright@gmail.com