SITE C | CLEAN ENERGY PROJECT

RESPONSE TO WORKING GROUP AND PUBLIC COMMENTS ON THE SITE C CLEAN ENERGY PROJECT ENVIRONMENTAL IMPACT STATEMENT

Technical Memo

ENVIRONMENTAL MANAGEMENT PLANS

MAY 8, 2013

Subject: Environmental Management Plans

Purpose

The purpose of the Environmental Management Plans Technical Memo is to describe the development of Environmental Management Plans (EMPs) for the Project.

1.0 Environmental Management in the EIS

The environmental management framework for the Project is described in Section 35 of the EIS. EMPs will be developed according to the following outline:

Objectives – Each management plan would outline the objectives specific to that plan. The objectives of each proposed management plan are described in the subsections that follow.

Statutory Requirements – Each management plan would describe the relevant statutory policy requirements, including:

- The applicable conditions upon which an Environmental Assessment Certificate may be issued or upon which a decision under Section 53 of the *Canadian Environmental Assessment Act* is made
- Any applicable conditions of permits and authorizations
- Other applicable legislation

Applicable guidelines adopted by the Canadian Council of Ministers of the Environment (CCME) would also be taken into account.

BC Hydro Policies – Each management plan would describe the relevant BC Hydro policy requirements. Corporate policies are subject to change from time to time. Any particular management plan would be developed in consideration of the relevant corporate policy in effect at the particular time.

Voluntary Commitments – Each management plan would describe the relevant standard practices and voluntary commitments.

Project Effects, Mitigation, and Environmental Protection Measures – Each management plan would describe the applicable potential Project effects and clearly document all measures to be implemented and actions to be taken to mitigate those potential effects. Documentation would include:

- Relevant Restricted Activity Zones (areas of the project where construction activities are restricted to a specified list) and Environmental Protection Zones (areas of the project where no construction activities are allowed)
- Standard codes of practice and management practices applicable to the plan

Training and Human Resource Planning – Each management plan would describe the worker qualifications and training requirements pertaining to the plan.

Monitoring and Reporting – Each management plan would describe the requirements for tracking, monitoring and reporting pertaining to the plan.

2.0 Roles and Responsibilities

BC Hydro's roles and responsibilities would include:

- Preparing and maintaining Environmental Management Plans
- Reviewing and assessing draft contractor work plans, worker training programs, and supervision plans
- Monitoring contractor performance and compliance with requirements
- Conducting environmental monitoring as required
- Reviewing and assessing contractor monitoring reports
- Reporting monitoring results as required
- Reporting and investigating incidents, and ensuring corrective actions are implemented.

Contractor roles and responsibilities would include:

- Preparing and maintaining work plans
- Ensuring workers are trained, competent, and adequately supervised
- Retaining qualified environmental monitor(s) with the authority to stop work in the event of non-compliance with conditions and requirements of commitments, regulatory approvals, management plans, or applicable legislative requirements
- Conducting environmental monitoring and reporting of the results as required
- Reporting and investigating incidents, and implementing corrective actions.

The reporting structure identified in the EMPs is described in Section 36 of the EIS.

BC Hydro expects that implementation of the EMPs as outlined in Section 35 of the EIS, and of the follow-up programs described in Table 39.2 of the EIS, will be conditions of approval of the Project.

3.0 EMP Development

BC Hydro expects that detailed construction phase EMPs will be required by regulators when permit applications are submitted and construction phase EMPs will be submitted as required to support permit applications. Operations phase EMPs will be developed during Project construction and be complete prior to commissioning.

EMPs will be developed by professionals with relevant expertise. Federal and BC government agencies, local governments in the vicinity of the Project and Aboriginal groups will have the opportunity to review and comment on the draft EMPs as appropriate. Comments received during consultation and the EIS comment period will be considered in the development of EMPs.

It is common for major capital projects to provide EMP outlines during an environmental assessment process followed by development of the detailed plans themselves during the regulatory or permitting process. This allows for the inclusion of the outcomes of the environmental assessment to be incorporated into the EMPs. Two examples are BC Hydro's Interior to Lower Mainland Transmission Project and Nalcor Energy's Lower Churchill Hydroelectric Project.

EMPs that BC Hydro has proposed are shown in the table below.

Construction Safety	
Emergency Response	Traffic
Fire Hazard and Abatement	Worker Safety and Health
Public Safety	
Construction Environment	
Acid Rock Drainage	Hazardous Waste
Air Quality, incl. dust	Heritage Resources
Blasting	Ice
Clearing and Debris Management	Noise and Vibration
Communications	Soil, Site Restoration and Re-Vegetation
Contaminated Sites	Smoke
Erosion Prevention and Sediment Control	Vegetation and Invasive Plant
Fisheries and Aquatic Habitat	Waste, incl. reduction and recycling
Fuel Handling and Storage	Wildlife (incl. human-bear conflict)
Groundwater Protection	
Operations Safety	
Emergency Response	Worker Safety and Health
Public Safety (incl. reservoir shoreline monitoring)	
Operations Environment	
Hazardous Waste	Waste
Ice	Water
Vegetation and Invasive Plant	

Related Comments / Information Requests:

This technical memo provides information related to the following Information Requests:

gov_0004-032	gov_0004-036	gov_0004-037	gov_0005-032	gov_0006-002
gov_0006-003	gov_0006-019	gov_0006-039	gov_0008-136	gov_0008-137
gov_0010-055	gov_0010-190	gov_0010-217	gov_0010-225	gov_0010-622
gov_0010-687	gov_0010-870	gov_0010-871	gov_0010-887	gov_0010-894
gov_0010-896	gov_0010-897	gov_0012-048	gov_0012-049	gov_0012-050
gov_0012-051	gov_0012-053	gov_0012-054	gov_0012-055	gov_0012-060
gov_0013-042	gov_0014-033	gov_0014-034	gov_0014-036	gov_0017-001
gov_0017-002	gov_0017-003	gov_0018_233	gov_0018_247	gov_0018_249
gov_0018_250	gov_0018_251	gov_0018_253	gov_0018_254	gov_0018_255
gov_0018_257	pub_0448-ag-075	pub_0448-ag-078	pub_0448-ag-105	pub_0448-ag-107
pub_0465-006	pub_0476-010	pub_0478-014	pub_0544-003	pub_0598-001
pub_0601-019	ab_0001-282	ab_0001-730	ab_0001-723	ab_0001-725
ab_0001-726	ab_0001-727	ab_0001-730	ab_0003-302	