# **Upper Lillooet Hydro Project**

# **Weekly Environmental Monitoring Report #57**

Reporting Period: April 12 - April 18, 2015

Upper Lillooet River Hydroelectric Facility (Water File No. 2002561, Water licence No. C130613), Boulder Creek Hydroelectric Facility (Water File No. 2003049, Water licence No. C129969) & Transmission Line

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#### Owner Construction Permits and Approvals

Environmental Assessment Certificate No. E13-01 (Amendment 1, 2, 3, 4, 5 & 6) Fisheries Act Subsection 35(2)(b) Authorization No. 09-HPAC-PA2-000303 (Amendment 1, 2) Letter of Advice for the Transmission Line No. 09-HPAC0-PA2-000303 Leave To Commence Construction (ULRHEF) File No. 2002561 Leave To Commence Construction (BDRHEF) File No. 2002453 Leave To Commence Construction (TX Line) File No. 2002561/2002453 Conditional Water Licence (ULRHEF C130613) File No. 2002561 Conditional Water Licence (BDRHEF C129969) File No. 2002453 Conditional Water Licence (BDRHEF C131153) File No. 2003601 Licence of Occupation (ULRHEF #232384) File No. 2409871 Licence of Occupation (BDRHEF #232386) File No. 2409998 Licence of Occupation (TX Line #2423386) File No. 2410654 Occupant Licence to Cut (ULRHEF Amendments 1, 2, 3, 4, 5, 6, 7) No. L49717 Occupant Licence to Cut (BDRHEF - KM 38 laydown) No. L49698 Occupant Licence to Cut (BDRHEF Amendments 1, 2, 3) No. L49816 Occupant Licence to Cut (TX Line Amendment 1, 2, 3, 4, 5, 6, 7, 8, 9) No. L49697 General Wildlife Measure Exemption Approval Letter (TX Line & BDRHEF) File No. 78700-35/06 UWR and 39585-20 WHA Heritage Conservation Act - Alteration Permit (ULRHEF) File No. 11200-03/2014-0033 Road Use Permit No. 6123-13-02 (Lillooet River FSR); 5673-13-01 (Rutherford Creek FSR); 7977-13-01 (Lillooet South FSR); 8015-13-01 (Ryan River); 8188-13-01 (Pemberton Creek FSR); and 9717-13-01 (Miller Bench FSR) Junction Permit (ULRHEF & BDRHEF) File No. 11250-32/6123 (Amendment 1) Aeronautical Obstruction Approval (Tx Line - Lillooet River Crossing) File No. 2013-004 Aeronautical Obstruction Approval (Tx Line - Ryan River) File No. 2013-005 Aeronautical Obstruction Approval (Tx Line - North Miller) File No. 2013-006 Aeronautical Obstruction Approval (Tx Line - South Miller) File No. 2013-007 Aeronautical Obstruction Approval (Tx Line - Pemberton Creek) File No. 2013-008 Aeronautical Obstruction Approval (Tx Line - Lillooet River near Pemberton) File No. 2013-009 Aeronautical Obstruction Approval (Tx Line - Lillooet River near Meager Creek) File No. 2013-010 Navigable Water Protection Act (ULRHEF) File No. 8200-2009-500434-001 Navigable Water Protection Act (BDRHEF) File No. 8200-2012-501-032-001 Navigable Water Protection Act (Tx Line - North Creek) File No. 8200-2013-500103-001 Navigable Water Protection Act (Tx Line - Lillooet River) File No. 8200-2013-500101-001 Navigable Water Protection Act (Tx Line - Lillooet River) File No. 8200-2013-500102-01 Navigable Water Protection Act (Tx Line - Ryan River) File No. 8200-2013-500104-001 Navigable Water Protection Act (Tx Line - South Miller River) File No. 8200-2013-500100-001 Navigable Water Protection Act (Tx Line - Boulder Creek) File No. 8200-2013-500099-001 Navigable Water Protection Act – Extension Approval (ULRHEF, BDRHEF, Tx Line) Navigable Water Protection Act (Bridge - Ryan River) File No. 8200-2013-500381 Navigable Water Protection Act (Bridge - Upper Lillooet Side Channel; Extension Approval) File No. 8200-2013-500383 Section 57 Authorization (ULRHEF) File No. 16660-20/REC202717 SLRD Temporary Use Permit No. 34 - Boulder Creek HEF SLRD Temporary Use Permit No. 35 - Upper Lillooet River HEF SLRD Building Permit (10864) - Upper Lillooet River HEF Powerhouse SLRD Building Permit (10865) - Boulder Creek HEF Powerhouse Works Permit for Construction within FSR Right-of-Way No. 6123-14-01 Section 52(1)(b) FRPA Authorization for Ryan River Wet Crossing File No. FOR-19400-01/2014 MOTI Permit to Construct, Use and Maintain Works Upon the Right-Of-Way of a Provincial Public Highway No. 2014-06099



#### Contractor Construction Permits and Approvals

Magazine Licence File No. UL76018

Section 8 Approval – Short Term Use of Water File (Lillooet River and Tributaries) No. A2006123 (Amendment 1) Waste Discharge under the Code of Practice for the Concrete and Concrete Products Industry under the Environmental Management Act (Authorization No. 107204) Tracking No. 326969

Wildlife Act Permits – Pacific Tailed Frog Salvage Permit # SU15-164805, Fish Salvage Permit #SU14-95329 Section 52 of the Fisheries (General) Regulations – Fish Salvage Licence # XR 139 2014 BC Safety Authority – Temporary Construction Electrical Service Permit EL-140698-2014 Municipal Wastewater Regulation - Authorization # 107032

Water Supply System Construction Permits – VCH-14-613 for Main Camp
Water Supply System Permit to Operate Issued July 30th, 2014 for Main Camp
Section 6(3) and Schedule 3 Wildfire Regulations Fire Exemption for Ryan River Bridge File No. 14350-07
SLRD Building Inspection Report dated August 13, 2014 - Construction Camp Building Permit No. 10830
Lillooet River FSR Temporary Road Closures Approval File No. 11250-32/6123 (Amendment 1, 2)
Lillooet South FSR Temporary Road Closures Approval File No. 11250-32/7977

#### **ACRONYMS:**

AMBNS	Active Migratory Bird Nesting Survey	ISW	Instream Works
ASMP	Archaeological Sites Management Plan	ITM	Environmental Issue Tracking Matrix
ARD M/L	Acid Rock Drainage and Metal Leaching	JEM	JEM Energy Ltd. (Delegate Independent
<b>BCEAO</b>	British Columbia Environmental		Engineer)
	Assessment Office	LTC	Leave to Construct
BCWQG	British Columbia Water Quality Guidelines	MFLNRO	Ministry of Forests, Lands and Natural
BDRHEF	Boulder Creek Hydroelectric Facility		Resource Operations
BG	Background	MOE	Ministry of Environment
BKL	BKL Consultants Ltd.	MOTI	Ministry of Transportation and Infrastructure
CE	CRT-ebc Construction Inc.	NCD	Non Classified Drainage
DFO	Fisheries and Oceans Canada	OLTC	Occupational License to Cut
DS	Downstream	PAG	Potentially Acid Generating
EAC	Environmental Assessment Certificate	ROW	Right of Way
EAO	Environmental Assessment Office	RVMA	Riparian Vegetation Management Area
Ecofish	Ecofish Research Ltd.	SES	Sartori Environmental Services
Ecologic	Ecologic Consulting	Stringer	Temporary Backfeed Transmission Line
EIR	Environmental Incident Report	Line	
ESC	Erosion and Sediment Control	TX Line	Transmission Line
FAM	Field Advice Memorandum	ULRHEF	Upper Lillooet Hydroelectric Facility
FSR	Forest Service Road	UWR	Ungulate Winter Range
GWR	Mountain Goat Winter Range	VC	Valued Component
Hedberg	Hedberg and Associates Ltd.	WEL	Westpark Electric Ltd.
IE	Independent Engineer (True North Energy)	WEMR	Weekly Environmental Monitoring Report
IEM	Independent Environmental Monitor	WHA	Wildlife Habitat Area
INX	Innergex Renewable Energy Inc.	WQ	Water Quality



# 1.0 Summary of Site Inspections for Reporting Period

The table presented below summarizes the IEM team site presence, weather and monitoring locations by component:

Dates	IEM Team Personnel	Weather Conditions	Key Monitoring Locations & Activities
April 12 – 18	TH, BA, SE	Variable conditions with a rain event on April 13	<ul> <li>ULRHEF &amp; BDRHEF</li> <li>Routine equipment maintenance and repairs completed at the 38km laydown shop location</li> <li>Maintaining electric fence, gates, and electrified mats</li> <li>Formwork and rebar installation at ULRHEF powerhouse with a concrete pour on April 13</li> <li>Formwork and rebar installation at BDRHEF powerhouse with a concrete pour on April 15</li> <li>Drill and blast works in BDRHEF tunnel</li> <li>Road maintenance on Lillooet River FSR from 18 − 37km</li> <li>The IEM conducted a site inspection on April 13 and 15</li> <li>TX Line</li> <li>Segment 1</li> <li>➤ Temporary generator site construction near 39km of the Lillooet River FSR</li> <li>Segments 8 and 9</li> <li>➤ Hand digging (including blasting) from structures 199 -201</li> <li>➤ Machine digging (including blasting) at structures 182 and 200</li> <li>➤ Plumbing, backfilling and hanging striker arms from structure 182 - 201</li> <li>Segment 12</li> <li>➤ Miller Bench FSR road upgrades continued, The IEM was onsite to attend the spur road construction kick-off meeting on April 13 and to monitor culvert installations on April 14 and 15</li> <li>Segment 13</li> <li>➤ Hand falling from structure 319 - 322.5</li> <li>Segment 16</li> <li>➤ Hoe chucking and log decking near structures 389 - 392</li> </ul>

IEM Team Personnel: TH – Tom Hicks, BA – Blake Aleksich, SE – Stephanie Ellis

# 2.0 Administrative Summary

Key communications and meetings the IEM team had with the licensees, contractors and/or environmental authorities:

Date	Communication Type	Participants	Issues Discussed	ITM ID No.
	Kick-off meeting	INX, WEL, SES, Mumleqs	Segment 12 clearing and road works kick-off meeting was held on the Miller Bench FSR to discuss site-specific construction, environmental and public relations issues.	-
April 13, 2015	Email	INX, CE, SES, Ecofish, MFLNRO, MOE, EAO	INX submitted a memorandum prepared by Ecofish with a supporting appendix report prepared by SES detailing the effectiveness monitoring of the ULRHEF downstream tunnel portal design for Mountain Goat migration, observations, and noise	-



Date	Communication Type	Participants	Issues Discussed	ITM ID No.
			monitoring results from fall 2013, spring 2014 and fall 2014.	
April 14, 2015	Email	INX, WEL, SES	WEL sent an update on the results of the pre- AMBNS window assessment surveys to determine if surveys would be required prior to May 1. The assessment surveys were conducted in Segment 12 and 13 and WEL reported very low activity. A reassessment was planned for the following week.	-
April 14-15	Email	INX, CE, SES, Golder	The use of material from spoil pile SP-003 for type B penstock structural backfill was discussed. The concern was the pile contained some probable PAG rock. It was decided that the material could be used for penstock backfill and recommended that it be used where there will be a soil cap to slow oxidation.	-

# 3.0 Current Work Restrictions and Timing Windows

The table presented below outlines work restrictions applicable during the reporting period for each active Project component location:

Component	Location	Wildlife/Archeology Concern	Construction/Timing Restrictions & Mitigations
		Within 150m of wetlands or 100m of Coastal Tailed Frog Streams	IEM presence is required when clearing within 150m of wetlands or 100m of CTF Streams, to ensure clearing area is minimized.
		Riparian Vegetation Management Areas (RVMA)	IEM monitoring is required during clearing within RVMAs.
	Segments 6 – 12	Surface Water Quality	IEM monitoring is required during culvert installation activities in non-fish bearing waters to document adherence to the Surface Water Quality Protection Plan objectives.
TX Line		Suitable Raptor Nesting Habitat	IEM presence is required when clearing within suitable Northern Goshawk (NOGO) and SPOW (Spotted Owl) nesting habitat during the breeding period.
		Suitable Class 1 & 2 Grizzly Bear forage habitat	IEM monitoring is required when clearing within identified Class 1 & 2 Grizzly Bear forage habitat, to ensure clearing area is minimized.
		Wildlife Habitat Area (WHA) 2-399	Construction of the transmission line within the Grizzly Bear WHA 2-399 must be construction outside of April 1 to June 1 and October 15 to December 31 to minimize disturbance to Grizzly Bears expected to use the WHA during spring and fall.



Component	Location	Wildlife/Archeology Concern	Construction/Timing Restrictions & Mitigations
		Ryan River Drainage	Construction of the TX Line into and across the Ryan River drainage will occur during the less critical Grizzly Bear summer foraging period (June 1 – September 1)
		Moose, Deer, & Mountain Goat UWRs	Helicopter flight paths will avoid UWRs and landing locations will be located further than 500m away from the UWRs during the sensitive late winter period (March 1 – May 15).
Lillooet River FSR & ULRHEF	Access roads above the lower limit of the 200m buffer Truckwash Creek Migration Corridor to the ULRHEF intake	Mountain Goat UWR	If a goat is observed within 500 m of construction operations, construction must cease for at least 48 hours. The IEM must record and submit all goat observations to FLNR within 48 hours.
III DUEE 9	ULRHEF work areas above the powerhouse (beyond 41.5km of the Lillooet River FSR) & BDRHEF intake	Wolverine den emergence	Construction will not occur beyond 41.5km of the Lillooet River FSR or above the BDRHEF intake access road gate from March 1 – April 30 during the critical den emergence period.
ULRHEF & BDRHEF	BDRHEF intake	Mountain Goat UWR habitat (u-2-002 UL 12)	During winter construction and operations, access to Boulder Creek HEF intake must be gated at least 500 m from the original UWR u-2-002 UL 12 to restrict motorized use within the UWR, unless otherwise directed by FLNR.

# 4.0 Upper Lillooet River Hydroelectric Facility & Boulder Creek Hydroelectric Facility – Monitoring Results

## 4.1 Construction Camp, 38 km Laydown & Lillooet River FSR

#### Operations:

- The electric fence was fully operational and clear of snow throughout the reporting period as identified in CE weekly reports provided to the IEM.
- Routine maintenance of construction equipment within the mechanic shop and fuel management continued at the 38 km laydown.
- Spring road maintenance continued on the Lillooet River FSR from 18 37km by the Primary Road Use Permit holder (Squamish Mills).

#### **Environmental Summary:**

• CE performed daily inspections of the electric fence and fuel storage areas.



## 4.2 Upper Lillooet River HEF Powerhouse

#### Construction Activities:

- Formwork and rebar installation.
- Structural concrete pour occurred on April 13 (Photo 1 and Photo 2).
- Dewatering to settling ponds (Photo 3).

#### Environmental Summary:

 On April 13, the IEM was onsite to inspect the ULRHEF powerhouse following a concrete pour. Rain contacting uncured concrete resulted in alkaline runoff and pooling found in the northeast portion of the powerhouse excavation. The IEM conducted water quality sampling in the powerhouse sump and in the settling ponds. All water samples were measured to have a pH <9 and suitable for discharge to the surrounding environment as per the Surface Water Quality Protection Plan (See Section 4.4 for Water Quality Results).

#### Photos:



Photo 1 – ULRHEF powerhouse with recently poured concrete in background (April 13, 2015).



Photo 2 - Concrete poured at ULRHEF powerhouse (April 13, 2015).



Photo 3 – ULRHEF powerhouse settling ponds (April 13, 2015).



#### 4.3 Boulder Creek HEF Powerhouse

#### Construction Activities:

- Formwork, rebar installation and backfill works (Photo 4).
- Structural concrete pour occurred on April 15 (Photo 5).
- Drill and blast works in tunnel.
- Tunnel portal and powerhouse dewatering to oil water separator and settling ponds (Photo 6).

#### Environmental Summary:

- All dewatering of the powerhouse excavation and tunnel was directed to the reconstructed settling ponds (Photo 6). All water introduced to the settling ponds was observed to be infiltrating to ground in the first cell of the ponds throughout this reporting period.
- New spill kits were placed at the tunnel portal site (Photo 7).

#### Photos:



Photo 4 – Current conditions at BDRHEF powerhouse (April 13, 2015).



Photo 5 – Concrete pour in progress at BDRHEF powerhouse (April 15, 2015).





Photo 6 – BDRHEF powerhouse settling ponds (April 13, 2015).



Photo 7 – New spill kit at the BDRHEF tunnel portal (April 13, 2015).

## 4.4 Water Quality Results

Weekly water quality monitoring at the ULRHEF and BDRHEF intakes will resume the week of May 1, 2015 once access to the sites is are open. Water quality will continue to be monitored at the discretion of the IEM at the ULRHEF and BDRHEF powerhouse sites to ensure site discharge meets surface water quality objectives.

Date	Time	Sample Location Description	рН	Turbidity (NTU)	Cond (uS)	Temp (°C)
		ULRHEF Powerhouse Following Cond	rete Pou	r		
	17:25	ULRHEF powerhouse settling ponds	8.04			-
April 13, 2015	17:50	ULRHEF powerhouse sump	8.21	•	ı	-
	18:04	ULRHEF powerhouse settling ponds	7.89	•	ı	-

#### 4.5 Recommendations

IEM recommendations for the hydroelectric facilities are as follows:

- The IEM recommends that the BDRHEF and ULRHEF sediment ponds continue to be utilized and are closely monitored to ensure that they are effectively promoting infiltration/ and treating water quality prior to discharging water offsite.
- Once the ULRHEF and BDRHEF intake sites can be accessed the IEM recommends that the effectiveness of installed winterization and ESC measures be assessed to ensure that regular maintenance is performed as needed.

# 4.6 Upcoming Works

The following construction activities are scheduled to occur the in the upcoming reporting period(s):

 Rebar, formworks, and concrete pours at the ULRHEF and BDRHEF powerhouses are scheduled to occur in the upcoming reporting period.



# 5.0 Transmission Line - Monitoring Results

#### **5.1** Transmission Line Construction Activities

Clearing, Existing Road Upgrades and Access Road Construction:

- Construction of temporary generator site in Segment 2 near 39km of Lillooet River FSR (Photo 8).
- Road upgrades (including culvert installations) continued in Segment 12 on Miller Bench FSR (Photo 9, Photo 10, Photo 11 and Photo 12).
- Hand falling in Segment 13 from structure 319 322.5 (Photo 13).
- Hoe chucking and log decking in Segment 16 (Photo 14).

Transmission Line Pole Installation, Line Stringing and Clipping:

- Ground works for pole foundations (including hand digging, machine works and blasting) were completed in Segment 8 and 9 from structure 188 201.
- Backfilling and hanging striker arms in Segment 8 and 9 from structures 182 202.

#### Environmental Summary:

- On April 14 and 15 the IEM was present for seven non-fish bearing culvert installations at MB23, MB24, MB30, MB32, MB33, MB34 and MB38 on the Miller Bench FSR. The culvert installations at MB30 and MB32 were at identified Coastal Tailed Frog (CTF) streams. An Ecofish crew conducted CTF salvages prior to works and during dewatering (Photo 9). The MB38 location was observed to have intermittent flow and the culvert installation was completed while no flow was present. For all wet culvert installations worksite isolation was achieved with dam, sump and pump methods and works were completed in the absence of flowing water (Photo 10, Photo 11 and Photo 12). Crews took care to minimize downstream sedimentation by minimizing disturbance to surrounding soil. The IEM conducted water quality sampling during all wet culvert installations (See Section 5.2 for Water Quality Results).
- On April 16, the IEM conducted a modified survey to detect presence/absence of Spotted Owl and Northern Goshawk nesting activity within the Segment 13 ROW clearing boundaries. The IEM conducted playback surveys and visual assessments at stations starting at structure 316 and ending southeast of structure 318 (Photo 15). The IEM did not detect any nests or signs of nesting activity.



## Photos:



Photo 8 – Construction of temporary generator site in Segment 2 (April 13, 2015).



Photo 9 – CTF salvage conducted by Ecofish crew at MB30 (April 15, 2015).



Photo 10 - Culvert installation with diversion in place at MB24 in Segment 12 (April 14, 2015).



Photo 11 – Sump and 3" pump used to divert water at MB34 (April 15, 2015).



Photo 12 – Culvert installation in progress at MB32 (April 15, 2015).



Photo 13 – Falling completed near structure 120 (April 15, 2015).





Photo 14 – Hoe chucking and log decking completed in Segment 16 (April 15, 2015).



Photo 15 – SPOW and NOGO habitat in Segment 13 (April 16, 2015).

## 5.2 Water Quality Results

The following table presents the results of water quality sampling collected during TX Line water management activities according to the conditions outlined in the Surface Water Quality Protection Plan. Exceedances of in-situ water quality (turbidity) deemed to be caused by project-related activities are highlighted in bold font and are discussed above in Section 5.1.

Date	Time	Sample Location Description	рН	Turbidity (NTU)	Cond (uS)	Temp (°C)		
	Seg	ment 12 – Miller Bench FSR culvert installatio	ns at MB	23 and MB2	1			
		MB23						
	9:50	Background above MB23	-	0.44	-	-		
	10:20	60m downstream during MB23 works	-	1.06	-	-		
April 14,	11:00	60m downstream following MB23 works	-	1.40	-	-		
2015		MB24						
	10:20	0 Background above MB24		1.06	-	-		
	11:30	10m downstream during MB24 works	-	3.95	-	-		
	13:05	10m downstream following MB24 works		4.36				
\$	Segment 1	2 – Miller Bench FSR culvert installations at M	B33, MB	30, MB34 an	d MB32			
	MB33							
	7:40	Background above MB33	-	2.13	-	-		
	8:15	10m downstream during MB33 works	-	17.9	-	-		
April 15,	8:50	60m downstream following MB33 works	-	2.67	-	-		
2015	MB30							
	9:45	Background above MB30	-	1.42	-	-		
	10:30	10m downstream during MB30 works	-	1.57	-	-		
	11:50	10m downstream during MB30 works	-	2.16	-	-		



Date	Time	Sample Location Description	рН	Turbidity (NTU)	Cond (uS)	Temp (°C)
	12:00	10m downstream following MB30 works	-	1.82	-	-
		MB34				
	12:25	Background above MB34	-	1.73	-	-
	12:35	100m downstream during MB34 works	-	24.4	-	-
	12:55	100m downstream during MB34 works		8.84		
	13:00	100m downstream following MB34 works		4.55		
		MB32				
	14:20	Background above MB32		1.69		
	14:30	10m downstream during MB32 works		2.07		
	14:40	10m downstream during MB32 works		1.71		
	14:50	10m downstream following MB32 works		1.73		

#### 5.3 Recommendations

 The IEM recommends all access roads be inspected to assess any slope failures or drainage/erosion concerns that have resulted from recent heavy rains and rain on snow events.

## 5.4 Upcoming Works

The following new and/or environmentally sensitive construction activities are scheduled to occur along the TX Line in the upcoming reporting period(s):

- The temporary generator works in Segment 2 will continue.
- Framing in Segments 8 and 9 will begin.
- Road upgrades and repairs in Segment 12 on the Miller Bench FSR are scheduled to continue.
- Clearing of Segment 12 and 13 ROW will continue.



# 6.0 Wildlife Sightings

As per the CEMP, a wildlife sightings record has been implemented and will be updated regularly by Project Personnel. It is mandatory for all personnel to report wildlife sightings including, but not limited to bears, cougars, mountain goats and deer. Wildlife sighting will be reported and recorded by the contractor(s) and submitted to the IEM on a weekly basis. Observation or detection of the following species will trigger notification to identified parties according to the following table.

Species Observed or Detected	Notification Period	Agencies to be Notified		
Northern Rubber Boa	Immediately	IEM, Owner		
Grizzly Bear	24hrs	IEM, Safety Officer, Conservation Officer, Owner		
Wolverine Den	24hrs	IEM, MFLNRO, Owner		
Spotted Owls	24hrs	IEM, MOE, Owner		
Mountain Goats	48hrs	IEM, MFLNRO, Owner		

# 7.0 Mountain Goat Monitoring Program

Mountain Goat monitoring will resume in the spring of 2015, once construction activities resume.



# 8.0 Environmental Issues Tracking Matrix (ITM)

# 8.1 Hydroelectric Facilities (ULRHEF & BDRHEF)

ITM Track	king Legenc	d: Wo	ork Item Open ork Item Complete ue Closed				
Issue T	Issue Tracking Environmental Issue		nmental Issue	Mitigation Measures			
ID No.	Status	Location	Issue Description	Action Taken/Recommended	Date of Identification	Targeted Date for Completion	Date Completed
	next ITM – ULR#23						

## **8.2** Transmission Line

ITM Tracking Legend:  Work Item Open  Work Item Complete  Issue Closed			rk Item Complete				
Issue Tracking		Environmental Issue		Mitigation Measures			
ID No.	Status	Location	Issue Description	Action Taken/Recommended	Date of Identification	Targeted Date for Completion	Date Completed
next ITM – Tx#3							