



## PARAMOUNT TRANSMISSION LTD.

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NEB File 3400-P097-1

March 15, 2002

National Energy Board  
444 7th Avenue S.W.  
Calgary, Alberta  
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Attention: Mr. Michel Mantha

Dear Sir;

**Re: Paramount Transmission Ltd. Cameron Hills Pipeline and Fuel Gas Pipeline, Order XO-P097-02-2002; Conditions 8, 18, and 13: Revegetation, Permafrost, and Wildlife Monitoring Plans**

The following is Paramount Transmission Ltd.'s (PTL) response to the request for clarification on PTL's vegetation, wildlife and permafrost monitoring plans sent by Mr. John Fox at the National Energy Board (NEB) on March 14 and 15, 2002 by e-mails. The NEB's request has been reiterated in italics for reference and PTL's response follows immediately after it.

### General

*1. Given the advanced state of construction, where possible, please identify the specific sites planned for:*

- a) vegetation monitoring transects*
- b) wildlife monitoring transects*
- c) permafrost monitoring*

*If PTL is unable to identify the sites at this time, please indicate when this information will be made available to the Board.*

**Response:** PTL has not identified specific sites at this time since this was scheduled for the latter part of construction during the cleanup and remediation phase of the project. PTL expects to provide this information to the NEB prior to the end of April 2002.

### Re-vegetation Monitoring Plan

*2. Why did PTL select a 1 metre square quadrat size? Would the company be opposed to using 2 metre square size?*

**Response:** A one metre quadrat size is a standard size typically used in open areas (e.g., non-treed areas) such as a recovering right-of-way by vegetation ecologists and has been approved by the NEB in other monitoring programs. PTL will use a two metre quadrat if it is requested by the NEB.

3. *In the re-vegetation plan, PTL intends to seed erosion-prone slopes. In the monitoring program, PTL indicates that transects for natural re-vegetation would be located on similarly sloped portions of the RoW that were not seeded. Please rectify these statements.*

**Response:** In order to assess the revegetation of the seeded areas, the seeded areas and non-seeded areas will be compared. PTL will be primarily seeding erosion prone areas. Therefore during the evaluation of the right-of-way under snow free conditions, non-seeded / non-erosion prone slopes that approach the grade of seeded / erosion prone slopes will be compared. This approach is required, as PTL does not wish to risk erosion by not seeding erosion prone slopes.

4. *Please indicate the time of year and intended frequency of monitoring and study at each quadrat.*

**Response:** All quadrats will be assessed once each year, in late summer or early fall following the summer growing period as specified in Section 5, Schedule, of the plan.

5. *In order to meet the objective of identifying competition issues between seeded and native species, in its % cover calculations will PTL clearly distinguish between indigenous species and those from the seed mix?*

**Response:** The percent cover of individual plant species will be determined within the quadrat area and will distinguish between indigenous and seeded species.

### **Wildlife Monitoring**

6. *PTL mentions the use of skidoos in the conduct of winter track count surveys. How will PTL minimise the influence of skidoos and snow-packing on the survey?*

**Response:** Approximately, three to four snowmobiles will be used to access transects along the right-of-way, once in early winter and once in late winter of each season. The assessors will dismount from the snowmobiles and travel to each of the transects in a habitat area on foot or snow shoes. It is anticipated that the impact from the snowmobiles will be minimal and of a short duration and snowfall events between the early and late winter surveys will cover the snow machine trails.

7. *PTL indicates that final placement of the transects will be determined by experienced wildlife biologists. PTL mentions a possible relationship between the vegetation monitoring sites and selection of uniform habitat types in the siting of wildlife track count transects. How will PTL account for proximity to existing wildlife trails? What other factors would be used in selecting the transect sites?*

**Response:** The establishment of transect locations will be based on habitat types (e.g., Riparian, Black Spruce, Mixedwood) crossed by the right-of-way. As a result, transect positioning will sample the habitat types constituting the majority of the right-of-way length. The study design will not bias transect position by using existing wildlife trail locations. However, wildlife trails will be included if encountered in a habitat type.

8. *PTL indicates that winter track counts will be undertaken twice each winter (early winter and late winter) after a significant snowfall event and that the total length of tracks per area per day will be calculated. For each survey location and time, over what period of time does PTL propose to observe track counts?*

**Response:** As described in the plan, the winter track count methodology documents the number and type of tracks made by wildlife species since the last snowfall. Each transect will be sampled once during each of the early and late winter survey periods for up to 5 years. The repeated sampling of the transects is intended to provide trend data on wildlife interactions with the right-of-way. The period of time to perform the track count on each transect will be the length of time required to walk and document the tracks on the 100 m transect, which is expected to take approximately 15 to 45 minutes depending on track density.

9. *Board staff note PTL's concurrence with all the recommendations put forth by Environment Canada in its letter to PTL dated 24 January 2002 with respect to the migratory bird monitoring program. Please confirm PTL's commitment to implement the measures outlined in the referenced letter and please clarify the number of years that PTL is proposing to add to the Shiha migratory bird monitoring program.*

**Response:** PTL will implement the recommendations in Environment Canada's letter of January 24, 2002. As stated in point 4 of the first paragraph of the letter, the program is a five year program with an additional migratory bird assessment in the year 2004. This results in a total of three migratory bird assessments for the five year program.

Since the pipeline construction is near its final phase, PTL requests that the NEB approve the above plans at its earliest convenience. If you require any further clarifications then please contact the undersigned at (403) 290-3696 or by e-mail, [tom.hong@paramountres.com](mailto:tom.hong@paramountres.com).

Yours truly,

**PARAMOUNT TRANSMISSION LTD.**



Tom Hong, P.Eng.  
Project Manager

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