

March 8, 2006

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Honourable Stan Struthers
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Honourable David Chomiak
Minister of Energy, Science and Technology
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Dear Minister Struthers, Minister Chomiak and Ms. Braun;

Re: Killarney Wind Energy Project (Public Registry File #5164.00)

Manitoba Wildlands has reviewed the proposal concerning the Killarney Wind Energy Project and we wish to have our comments noted and placed in the Public Registry file.

The Killarney Wind Energy Project is the latest in a series of wind project for our province. It is clear from the political support and commitments from the current provincial government and the public's general desire for alternative energy projects that this will by no means be the last wind energy project proposed for our province. Manitoba Wildlands' concern is in relation to the overarching issue of the lack of environmental review and assessment standards for wind projects in Manitoba.

The fact that no public environmental impact standards have been developed for wind projects in the province has resulted in a situation where public review of these projects is occurring in a vacuum, without a standard to review from.

The same then applies to the licensing decisions for these projects. Manitoba and the wind developers are risking consistency in decision-making without a standard for environmental assessment ‘best practices’ for wind projects, and certainty in terms of requirements for proponents. It is imperative that guidelines and standards be developed for the environmental review and assessment of wind projects and that the public be provided the opportunity to provide input into their development.

Problems associated with the absence of these standards for wind projects have been manifested in several ways, which we are outlining below:

- There are no public environmental impact guidelines for wind energy projects in Manitoba
- The Killarney Wind Energy Project, like other projects that have preceded it, assumes staged licensing by stating that it is a 99 megawatt project, while at the same time stating that it will potentially be much larger. The government of Manitoba has made a clear and unequivocal commitment to end staged licensing¹; projects such as these, which assume future expansion, must be assessed as a single project that includes foreseeable future expansions. Continued avoidance of federal requirements for environmental assessment of wind energy projects, when the first stage of these projects is proposed is essentially a cynical, risk-attracting approach.
- Wind project proponents in Manitoba appear to be being advised that regardless of the size of the ultimate intended wind project, projects can or should be described as 99MW projects in order to avoid a federal review for triggers under the Canadian Environmental Assessment Act. This obvious circumvention of federal environmental standards must be addressed.
- Further to this problem of initial licensing of intended larger projects as 99MW projects, when an application for licensing the expansion does take place for existing wind projects, there must be assurances now that public review will occur for any expansion. At that time an environmental review to verify the original EIS and license conditions also should occur. Combined size of a wind project should be the basis for decisions about potential federal responsibility and environmental assessment.
- Manitoba appears to be avoiding public posting and review regarding infrastructure for wind projects for which other proponents (Manitoba Hydro, Manitoba government) are responsible. Manitoba Conservation is now overdue to set standards as to how all the elements needed for a wind project will be provided for public review, with clear indication of which entity is responsible for each element. All projects elements requiring an environmental permit or license should be clearly available to the public at the onset.

¹ “We are also committed to an environmental licensing process that follows the recommendations of the Sustainable development Implementation Committee. This commitment includes . . . [a]n end to licensing developments in stages” (Please see ‘1999 Manitoba Election Promises’ Page 2, September 4, 1999 located at:

http://manitobawildlands.org/govern_elections.htm#mbelection)

Manitoba Wildlands continues the work of WWF Canada and Nature Canada for new Manitoba Protected Areas.

- The lack of a Manitoba Energy Plan means that a series of projects are underway while energy planning is not.
- These wind projects generate power that will be added to the existing Manitoba Hydro transmission grid, yet the role and responsibility of Manitoba Hydro continues to be unclear. In particular, clarity regarding licensing of transmission infrastructure is needed. See above.
- Recent assumptions by proponents and consultants for wind energy proponents in Manitoba that materials posted for environmental proposals under the Environment Act are confidential must be corrected. We would be happy to provide the Minister and the Environmental Assessment and Licensing Branch with a copy of correspondence from a project proponent and their consultant that illustrates this problem. Needless to say, this issue is exacerbated by the lack of standards for these projects. It may in fact be caused by lack of standards for wind energy projects in Manitoba. It is an odd situation to have to state clearly in correspondence under the Environment Act that proposals, EIS filings, public comments on these etc are public documents.
- Public notice for open houses, and access to information prior to construction, have not been adequate and this lack is also indicative of the lack of public standards for wind projects.
- Some of our concerns could easily be addressed by making sure an electronic notice and registry system for all projects proposed under the Environment Act is a priority.

A comprehensive public process for developing environmental assessment standards for wind projects that addresses the problems outlined above needs to be initiated immediately. This needs to begin with a process to develop environmental impact statement (EIS) guidelines for all wind projects. The development of standards for wind projects in Manitoba should be complete before any more new wind energy projects are proposed for Manitoba. It must include clear information as to when federal responsibilities are triggered. We would suggest both operational standards regarding all environmental proposals and EIS Standards be put in place immediately.

Thank you for the opportunity to comment on this proposed project – we look forward to further participation in the development of EIS guidelines and standards for the environmental assessment and review of wind projects in Manitoba.

Yours truly,

Gaile Whelan Enns
Director, Manitoba Wildlands